

Post Border Control Policy: Stakeholder Analysis Perspective

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ABSTRACT:

The distribution of unregistered Drugs and Foods during the 2015-2017 period—including illegally imported Drugs and Food—dominates the findings in Drug and Food control, according to the inspection and investigation of Indonesia National Agency of Drug and Food Control (BPOM) and Directorate General of Customs and Excise (DGCE). This study aims to determine stakeholder understanding and analysis in implementing BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017. The qualitative method with Stakeholder Analysis is used as an analysis on data obtained through literature studies and structural official interviews and executive officers at BPOM and DGCE. The results show that the performance of BPOM Inspection & Certification Officer, BPOM Investigator, and DGCE Law Enforcement Officer became Definitive Stakeholder in influencing the implementation of those regulations. Head of Division of BPOM Inspection and Certification, Head of Division of BPOM Law Enforcement and Head of Division of DGCE Law Enforcement proved to have enough team strength and authority to become Dominant Stakeholders. Community, passenger, business actors, importers can become Dangerous Stakeholders because they have personal and business interests if the regulations are not clear or consistent enough. It is necessary to form an integrated team between institutions in order to fight against the entry of illegally imported Drug and Food.

Keywords: *BPOM, DGCE, implementation, post border, Stakeholder analysis*

1. INTRODUCTION

Post market control data revealed that there is an increase in violations of unregistered Drug and Food, included illegally imported Drug and Food, by 32.57% in 2015 - 2017. During the same period, Drug and Food investigation also shows that this violations of unregistered Drug and Food is dominant among other Drug and Food cases, with overall average of 17.51% of the 13 types of Drug and Food cases handled by civil investigator (National Agency of Drug and Food Control [BPOM], 2015;2016;2017). Further, Directorate General of Customs and Excise (DGCE) control found violations in customs case in the form of restricted imported goods as they are not supported with permits from the relevant technical agencies, BPOM in this case. This is always included in the 10 (ten) large types of commodities resulting from the law enforcement action by DGCE, with portion of 42.95%, based on data from 2013 – 2017 (“Pencapaian Kinerja”, 2016, pp. 9; Ministry of Finance, 2016; 2017).

Another challenge comes from the existence of the 2017 Economic Policy Package XV which aims to facilitate and accelerate the flow of goods at port. The government's next step is to establish a policy to simplify the trade system through a shift in supervision of the prohibitions and restrictions provisions from the border to the post border (Ministry of Economic Coordinator, 2017). Included in this shift are commodities such as raw materials and products of cosmetics, quasi product, processed foods and health supplements. BPOM issued BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017 (BPOM, 2017b; 2017c).

The impact of the policy allows raw materials and products of cosmetics, quasi product, processed food and health supplements to enter Indonesian territory more easily, including those that do not have registration number from BPOM, bearing in mind that their registration controls shift to the post border region. This creates a gap with the duties and functions of BPOM in securing the public against harmful Drug and Food and DGCE as a community protector. Cooperation between BPOM and DGCE as agreed in Cooperation Agreement No. HK.09.1.2.23.05.17.1959 and No. KEP-394/BC/2017 concerning Control of Drug and Food Importation, Release, and Distribution between the Main Secretary of BPOM and the Director General of DGCE can be used as key to omit the gap. However, this is highly dependent on the stakeholders involved in implementing BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017 (BPOM, 2017d).

This research is important to ensure the implementation of BPOM Regulation No. 29 and BPOM Regulation No. 30 of 2017 is conducted in overcoming factual threats: the entry

of illegally imported Drug and Food products. Hence, it is necessary to study and analyze the role of stakeholders and provide recommendations in the business process of post border control. This study aims to (1) conduct a stakeholder analysis to determine the position and role of the parties in order to support the policy of post border control; (2) identify and analyze knowledge and perception of human resources in BPOM and DGCE in terms of post border control.

2. LITERATURE REVIEW AND HYPOTHESIS DEVELOPMENT

Post border control policy is relatively new, so the data and information from research results in the field is very limited. Some writings on post border control are socialization of post border surveillance policies (Ministry of Economic Coordinator, 2018) or general references on the mechanism of post border trade control (DGCE, 2018), including a review of policies on control of goods circulating in border areas (Center for Domestic Trade Policy, 2014). While in other studies on control conducted by BPOM, it still discusses BPOM control efforts carried out either with its own authority or with other agency stakeholders, but is still on the distribution channel and has not specifically discussed the controls on its entry routes through customs areas. Among these studies are the effectiveness of BPOM control on the circulation of imported processed food products in realizing consumer protection (Nurhayati, 2009); functional coordination between Civil Investigators and Police Investigators in law enforcement against the distribution of illegal Drug and Food (Peldi, 2017); cross-cutting policies to eradicate counterfeit drugs in Indonesia (Handayani, 2018). In the research related to the control cooperation conducted by DGCE, it is still limited to collaboration carried out between stakeholders within the Indonesian Ministry of Finance. It has not been seen cooperation with other government agencies that have control functions on the same imported commodity objects, including those seen in research on the joint audit of the Directorate General of Taxes and Directorate General of Customs and Excise: analysis of factors supporting cooperation and information exchange (Wibowo, 2018), and the synergy of tax and customs authorities through joint audit examinations (Nugrahanto, and Muchtar, 2019). From these studies, it can be concluded that optimal control results require good collaboration with relevant stakeholders as well as even understanding between stakeholders when carrying out the control.

Using a governance perspective, the involvement of many competent stakeholders in a policy will make policy rationality better (Surowiecki, 2004). Multi-stakeholder involvement is a necessity in the era of democratic governance. The government is not the

only actor who carries out public policy, but the public, private, and intergovernmental agencies have influence when the policy rules are formulated or implemented. This multi-stakeholder contributes to achieve public policy outcomes through its interactions (Bovaird, and Loffler, 2003)

Mitchell, Agle, and Wood (1997) found that stakeholders are individuals or groups whose classification must be explained in 3 main attributes of power, legitimacy, and urgency. Preble (2005) believes the definition of stakeholders presented by the experts was previously valid. Some conceptual and empirical works identify that stakeholders can also be useful in helping organizations sort out which stakeholders draw the most attention at a particular point in time. Mitchell et al. is included as one who developed a theory of stakeholders' identification and salience which advanced the key prepositions: stakeholders' salience will be positively related to the cumulative number of stakeholder attributes-power, legitimacy, and urgency- perceived by managers to be present. Elias, AA., and Cavana, RY. (2011) said the concept of stakeholders is very dynamic and over time can quickly change. In the process of stakeholder concept dynamics, it was recognized that important work was by Mitchell, et al. (1997). They proposed that stakeholder classes can be identified by owning or being associated with ownership one or more related attributes: power, legitimacy, and urgency. By entering urgency as an attribute, dynamic components are added to the process where stakeholders achieve salience in the manager's mind. By combining this the attributes they produce are stakeholder typologies. Mainardes, E.W., Alves, H., Raposo, M. (2012) said that in the literature classifying stakeholders based on the level of interest that has been proven most is the model of Mitchell et al. (1997). This model is the most commonly discussed and used on the Internet literature. With the aim of identifying and classifying stakeholder interests, the application of this instrumental stakeholder theory was primarily designed by Mitchell et al. (1997), which examines managers' perceptions about stakeholder and characteristics their importance in terms of factors of power, legitimacy and urgency.

Through a combination of these attributes, it is expected to produce stakeholder typologies that emphasize their specificity or salience towards the organization. Mitchell describes stakeholder typologies based on these three main attributes: (1) latent stakeholders - typologies that only have one attribute, consisting of dormant stakeholders (power), discretionary stakeholders (legitimacy), and demanding stakeholders (urgency); (2) expectant stakeholders - typologies that have a combination of two attributes, consisting of dominant stakeholders (power and legitimacy), dependent stakeholders (legitimacy and

urgency) and dangerous stakeholders (urgency and power); (3) definitive stakeholder - typology which has the three stakeholder attributes, so that with the highest levels of salience, this stakeholder group will dominate and have a significant effect on organizational performance.

3. RESEARCH METHODS

This study uses a qualitative approach with stakeholder analysis, which seeks to describe phenomena that occur after the enactment of BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017. The sample of this study is limited to BPOM and DGCE agencies that are considered to have a central role in the implementation of the regulation. The technique used in determining informants is purposive or judgmental sampling (sample selection techniques based on knowledge of the population and research objectives) (Babbie, 2013). The informants were taken from structural officials involved in drafting regulations at BPOM and DGCE; and BPOM / BPOM Regional Officers and DGCE / DGCE Regional Offices.

Primary data is collected by conducting interviews to find out understanding in implementing regulations, as well as stakeholder identification and analysis. Secondary data was obtained through literature studies from related institutions, such as BPOM, Ministry of Finance, DGCE, Ministry of Economic Affairs and others. The analysis tool uses the Mitchell Stakeholder Analysis Model which is suitable to analyze government stakeholders as it identifies stakeholders into seven salience. The stakeholder strategy can reflect the organization's need to understand the stakeholders' strengths and interests in detail in order to develop actions that are appropriate for certain stakeholders (Mitchell et al, 1997).

4. ANALYSIS AND DISCUSSION

a. Stakeholder Mapping

BPOM in carrying out its control duties is based on Presidential Regulation No. 80 of 2017. BPOM carries out functions including the implementation of controls before distribution and controls during distribution; and implementation of law enforcement against violations of statutory provisions in the field of Drug and Food control (Presidential Regulation, 2017). While based on the Minister of Finance Regulation No. 234 / PMK.01 / 2015 DGCE has the task of carrying out the formulation and implementation of policies in the areas of supervision, law enforcement, service and optimization of state revenue in the field of customs and excise in accordance with statutory provisions (Ministry of Finance, 2015).

This shows that BPOM and DGCE are agencies that have legal legitimacy in carrying out the control task of importing raw materials and Drug and Food product into Indonesian territory before reaching distribution facilities or used by the public. The implementation of control tasks up to law enforcement by BPOM Civil Investigators often have to coordinate with other law enforcement agencies such as the police and prosecutors in the form of requests for assistance as well as settlement and submission of criminal case files. This is necessary to determine that the case of illegal Drugs and Food has fulfilled the element of crime (Peldi, 2017).

In addition to stakeholders who have control authority, in implementing BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017 there are other stakeholders who have a role in the supply chain of Drug and Food into the territory of Indonesia. Based on several import regulations, stakeholders can be mapped against regulated import schemes (Table 1).

Table 1. Stakeholders in Various Import Schemes

Import Schema	Regulation	Stakeholders
Imported package	Minister of Finance Regulation No 112/PMK.04/2018	Communities as buyers / recipients of import packages, and postal companies or Courier Service Companies (CSC) who send the imported packages (Ministry of Finance, 2018a).
Passenger luggage / crew of the transport facility	Directorate General of Customs and Excise Regulation No. PER-09/BC/2018	Passengers or crew members of transportation facilities that can import imported Drug and Food only for personal interest in a reasonable type and quantity, and are not traded (Ministry of Finance, 2018b).
Border society	Minister of Finance Regulation No. 80/PMK.04/2019	Residents in the border region with Malaysia and Papua New Guinea, import Drug and Food only for

		personal needs in reasonable types and quantities, and are not traded (Ministry of Finance, 2019a).
Cargo	Minister of Finance Regulation No. 11/PMK.04/2019	Individual importers or legal entities that import goods into Indonesian territory, especially in large quantities for the purpose of trading (Ministry of Finance, 2019b).

Indonesia implements Indonesia National Single Window (INSW) for efficiency, effectiveness and integration of services. BPOM has been incorporated in the INSW portal. An e-BPOM system has been developed which is managed by Center for Drug and Food Data and Information (Pusdatin). This shows that there are stakeholders who support the control of Drug and Food imports into the territory of Indonesia, these stakeholders are INSW Portal Management and Pusdatin BPOM.

Based on the results of interviews and literature studies, a list of stakeholders has been collected that directly or indirectly will be involved in implementing the regulation. In the BPOM and DGCE structure, stakeholders are also grouped into management levels, differentiated by echelon level on the role of top management which sets the goals and direction of the business process; middle management who controls management to achieve business process objectives; and first line management that oversees implementation so as not to get out of the context of work and business processes, while the other stakeholders are external.

Table 2. List of Stakeholders

I. Top Management 1. Head of BPOM 2. DG of Custom & Excise 3. Deputy II, III BPOM 4. Deputi of Law Enforcement BPOM 5. Director of Enforcement & Investigation DGCE 6. Director of Inspection & Certification	15. Head Divison of Enforcement & Investigation DGCE III. First Line Management & Operasional 16. Section Chief & Officer of Inspection & Certification 17. Section Chief & Officer of Investigation 18. Section Chief & Officer of Enforcement & Investigation DGCE
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<p>BPOM</p> <p>7. Director of Investigation BPOM</p> <p>8. Director of Intelligence BPOM</p> <p>9. Head of Legal & Org. Bureau BPOM</p> <p>10. Head of Center for Drug & Food Data & Information BPOM</p> <p>11. Head of Regional Office BPOM</p> <p>12. Head of Regional Office DGCE</p> <p>II. Middle Management</p> <p>13. Head Division of Inspection & Certification BPOM</p> <p>14. Head Division of Law Enforcement / Investigation / Intelligence BPOM</p>	<p>IV. External</p> <p>19. INSW</p> <p>20. Communities / Passengers / crew members of transportation</p> <p>21. Importers</p> <p>22. Courier Service Companies</p> <p>23. Logistics Company & Forwarder</p> <p>24. Researcher in Research Institution</p> <p>25. Bureau Chief of Coordination and Control in Police Department</p> <p>26. Presecutor</p>
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There are 26 participant included in the list stakeholders who implement the regulation. The interests of each stakeholder are not always consistent, hence organizations must respond to a variety of different interests.

Based on the role described in BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017 stakeholders can be clustered into several groups :

Table 3. Identification of the Role of Stakeholders

No	Role	Stakeholder
1	Legalize regulation and cooperation	Head of BPOM, DG of Custom & Excise
2	Import & apply for an Import Certificate	Importers
3	Import but not trade	Communities / Passengers / crew members of transportation, Research Institution
4	Transportation service manager manage the transportation service	Courier Service Companies; Logistics Company & Forwarder
5	Manage the system (e-BPOM, INSW) and import realization data, and revisions to the system needed	INSW, Pusdatin BPOM

6	Verify Import Certificate for Border or Post Border & inspection	Deputy II, III BPOM, Director of Inspection & Certification, Head of Regional Office BPOM, Head Division of Inspection & Certification BPOM, Section Chief & Officer of Inspection & Certification
7	Making supporting regulations	Head of Legal & Org. Bureau BPOM
8	Custom Clearance	Head Division of Enforcement & Investigation DGCE, Head of Regional Office DGCE, Head Division of Enforcement & Investigation DGCE, Section Chief & Officer of Enforcement & Investigation DGCE
9	Law Enforcement	Deputi of Law Enforcement BPOM, Director of Investigation BPOM, Director of Intelligence BPOM Head of Regional Office BPOM Head Division of Law Enforcement / Investigation / Intelligence BPOM, Police, Presecutor

b. Identification of Stakeholders

Stakeholders are identified using the Mitchell Theory in the role of post border surveillance. There are three attributes according to Mitchell Theory in Figure 1 (using the number in Table 1. List of Stakeholders).

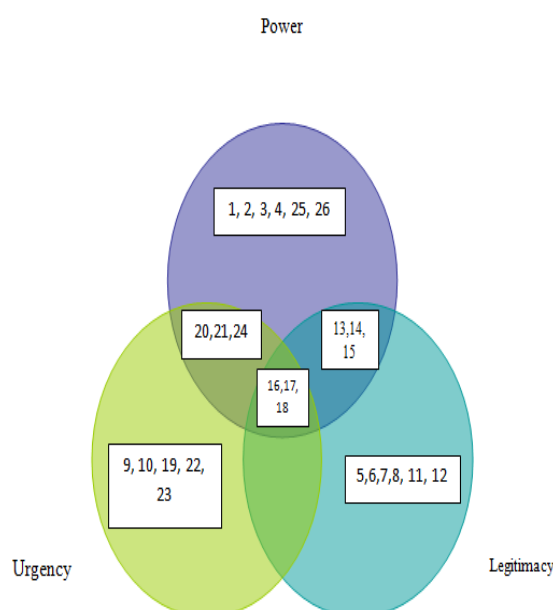


Figure 1. Stakeholders Identification Using Mitchell Theory

There are 17 stakeholders that only have one attributes, or atent stakeholders, identified, consist of: a) 6 dormant stakeholders who possess power to impose their will through coercive, utilitarian or symbolic means that is Echelon I Officials at BPOM and DGCE who are able to provide policies to carry out all matters regulated in BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017 covered by BPOM and DGCE duties. Police and prosecutor as stakeholders who have the power in following up the criminal proceedings of importing illegal Drug and Foods if investigators from the BPOM or DGCE follow up on the case in court; b) 6 discretionary stakeholders who have high legitimacy, that is structural Echelon II at BPOM, DGCE, as well as the Head of BBPOM and the Head of Regional Office of DGCE who have legal authority to assign supervisory or enforcement officers to carry out inspection and investigation tasks.; c) 5 demanding stakeholders, those with urgent claims but no legitimacy or power, that is the Data and Information Center of BPOM (Pusdatin) and INSW which requires immediate information regarding the need for post border control supported by an informative import realization information system in e-BPOM. the other one is the Legal & Organization Bureau of BPOM that require immediate information about the need for technical regulations which become the implementing rules (technical guidelines and standard on exclusion rules) for updating the business process of control. Likewise, logistics service entrepreneurs, forwarders, and deposit service companies to be given knowledge so that they are not used as transportation for the import of illegal imported Drug and Food. This is also in accordance with the interview answers of supervisors who need more applicable technical guidelines in carrying out post border control, as well as support from the e-BPOM system for complete information on incoming Drug and Food.

There are 6 identified stakeholder expectants, consisting of: a) 3 dominant stakeholders (power-legitimacy) are structural Echelon III which has a team as the power to carry out the functions of inspection and certification, enforcement and investigation in the process of post border control. It also has the authority (legitimacy) with the competencies required as inspector and investigators; b) 3 dangerous stakeholders (urgency-power) are the community when pressed in meeting personal needs for example for health; importers if they are forced to pursue business competition and educational / research institutions if they are forced to do scientific research. Under conditions that are urged to use their power to protest, it can even violate the rules if done for personal gain or corporation with the type and amount that violates the rules or for trading.

There are 3 definitive stakeholders that have been identified as having three attributes of stakeholders (power-legitimacy-urgency), namely Inspection and Certification Officers - BPOM, Investigators of BPOM and DGCE Enforcement and Investigation Officers because they have the power to carry out tasks protected by law, has authority and competence in conducting control, and has urgency in carrying out new post border control business processes because this can be a threat from the easier entry of illegal imported Drugs and Food into Indonesian territory. So these stakeholders strongly dominate the implementation of post border control policies and affect the performance of post border control. Considering that these stakeholders carry out control tasks that contain elements of prevention, ascertainment, and law enforcement on the same object, imported Drug and Food, collaborative efforts need to be made. However, because the business process of post-border control is relatively new, it is found that there are obstacles in the form of lack of good communication transmission between BPOM and DGCE. The communication carried out is still a formality in the interests of socialization Per. BPOM No. 29 and 30 of 2017 and the consistency of communication has not been seen to be planned until the evaluation stage.

5. CONCLUSION

BPOM Inspection & Certification Officers, BPOM Civil Investigators, and the DGCE Enforcement and Investigation Officer become significant influential stakeholders in utilizing authority, cooperation and responses to conduct post-border control. Structural Echelon III / Head Division of Inspection and Certification at BPOM, Head Division of Law Enforcement at BPOM, and Echelon III / Head Division of Enforcement and Investigation at DGCE has team strength and authority that must be able to be utilized in conducting post border control. Communities / passengers / transport crews and business actors / importers can become potentially deviant stakeholders because they have business and personal interests, as well as demands for ease of business as well as clarity of consistent ban restriction rules.

Understanding / perceptions of BPOM Officers and DGCE's Enforcement and Investigation Officers regarding the post border control policy can be summarized that the officers need guidelines for post border supervision for Drug and Food which are manifested as derived from these regulations. Officers also need support for access to the e-BPOM system to make early detection efforts since the notification from DGCE is received by BPOM to prevent the entry and distribution of illegal imported drugs and foods. In

addition, given the collaborative nature in implementing BPOM Regulation No. 29 of 2017 and BPOM Regulation No. 30 of 2017, it is necessary to form an integrated team of post-border control between agencies by appointing a coordinating unit in each agency that handles law enforcement against the entry of illegal imported Drug and Food.

Communities / passengers / transport crews and business actors / importers, as well as research / research institutions require more detailed derivative rules regarding exclusion clauses that accommodate personal needs, registration samples and scientific interests. These derivative rules can impose restrictions on the amount or volume that apply based on the general needs for the use of the Drug and Food. Likewise, the need for a support system that helps monitor trends and patterns in the use of imported drugs and food in the community.

6. LIMITATIONS AND SUGGESTIONS

As qualitative research methods are used, this study intends to clarify post-border control issues that have not received much attention in scientific research. So that previous research information is also very limited. However, this study seeks to find the meaning of symptoms and social interactions, especially in interviews and previous empirical data. This research also has not yet reached post border surveillance with importation schemes through border society at land border areas, which may have other influential stakeholders. Likewise with comparative research with supervisory stakeholder governance in other countries that has not been touched in this study.

Based on the basic axioms of qualitative research related to the possibility of generalization, this research is transferability which means it can be applied elsewhere in contexts and conditions that are not much different (Sugiyono, 2017). Development can be done by adding a larger number of samples and more diverse stakeholders. Moreover, further study can be done on things that is not covered in this research, as stated above.

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REFERENCES

- Babbie, E. (2012). *The Practice of Social Research, Thirteenth Edition, International Edition*. Canada : Wadsworth, Cengage Learning.
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2015). *Laporan Tahunan 2015*. Jakarta, Indonesia : Author.
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2016). *Laporan Tahunan 2016*. Jakarta, Indonesia : Author.
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2017a). *Laporan Tahunan 2017*. Jakarta, Indonesia : Author.
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2017b). *Peraturan Badan POM No. 29 Tahun 2017 tentang Pengawasan Pemasukan Bahan Obat dan Makanan ke Dalam Wilayah Indonesia* (Berita Negara RI No. 1842). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia.
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2017c). *Peraturan Badan POM No. 30 Tahun 2017 tentang Pengawasan Pemasukan Obat dan Makanan ke Dalam Wilayah Indonesia*. (Berita Negara RI No. 1843). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia
- National Agency of Drug and Food Control (Badan Pengawas Obat dan Makanan [BPOM]). (2017d). *Perjanjian Kerjasama No. HK.09.1.2.23.05.17.1959 dan No. KEP-394/BC/2017 tentang Pengawasan Pemasukan, Pengeluaran dan Peredaran Obat dan Makanan*. Jakarta : Pemerintah RI. Biro Hukum dan Organisasi.
- Bovaird, T, & Loffler, E (ed.) (2003) *Public Management and Governance*. London: Routledge.
- Directorate General Customs and Excise (DGCE). (2017). *Mekanisme Pengawasan Tata Niaga Post border*. Jakarta, Indonesia : Author.
- Elias, AA., and Cavana, RY. (2011). *Stakeholder Analysis for Systems Thinking and Modelling*. Victoria University of Wellington, New Zealand. Retrived from https://www.researchgate.net/publication/253711729_Stakeholder_Analysis_for_Systems_Thinking_and_Modeling
- Freble, JF. (2005). Toward a comprehensive model of stakeholders management. *Business and Society Review*. 110(4), 407-431. Retrived from onlibrary.wiley.com/doi/full/10.1111/j.0045-3609.2005.00023.x
- Handayani, RD. (2018). *Kebijakan Lintas Sektor Pemberantasan Obat Palsu Di Indonesia*. (Master's Thesis). Universitas Indonesia, Jakarta, Indonesia.

- Ministry of Finance. (2015). *Peraturan Menteri Keuangan Nomor 234/PMK.01/2015 tentang Organisasi dan Tata Kerja Kementerian Keuangan*. (Berita Negara RI No. 1926). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia.
- Ministry of Finance. (2016). *Laporan Tahunan 2015 : Membangun Optimisme Ditengah Tantangan*. Jakarta, Indonesia : Author.
- Ministry of Finance. (2017). *Laporan Tahunan 2016 : Membangun Kredibilitas Fiskal*. Jakarta, Indonesia : Author.
- Ministry of Economic Coordinator. (2017). *Paket Kebijakan Ekonomi Tahap XV : Pengembangan Usaha Dan Daya Saing Penyedia Jasa Logistik Nasional*. Jakarta, Indonesia
- Ministry of Economic Coordinator. (2018, January 31). *Penyederhanaan Tata Niaga Impor: Pengalihan Pengawasan Border Ke Post Border*. Retrieved September 29, 2018, from <http://ekon.go.id/press/download/3810/2686/bahan-pengaturan-tata-niaga-lartas-post-border.pdf>
- Ministry of Finance. (2018a). *Peraturan Menteri Keuangan RI No. 112/PMK.04/2018 Tentang Perubahan Atas Peraturan Menteri Keuangan No. 182/PMK.04/2016 Tentang Ketentuan Impor Barang Kiriman*. (Berita Negara RI No. 1255). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia.
- Ministry of Finance. (2018b). *Peraturan Direktur Jendral Bea dan Cukai No. PER-09/BC/2018 tentang Petunjuk Pelaksanaan Ekspor dan Impor Barang yang Dibawa oleh Penumpang dan Awak Sarana Angkut*. Jakarta: Sekretaris Dirjen Bea dan Cukai.
- Ministry of Finance. (2019a). *Peraturan Menteri Keuangan No. 80/PMK.04/2019 Tentang Impor Dan Ekspor Barang Yang Dibawa Oleh Pelintas Batas Dan Pemberian Pembebasan Bea Masuk Barang Yang Dibawa Oleh Pelintas Batas*. (Berita Negara RI No. 583). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia.
- Ministry of Finance. (2019b). *Peraturan Menteri Keuangan No. 11/PMK.04/2019 Tentang Perubahan Atas Peraturan Menteri Keuangan No. 229/PMK.04/2017 Tentang Tata Cara Pengenaan Tarif Bea Masuk Atas Barang Impor Berdasarkan Perjanjian Atau Kesepakatan Internasional*. (Berita Negara RI No. 95). Jakarta : Kementerian Hukum dan HAM, Republik Indonesia.
- Mainardes, E.W., Alves, H., Raposo, M. (2012). A Model for Stakeholder Classification and Stakeholder Relationships. *Management Decision*, 50(10), 1861-1879. Retrived from <https://www.emerald.com/insight/content/doi/10.1108/00251741211279648/full/html>

- Mitchell, R.K., Agle, B.R., & Wood, D.J. (1997). Toward A Theory Of Stakeholder Identification And Salience : Defining The Principle Of Who And What Really Counts. *Academy of Management Review*, 22(4), 835-896. Retrieved from <https://www.jstor.org/stable/259247>
- Nugrahanto, A., & Muchtar, M. (2019). Sinergi Otoritas Pajak Dan Kepabeanan Melalui Pemeriksaan Joint Audit. *Jurnal Perspektif Bea Dan Cukai*, 3(2), 154-171. Retrieved from <http://jurnal.pknstan.ac.id/index.php/PBC/article/view/558/355>
- Nurhayati, I. (2009). Efektifitas Pengawasan Badan Pengawas Obat dan Makanan Terhadap Peredaran Produk Pangan Olahan Impor Dalam Mewujudkan Perlindungan Konsumen. *Mimbar Hukum*, 21(2), 203-222.
- Peldi, N. (2017). *Koordinasi Fungsional Antara Penyidik Pegawai Negeri Sipil Dengan Penyidik Polri Dalam Penegakan Hukum Terhadap Peredaran Obat Dan Makan Ilegal* [Abstract], from <http://scholar.unand.ac.id/id/eprint/21553>
- Pencapaian Kinerja Bea Cukai Bidang Pengawasan Tahun 2015*. (2016). Warta Bea Cukai, 48(1), 9.
- Indonesia Government. *Peraturan Presiden No. 80 Tahun 2017 tentang Badan Pengawas Obat dan Makanan*. (Lembaran Negara RI No. 180). Jakarta : Sekretariat Negara, Republik Indonesia.
- Center for Domestic Trade Policy (Pusat Kebijakan Perdagangan Dalam Negeri). (2014). *Pengawasan Barang Yang Beredar Di Daerah Perbatasan*. Jakarta, Indonesia : Badan Pengkajian Dan Pengembangan Kebijakan Perdagangan, Kementerian Perdagangan, Republik Indonesia.
- Sugiyono. (2017). *Metode Penelitian Kombinasi (Mixed Methods)*. Bandung : Alfabeta, Indonesia.
- Surowiecki, J. (2004) *The Wisdom of Crowds: Why the Many are Smarter than the Few*. London: Abacus.
- Wibowo, W. (2018). *Joint Audit Ditjen Pajak dan Ditjen Bea dan Cukai: Analisis Faktor-Faktor Pemampu Kerja Sama dan Pertukaran Informasi* [Abstract], from http://etd.repository.ugm.ac.id/index.php?mod=penelitian_detail&sub=PenelitianDetail&act=view&typ=html&buku_id=164098&obyek_id=4#