

Legal analysis of the status and content of general election commission decision number 1774 of 2024 in the election of the mayor of Banjarbaru

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Abstract: *This article aims to analyze the legal position and substantive content of General Elections Commission Decision Number 1774 of 2024 within the regulatory system of regional head elections, focusing on the 2024 Banjarbaru mayoral election. This study addresses a gap in electoral law scholarship, which has primarily examined election administration and dispute resolution but has given limited attention to the legal status of General Elections Commission Decisions that contain general and continuously applicable norms. The legal issue emerged when one candidate pair was disqualified after ballot printing, yet the election was not transformed into a single-candidate election using the empty-column mechanism. Instead, the General Elections Commission applied a technical provision declaring votes for the disqualified candidate pair invalid. This research employs normative legal research using statutory, conceptual, and case approaches. The study finds that Decision Number 1774 of 2024 cannot be classified as a *beschikking* because it lacks individual, concrete, and final characteristics. However, it also cannot be regarded as a *regulation* (*regeling*) because its authority is not derived from legislative delegation. The decision is more appropriately positioned as a *beleidsregel* or technical policy rule. Furthermore, Point 5 of the Decision conflicts with Article 54C of the Regional Head Election Law, which requires the empty-column mechanism when only one candidate pair remains. This study contributes a novel perspective by examining the hybrid legal character of KPU Decisions and clarifying the limits of electoral administrative discretion in protecting citizens' meaningful voting rights.*

Keywords: General Elections Commission Decision; regional head election; conflict of norms; empty column; Banjarbaru.

INTRODUCTION

Democracy and the rule of law are two principles that mutually reinforce one another in the administration of the Indonesian state. Democracy places the people as the holders of sovereignty, while the rule of law requires that the exercise of such sovereignty is not based solely on political will but is carried out through clear,

rational, and accountable legal procedures. The Constitution affirms that "sovereignty is in the hands of the people and is exercised according to the Constitution" (Undang-Undang Dasar Negara Republik Indonesia Tahun 1945, art. 1, para. 2) and also stipulates that "the State of Indonesia is a state based on the rule of law" (Undang-Undang Dasar Negara Republik Indonesia Tahun 1945, art. 1, para. 3). These constitutional provisions demonstrate that democracy and the rule of law are inseparable foundations of Indonesia's constitutional system.

In a democratic system, general elections and regional head elections are not merely periodic political events, but legal instruments for transforming popular sovereignty into governmental legitimacy. The right to vote has substantive meaning because through this right citizens express their approval, rejection, or political choice regarding candidates and the policies offered. Therefore, elections that are honest, fair, and meaningful are a requirement so that popular sovereignty does not remain only at a formal level (Asshiddiqie 2006). Electoral integrity constitutes a fundamental prerequisite for democratic legitimacy, while Birch argues that the protection of voting rights must extend beyond formal participation to ensure that every vote has substantive legal and political value.

Regulations concerning regional head elections are based on the constitutional provision that governors, regents, and mayors are elected democratically. Meanwhile, the administration of these elections is entrusted to a General Election Commission that is national, permanent, and independent. Article 22E paragraph (5) of the 1945 Constitution of the Republic of Indonesia stipulates that "General elections shall be conducted by a General Election Commission that is national, permanent, and independent" (Constitution of the Republic of Indonesia of 1945, art. 22E, para. 5). This constitutional framework positions the General Election Commission as an institution that is not only technically responsible for administering elections but is also obligated to ensure that every stage of the electoral process is conducted in accordance with the principles of popular sovereignty, the rule of law, and the protection of citizens' voting rights.

At the statutory level, regional head elections are regulated under Law Number 1 of 2015 concerning the Stipulation of Government Regulation in Lieu of Law Number 1 of 2014 on the Election of Governors, Regents, and Mayors into Law, as amended several times, most recently by Law Number 6 of 2020 concerning the Third Amendment to Law Number 1 of 2015 on the Stipulation of Government Regulation in Lieu of Law Number 1 of 2014 on the Election of Governors, Regents, and Mayors into Law (Regional Head Election Law).

However, the Simultaneous Regional Head Elections of 2024 reveal the complexity of these regulations. Nationally, the elections were held in 545 regions, covering 37 provinces, 415 regencies, and 93 cities. One region that presents significant legal issues is Banjarbaru City (Yuniarto 2024).

Initially, the 2024 Banjarbaru mayoral election was contested by two candidate pairs. However, shortly before voting day, one of the candidate pairs was canceled or disqualified for being found to have committed administrative violations. This situation raises a fundamental question: should the election be treated as an election with only one candidate pair and use an empty column mechanism, or should it continue using ballots that had already been printed?

Normatively, the Regional Head Election Law anticipates situations where the cancellation of participants results in only one remaining candidate pair. Article 54C paragraph (1) letter e stipulates that an election with a single candidate pair is

conducted if a candidate pair is subject to a disqualification sanction as an election participant, resulting in only one remaining candidate pair. Furthermore, Article 54C paragraph (2) requires the use of ballots containing two columns, namely one column for the candidate pair and one empty column without a picture.

However, in the practice of the Banjarbaru mayoral election, the General Election Commission used General Election Commission Decision Number 1774 of 2024 as a technical guideline. Point 5 of Annex I of this decision states that ballots marked for a candidate pair that has been disqualified due to recommendations from the Election Supervisory Body (Bawaslu) or court rulings are considered invalid. As a consequence, voters who selected a candidate pair that had been disqualified are not positioned as voters rejecting the single candidate through the empty column, but rather as voters whose ballots are considered invalid.

The Constitutional Court subsequently held that the implementation of General Election Commission Decision Number 1774 of 2024 in the Banjarbaru mayoral election had undermined voters' right to cast a meaningful vote. The Court emphasized that the use of ballot papers containing the name of a disqualified candidate pair created ambiguity and confusion among voters, while only votes cast for the remaining candidate pair were recognized as valid (Constitutional Court of the Republic of Indonesia, 2025, p. 241). Ultimately, the Constitutional Court annulled the election results and ordered a revote using ballots that present the remaining candidate pair against an empty column.

Previous studies have examined electoral governance and the protection of voting rights from various perspectives. Birch, Daxecker, and Höglund 2020 argue that the integrity of electoral processes is essential for ensuring democratic legitimacy and protecting citizens' political rights. Similarly, Birch and Van Ham demonstrate that effective oversight institutions and an independent electoral management body are fundamental to guaranteeing electoral integrity and accountability. Furthermore, studies on Indonesian democracy have examined the institutional dynamics of elections and political parties, emphasizing that electoral governance is strongly influenced by the interaction between legal frameworks and political institutions (Fionna and Tomsa 2020). Other research has also explored electoral reforms and democratic consolidation in Indonesia, highlighting the continuing development of electoral institutions following constitutional reforms.

Despite these contributions, the existing literature predominantly discusses electoral integrity, electoral management, constitutional adjudication, and the implementation of elections from institutional or political perspectives. Very few studies have examined the legal position of decisions issued by electoral management bodies, particularly General Election Commission Decisions (Keputusan KPU), within the hierarchy of Indonesian laws and regulations. Moreover, no previous study specifically analyzes General Election Commission Decision Number 1774 of 2024 following the Constitutional Court's ruling on the 2024 Banjarbaru mayoral election. Consequently, the relationship between the legal status of such a decision, its normative substance, and its implications for the constitutional protection of voting rights remains insufficiently explored.

This study addresses that gap by integrating constitutional law, administrative law, and the theory of the hierarchy of laws and regulations to evaluate both the formal legal position and the substantive legality of General Election Commission Decision Number 1774 of 2024. Unlike previous studies that primarily focus on electoral governance or electoral disputes, this research specifically examines whether a KPU

Decision containing generally applicable normative provisions is consistent with higher legal norms governing regional head elections and whether it adequately protects citizens' constitutional voting rights. Accordingly, this study offers a novel juridical perspective on the limits of the regulatory authority of electoral management bodies in Indonesia and contributes to strengthening legal certainty in the administration of regional head elections.

From this event, there are two important legal issues. First, what is the position of General Election Commission Decision Number 1774 of 2024 within the Indonesian hierarchy of laws and regulations, considering that the instrument is titled a "decision" but contains guidelines that are general and repeatedly applicable. Second, whether its substance particularly Point 5 of Annex I conflicts with higher-level legal norms within the regulatory framework of regional head elections. These two issues are important because they concern the limits of the technical discretion of election administrators and the protection of citizens' voting rights.

Based on the formulation of the problems above, this study is expected to provide a comprehensive juridical analysis of the position of General Election Commission Decision Number 1774 of 2024 within the hierarchy of laws and regulations in Indonesia, as well as to assess its conformity with higher legal norms in the regulation of regional head elections. In addition, this study is also intended to identify whether there is a normative conflict in the substance of the decision, particularly in relation to the protection of citizens' voting rights and the principle of popular sovereignty. Thus, the results of this study are expected to contribute academically to clarifying the limits of the technical authority of election administrators and strengthening legal certainty in the implementation of regional head elections in Indonesia.

METHODS

This research is a normative legal study. Normative legal research is conducted by examining library materials to find legal arguments on issues of norms, including legal vacuums, ambiguity of norms, or conflicts of norms (Soekanto and Mamudji 2021).

In the context of this article, the main object of study is the norms contained in General Election Commission Decision Number 1774 of 2024 and its relationship with the norms in the Regional Head Election Law, General Election Commission Regulation Number 17 of 2024, and Constitutional Court Decision Number 05/PHPU.WAKO-XXIII/2025.

The approaches used are the statutory approach, the conceptual approach, and a limited case approach. The statutory approach is used to examine the construction of the hierarchy of norms and the substance of single-candidate elections. The conceptual approach is used to explain categories of administrative legal products such as *regeling*, *beschikking*, and *beleidsregel*. The case approach is used to analyze the Constitutional Court's considerations in the dispute over the results of the 2024 Banjarbaru mayoral election (Muhaimin 2020).

RESULTS AND DISCUSSION

The Position of General Election Commission Decision Number 1774 of 2024

The Indonesian legal system recognizes legislation as written regulations containing generally binding legal norms that are enacted or established by authorized state institutions or officials through procedures prescribed by statutory law. This definition is expressly provided in Article 1 point 2 of Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended several times, most recently by Law Number 13 of 2022 (Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended by Law Number 13 of 2022, art. 1, point 2). This definition contains several important elements, namely written form, legal norms, general binding force, authorized forming officials, and lawful formation procedures.

The Law on the Formation of Laws and Regulations establishes the hierarchy of Indonesian legislation, consisting of the 1945 Constitution of the Republic of Indonesia, Decrees of the People's Consultative Assembly, Laws or Government Regulations in Lieu of Laws, Government Regulations, Presidential Regulations, Provincial Regional Regulations, and Regency/City Regional Regulations (Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended by Law Number 13 of 2022, art. 7, para. 1). Outside this hierarchy, Article 8 of the Law on the Formulation of Laws and Regulations recognizes laws and regulations enacted by certain state institutions, bodies, or commissions, provided that they are expressly mandated by higher laws and regulations or established pursuant to delegated legislative authority (Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended by Law Number 13 of 2022, art. 8).

In the field of elections, the General Election Commission (KPU) has the authority to issue General Election Commission Regulations and General Election Commission Decisions. Article 75 paragraph (1) of the Election Law provides that, in administering general elections, the General Election Commission shall establish General Election Commission Regulations and General Election Commission Decisions (Law Number 7 of 2017 on General Elections, as amended by Law Number 7 of 2023, art. 75, para. 1). In the context of regional head elections, the Commission is also assigned the duty and authority to formulate and determine technical regulations and guidelines for each stage of the election. Thus, General Election Commission Decision Number 1774 of 2024 arises from the institutional authority of the Commission as the election organizer.

However, the formal validity of the formation of a legal instrument does not automatically resolve the issue of its legal position. To assess the position of General Election Commission Decision Number 1774 of 2024, it is first necessary to distinguish three forms of administrative legal products commonly discussed in administrative law, namely *regeling*, *beschikking*, and *beleidsregel* (Mokat 2023). These three categories have different bases of authority, normative characteristics, target subjects, and consequences for judicial review (Al-Fatih and Muluk 2023).

A *regeling* is a type of legal instrument that is regulatory in nature. It contains general and abstract norms, applies prospectively, and is intended to serve as the basis for governmental actions or other legal acts. Because of its general nature, the addressees of norms in a *regeling* are not individually specified. Because of its abstract nature, the object being regulated is not a single concrete event that has already occurred, but rather categories of events that may occur repeatedly

(Kastanya 2023). In the Indonesian context, a *regeling* is closely related to the concept of legislation or statutory regulations (Yasin, Ahmad Alif Hidayat 2025).

Beschikking, on the other hand, is an administrative decision or determination addressed to a specific subject, concerning a concrete event, and giving rise to final legal consequences. A *beschikking* serves as a means of applying general norms contained in a *regeling* to a particular situation. Therefore, the characteristics of being individual, concrete, and final constitute the main distinguishing limits between an administrative decision and a regulatory instrument that is general in nature (Tumadi 2023).

Between the two lies the *beleidsregel* or policy regulation. A *beleidsregel* arises from governmental discretionary power (*vrije bevoegdheid or diskresi*) (Susila Wibawa, Shania Prilla Davanti, and F.C. Susila Adiyanta 2023) in dealing with situations where legislation provides options, is silent, incomplete, unclear, or where there is administrative stagnation that must be addressed in the public interest (Hamid, Heriani, and Maksum 2021). In practice, a *beleidsregel* may appear in the form of guidelines, implementing instructions, technical instructions, circular letters, directives, or other written forms that provide guidance for administrative officials in exercising their authority consistently (Susila Wibawa et al. 2023).

Doctrinally, a *beleidsregel* is not a *regeling* in the formal sense because it does not originate from the authority to form legislation. It is also not a *beschikking* because it does not resolve an individual, concrete, and final case. Its position is more appropriately understood as an internal or technical policy instrument that guides the exercise of administrative authority. Therefore, its binding force is primarily internal within the administrative environment, although in practice it may also have external effects on citizens (Murlinus Murlinus 2024).

General Election Commission Decision Number 1774 of 2024 shows a complex character. In terms of nomenclature, it is referred to as a "Decision." However, substantively, the decision establishes technical guidelines for the implementation of voting and vote counting in the election of governors, regents, and mayors. The FIRST and FOURTH Dictums state that these technical guidelines serve as guidance for election organizers at all levels, including provincial KPU, regency/city KPU, sub-district election committees (PPK), village/sub-district election committees (PPS), and polling station committees (KPPS).

If tested against the characteristics of a *beschikking*, General Election Commission Decision Number 1774 of 2024 does not meet the elements of being individual, concrete, and final. This decision is not addressed to a specific person or legal entity, but rather to all election administrators at the regional level involved in the regional head elections. The decision also does not regulate a single concrete event that has already been completed, but instead sets out technical procedures to be applied in various voting and vote-counting processes. In addition, it is not a final determination that resolves a legal relationship, but rather a guideline for the implementation of election stages.

At the same time, General Election Commission Decision Number 1774 of 2024 also cannot simply be classified as a pure *regeling*. Indeed, its substance is general and abstract because it regulates procedures that apply repeatedly. However, its legal basis of authority does not stem from attribution or delegation to form independent statutory norms. Its considerations indicate that the decision was issued to implement the provisions of General Election Commission Regulation Number 17 of

2024. This means that it is technical in nature, subordinate, and dependent on a higher *regeling*.

Based on these characteristics, General Election Commission Decision Number 1774 of 2024 is more appropriately classified as a *beleidsregel* or technical policy guideline. It arises from the need of the General Election Commission to standardize the implementation of voting and vote counting. It provides technical guidance for election administrators in translating general norms already regulated in laws and General Election Commission Regulations. As a *beleidsregel*, the decision is valid as an administrative guideline as long as it does not create new norms that conflict with higher-level legislation.

Consequently, the position of General Election Commission Decision Number 1774 of 2024 lies outside the formal hierarchy set out in Article 7 of the Law on the Formation of Legislation and is subordinate to the laws and regulations that serve as its legal basis. It may not annul, alter, or restrict rights that have already been guaranteed by law. If its content concerns citizens' voting rights, such technical guidelines must be strictly interpreted as implementing rules, not as a source of new norms capable of displacing statutory provisions.

The binding force of General Election Commission Decision Number 1774 of 2024 is primarily internal in nature. This is evident from the FOURTH Dictum, which states that the guideline serves as a reference for provincial KPU, regency/city KPU, sub-district election committees (PPK), village/sub-district election committees (PPS), and polling station committees (KPPS) in carrying out voting and vote counting. Although its impact may be felt by voters and election participants, the direct addressees of its technical norms are the election administrators. Therefore, when the external effects of this decision potentially reduce voting rights, its review must be based on the principles of legality, the hierarchy of norms, and the protection of voters' constitutional rights.

Conflict of the Substantive Content of General Election Commission Decision Number 1774 of 2024 with the Norm on Single-Candidate Elections

The main issue with General Election Commission Decision Number 1774 of 2024 does not lie in its existence as a technical guideline, but in certain provisions that potentially conflict with the law. The critical point is found in Point 5 of Annex I, which stipulates that ballots marked for a candidate pair that has been disqualified due to recommendations from the Election Supervisory Body (Bawaslu) or court decisions are declared invalid. This norm appears technical, but its consequences are highly substantive because it determines whether a citizen's expression of choice is counted as a valid vote or discarded as an invalid vote.

To assess this conflict, the theory of normative conflict must be applied. In legal reasoning, a normative conflict occurs when two legal norms regulate the same object but issue contradictory commands. Nurfaqih Irfani, referring to Hans Kelsen's thought, explains that normative conflicts can be distinguished based on the nature of their contradiction, namely bilateral or unilateral, and based on the scope of the contradiction, namely total or partial (Irfani 2020).

A bilateral conflict occurs when compliance with one norm automatically violates the other, and vice versa. A unilateral conflict occurs when compliance with one norm violates another norm, but the reverse is not necessarily true. Meanwhile, a total conflict occurs when the entire substance of two norms regulating the same object is

contradictory, whereas a partial conflict occurs when the contradiction concerns only a specific part of the substance of the norms (Irfani 2020).

In the case of the Banjarbaru mayoral election, the norm in Point 5 of General Election Commission Decision Number 1774 of 2024 must be compared with Article 54C of the Regional Head Election Law. Article 54C paragraph (1) letter e explicitly regulates that an election with a single candidate pair is conducted when a candidate pair is subject to disqualification sanctions as an election participant, resulting in only one remaining candidate pair. Article 54C paragraph (2) then stipulates that such an election uses ballots containing two columns, namely a column for the candidate pair and an empty column without an image.

The empty column mechanism in Article 54C cannot be regarded as a mere technical formality. It is a democratic instrument ensuring that voters still have a meaningful choice in an election with a single candidate pair. This is reinforced by Article 54D paragraph (1), which requires a single candidate pair to obtain more than fifty percent of valid votes in order to be declared the elected candidate pair. Through this mechanism, voters may either approve the single candidate pair or reject it through the empty column, and both forms of expression carry legal significance.

The contradiction arises because Point 5 of General Election Commission Decision Number 1774 of 2024 does not direct a situation where the disqualification of a candidate pair is treated as a single-candidate election with an empty column mechanism. Instead, the provision states that votes cast for a candidate pair that has been disqualified are considered invalid. In the context of ballots that still contain two candidate pairs, voters who select the disqualified candidate pair are not treated as voters rejecting the remaining candidate pair, but rather as voters who cast an invalid vote.

Thus, the conflict between Point 5 of General Election Commission Decision Number 1774 of 2024 and Article 54C of the Regional Head Election Law is bilateral in nature. If election organizers comply with Point 5 by declaring votes cast for the disqualified candidate pair as invalid votes, then they fail to implement the mandate of Article 54C, which requires the use of the empty column mechanism. Conversely, if election organizers comply with Article 54C by applying the empty column mechanism, then Point 5 can no longer be applied as it is written.

The conflict is also total in nature. Article 54C requires a single-candidate election mechanism that places the remaining candidate pair alongside an empty column. Point 5 of General Election Commission Decision Number 1774 of 2024, on the other hand, establishes a different mechanism, namely continuing to use ballots that include the disqualified candidate pair and classifying votes for that candidate pair as invalid votes. The substance of both norms does not merely differ in technical details, but differs in the fundamental design of voter rights protection.

If compared with General Election Commission Regulation Number 17 of 2024 as the primary regulation, Point 5 of General Election Commission Decision Number 1774 of 2024 also does not have a strong explicit legal basis. Article 36 of General Election Commission Regulation Number 17 of 2024 does regulate the validity of votes in certain conditions, but the norm is related to situations where a candidate pair or candidate is permanently incapacitated or declared convicted as regulated in Article 15 and Article 16. Both provisions do not explicitly regulate the situation of candidate disqualification due to recommendations from the Election Supervisory Body (Bawaslu) or court decisions that result in only one remaining candidate pair.

From the perspective of good legislative drafting, this situation raises legal concerns. Technical guidelines should function to elaborate existing legal norms rather than establish new normative arrangements that directly determine whether a voter's ballot is considered valid or invalid. The principle of conformity between the type, hierarchy, and substance of legal regulations requires that the content of a legal instrument must correspond to its legal form and position within the regulatory hierarchy. Furthermore, the principles of clarity of purpose, appropriate institutional authority, conformity between the type, hierarchy, and content of regulations, effectiveness, utility, clarity of formulation, and openness must be reflected in the formation of legislation (Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended by Law Number 13 of 2022, art. 5). The substance of regulatory content must also embody principles such as protection, humanity, nationality, kinship, archipelagic insight, unity in diversity, justice, equality before the law, order and legal certainty, and balance, harmony, and conformity (Law Number 12 of 2011 on the Formulation of Laws and Regulations, as amended by Law Number 13 of 2022, art. 6).

The application of Point 5 in the Banjarbaru mayoral election shows that the technical guideline does not merely create administrative issues, but also constitutional problems. Voters who selected the disqualified candidate pair were not provided with a lawful channel to express rejection of the remaining candidate pair. As a result, the value of their votes was effectively lost. This contradicts the principle of equal vote value, commonly expressed in the principle of "one person, one vote, one value."

The Constitutional Court essentially interpreted this issue as concerning the loss of a meaningful choice for voters. The Court held that, after Candidate Pair Number 2 was disqualified, the Banjarbaru mayoral election legally constituted an election with a single candidate pair. Consequently, the electoral mechanism that should have been applied was the mechanism provided under Article 54C and Article 54D of the Regional Head Election Law (Constitutional Court of the Republic of Indonesia, 2025).

The Constitutional Court also considered that the use of ballots that still included the disqualified candidate pair created ambiguity and confusion among voters. Although the General Election Commission attempted to conduct socialization, this did not change the fact that only votes for the remaining candidate pair were counted as valid votes, while votes cast for the disqualified candidate pair were declared invalid, without any equivalent mechanism for expressing rejection (Constitutional Court of the Republic of Indonesia, 2025).

The Constitutional Court's decision effectively enforces the principle of *lex superior derogat legi inferiori*, meaning that higher-ranking norms prevail over lower-ranking ones. The technical norm in the General Election Commission Decision cannot override the higher-level statutory norm. Therefore, the Court annulled the results of the Banjarbaru mayoral election and ordered a re-vote using ballots that place the remaining candidate pair against an empty column (Constitutional Court of the Republic of Indonesia, 2025).

From the above analysis, it can be affirmed that the technical discretion of the General Election Commission has clear limits. The Commission does require technical guidelines to ensure uniformity in voting and vote-counting procedures. However, such technical discretion must not alter the normative design established by law, especially when such alterations result in the loss of citizens' meaningful voting

rights. In a democratic rule-of-law state, technical efficiency must be subordinate to the protection of voters' constitutional rights.

CONCLUSIONS

First, General Election Commission Decision Number 1774 of 2024 cannot properly be classified as a *beschikking*, even though it uses the nomenclature "Decision." The substance of the decision is not individual, concrete, and final, but rather contains guidelines that are general, abstract, and applicable to the implementation of voting and vote-counting stages. However, the decision also cannot be placed as a pure *regeling* because it does not originate from attribution or delegation of legislative authority to establish new statutory regulations. It is more appropriately understood as a *beleidsregel* or technical policy guideline that is internal and subordinate to General Election Commission Regulations, laws, and higher legal norms.

Second, there is a normative conflict between Point 5 of Annex I of General Election Commission Decision Number 1774 of 2024 and Article 54C of the Regional Head Election Law. In situations where the disqualification of a candidate pair results in only one remaining candidate pair, the Regional Head Election Law requires the use of the empty column mechanism. In contrast, Point 5 of the General Election Commission Decision stipulates that votes cast for the disqualified candidate pair are declared invalid. This conflict is bilateral because compliance with one norm prevents compliance with the other, and it is total because the regulated mechanisms differ fundamentally in substance.

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