



Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

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ABSTRACT

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The research objectives to be achieved are to describe and analyze the Implementation of Minister of Transportation Regulation No. 65 of 2009 concerning Indonesian-flagged Non-Convention Vessels at the Tanjung Perak Main Harbormaster's Office in Surabaya; and describe and analyze the supporting and inhibiting factors. The type of research used is qualitative research.

The results showed that the Ship Safety and Ship Manning Standards that have been carried out are in accordance with what is the goal, Ship Safety and Ship Manning Resources assigned to the crew are still not optimal because they are not in accordance with international regulations, Ship operations and ship safety have been properly implemented, The role of communication carried out in the form of coordination between several parties is still lacking, The attitude of the implementers of Ship Safety and Ship Manning is responsible for imposing sanctions in this case conveying to the captain to be in accordance with, Economic, Social and Political Factors Ship Safety and Ship Manning are supportive. The conclusion of this research is that the Implementation of the Policy of the Minister of Transportation Regulation No. 65 of 2009 concerning Indonesian-flagged Non-Convention Ships at the Tanjung Perak Main Shipyard Office in Surabaya is running in accordance with applicable provisions.

There are several suggestions that are recommended, among others, the Government of Indonesia through the Ministry of Transportation can make special policies in monitoring growth and development towards the security of ships and port facilities, including the level of security conditions, there must be synchronization and synergy between the central government and local governments in regulating regulations so as not to cause contradictions in implementation.

KEYWORDS:

Implementation, Policy, Certificate of Carriage, Tanjung Perak

INTRODUCTION

Ships are water vehicles of any shape and type, driven by engine power, wind power or delayed, including vehicles with dynamic carrying capacity, vehicles below the water surface, as well as floating devices and floating buildings that can move. Shipping is everything that is related to the seaworthiness, measurement of data collection and ship

nationality, ship management (skipper and crew) and ship cargo. The port is closely related to sea transportation activities, both loading and unloading of goods, passengers, and the berth of ships ranging from large ships to even fishing boats. The port can also be interpreted as something related or related to all port management activities and other activities to carry out port functions to support the smooth running of the port. Including for the smooth flow of ship traffic, passengers and goods, safety when sailing, encouraging the improvement of the national economy and a region and no less important is the security and order of the port itself. The port is also a gateway to enter a certain area and as a connecting infrastructure between regions, between islands, even between countries.

Based on the general explanation of Law No. 17 of 2008 concerning the Issuance of Sailing Approval Letter,

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Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

thanks to the grace of God Almighty, the Unitary State of the Republic of Indonesia has been endowed as an archipelago consisting of thousands of islands, along the equator, between two continents and two oceans so that it has an important and strategic position and role in relations between nations. The strategic position of the Unitary State of the Republic of Indonesia must be maximally utilized as the basic capital for national development based on Pancasila and the 1945 Constitution of the Republic of Indonesia to realize a safe, peaceful, just and democratic Indonesia, and improve the welfare of the people. In the context of implementing national development and realizing the Archipelago Concept, it is necessary to develop an effective and efficient national transportation system, increase the mobility of people, goods and services, help create a stable and dynamic national distribution pattern, and support regional development and further strengthen the development of community life, support security, and improve international relations. The issuance of a Sailing Approval Letter is regulated in Law Number 17 of 2008 Article 219 which explains that every ship sailing is required to have a Sailing Approval Letter issued by the Syahbandar.

Therefore, to obtain SPB (Sailing Approval Letter) the ship must meet the standards of provisions in sailing and navigation described in Law No. 17 of 2008 Article 217 such as; ship safety, prevention of pollution from ships, ship manning, ship loading lines and loading, crew welfare and passenger health, ship legal status, safety management and prevention of pollution from ships and ship security management. Ships are declared seaworthy when they have completed ship safety certificates and other safety documents. In addition, the crew must also meet the qualification and competency requirements in accordance with national and international regulations. The certificates that must be owned by the crew are a certificate of seafarer expertise (Certificate of Competency) and a certificate of seafarer skills (Certificate of Proficiency).

Therefore, to obtain an SPB (Sailing Approval Letter) a ship must meet the standard provisions for sailing and navigation as described in Law no. 17 of 2008 Article 217 such as; ship safety, prevention of pollution from ships, manning of ships, loading and unloading of ships, welfare of ship crew and health of passengers, legal status of ships, safety management and prevention of pollution from ships and ship security management. A ship is declared seaworthy if it has completed a ship safety certificate and other safety documents. Apart from that, ship crew must also meet qualification and competency requirements in accordance with national and international regulations. The certificates that ship crew must have are a seaman's skills certificate (Certificate of Competency) and a seaman's skills certificate (Certificate of Proficiency).

Minimum manning requirements that must be met by Fish Vessels, mainly related to the certificate requirements that must be owned by the crew, both fish vessels that have a Ship Length of less than 12 meters, 12 to 24 meters and more than 12 meters. The following is a table on the minimum requirements for Officers' Certificates on AHTS and TUG BOAT Vessels for Local Shipping. That the minimum requirements for the Certificate of Officers on Board AHTS (Anchor Handling Tug and Supply) Ships and TUG BOAT for Local Shipping include (1) Position of Radio Officer with ORU diploma if the ship is equipped with GMDSS (Global Maritime Distress Safety system) radio station; (2) Position of Radio Officer with REK-II diploma, if the ship is equipped with telegraphy radio station; (3) The position of Radio Officer can be eliminated, if there are 2 people among the Skipper and Chief of Staff have an ORU certificate, except for vessels of GT < 500, only 1 (one) person among the Skipper and Chief of Staff has an ORU certificate; (4) Each COC (Certificate Of Competency) must be accompanied by an inauguration of the position. The following table shows the minimum requirements for the Certificate of Officers on Board AHTS and TUG BOAT for Indonesian Area Shipping; that the minimum requirements for the Certificate of Officers on Board AHTS and TUG BOAT for Indonesian Area Shipping; (1) The position of Radio Officer can be eliminated, if there are 2 people among the Captains and Chiefs of Staff who have ORU certificates; (2) The position of Radio Officer with ORU certificate if the ship is equipped with GMDSS radio station; (3) The position of Radio Officer with REK-II certificate, if the ship is equipped with telegraphy radio station; (4) The position of Chief Engineer for ships of size 750 to <3000 is certified ATT-II, or may be ATT-III if he has obtained confirmation as Head of Engine Room; (5) each COC (Certificate Of Competency) must be accompanied by confirmation of position.

The existence of ports is an important means for the sea transportation system in Indonesia. One of the main ports in Indonesia is Tanjung Perak Port Surabaya, which connects the islands in the archipelago. Tanjung Perak Port Surabaya is part of connectivity with other ports, both in inter-island trade activities, passenger movement and import and export intensity is getting higher and Tanjung Perak Port Surabaya as the main class port in Indonesia must improve in order to support all sea transportation activities which are positioned between the western and eastern regions of Indonesia.

Tanjung Perak Port Surabaya is part of connectivity with other ports, both in inter-island trade activities, passenger movement and import and export intensity is getting higher and Tanjung Perak Port Surabaya as the main class port in the country of Indonesia must improve in order to support all sea transportation activities whose position is between the western and eastern regions of Indonesia. Therefore, the smoothness of the transportation system is

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

very important to support effectiveness in the transportation of goods to be traded. One of the means of sea transportation used so far is the ship, which is a means of transportation for the transportation of goods and passengers in large quantities, both domestically and abroad. The number of ships entering and exiting Tanjung Perak Port has increased from year to year.

The practice of organizing public services is one of the manifestations of the function of the state apparatus as a servant of the community in addition to being a servant of the state. This service function is directed at meeting the needs of the community as well as creating social justice in the community, so that the government will be able to realize a better life for its people (Kurniawan, 2005). The government through its bureaucratic system has an obligation to provide services to the community. The problem of public services has a very big role because it involves the public interest. The condition of public administration by government officials in various aspects of services, including those related to the fulfillment of civil rights and basic needs of the population, still feels that the procedures and service mechanisms are still convoluted, not transparent, less informative and less consistent so as not to guarantee legal certainty, time and cost. For this reason, it is necessary to reform and improve the performance of the state apparatus in order to be able to carry out optimal and excellent services in the form of fast, cheap, easy, fair and transparent services (Priandono, 2003).

One of the Government institutions that has an important role in supporting the smooth running of shipping in Indonesia is the Office of the Harbor Master and Port Authority. This Government organization is in line with the provisions of Law Number 17 of 2008 Article 5 paragraph (1) which states that shipping is controlled by the state and its guidance is carried out by the government. One of the guidance carried out by the government based on Law Number 17 of 2008 paragraph (2) is the regulatory function, which includes the determination of general and technical policies, among others, determining norms, standards, guidelines, performance, planning, and procedures including, requirements, safety, and security of shipping and licensing.

The Sailing Approval Letter is a state document issued by the Syahbandar office to every ship that will sail from the port after the ship has fulfilled the ship's seaworthiness requirements and other obligations. This document is so important because it concerns the smooth operation of the ship and the safety of the ship, skipper and crew. For the year 2022 Safe Manning management has increased from the previous year by 1015 from the data above the increase in Safe Manning management should also be balanced with good service so that the creation, determination of norms, standards, guidelines, performance, planning, and procedures

including, requirements, safety, and security of shipping and licensing in accordance with applicable regulations.

In this regard, the role of the Syahbandar is very important, including checking the condition of the ship and checking all ship documents, and determining sailing permits. But the reality is that there are still ships that are not equipped or have papers in sailing. This will have a negative impact on fishermen who will be subject to criminal provisions stipulated in Article 98 of Law Number 45 of 2009 concerning Law Number 31 of 2004 concerning Fisheries, with a maximum imprisonment of 1 (one) year and a maximum fine of Rp.1,000,000,000, - (one billion rupiah). Service standards that should aim to become service guidelines in the issuance of Sailing Approval Letters are still not well realized.

The certificate is a certificate issued by the Directorate General of Sea Transportation for crew members who meet the qualification and competency standards in accordance with the Minister of Transportation Regulation No. 20 of 2015 concerning Standard Shipping Safety Requirements. For this reason, it is necessary to pay attention to efforts to prevent ship accidents by checking the completeness of the ship. That to ensure shipping safety as a support for smooth ship traffic at sea, it is necessary to have a crew that has expertise, ability and skill, thus every ship that will sail must be manned with sufficient and capable crew to carry out their duties on the ship in accordance with their position by considering the tonnage of the ship, the arrangement of the ship's machinery and the shipping area in accordance with other international regulations. So the issuance of a safe manning certificate to find out whether those working on the ship are in accordance with applicable regulations, because to ensure the safety of a ship it must be with competent people in accordance with applicable regulations which essentially emphasize on three areas, including : 1) Responsibility of shipping companies, 2) Uniformity of competency standards, 3) Government responsibility.

RESEARCH METHOD

The type of research used in this study is qualitative research, where researchers describe and explain the situations and conditions that occur, after researchers conduct observations and interviews. Qualitative research method as a research procedure that produces descriptive data in the form of written or spoken words from people and observable behavior, qualitative research will produce analytical procedures that do not use statistical analysis procedures or other quantification methods. According to Sugiyono (2015) qualitative research methods are methods based on the philosophy of postpositivism, while to research on natural objects, where the researcher is the key instrument, data collection techniques are carried out by triangulation (combined). Data analysis is inductive or qualitative, and

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

research results emphasize meaning rather than generalization.

In this study the authors tried to obtain a clear concrete picture of the Implementation of the Policy of the Minister of Transportation Regulation Number 65 of 2009 concerning Indonesian-flagged Non-Convention Ships at the Tanjung Perak Surabaya Main Shipyard Office. which follows a series of activities carried out, by trying to explore the facts, and analyzing them objectively based on theoretical principles.

The data analysis technique used in this qualitative research is clear, namely by using qualitative analysis techniques, where by collecting data, observing, interviewing and concluding the data taken. The model in data collection used in this research is the Miles and Huberman model. Data analysis using several steps according to the theory of Miles, Huberman and Saldana (2014), namely analyzing data with three steps: condensation, presenting data, and drawing conclusions or verification. Data condensation refers to the process of selecting, narrowing, simplifying, summarizing, and transforming data.

RESULTS AND DISCUSSION

Ship Safety Certificate Issuance Services include Issuance of Dangerous Goods/Fitness Certificate, Issuance of High Speed Craft (HSC) Certificate, Issuance of Ship Safety Certificate, Issuance of National Certificate of Oil Pollution Prevention (SNPP), Issuance of International Certificate of Oil Pollution Prevention (IOP), Issuance of International Certificate of Air Pollution Prevention (IAPP), Issuance of International Certificate of Dirt Pollution Prevention (ISPP), Issuance of Anti-Barnacle System (AFS) Control Certificate, Certificate of Ship Safety Management (SMC), Certificate of Company Safety Management (DOC), Issuance of Ballast Water Management (BWM) Certificate, Issuance of Permanent Letter of Measure, Issuance of Safety Certificate of Motor Sailing Vessels (KLM),

1. Implementation of the Indonesian-flagged Non-Convention Vessel Policy at the Tanjung Perak Main Harbor Office Surabaya

In the regulation of Minister of Transportation Number 65 of 2009 concerning Non-Convention Vessel Standards, for Indonesian-flagged non-convention vessel standards as referred to in paragraph (1) consist of; (a) Ship construction and ship stability; (b) Equipment; (c) Equipment; (d) Machinery and electricity; (e) Ship measurement; (f) Manning; and (g) Operational management (ship safety and security management) and maritime environmental protection.

Based on Law No. 17 of 2008 concerning Shipping, the port is defined as; "Port is a place consisting of land and / or waters with certain boundaries as a place of government activities and business activities that are used as a place for

ships to dock, embark and disembark passengers, and / or loading and unloading goods, in the form of terminals and ship berths equipped with shipping safety and security facilities and port support activities as well as a place for intra-and intermodal transportation movements" The port as a transportation infrastructure that supports the smooth running of the sea transportation system has a function that is closely related to social and economic factors. Economically, the port functions as one of the drivers of the economy because it is a facility that facilitates the distribution of production results, while socially, the port becomes a public facility where interaction between users (community) takes place, including interactions that occur due to economic activity. More broadly, the port is the central node of a supporting area (hinterland) and a link with the area outside it. In general, the port has a function as a link, interface, and gateway. The intended link (chain) is that the port is one of the links in the transportation process from the origin of the goods to the destination.

The Safe Manning Certificate has several elements of requirements that are in accordance with the regulations and have been checked by the Marine Inspector. According to PM 65 of 2009 concerning Indonesian-flagged Non-Convention Vessel Standards which reads Crew is a person who works or is employed on the ship by the owner or operator of the ship to perform duties on the ship in accordance with his position stated in the certificate. Therefore it is required that there is a Safe Manning certificate on every ship, to ensure that their ships have crews with the appropriate requirements and have been properly trained and certified. The Safe Manning certificate has contents in it which consist of several elements of the requirements on the ship that are in accordance with the regulations and have been checked by the Marine Inspector. The contents of the Safe Manning certificate are: (a) Letter Number; (b) Ship Name; (c) Call Of Sign; (d) Port of Registration; (e) Registration Number; (f) Name of Company/Vessel Operator; (g) IMO Number; (h) Voyage Area; (i) Ship Type/Type Of Ship; (j) Gross Tonnage; (k) Propulsion Engine Power (KW; (l) Total Marine Engine Power; (m) Position of Ship's Officer; (n) Place of Document Issuance; (o) Date of Document Issuance; (p) Document Validity Period.

2. Standards and Objectives for Ship Safety and Ship Manning

Understanding the standards and objectives for policy objectives is very important. Policy implementation will usually fail (frustrated) if the implementers (officials) are completely unaware of the standards and objectives of the policy objectives. Policy standards and objectives have a close relationship with attitudes towards implementers. The disposition of implementors towards policy standards and objectives is also a "crucial" thing. Implementors may fail to

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

realize the policy, because they reject or do not understand what is the purpose of a policy.

This can be achieved through the use of a documented safety management system. A safety management system that complies with the ISM Code standard is that the company must provide services that meet the requirements set by the International Safety Management Code which includes the operation of ships and prevention of marine pollution so that ships can operate safely and prevent environmental pollution. The advantage of establishing a Safety Management System is to increase safety awareness and skills of safety management personnel in order to establish a safety culture that encourages continuous improvement. As well as greater client confidence to increase the company's mental resilience. Shipping Safety is a state of fulfillment of safety requirements concerning transportation in waters, Ports and the Maritime Environment Ship Safety Standards and Ship Manning Consists of: 1) Human Resources; 2) Facilities and Infrastructure; 3) Standard Operating Procedures; 4) Environment; 5) Sanctions

In accordance with the Regulation of the Minister of Transportation of the Republic of Indonesia Number PM 25 of 2015 concerning River, Lake and Crossing Transportation, which is still used as the legal basis for non-convention vessels or Non Convention Vessel Standards (NCVS) intended for ships weighing under 500 GT that carry out domestic and international shipping activities. The performance of crossing transportation in terms of safety is considered much better, following the high level of operator compliance with safety regulations. However, operators should not be careless considering that accidents can occur at any time due to various factors, whereas the image of the transportation world will be damaged if there is an accident at sea, including crossing transportation. For this reason, crossing transport operators must fully support the government's efforts to minimize the number of accidents in the transportation sector by complying with all regulations relating to safety aspects. Efforts to improve shipping safety must be carried out continuously. Now the conditions are much better, even in 2009 there was no crossing ship accident, there are several regulations that need to be understood, including the provisions of the International Safety Management (ISM) Code, marshaling and maritime certification.

3. Ship Safety and Boating Resources

Each stage of implementation requires that there are qualified human resources and in accordance with the work provided by the policies set politically. Humans are the most important resource in determining the success of a policy implementation, this is because success in policy implementation is highly dependent on the ability to utilize available resources, especially human resources. In addition

to human resources, financial resources and time are important calculations in the success of policy implementation. Policy resources are no less important than communication. In this policy resources must also be available to facilitate the administration of a policy implementation. These resources consist of funds or other intensives to facilitate the implementation of a policy. The lack or limitation of funds or other intensives in policy implementation is a major contribution to the failure of policy implementation.

The seaworthiness of the ship is closely related to the Safety of Shipping. Every ship that sails must be in a seaworthy condition so as to ensure safety and security while the ship is sailing. The seaworthiness of the ship is also assisted by Shipping Safety facilities and infrastructure. If the matters concerned are ignored, the risk of ship accidents will be very high. that to carry out shipping activities every sea transportation (ship) requires a Sailing / Anchoring Approval Letter (SPB) issued by the syahbandar in order to sail or anchor. In order to obtain an SPB, the ship that will sail must fulfill several requirements. Each Sailing Approval Letter can be given by a syahbandar to a ship user or owner if the ship has fulfilled several important requirements.

A seaworthy ship is a ship that meets the requirements of ship safety and security, prevention of pollution of the aquatic environment from ships, manning, navigation equipment and safety equipment, loading lines, and loading. According to Law of the Republic of Indonesia Number 17 of 2008 concerning Shipping, Seaworthiness of a Ship is the state of a ship that meets the requirements of ship safety, prevention of water pollution from ships, manning, loading lines, loading, crew welfare and passenger health, ship legal status, safety management and prevention of pollution from ships, and ship security management for sailing in certain waters. In the Law of the Republic of Indonesia Number 17 of 2008 concerning Shipping, it states several important requirements for the safety and security of water transportation, including the fulfillment of shipworthiness and navigational requirements.

Safety requirements as intended include material, construction, building, machinery and electricity, stability, arrangement and equipment including auxiliary equipment and radio, and ship electronics. Fulfillment of each ship's seaworthiness requirements is evidenced by ship certificates and letters. The safety certificate as referred to consists of a safety certificate for passenger ships, safety certificates for cargo ships, certificates of seaworthiness and manning of fishing vessels. Whereas what is meant by ship's letter or document includes Measure Letter, Ship's Nationality Certificate, Safety Certificate, Load Line Certificate, Ship's Certificate, and cargo document.

The mandatory requirements that must be met to be able to work as a crew member in accordance with Article 17

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

of Government Regulation No. 7 of 2000 concerning Maritime Affairs, among others: 1) Have a seafarer expertise certificate;) At least 8 years old; 3) Have a seaman's book; 4) Physically and mentally healthy based on the results of a medical examination; 5). Have signed a PKL (Sea Work Agreement) In Shipping Law No.17 of 2008, the fifth part of Article 151 crew welfare and passenger health, every crew member is entitled to welfare.

4. Organizational Characteristics of Ship Operations and Ship Safety

The center of attention on implementing agents, namely as formal organizations and informal organizations that will be involved in implementing policies. This is important because the performance of policy implementation will be greatly influenced by the characteristics that are very appropriate and suitable for the implementing agents. This relates to the policy context that will be carried out in some policies that require strict and disciplined policy implementers. In other contexts, democratic and persuasive implementing agents are needed. In addition, the coverage or area is an important consideration for determining policy implementing agents. There are two characteristics of the implementing organization in this case the main characteristics of the bureaucratic structure are standard work procedures (SOP = Standard Operating Procedures) and fragmentation (Edward III, 1980). Standard Operating Procedures (SOP). SOPs were developed as an internal response to the time and resource constraints of implementers and the desire for uniformity in the operation of complex and widely dispersed organizations. These SOPs are routine in nature and are designed so that typical situations in the past may inhibit policy change because they are incompatible with new situations or programs.

INAPORTNET is a system that facilitates service users, in the practice of implementing Inaportnet requires a stable and strong network connection so that there is no delay or interruption when the data input process in the clearance process takes place, due to weak internet network connections. Inaportnet is neutral in the sense that it is impartial, the system can only be accessed according to the interests of the user because each user has a different password and id. Operational definitions used in Inaportnet Inaportnet services can be accessed through www.portal.inaportnet.com. In the portal users can find out the operational definitions in the port.

The issuance of SPB (Sailing Approval Letter) is a process carried out by the Syahbandar for ships that will sail leaving the port to ensure that the ship, crew and cargo technically administratively meet the requirements of safety and security of shipping and protection of the maritime environment, the requirements of safety and security of shipping are a condition of fulfillment of safety and security

requirements concerning transportation in port waters and the maritime environment in accordance with the decision of the minister of transportation Number KM 01 Year 2010.

5. Communication between Ship Safety and Watchkeeping Organizations

The process of transferring news down within an organization or from one organization to another, and to other communicators, is often subject to distortion whether intentional or not. If different sources of communication can give inconsistent interpretations of a standard or goal, or the same source of information gives conflicting interpretations, then at some point the policy implementer will find it more difficult to carry out an intensive policy. Thus, the prospect of effective policy implementation is largely determined by communication to policy implementers accurately and consistently (accuracy and consistency). In addition, coordination is also a powerful mechanism in policy implementation. The better the communication coordination between the parties involved in policy implementation, the smaller the error will be, and vice versa.

The level of shipping safety can also be influenced by the factor of communication systems between ships to ports, ports to ships, or between ships to ships. communication systems are those that help ships to overcome difficulties in communication, in terms of exchanging ID, position, speed and other vital data with nearby ships or port stations through a standardized tran-ponder system. communication tools are all media used to disseminate or convey information, be it information to one person or to many people. This communication tool not only conveys information but also generates information. According to Government Regulation Number 5 of 2010 concerning Kenavigasaaian, Shipping Telecommunications is a special telecommunication for the purposes of shipping services which is any transmitting, sending or receiving any type of sign, image, sound and information in any form through wire systems, optical, radio, or other electromagnetic systems in mobile services- shipping which is part of shipping safety.

The division of communication systems based on the physical medium used can be grouped into two types, namely communication systems in the form of cables and wireless. Wireless communication systems use radio frequencies or radio waves as an information carrier medium or better known as radio communication systems. Radio communication systems are useful as a means of navigational aids to enable ships to make economical voyages, because without this radio communication system the ship must make detour voyages to avoid navigation hazards. Radio communication systems can also be interpreted as communication systems that do not use wires in the propagation process but use air or space as an introduction.

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

The latest technology of ship communication systems at sea is called

Automatic Identification System (AIS). AIS as one of the technologies to detect the position of ships already exists and is implemented on ships that are at least 300 GT (Gross Tonnage) for all ships traveling internationally and 500 GT for those traveling nationally. This system helps ships to overcome difficulties in communication, with this technology port authorities can know the type of ship, ship size, ship name, call sign, and can see dynamic data such as ship coordinates, ship direction, speed and time. Data exchange by AIS occurs automatically to monitor the movement patterns of ships that pass through the area and arrive clearly at the destination.

The concept of AIS was determined by a Swede named Hakan Lans in the mid-1980s with his spontaneous genius technique, announced as a communication tool that uses a large number of responder transmitters to transmit data quickly over radio channels through synchronization of data transmission according to a predetermined standard time. AIS is designed in operations including: 1) Ship-to-ship information to avoid collisions; 2) Information about ships and cargo when entering coastal areas; 3) Traffic regulation tools integrated with VTS (Vessel Traffic System). Therefore, seeing the importance of the duties and supervision of the Kesyahbandaran Office and Port Authority to support the orderly administration of shipping and safety, cooperation between related parties is needed to work hand in hand in carrying out their duties. So that there is safety and security in sea transportation shipping waters in Indonesia.

6. Economic, Social and Political Conditions Ship Safety and Ship Manning

The last thing that needs to be considered to assess implementation performance is the extent to which the external environment contributes to the success of public policies. A non-conducive social, economic and political environment can be a source of problems from the failure of policy implementation performance. Therefore, policy implementation efforts require conducive external environmental conditions. Understanding policy implementation as actions taken by individuals or groups of government or private sector that are directed at achieving the objectives set out in previous policy decisions. These actions include efforts to transform decisions into operational actions within a certain period of time as well as in order to continue efforts to achieve major and minor changes set by policy decisions from the various opinions above, it can be drawn a common thread that policy implementation is an activity to carry out policies, aimed at target groups, to realize policy objectives.

According to the IMO (International Maritime Organization) Maritime Safety Committee, the International Ship and Port Facility Security Code (ISPS Code) is a

comprehensive code of measures to enhance the security of ships and port facilities. Basically, the code uses a risk management approach to ensure the security of ships and port facilities and to determine what security measures are appropriate, a risk assessment must be carried out in each specific case. The purpose of the code is to provide a standardized, consistent framework for evaluating risk, enabling governments to compensate for changing threats by changing the vulnerability of ships and port facilities through the determination of appropriate levels of security measures.

Factors that hinder Syahbandar's supervision in an effort to realize the safety, security and order of passengers at the Port Socio-cultural factors, namely the inherent culture of reluctance among syahbandar officials and the public so that if they are familiar then security checks on passengers are sometimes ignored. In addition, the behavior of some people who do not carry out the rules properly results in a situation at the passenger terminal that is difficult to control. Technical factors, namely the availability of inspection facilities such as metal detectors there is only one piece. The performance of a handful of unscrupulous Syahbandar supervisory employees in an effort to realize safety, security and order. International Safety Management Code (ISM code) as an international safety management regulation for the security and safety of ship operations and prevention of pollution of the marine environment established by the International Maritime Organization (IMO) which is still possible to be amended. The ISM code is a product of the IMO which was finally adopted by SOLAS in 1994. The ISM Code is a standard safety management system for the safe operation of ships and for the prevention of pollution at sea. In essence, the ISM Code aims to ensure safety at sea, prevent accidents or deaths, and also prevent damage to the environment and ships.

CONCLUSION

Based on the results of research conducted by researchers through observation, interviews, and documentation related to the problems in the study, it can be concluded that:

- 1) Implementation of the Minister of Transportation Regulation No. 65 of 2009 concerning Indonesian-flagged Non-Convention Ships at the Tanjung Perak Main Shipyard Office in Surabaya runs in accordance with applicable regulations, it's just that there are problems of technical factors in its application in Inter-Organizational Communication of Ship Safety and Manning and Economic, Social and Political Conditions of Ship Safety and Ship Manning.
- 2) Supporting and Inhibiting Factors for the Implementation of the Policy of the Minister of Transportation Regulation No. 65 of 2009 concerning Indonesian-flagged Non-Convention Ships at the Tanjung Perak Main Shipyard Office in Surabaya for supporting factors there are

Agus Rusdiyanto et al, Policy Implementation of the Regulation of the Minister of Transportation Number 65 of 2009 Concerning Indonesian-Flagged Non-Convention Vessels in the Main Harbor Office Tanjung Perak Surabaya

Standards and objectives of the sea transportation system in Indonesia using the minimum Safe Manning Document reference and for inhibiting factors there is still misleading for the application of Regulations in the field and about contradictory Central Government and Local Government regulations or the absence of synergy in their Implementation.

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