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LEGAL SUPERVISION OF THE IMPLEMENTATION OF THE OSS-RBA BUSINESS LICENSING SYSTEM IN SPECIAL ECONOMIC ZONES

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A B S T R A C T

This study aims to analyze the implementation of legal supervision over the risk-based Online Single Submission (OSS-RBA) business licensing system in Special Economic Zones (SEZs) and to identify the synchronization of supervisory authority among SEZ Administrators, the Central Government, and Local Governments. The method employed in this study is normative legal research using statute and conceptual approaches. Secondary data, comprising primary legal materials—specifically Law No. 6 of 2023 on Job Creation, Government Regulation No. 5 of 2021, and Government Regulation No. 40 of 2021—were comprehensively analyzed using qualitative methods. The results indicate that the implementation of OSS-RBA licensing supervision in SEZs continues to face obstacles regarding overlapping operational authority. There is a potential normative conflict between the mandate for independent service and supervision by SEZ Administrators under Government Regulation No. 40 of 2021, and the obligation for cross-sectoral coordinated supervision stipulated in Government Regulation No. 5 of 2021. Furthermore, the administrative law paradigm shift from *ex-ante* to *ex-post control* has not been sufficiently supported by the maturity of the digital supervisory subsystem. Technically, SEZ Administrators do not yet possess adequate digital authority (role access) within the OSS subsystem to impose administrative sanctions independently. To ensure legal certainty and the effectiveness of the ease of doing business, regulatory harmonization that explicitly delineates sectoral jurisdictions is required, along with the strengthening of system integration that grants proportional supervisory autonomy to SEZ Administrators.

INTRODUCTION

The transformation of the licensing architecture in Indonesia following the enactment of the Job Creation Law has drastically shifted the supervisory approach from *ex-ante* (pre-audit control) to *ex-post* (field-based supervision) (Syirazi Neyasyah et al., 2026). Empirical data from the Ministry of Investment/BKPM indicates that since the implementation of the Online Single Submission Risk-Based Approach (OSS-RBA) system, millions of Business Identification Numbers (*Nomor Induk Berusaha* / NIB) for low and medium-low risk business activities have been issued automatically without requiring preliminary document verification. However, this licensing relaxation has generated administrative friction and residuals at the operational level (Cahyaningtyas, 2022).

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Based on a preliminary study conducted in the Gresik Special Economic Zone (SEZ), East Java as one of the labor-intensive and manufacturing SEZs experiencing massive investment growth potential bottlenecks were identified regarding the execution of administrative sanctions and jurisdictional ambiguities upon the occurrence of spatial planning or environmental violations by business actors. This phenomenon is triggered by a contradictory authority architecture: whereas the OSS-RBA supervision is designed to be centralized and mandates cross-sectoral coordination pursuant to Government Regulation Number 5 of 2021 concerning Risk-Based Business Licensing, SEZs adhere to the principle of *lex specialis* governance which vests the mandate of autonomous public services and independent supervision solely in the SEZ Administrator pursuant to Government Regulation Number 40 of 2021 concerning Special Economic Zones.

The discourse surrounding the OSS-RBA policy and the institutional framework of Special Economic Zones (SEZs) has been extensively examined within administrative and investment law literature. Current state-of-the-art research predominantly highlights the OSS-RBA issue through the lens of jurisdictional contestation between the Central Government and Regional Governments. Research by Nisrina et al. (2026) reveals that the centralization and automation of risk-based licensing via the OSS-RBA practically diminishes the authority and control functions at the regency/municipality level due to the inadequacy of local supervisory infrastructure. On the other hand, literature examining special zones such as the comparative study by Habibi et al. (2025) entitled *"The Strategic Role of Administrators in Managing Regulations and Investment Facilities in the Mandalika Special Economic Zone"*, the research by Trisniati et al. (2022) entitled *"Collaborative Governance in the Development of Special Economic Zones"*, and the study by Triana et al. (2024) entitled *"Legal Certainty in Capital Investment in Special Economic Zones from an Investor's Perspective"* generally dissects the governance of the SEZ Administrator's institutional autonomy and the efficacy of fiscal incentives (such as tax holidays) in stimulating Foreign Direct Investment (FDI). However, these studies entirely fail to correlate these elements with the readiness of the digital legal supervisory instruments that bind the zones.

Despite the abundance of research addressing the issues of OSS-RBA and SEZ governance, a profound research gap remains. Previous studies have yet to dissect the intersection between the algorithmic digital supervisory subsystem of the OSS-RBA and the *lex specialis* authority construction of the SEZ Administrator. Existing literature is strictly confined to evaluating general licensing within standard regional autonomous territories. Consequently, there is an urgent need to empirically and normatively examine how digital supervisory access rights (*role access*) within the OSS-RBA system are distributed in jurisdictions with special zone status, considering that the law explicitly grants the SEZ Administrator full, independent authority. The failure to synchronize this digital subsystem not only engenders conventional overlapping jurisdictions with technical ministries but also creates a legal vacuum (*vacuum of law*) that rogue business actors could potentially exploit to evade post-issuance legal compliance.

Departing from this gap, this research aims to critically analyze the implementation of legal supervision concerning the OSS-RBA business licensing system within the Special Economic Zone territory, as well as to formulate a resolution to the jurisdictional conflicts among the SEZ Administrator, Regional Governments, and the Central Government. The novelty of this research lies in synthesizing the State Administrative Law approach with the architectural analysis of e-government (operational cyber law), thereby proposing a novel legal construction formulated as the "Integrated Supervisory Authority Distribution Model." This model fully accommodates the institutional independence of SEZs within the national digital licensing ecosystem.

METHODE

This research constitutes normative juridical legal research (doctrinal legal research), which examines legal principles, statutory synchronization, and the concepts of state administrative law. This design was selected because the crux of the problem lies at the level of *law in books*, namely the potential for antinomy (conflict of norms) between the centralized sectoral supervisory architecture and the autonomy of the special zone. This study employs two primary approaches: the statute approach, to dissect the hierarchy and synchronization of regulations pertaining to the OSS-RBA and SEZs; and the conceptual approach, to analyze the paradigm shift of *ex-post* supervision in government administration.

Research Targets (Sources of Legal Materials) In normative legal research, the research targets do not utilize human populations and samples, but rather rely on legal materials, with the Gresik Special Economic Zone (SEZ) in East Java serving as the contextual locus and prescriptive case study. The legal materials utilized encompass the following:

1. Primary Legal Materials: Binding laws and regulations, comprising Law Number 6 of 2023 concerning Job Creation, Government Regulation Number 5 of 2021 concerning Risk-Based Business Licensing, Government Regulation Number 40 of 2021 concerning Special Economic Zones, and zone-specific regulations, namely Government Regulation Number 71 of 2021 concerning the Designation of the Gresik Special Economic Zone.
2. Secondary Legal Materials: Academic literature, reputable scientific journals, institutional reports, and policy documents on the governance of the Gresik SEZ that are relevant to the issues of overlapping jurisdictions and digital system integration.
3. Tertiary Legal Materials: Legal dictionaries and encyclopedias that provide explanations for technical terms in administrative law.

Data Collection Techniques and Instrument Development Data collection was conducted through library research and documentary study. The researchers performed a systematic review

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of laws and regulations, judicial decisions, and literature detailing the jurisdictional relations among the SEZ Administrator, Regional Governments, and the Central Government. The research instrument was developed in the form of a legal inventory and synchronization matrix. This matrix functions to map and juxtapose the statutory provisions governing sectoral supervisory authority within the OSS-RBA ecosystem against the *lex specialis* rights and provisions of the SEZ Administrator (specifically the authority of the Gresik SEZ Administrator pursuant to its zone profile documents), thereby identifying legal loopholes, normative gaps, or statutory conflicts.

Data Analysis Techniques The collected legal materials were analyzed using a qualitative-normative approach and are prescriptive in nature. The analytical technique employs deductive reasoning, drawing conclusions from a major premise (principles of administrative law and general statutory provisions) to a minor premise (the normative reality of the OSS-RBA system integration in the Gresik SEZ). This process involves legal interpretation, specifically systematic and grammatical interpretations, to elucidate the meaning of conflicting statutory provisions. The analytical results were subsequently argumentatively constructed to formulate a legal harmonization model capable of ensuring the legal certainty of supervisory autonomy for the SEZ Administrator within the national digital architecture.

RESULT AND DISCUSSION

1. Legal Construction and Reality of OSS-RBA Supervision in Special Economic Zones

The legal architecture of licensing in Indonesia has undergone a fundamental reorientation following the enactment of Law No. 6 of 2023 on Job Creation (Hakim, 2023). The primary philosophy of this transformation rests upon the reform of a risk-based licensing system (*Risk-Based Approach*), which bears direct implications for the model of legal certainty in Indonesia (Kartimin et al., 2026). Through Government Regulation (*Peraturan Pemerintah* / PP) No. 5 of 2021, the state overhauled its administrative control strategy. Supervision, which previously focused heavily on stringent pre-issuance compliance (*ex-ante*), has been relaxed into post-issuance field supervision (*ex-post*). The implementation of this Online Single Submission (OSS) system was engineered as an instrument to streamline bureaucratic licensing procedures and accelerate investment rates (Badawi & Wedhatami, 2025). At low and medium-low risk levels, the system automatically issues a Business Identification Number (*Nomor Induk Berusaha* / NIB) as a single legal identity without requiring prior manual verification.

Regarding the *Lex Specialis* Mandate of the SEZ Administrator, within the landscape of investment governance, Special Economic Zones (SEZs) are designed as *lex specialis* jurisdictions exempted from conventional bureaucratic bottlenecks. The existence of the SEZ Administrator plays a highly strategic role in managing regulations, licensing, and delivering integrated investment facilities within the zone (Habibi et al., 2025). Pursuant to PP No. 40 of 2021 concerning SEZ Governance, the government autonomously delegates authority. Articles 146 through 149 reinforce that the administration of business licensing, other permits, and supervisory functions within the SEZ locus are executed independently by the SEZ Administrator. This legal construction ideally establishes the Administrator as a single governmental entity (*a one-stop autonomous body*) to guarantee service speed and certainty for zone tenants and investors.

Although this regulatory framework conceptually aims to truncate bureaucratic chains, the implementation of the OSS-RBA digital licensing system paradoxically generates administrative and structural friction in practice. The contribution of administrative law to public service reform in the digital era ought to foster legal certainty (Olii & Ekwanto, 2024), however, the current algorithmic architecture of OSS-RBA is not fully integrated with the principles of SEZ autonomy. In practice, the implementation of OSS at the regional level frequently encounters technical impediments and severs coordination lines with local government apparatuses (Khanna et al., 2024). The digital OSS-RBA system is currently engineered with a centralistic logic that automatically distributes supervisory notifications (*role access*) to central line ministries/agencies or regional technical departments, rather than directly to the SEZ Administrator.

The implementation of supervision, as a critical facet of law enforcement principles, encounters significant impediments due to regulatory misalignment. *De jure*, the SEZ Administrator is invested with a *lex specialis* mandate to supervise and enforce regulations under Government Regulation No. 40 of 2021 concerning the Implementation of Special Economic Zones. *De facto*, however, its authority is circumscribed due to the absence of adequate executory access rights (*role access*) within the OSS-RBA supervisory dashboard established by Government Regulation No. 5 of 2021 concerning Risk-Based Business Licensing.

Articles 146 and 147 of PP No. 40 of 2021 mandate a full delegation of authority effectively interpreted as a "severance of ties with parent institutions" to the SEZ Administrator. Conversely, Articles 215 and 222 of PP No. 5 of 2021 stipulate that supervisory functions must still engage technical ministries/agencies and regional government bodies. Furthermore, regarding digital system control, Article 211 Paragraph (2) of PP No. 5 of 2021 establishes that supervision is "executed through the Supervision subsystem within the OSS System," which constitutes the core of this digital anomaly (*de facto*). Within the OSS-RBA technological ecosystem managed by the central Ministry of Investment/BKPM, violation notification algorithms which trigger inspections and the execution of administrative fines or license revocations are automatically dispatched to relevant central ministries or regional departments based on Indonesia Standard Industrial Classification (KBLI) codes, rather than being granted exclusively to the SEZ Administrator's dashboard.

This condition aligns with the premise that administrative law reform in the digital government era continues to pose crucial challenges regarding the weak integration of legal values with operational transparency principles in electronic government systems (Maligi & Ramadhani, 2026). Consequently, when spatial planning or environmental standard violations occur among business actors within an SEZ, it produces both jurisdictional overlapping and an enforcement vacuum (*vacuum of law*). Regional technical departments hesitate to take enforcement action out of deference to the zone's autonomous authority, while the SEZ Administrator remains constrained by the absence of digital supervisory access instruments required to impose administrative sanctions directly through the system.

2. Anatomy of a Conflict of Authority: Clash of Norms and Legal Vacuum

The jurisdictional conflict between the Special Economic Zone (SEZ) Administrator and technical agencies (both central and regional) stems from the clash of two regulations operating under contradictory paradigms. Doctrinally, the governance of SEZs relies on the legal maxim *lex specialis derogat legi generali*. Government Regulation No. 40 of 2021 was essentially designed to truncate traditional bureaucratic chains through the delegation of absolute authority to the SEZ Administrator as the sole territorial authority (Atmanto, 2020). However, the enactment of Government Regulation No. 5 of 2021 concerning Risk-Based Business Licensing (OSS-RBA) introduced a universal regime of digital centralization that, in principle, binds all supervisory entities. This condition triggers an administrative law anomaly, wherein a territorial-based autonomous mandate directly clashes with a standardized and rigid information system architecture (Marbun, 2022).

Table 1. Analysis of Norm Clash

Analytical Dimension	SEZ Governance Framework (Government Regulation No. 40 of 2021)	OSS-RBA Governance Framework (Government Regulation No. 5 of 2021)	Legal Conflicts & Operational Implications on the Ground
Legal Statutory Basis (Articles)	Articles 146, 147, and 151	Articles 211, 215, and 222	Direct conflict of administrative law norms regarding the designated supervisory subject.
Nature of Authority	Autonomous and Fully Decentralized (Lex Specialis).	Centralized and Hierarchically Distributed (Lex Generalis).	Jurisdictional overlap between the absolute mandate of the SEZ Administrator and external technical line agencies.
Supervisory Executing Entities	Exclusively and independently executed by the SEZ Administrator (receiving full delegation from Ministers, Governors, or Regents).	Jointly executed by Ministries/Agencies, Provincial/Regency Technical Agencies, and the SEZ Administrator.	Jurisdictional ambiguity: Regional technical agencies are reluctant to intervene within SEZ boundaries, yet OSS-RBA system rules continuously require their involvement.
Digital Executorial	De jure possesses full authority to independently enforce compliance and	Supervisory role access within the IT system (OSS Dashboard) is mapped to	Legal Vacuum (Vacuum of Law): The SEZ Administrator lacks digital access rights

Instruments (De Facto)	impose administrative sanctions.	Ministries/Agencies based on KBLI classification.	(execution toggles) within the system to enforce sanctions electronically.
Scope & Focus of Supervision	Legal certainty and investment acceleration exclusively within the territorial boundaries of the SEZ.	National risk-based monitoring of business activity standards (e.g., spatial planning, environmental compliance).	Business entities within the SEZ risk escaping administrative sanctions due to a digital bureaucratic impasse between SEZ Administrators and Regional Agencies.

Pursuant to the comparative regulatory matrix outlined above, the authority vested in the SEZ Administrator is *de facto* diminished within the OSS-RBA supervisory subsystem. The system algorithm mapping role access for oversight and supervision is entirely structured around the nomenclature of the Indonesian Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* / KBLI). This design automatically dispatches violation notifications to central line Ministries/Agencies or Regional Apparatus Organizations (*Organisasi Perangkat Daerah* / OPD), rather than to the SEZ Administrator's dashboard (Cahyaningtyas, 2022). The absence of high-level executory access rights (*super-admin privileges*) at the SEZ level eliminates the Administrator's capacity to independently upload electronic Inspection Reports (*Berita Acara Pemeriksaan* / e-BAP), suspend Business Identification Numbers (*Nomor Induk Berusaha* / NIB), or process license revocations. Crucially, this dynamic manifests as both a conflict of norms (*conflictus normarum*) and a legal vacuum (*vacuum of law*).

Furthermore, this deficit in digital regulatory instruments culminates in operational executorial paralysis on the ground. A sharp asymmetry exists between physical authority and digital instruments: while the SEZ Administrator possesses factual supervisory insights on the ground, it remains constrained by systemic restrictions; conversely, regional agencies holding system authority are often reluctant to intervene within SEZ territorial boundaries to avert jurisdictional friction. This situation corroborates that the administrative transition from paper-based to platform-based governance within the OSS-RBA system has not been accompanied by comprehensive legal engineering, thereby posing a significant risk of creating loopholes of impunity for tenants or business entities violating operational standards within the SEZ.

3. Regulatory Authenticity and Legal Legitimacy of the Region: A Case Study of Government Regulation Number 71 of 2021 concerning the Gresik Special Economic Zone

As an academic foundation to unravel the nexus between the legal establishment of an autonomous zone and the implementation of OSS-RBA licensing supervision, an authenticity analysis of the specific legal instrument creating the Special Economic Zone (SEZ) is imperative. In this discourse, the primary legal document under analysis is Government Regulation (*Peraturan Pemerintah* / PP) Number 71 of 2021 concerning the Gresik Special Economic Zone. This authenticity analysis is crucial to ensure that the *lex specialis* authority inherent to the zone possesses an indisputable legal-formal foundation, which theoretically aligns with the principle of absolute delegation of authority to the SEZ Administrator to truncate traditional bureaucratic chains (Atmanto, 2020).

Formally, the authenticity of PP Number 71 of 2021 is conclusively verifiable through the state administrative legalization attributes attached to the document. This regulation was officially enacted in Jakarta on June 28, 2021, by the President of the Republic of Indonesia, Joko Widodo, and promulgated on the same day by the Minister of Law and Human Rights of the Republic of Indonesia, Yasonna H. Laoly. Furthermore, the official copy of this legal document underwent an authentication process by the Ministry of the State Secretariat of the Republic of Indonesia, as evidenced by the attestation of the Deputy for Legislation and Legal Administration. This formal validity delivers legal certainty which, according to Kartimin et al. (2026), constitutes a direct implication of the risk-based licensing philosophy establishing that the creation of the Gresik SEZ is a nationally valid product of executive legislation.

Materially, this regulation legally legitimizes the territorial delineation of the Gresik SEZ spanning 2,167 (two thousand one hundred and sixty-seven) hectares located in Manyar District, Gresik Regency, East Java Province. The document locks in the zoning designations to accommodate strategic business clusters, encompassing production and processing; logistics and distribution; research, digital economy, and technology development; as well as energy development. The complexity of these high-value business activities corroborates the arguments of Habibi et al. (2025) regarding the vital and strategic role of the SEZ Administrator in managing investment facilities, while simultaneously reflecting the objective of bureaucratic simplification to spur investment as emphasized by Badawi & Wedhatami (2025).

In essence, the authenticity of the Gresik SEZ legal document gives rise to a critical supervisory problem within the OSS-RBA framework, stemming from the strict statutory deadlines mandated by the state. Articles 5 and 6 of the regulation obligate the designation of a development and management entity within a maximum of 30 (thirty) days and impose a legal duty to complete operational development within a maximum of 36 (thirty-six) months from the promulgation of the regulation. These stringent deadlines, compounded by the industrial complexity (such as high-tech manufacturing) within the Gresik SEZ, necessitate the presence of a highly responsive digital supervisory instrument.

However, turning to the findings of administrative law anomalies, the authenticity and authoritative power guaranteed by Government Regulation Number 71 of 2021 are vulnerable to disruption. While the exclusive rights of the zone are *de jure* validated through an authentic state legal document, their technological execution remains *de facto* constrained by the centralized architecture of the OSS-RBA. This condition reinforces the analysis of Marbun (2025) and Maligi & Ramadhani (2026), demonstrating that current electronic government (e-government) systems remain deficient in integrating the legal principles of territorial decentralization, thereby causing the legitimate authority of the Gresik SEZ Administrator to be diminished by rigid information system algorithms.

4. Legal Reconstruction: Integrated Supervisory Authority Distribution Model in the OSS-RBA Ecosystem

The impasse in policy implementation stems from the clash between the principle of physical zonal autonomy and the centralization of digital systems. This condition demands a resolution extending beyond conventional legal interpretation approaches. The transformation of licensing regulations carries significant legal implications for administrative governance in Indonesia (Nursidi, 2023). The epistemological gap between spatial-based regulation and sectoral-based digital system implementation necessitates a dual reconstruction. This reconstruction encompasses legal harmonization at the level of state administrative law dogmatics and the development of system interoperability within the electronic government (e-government) governance architecture (Riziq & Hotijah, 2025).

Doctrinally, a legal anomaly arises when the supremacy of the maxim *lex specialis derogat legi generali* the bedrock of Special Economic Zones (SEZs) is diminished by a vacuum of procedural norms within the electronic system. Given that Government Regulation (*Peraturan Pemerintah* / PP) Number 40 of 2021 concerning SEZ Governance and PP Number 5 of 2021 concerning Risk-Based Business Licensing hold equal hierarchical status, resolving this jurisdictional conflict cannot be achieved through mechanisms of annulment. In essence, the development of the public service system under the Online Single Submission Risk-Based Approach (OSS-RBA) regime was intended to streamline licensing instruments following the enactment of the Job Creation Law (Hamdani et al., 2023). However, to prevent such simplification from eroding zonal autonomy, comprehensive legal harmonization is required to guarantee risk-based licensing certainty, including the accommodation of green investment frameworks within the OSS-RBA system (Nisrina et al., 2026; Trisniati et al., 2022).

As a constitutional recourse, the central government must formulate a bridging regulation. This secondary regulation serves a strategic function to:

- Establish a framework for collaborative governance within SEZ administration, enabling central and regional authorities to synergistically delegate comprehensive supervisory authority into a single zonal window (Praise et al., 2022; Trisniati et al., 2022).
- Affirm the delegation of attributive authority and executorial mandates to the SEZ Administrator, thereby validating its status as a single authority *de jure* and rendering it operationally functional *de facto*.

4.1. System Architecture Engineering: Implementation of Geographical-KBLI Routing and Role-Based Access Control (RBAC)

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The fundamental root of the executorial paralysis experienced by SEZ Administrators lies in the risk-based licensing reform architecture derived from Government Regulation Number 5 of 2021 (Praise et al., 2022). The supervisory design within this system exclusively relies on a single parameter the Indonesian Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* / KBLI) thereby engendering complex structural challenges during the implementation phase of investment mechanisms within SEZ jurisdictions (Salsabila et al., 2025). By ignoring spatial and territorial variables, this design triggers jurisdictional overlaps with technical line agencies outside the zone. To address these deficiencies while maintaining the integrity of integrated licensing within a sustainable development framework (Pratama & Suardita, 2025), the OSS-RBA subsystem architecture must be re-engineered into a hybrid model, termed Geographical-KBLI Routing.

- Spatial Geofencing Integration: The OSS-RBA system must imperatively incorporate geofencing technology linked to the geographic coordinate parameters of SEZs. Upon detecting that an investment domicile coordinate lies within the zone's territorial delineation boundaries (such as the Gresik SEZ), the system algorithm will automatically bypass regional technical agencies and directly route the supervisory workload to the SEZ Administrator's dashboard.
- Modification of Role-Based Access Control (RBAC): SEZ Administrators must be granted full digital capabilities (*super-admin privileges*) to autonomously execute system-based administrative enforcement actions ranging from uploading electronic Inspection Reports (*Berita Acara Pemeriksaan* / e-BAP) to suspending Business Identification Numbers (*Nomor Induk Berusaha* / NIB) without requiring external authorization.

4.2. Restoration of Legal Certainty and Teleological Implications for the Investment Climate

Ultimately, this techno-legal reconstruction culminates in a crucial endeavor to restore the essential role of legal principles in realizing the philosophical objectives of business licensing (Erlina & Krisnanto, 2022). The OSS-RBA technology must be transformed from a mere instrument of centralist control into a service catalyst adaptive to the prerogatives of special zones. Such precise inter-systemic integration serves as a primary instrument in guaranteeing justice, legal certainty, and socio-economic utility within the implementation of electronically integrated services (Wicaksono, 2021).

In turn, the synergy forged between the legal-formal authenticity of zonal regulations and the flexibility of digital infrastructure will simultaneously restore legal certainty for business entities in acquiring business licenses (Mayasari, 2025). This condition of legal certainty constitutes a paramount variable in mitigating business climate risks and securing investor confidence (Triana et al., 2024), directly accelerating the absorption of investment capital within Special Economic Zones.

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CONCLUSSION

Based on the foregoing analysis of regulatory authenticity and the structural clashes in supervisory architecture, this study concludes that the executorial paralysis experienced by Special Economic Zone (SEZ) Administrators stems from a fundamental misalignment between the principle of physical territorial autonomy and the centralization of digital instruments. The authentic *lex specialis* mandate conferred upon the Administrator as legally validated through Government Regulation (*Peraturan Pemerintah* / PP) Number 71 of 2021 concerning the Gresik SEZ and PP Number 40 of 2021 is *de facto* diminished by the rigidity of electronic governance under the Online Single Submission Risk-Based Approach (OSS-RBA) framework derived from PP Number 5 of 2021. Furthermore, the reliance on the Indonesian Standard Industrial Classification (*Klasifikasi Baku Lapangan Usaha Indonesia* / KBLI) as a single variable within the OSS-RBA algorithm, devoid of spatial parameters, creates jurisdictional overlaps that undermine the foundational philosophy of zonal decentralization.

To resolve these administrative law anomalies, this study recommends a dual reconstruction approach encompassing legal harmonization and technological engineering:

1. At the Juridical Level: The central government is urgently called upon to formulate a bridging regulation in the form of a Ministerial Regulation or a Joint Circular Letter (*Surat Edaran Bersama* / SEB). This regulation is crucial to provide legal standing for supervisory procedural exemptions within SEZs, thereby restoring the absolute authority of the SEZ Administrator without invoking mechanisms to invalidate equal-tier statutory regulations.
2. At the Technological Level: The OSS-RBA system must imperatively adopt a hybrid architecture through the implementation of Geographical-KBLI Routing. By integrating spatial geofencing technology into the territorial boundary polygons of the zones and granting *super-admin privileges* to SEZ Administrators, the system can automatically delegate supervisory workloads autonomously and in real-time.

The synergy between bridging regulations and digital interoperability constitutes an absolute prerequisite for restoring justice, utility, and legal certainty within the business licensing regime. Transforming the OSS-RBA system from a centralist bureaucratic apparatus into an adaptive executorial catalyst will ultimately reduce bureaucratic transaction costs, elevate collaborative governance, and accelerate the realization of global investment within Special Economic Zones.

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