

# ANALYSIS OF STAKEHOLDER ROLES ON THE IMPLEMENTATION OF ENVIRONMENTAL MANAGEMENT SYSTEM IN MANYAR SUB-DISTRICT

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## ABSTRACT

*Manyar District is an area with highly diverse land functions, ranging from urban support zones to industrial areas and special economic zones (SEZs). The complexity of these land functions makes Manyar District one of the areas with particularly concerning environmental conditions. Therefore, a well-implemented environmental management system is crucial in this area. However, to assess the implementation of the environmental management system, it is essential to first understand its institutional framework. This study aims to analyze the roles of stakeholders on implementing EMS in Manyar District. The research will employ a qualitative deductive approach with an overall descriptive method. Interviews with relevant stakeholders will serve as the primary source of data. The findings of the research indicate the involvement of seven stakeholders: (1) Environmental Agency; (2) Regional Planning Agency (BAPPEDA); (3) Health Agency; (4) Trade and Industrial Agency (DISKOPERINDAG); (5) Public Works and Spatial Planning Agency (Dinas PUTR); (6) Sub-District Government; and (7) Village Government. Among these stakeholders, the Health Department and DISKOPERINDAG are not involved at all. Regarding their roles in the five aspects of environmental management systems, they generally cover all aspects except for management review, which has not been implemented as the system has not yet reached the five-year mark.*

**Keyword** : Manyar district; stakeholder; role

## ABSTRAK

*Kecamatan Manyar merupakan sebuah kawasan dengan fungsi lahan yang sangat tinggi. Mulai dari kawasan perkotaan pendukung kawasan inti, kawasan peruntukan industri, hingga kawasan ekonomi khusus (KEK). Fungsi lahan yang sangat kompleks tersebut, menjadikan Kecamatan Manyar sebagai salah satu kawasan dengan kondisi lingkungan yang sangat memprihatinkan. Sebuah pola penerapan sistem manajemen yang baik, tentu sangat dibutuhkan di kawasan tersebut. Namun, untuk mengidentifikasi penerapan sistem manajemen lingkungan, perlu diketahui terlebih dahulu terkait sistem kelembagaannya. Oleh sebab itu, maka penelitian ini akan mengulas terkait analisis peran stakeholder terhadap penerapan sistem manajemen lingkungan yang ada di Kecamatan Manyar. Penelitian ini akan menggunakan pendekatan deduktif kualitatif, dengan metode deskriptif secara keseluruhan. Selain itu, penelitian ini akan menggunakan hasil wawancara kepada stakeholder terkait, sebagai sumber utama data primer. Hasil dari penelitian menunjukkan, bahwa terdapat tujuh stakeholder yang berperan meliputi (1) Dinas Lingkungan Hidup; (2) BAPPEDA; (3) Dinas Kesehatan; (4) DISKOPERINDAG; (5) Dinas PUTR; (6) Pemerintah Kecamatan; dan (7) Pemerintah Desa. Dari ketujuh stakeholder tersebut, terdapat dua stakeholder yang tidak dilibatkan sama sekali yaitu Dinas Kesehatan dan DISKOPERINDAG. Sedangkan, terkait peran terhadap ke lima aspek sistem manajemen lingkungan, secara umum sudah mencakup keseluruhan, terkecuali pada tinjauan manajemen yang belum dilaksanakan, karena penerapan belum mencapai lima tahun.*

**Kata Kunci**: Kecamatan Manyar; stakeholder; peran

## 1. INTRODUCTION

Manyar District is an area located in Gresik Regency, characterized by highly concerning environmental conditions. According to Husna (2018), in her research, the water quality in Manyar District, both seawater and groundwater, does not meet standards. The health aspect of the abiotic water quality tends to be "very poor," primarily due to industrial waste. Other studies on air quality, presented by

Fachrurrozi (2015) and Jatmikko et al. (2019), indicate that the air quality in Manyar District, Gresik Regency, falls far below standards. Ambient air testing results for CO<sub>2</sub> levels in Manyar District exceed the national average, with the highest recorded at 703 ppm in Roomo village. The poor air quality in Manyar District is attributed to several factors such as high air pollution from industries and uncontrolled vehicle emissions. This is understandable considering Manyar District serves as the main

gateway to Gresik Regency, characterized by a high concentration of industries.

There are numerous factors contributing to environmental degradation in Manyar District, one of which is its highly intensive land use. The population density in Manyar District is influenced significantly by Presidential Regulation Number 66 of 2022, which designates Manyar District as a supporting urban area for Surabaya's core region and simultaneously earmarks it as an industrial zone. This designation is further reinforced by Gresik Regent Regulation Number 16 of 2021, detailing the Spatial Planning Plan for the Manyar Bungah region from 2020 to 2040, which specifies Manyar District as an industrial area. Additionally, Government Regulation Number 71 of 2022 designates Manyar District as a Special Economic Zone (SEZ), with four key business activities: (1) processing and production activities; (2) distribution and logistics activities; (3) digital economy, research, and technology activities; and (4) energy development activities. Given the diverse functions in Manyar District, fostering a strong correlation among government, industries, and the community is crucial.

This research aims to comprehensively review the roles of stakeholders in the implementation of environmental management systems in Manyar District. Therefore, this study will adopt the government's perspective as a representation of stakeholders to obtain necessary information. This approach is necessary because efforts in environmental prevention and mitigation must adhere to government policies (Masyrurroh et al., 2021). Furthermore, as stated by Rowa (2021) in his book, environmental issues are a mandatory concern of the government, despite not directly relating to basic services. Another statement by Iryanti (2023) highlights the government's role as the primary controller of environmental aspects, manifested through planning and auditing processes.

According to Strum (1998) as cited in Purwanto (2002), environmental management systems are defined as a part of management focused on the implementation of environmentally conscious policies. Referring to the book "Environmental Management" by Assa and Adrie F. (2021), environmental

management systems are described as a process or a long series aimed primarily at enhancing efficiency and minimizing environmental impacts, both presently and in the future. The book also mentions that an environmental management system is a complex framework involving various parties such as the community, organizations, companies, government, and other stakeholders. Moreover, successful implementation of an Environmental Management System requires strong commitment among all involved parties, ensuring that the system operates effectively and efficiently.

In analyzing the roles of stakeholders or policymakers in implementing an environmental management system in Manyar District, the researcher utilized the stakeholder role variable with sub-variables based on the fundamental theories and concepts of environmental management systems from ISO 14001:2004 / SNI 19-14001-2005 and SNI ISO 14001:2015. Both theories essentially cover similar aspects and are generally interconnected. The sub-variables include (1) General requirements and policies; (2) Planning; (3) Implementation and Operation; (4) Checking; and (5) Management Review. These sub-variables will be compared with interview results from relevant stakeholders, as well as secondary data collected by the researcher.

## 2. DATA DAN METHODS

### 2.1. Research Approach and Methods

The approach used is deductive with a qualitative method. Deductive approach, as described by Suriasumantri (2015) in his book, involves a process or method of reasoning that draws specific conclusions from general statements. Meanwhile, qualitative method is used to examine a phenomenon by constructing a complex picture and reporting findings obtained from all informants, conducted in natural settings (Creswell, 2013). The research employing qualitative method aims to identify roles based on interview results from relevant stakeholders.

### 2.2. Observation Units and Analysis Units

(Moleong, 2018) defines observation units as individuals or entities that function as

informants in detailing the place, conditions, situations, and scope in research. In this study, the observation units are stakeholders or policy makers who are considered to have the most understanding and knowledge related to environmental management systems. The research focuses on Manyar Subdistrict, Gresik Regency, as the research object, with information gathered through literature and aligned with local government offices, subdistrict governments, and several village administrations.

Meanwhile, for analysis units, they refer to the objects or entities in research. These can include individual humans, groups, objects, locations/places, stories or events, and historical records (Hamidi, 2005). In this study, the analysis units are the roles of stakeholders or policymakers in the implementation of existing environmental management systems in Manyar Subdistrict, Gresik Regency.

### 2.3. Methods of Data Collection and Analysis

Research data collection methods are divided into two types: primary data and secondary data. According to Sugiyono (2016), primary data are obtained directly by the researcher, while secondary data are additional data obtained through documents and other sources. The secondary data for this study were generally obtained from relevant government agencies and are detailed in the table below.

**Tabel 1.** Secondary data

No	Data Needs	Format	Source
1	Administrative map of Manyar Subdistrict	Shp	<i>Public Works and Spatial Planning Agency (PUTR)</i>
2	KLHS Manyar-Bungah	Doc	
3	Literature, journals, news, and other documents	Doc	Google, news, and other sources

Sources: Author's Analysis, 2024

For primary data, it will be obtained through interviews with relevant parties and direct field observations. The interviews will be conducted using a semi-structured in-depth interview method, targeting three types of informants: local government officials, subdistrict officials, and village officials. The

interviewees, referred to as stakeholders in this context, are detailed in the table below.

**Tabel 2.** Data of Interviewees/Informants

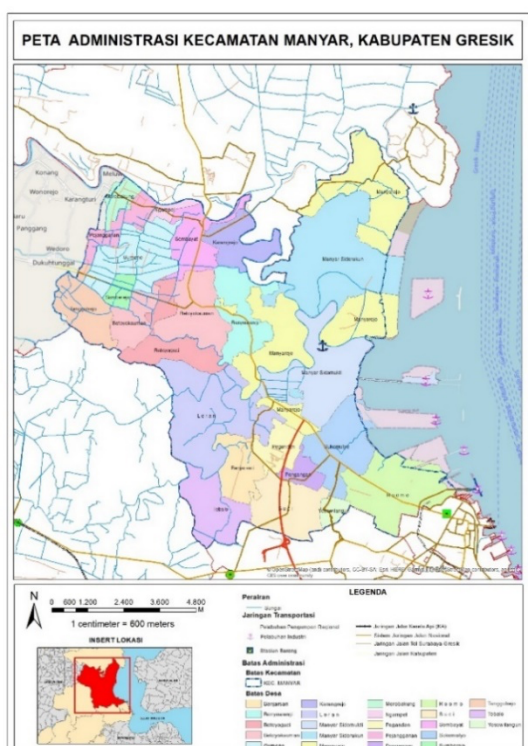
No	Interviewees	Informants	Time
1	The Environmental Agency of Gresik Regency	AM	11/21/2023
2	BAPPEDA of Gresik Regency	DP	12/07/2023
3	The Health Agency of Gresik Regency	TS	12/01/2023
4	DISKOPERINDAG of Gresik Regency	LE	12/01/2023
5	Public Works and Spatial Planning Agency (PUTR) of Gresik Regency	ZN	12/06/2023
6	The Subdistrict Government of Manyar	ZA	12/04/2023
7	The Village Government of Manyarejo	SS	11/20/2023
8	The Village Government of Manyarsidomukti	HS	11/21/2023
9	The Village Government of Sukomulyo	SB	12/06/2023
10	The Village Government of Roomo	AJ	11/21/2023

Sources: Author's Analysis, 2024

The method of analysis is a way to process data into information, so that conclusions can be drawn and understood to find solutions to problems (Abdullah et al., 2022). In this research focusing on the role of stakeholders in the implementation of environmental management systems, a descriptive analysis method will be used comprehensively. According to Sugiyono (2016), descriptive analysis is a statistical method for analyzing data by describing or portraying it clearly and non-manipulatively, not intended for general conclusions. Descriptive analysis is commonly used in research based on phenomena or similar sources. Moreover, the presentation of data in descriptive methods often involves the use of graphs, tables, diagrams, and percentage calculations.

### 2.4. Research Location

The research location is in Manyar Subdistrict, Gresik Regency. According to BPS Gresik Regency 2023, Manyar Subdistrict is administratively bordered as follows: to the north by Bungah Subdistrict, to the east by Gresik Subdistrict and the Madura Strait, to the south by Kebomas Subdistrict, and to the west by Duduksampeyan Subdistrict. Manyar Subdistrict is divided into 23 villages or urban wards, illustrated on the administrative map as follows.



**Gambar 1.** Map of the Subdistrict  
Sources: Author's Analysis, 2024

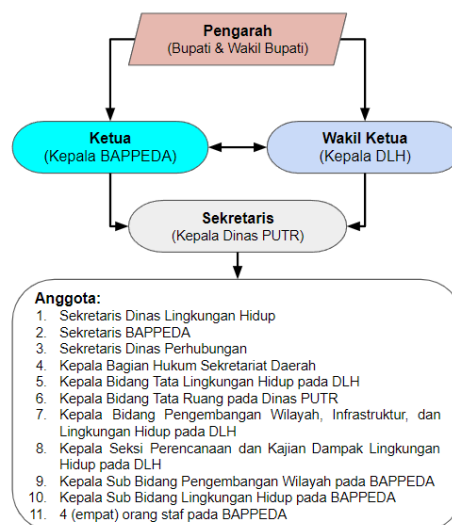
### 3. RESULTS AND DISCUSSION

The Manyar subdistrict, located within the supporting urban area of Surabaya's core zone, also falls under the Special Economic Zone (SEZ), undoubtedly possesses a highly complex institutional structure. The government's role in this area is quite detailed, involving both central and local governments. According to Law number 39 of 2009, the institutional system within the Special Economic Zone (SEZ) is divided into two types: the National Council and the Regional Council. The National Council, as described in the law, is chaired by the Minister of Economy and has roles including (1) drafting SEZ plans; (2) determining general policies; (3)

setting service and infrastructure standards; (4) reviewing SEZ area proposals; (5) recommending SEZ establishment; (6) recommending and assessing potentials; (7) assisting in problem-solving during SEZ implementation, development, and management; and (8) evaluating SEZ sustainability for reporting to the president, up to revoking SEZ status if necessary.

Meanwhile, the Regional Council, as outlined in Law number 39 of 2009, is chaired by the governor with the regent/mayor as their deputy. The Regional Council's roles include (1) implementing established policies; (2) forming an administrator; (3) coordinating, supervising, controlling, and evaluating the administrator in SEZ operations; (4) determining strategic steps in resolving issues during SEZ activities; (5) reporting SEZ management to the National Council; and (6) reporting all issues to the National Council. From these institutional roles, it is evident that the role of the District/City Government within the Special Economic Zone remains quite significant. The law also specifies that the establishment of a Special Economic Zone (SEZ) requires proposals from businesses, district/city governments, or provincial governments, and must be accompanied by environmental documentation.

There is an institutional diagram cited from the Strategic Environmental Assessment (SEA) document of Manyar-Bungah. This diagram represents the roles in the implementation of the environmental management system in Manyar District, Gresik Regency, at present.



**Gambar 2.** Government Roles Coordination

Sumber: KLHS Manyar-Bungah, 2020

From the above diagram, it is known that the agencies involved in environmental management so far include (1) the Regional Development Planning Agency (BAPPEDA); (2) the Environmental Agency; (3) the Public Works and Spatial Planning Agency (PUTR); and (4) the Transportation Agency. However, the roles of the Health Agency and the Trade and Industry Agency (DISKOPERINDAG) do not yet appear to be significant.

Before discussing the roles of each stakeholder in Manyar District, Gresik Regency, there is an indication that the implementation of environmental management system in Manyar District is still relatively early. Serious implementation efforts began around 2020, following substantial investments entering the area. This was stated by the Regional Development Planning Agency (BAPPEDA) of Gresik Regency in the following interview.

*"...Actually, all aspects of the environmental management system have been implemented for a long time. However, it must be acknowledged that the biggest trigger was indeed around 2019 to 2021, when there were massive investments including Freeport. Therefore, during those years, we also optimized the environmental documentation." (DP, Regional Development Planning Agency, Gresik Regency, Dec 7, 2023).*

From the statement by BAPPEDA, it is understood that the implementation of the environmental management system in Manyar District has not yet reached five years. Therefore, there is a possibility that certain stakeholder roles have not been fully implemented or even not implemented at all. The roles of each stakeholder in deeper implementation of the environmental management system are outlined as follows:

### 3.1. The Environmental Agency of Gresik Regency

The role of the Environmental Agency in implementing environmental management systems can be considered highly complex. This role encompasses all aspects of environmental management systems, from general requirements to management reviews. The Environmental Agency itself can be seen as the mastermind behind anything related to

environmental aspects. Moreover, the agency is also responsible for all environmental damage caused by both natural factors and human activities. A statement presented by the Environmental Agency of Gresik Regency during an interview with researchers is as follows:

*"...In essence, everything related to the environment in Gresik Regency, especially in Manyar District, is our responsibility at the Environmental Agency, including the aspect of environmental management systems. So far, we have fulfilled almost all roles, except for management review aspects because the implementation has not yet reached five years." (AM, Environmental Agency of Gresik Regency, 21 Nov 2023).*

Besides the statement above, there is a table illustrating the role of the Environmental Agency on Environmental Management System, outlined in the following table.

**Tabel 3.** The role of Environmental Agency on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	Have a role
	<b>Condition</b>	<b>Implemented</b>
2	Planning	Have a role
	<b>Condition</b>	<b>Implemented</b>
3	Implementation and Operation	Have a role
	<b>Condition</b>	<b>Implemented</b>
4	Checking	Have a role
	<b>Condition</b>	<b>Implemented</b>
5	Management Review	Have a role
	<b>Condition</b>	<b>Not Implemented</b>

Sources: Author's Analysis, 2024

From all the statements and tables above, it can be concluded that the Environmental Agency plays a significant role in implementing the environmental management system in Manyar District, Gresik Regency. This role encompasses all aspects and is generally implemented, except for the management review aspect.

To provide an overview of the Environmental Agency's role in the

environmental management system, we can look at the performance results as follows:

- Strategic Environmental Assessment (SEA) Document for Manyar-Bungah District in 2020;
- Document on Environmental Protection and Management Implementation in 2021;
- Document on Strengthening Climate Change Adaptation and Mitigation Actions in Gresik Regency in 2022;
- Document on Guidelines for Integrating Technical Requirements and Technical Details for Environmental Protection in 2022.

### 3.2. Regional Development Planning, Research, and Development Agency (BAPPEDA) of Gresik Regency

The primary role of the Regional Development Planning, Research, and Development Agency (BAPPEDA) in the Environmental Management System is to assist the Environmental Agency in general requirements and policies. Additionally, BAPPEDA functions in assisting program planning and conducting management reviews to renew existing systems. However, similar to the previous Environmental Agency, management review aspects cannot be implemented due to the system's tenure of less than five years. This was also validated by a statement from BAPPEDA during an interview with researchers.

*"...The primary duties and functions of BAPPEDA in implementing the environmental management system are to assist the Environmental Agency in policy-making, planning, and management reviews. However, at present, management reviews cannot be conducted yet, considering that the implementation started only in 2020 upon the approval of the SEA document." (DP, Regional Development Planning, Research, and Development Agency (BAPPEDA) of Gresik Regency, December 7, 2023).*

As for the role of the Regional Development Planning, Research, and Development Agency (BAPPEDA) in the implementation of the Environmental Management System in Manyar District, it can be seen in Table 4 below.

**Tabel 4.** The role of BAPPEDA on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	Have a role
	<b>Condition</b>	<b>Implemented</b>
2	Planning	Have a role
	<b>Condition</b>	<b>Implemented</b>
3	Implementation and Operation	No Part
	<b>Condition</b>	-
4	Checking	Have a role
	<b>Condition</b>	<b>Implemented</b>
5	Management Review	Have a role
	<b>Condition</b>	<b>Not Implemented</b>

Sources: Author's Analysis, 2024

### 3.3. The Health Agency of Gresik Regency

Referring to Regulation of the Minister of Health of the Republic of Indonesia Number 2 of 2023 concerning Environmental Health, it can be interpreted that the District/City Health Office has guidelines for improving the environment in their respective areas. The regulation also specifies that environmental health is determined in (1) settlements; (2) workplaces; (3) recreational areas; and (4) public facilities.

Meanwhile, for the Health Office of Gresik Regency, so far, a significant role has yet to be observed. However, the Health Office should have a role similar to the Environmental Agency, starting from general requirements to simpler-scale management reviews. The non-involvement of the Health Office is evident from interviews conducted by researchers with relevant parties, where it was found that the Health Office has not been fully engaged. The interview statement is as follows.

*"...Regarding the role of the Health Office in implementing environmental management systems in the Manyar Subdistrict, legally it is almost equivalent to the Environmental Agency, albeit on a simpler scale. However, currently, this role only encompasses homes and their immediate surroundings. Beyond that, the Health Office's responsibilities also extend to a limited number of individuals within the community. To be honest, this role remains quite limited considering that according to ministerial*

regulations, it should ideally cover broader areas such as residential areas or even recreational facilities." (TS, The Health Agency of Gresik Regency, 1 Dec 2023).

Based on the statement above, it is known that the role of the Health Office in environmental management systems in Manyar Subdistrict, so far, has not been fully optimal, or perhaps even absent. This situation is not due to the unwillingness of the office, but rather due to the need for improvement in the environmental assessment at the district/city level. Additionally, factors contributing to the Health Office's suboptimal role can also be seen in its tasks and functions, which currently do not encompass broader environmental aspects. The role of the Health Office in implementing environmental management systems can be seen in the following table.

**Tabel 5.** The role of the Health Agency on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
2	Planning	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
3	Implementation and Operation	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
4	Checking	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
5	Management Review	Have a role
	<b>Condition</b>	<b>Not Implemented</b>

Sources: Author's Analysis, 2024

### 3.4. Trade and Industrial Agency (DISKOPERINDAG) of Gresik Regency

Based on the Minister of Industry Regulation Number 1 of 2020, it can be interpreted that the Department of Industry and Trade of Districts/Cities should have a significant role in environmental aspects, particularly in the implementation of environmental management systems. The role of Trade and Industrial Agency (DISKOPERINDAG) is essentially the coordination of all aspects related to industries and similar entities, in alignment with policies, laws, and environmental regulations in force.

Furthermore, DISKOPERINDAG's specific role in the implementation of environmental management systems involves aspects of application, operations, and periodic inspections conducted regularly.

Similarly to the Health Agency, there is also no significant role visible of DISKOPERINDAG, or perhaps none at all. The absence of such a role was validated by statements from the relevant office during interviews with researchers

*"...So far, environmental aspects have not been included in the scope of work of DISKOPERINDAG. This is because there has been no directive from the top (Regent) to engage in environmental issues. Referring to ministerial regulations, we actually have environmental responsibilities. However, for more active involvement, we need to discuss with all parties, especially superiors and the Environmental Agency (DLH)." (LE, DISKOPERINDAG Gresik Regency, December 1, 2023).*

Based on all the discussions above, the conclusion can be drawn that DISKOPERINDAG has a role in the implementation, operation, and inspection of environmental management systems. However, this role has not been realized due to the absence of directives from superiors (Regent). The roles of the Cooperative, Small Business, Industry, and Trade Office (DISKOPERINDAG) are outlined in the following table.

**Tabel 6.** The role of DISKOPERINDAG on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	No Part
	<b>Condition</b>	-
2	Planning	No Part
	<b>Condition</b>	-
3	Implementation and Operation	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
4	Checking	Have a role
	<b>Condition</b>	<b>Not Implemented</b>
5	Management Review	No Part
	<b>Condition</b>	-

Sources: Author's Analysis, 2024

### 3.5. Public Works and Spatial Planning Agency (PUTR) of Gresik Regency

The role of the Public Works and Spatial Planning Agency (PUTR) of Gresik Regency in the implementation of environmental management systems is to assist the Environmental Agency in planning. This role is quite significant because planning requires input from various perspectives, including spatial planning aspects of the region. A statement from a representative of the PUTR during an interview with researchers is as follows:

*"...The most visible role of the PUTR, so far has been to assist the Environmental Agency and BAPPEDA. One of the outputs of this planning is the Manyar-Bungah Environmental Impact Assessment (KLHS) document, which was approved in 2020." (ZN, Public Works and Spatial Planning Office (PUTR) of Gresik Regency, December 6, 2023).*

As for the role of the PUTR Office in the implementation of Environmental Management Systems in Manyar District, it can be seen in Table 7 below.

**Tabel 7.** The role of Public Works and Spatial Planning Agency on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	No Part
<b>Condition</b>		-
2	Planning	Have a role
<b>Condition</b>		<b>Implemented</b>
3	Implementation and Operation	No Part
<b>Condition</b>		-
4	Checking	No Part
<b>Condition</b>		-
5	Management Review	No Part
<b>Condition</b>		-

Sources: Author's Analysis, 2024

The commitment of PUTR to improve the environment, can be reflected in various forms, one of which is the Manyar-Bungah Environmental Impact Assessment (KLHS) document. Therefore, it can be concluded that PUTR in planning aspects, can be considered fully fulfilled.

### 3.6. The Subdistrict Government of Manyar

The most visible role of Manyar Subdistrict government lies in the aspect of implementation and operations. This role is not up for debate, as it is already very clear and observable directly. During an interview with researchers, the Manyar Subdistrict government made the following statement.

*"...Our role in implementing the environmental management system, especially in Manyar Subdistrict, is to assist the department in the aspects of implementation and operations. At times, we also provide information for planning and accompany during evaluations or inspections. So far, we have executed this role to the fullest extent." (ZA, Manyar Subdistrict Government, 4 Dec 2023).*

Besides the statement above, there are also analysis results regarding the role of the Manyar Subdistrict Government in implementing the Environmental Management System, summarized in the following table.

**Tabel 8.** The role of Subdistrict Government on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	No Part
<b>Condition</b>		-
2	Perencanaan	Have a role
<b>Condition</b>		<b>Implemented</b>
3	Penerapan dan Operasi	Have a role
<b>Condition</b>		<b>Implemented</b>
4	Pemeriksaan	Have a role
<b>Condition</b>		<b>Implemented</b>
5	Tinjauan Manajemen	No Part
<b>Condition</b>		-

Sources: Author's Analysis, 2024

### 3.7. The Village Government of Manyar

At a glance, the role of village governments in implementing the EMS is nearly the same as that of subdistrict governments, but on a smaller scale. Interviews conducted with each village official indicated a similar role: carrying out the implementation and operations. The statements from each village government are as follows:



"...Our role in implementing the EMS is to assist the department. This includes providing information for planning or carrying out the implementation and operations. We have fulfilled this role to the maximum extent." (SS, Manyarejo Village Government, 20 Nov 2023).

"...The visible role of the village government is in implementation and operations. Beyond that, is no longer within the village government's jurisdiction." (HS, Manyarsidomukti Village Government, 21 Nov 2023).

"...We have a role in implementing the EMS at the village level, specifically in terms of implementation and operations. At times, we also support the Environmental Agency, during inspections in the village sector." (SB, Sukomulyo Village Government, 6 Dec 2023).

"...So far, we have always assisted the department by providing the necessary information. Additionally, we carry out directives, specifically regarding the implementation and operations of the EMS." (AJ, Roomo Village Government, 21 Nov 2023).

Similar to the Subdistrict Government, Village Governments also play a role in the implementation and operation of the EMS. Another role is to assist with information and accompany departments during periodic inspections. The analysis results regarding the role of Village Governments in implementing the EMS are as follows:

**Tabel 9.** The role of Village Government on Environmental Management System

No	Aspect of EMS	Condition
1	General requirements and policies	No Part
	<b>Condition</b>	-
2	Perencanaan	Have a role
	<b>Condition</b>	<b>Implemented</b>
3	Penerapan dan Operasi	Have a role
	<b>Condition</b>	<b>Implemented</b>
4	Pemeriksaan	Have a role
	<b>Condition</b>	<b>Implemented</b>
5	Tinjauan Manajemen	No Part
	<b>Condition</b>	-

Sources: Author's Analysis, 2024

Based on the table above, it is evident that each Village Government has fulfilled its respective roles to the fullest extent. This includes aspects such as planning, implementation and operations, as well as periodic inspections.

#### 4. CONCLUSION

The Manyar Subdistrict, which supports the urban core area (Surabaya), industrial zones, and special economic zones (KEK), has a highly complex institutional system. This institutional framework begins with the Central Government, extends through Local Governments, Subdistrict Governments, and even Village Governments. According to the Strategic Environmental Assessment (KLHS) document for Manyar-Bungah, which also serves as a representation of the EMS, there are four key stakeholders involved in its implementation. These stakeholders include (1) the Regional Development Planning Agency (BAPPEDA); (2) the Environmental Agency; (3) the Public Works and Spatial Planning Agency (PUTR); and (4) the Transportation Agency. However, this institutional framework currently does not encompass two critical departments: the Health Agency and the Trade and Industry Agency (DISKOPERINDAG). Yet, both departments should play significant roles, as stipulated by respective ministerial decisions.

Based on the analysis conducted, it is concluded that the government entities involved in implementing the EMS in Manyar Subdistrict consist of seven stakeholders, namely (1) the Environmental Agency; (2) the Regional Development Planning Agency (BAPPEDA); (3) the Health Agency; (4) the Trade and Industrial Agency (DISKOPERINDAG); (5) the Public Works and Spatial Planning Agency (PUTR); (6) Manyar Subdistrict Government; and (7) related Village Governments. Generally, these seven stakeholders have made efforts in implementing the EMS, except for the Health Agency and DISKOPERINDAG. According to statements from these two stakeholders, they have not been involved at all and their roles have not been clearly defined, due to the lack of specific assignments or directives from higher authorities (regional leaders). In addition, the roles of these seven stakeholders regarding the five aspects of the EMS are almost comprehensive at present.

The exception is in the management review aspect, which cannot yet be carried out because the implementation of the EMS has not yet reached the minimum standard of five years.

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