

Administrative Law and Fiscal Governance of Petroleum Imports: Indonesia–Singapore Comparison

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Abstract

This study aims to examine how administrative law architecture influences the fiscal governance of petroleum imports in Indonesia and Singapore, focusing on institutional design, licensing procedures, regulatory coordination, and digital governance. The study addresses a research gap in petroleum import scholarship, which has predominantly emphasized economic and market determinants while giving limited attention to administrative-law mechanisms shaping policy implementation. Using normative juridical research with statutory, comparative, and conceptual approaches, this study analyses legislation, administrative regulations, policy instruments, institutional arrangements, and relevant scholarly literature in both jurisdictions. The findings show that Indonesia's fragmented institutional authority, multilayered licensing procedures, centralized import arrangements, and limited digital integration constrain regulatory predictability, administrative accountability, and the effectiveness of fiscal instruments in influencing import behaviour, which remains strongly affected by global prices, declining domestic production, and market volatility. Singapore, by contrast, demonstrates coordinated institutional mandates, integrated digital procedures, and consistent regulatory enforcement that support administrative efficiency and policy stability. The novelty of this study lies in conceptualizing administrative law architecture as a determinant of fiscal-import policy performance through a civil law–common law comparison, extending petroleum governance analysis beyond economic factors to institutional and procedural dimensions. The study proposes institutional integration, digital administrative reform, procedural simplification, and strengthened accountability as key directions for improving Indonesia's petroleum import governance.

Keywords: Administrative Law; Comparative Legal Systems; Fiscal Policy; Petroleum Import Governance

1. INTRODUCTION

Administrative law serves as the legal foundation governing how state authority is exercised in implementing public policies, including those regulating fiscal and energy sectors. In Indonesia, the exercise of administrative authority is expected to uphold legality, accountability, and the principles of justice derived from Pancasila.¹ This framework ensures that governmental actions, including those related to petroleum importation, operate within clear procedural boundaries while accommodating both domestic policy priorities and international obligations. Indonesia and Singapore represent two contrasting legal systems that shape their administrative and regulatory approaches. Indonesia, as a civil law jurisdiction, relies on codified statutes, centralized regulation, and non-binding judicial decisions. Singapore's common law system, conversely, places strong reliance on judicial precedent and jurisprudential reasoning. These structural differences affect administrative processes, regulatory flexibility, and the manner in which fiscal policy, particularly petroleum import policy, is formulated and enforced.

¹ Kuku Sudarmanto, "Hukum Administrasi Dan Sistem Peradilan Di Indonesia Yang Berkeadilan Sesuai Asas-Asas Pancasila," *Jurnal Ius Constituendum* 6, no. 2 (2021): 407–423, <https://doi.org/10.26623/jic.v6i2.4110>.

Administrative law constitutes the normative foundation through which state authority is exercised in the implementation of public policy, including fiscal governance and energy regulation. Beyond ensuring legality, administrative law functions as an institutional mechanism that structures regulatory coordination, procedural certainty, and accountability in the management of strategic resources. In the context of petroleum imports, administrative arrangements shape how fiscal instruments, licensing systems, and regulatory oversight operate in practice. Consequently, the effectiveness of petroleum import governance cannot be understood solely in economic terms but must also be examined through the institutional design and operational logic of administrative law.

The urgency of examining petroleum import governance arises from Indonesia's ongoing energy deficit, declining domestic production, and rising dependence on imported petroleum. Structural challenges in energy regulation, inefficiencies, and market fluctuations intensify fiscal pressures on the state.² These conditions highlight the need for an administrative law structure that ensures transparency, efficiency, and stability in the management of petroleum importation. Administrative barriers have also become increasingly relevant due to operational challenges faced by international fuel distributors in Indonesia. Companies such as Shell and BP have experienced obstacles related to supply expansion and distribution permits, raising questions about whether the constraints stem from logistical limitations or administrative preferences within the regulatory framework. This situation underscores the need to assess the role of administrative law in shaping regulatory transparency, procedural certainty, and fiscal policy outcomes.

The urgency of examining petroleum import governance is further intensified by Indonesia's structural energy transition and increasing dependence on imported fuel. Declining domestic production, exposure to global price volatility, and rising fiscal burdens have transformed petroleum imports into a central component of national economic stability. Under such conditions, the effectiveness of fiscal policy depends not only on market dynamics but also on the capacity of administrative institutions to manage licensing, supervision, and inter-agency coordination. Administrative design therefore becomes a decisive factor in determining whether fiscal policy can operate predictably and efficiently. By contrast, Singapore has developed an efficient and transparent administrative system to manage its energy imports, supported by regulatory mechanisms established under the Energy Market Authority. The country's structured approach to importing low-carbon electricity reflects its broader reliance on clear administrative procedures, long-term diversification planning, and common law principles that promote regulatory consistency.

Despite the existence of an extensive regulatory framework governing petroleum imports in Indonesia, empirical and institutional indicators suggest that administrative arrangements have not fully ensured effective policy control. Fragmented authority across multiple agencies, procedural complexity in licensing, and limited institutional integration

² Tania Stivani Pangestu and Edy Soesanto, "Analisis Strategi Indonesia Untuk Menghadapi Pasar Ekspor Migas," *Jurnal Mahasiswa Kreatif* 1, no. 4 (2023): 162–171, <https://doi.org/10.59581/jmk-widyakarya.v1i4.770>.

create regulatory uncertainty and operational inefficiencies. These structural features raise a central problem: the performance of petroleum import policy appears to be influenced not only by economic pressures but also by the configuration of administrative law that governs regulatory implementation. Understanding this relationship becomes essential for assessing the effectiveness of fiscal governance.

Differences in legal traditions generate distinct models of administrative governance that influence regulatory flexibility, institutional coordination, and policy responsiveness. Civil law systems generally emphasize codification, hierarchical regulation, and procedural formalism, whereas common law systems rely more heavily on precedent, adaptive interpretation, and institutional integration. These structural characteristics affect not only regulatory processes but also the implementation of fiscal policy instruments. As a result, comparing Indonesia and Singapore offers an opportunity to examine how contrasting administrative legal designs shape the governance of petroleum imports in different institutional environments.

A substantial body of scholarship on energy governance is grounded in economic and trade analysis. Studies within this cluster examine the influence of global price dynamics, exchange rate movements, and comparative advantage on export and import patterns. Econometric modeling and competitiveness indices have provided valuable insights into macroeconomic determinants of resource trade and market responsiveness. However, these studies primarily conceptualize policy outcomes as functions of market variables and do not systematically examine the institutional or legal mechanisms through which policies are implemented.

Huda (2021) analyzes Indonesia's export competitiveness for patchouli essential oil using revealed-comparative and competitiveness indices across multiple partner markets.³ The study's strengths lie in applying multiple competitiveness metrics (RCTA, XCI, ISP) that reveal nuanced export performance and specialization patterns, plus clear policy implications for improving value-added exports. Its limitations for your topic are similar to Saeyang's: it is agribusiness-centered and emphasizes market/production factors rather than legal-administrative determinants of trade and fiscal policy. In addition, the paper uses mostly descriptive indices rather than an in-depth legal or governance analysis, so it provides limited insight into how administrative law instruments (licenses, VAT/tax regimes, procurement rules) affect imports or foreign firm participation.

Saeyang (2022) presents an empirical ARDL analysis of determinants affecting the revealed symmetric comparative advantage (RSCA) of crude palm oil exports in Indonesia,

³ Fahmi Huda, Deny Meitasari, and Wiwit Widyawati, "Analisis Daya Saing Ekspor Minyak Atsiri Nilam (Patchouli Essential Oil) Indonesia Di Pasar Internasional Dengan Negara Brazil, Amerika Serikat, Meksiko, Dan Perancis Periode 2001-2018," *Jurnal Ekonomi Pertanian Dan Agribisnis* 5, no. 4 (October 2021): 1069–85, <https://doi.org/10.21776/ub.jepa.2021.005.04.10>.

Malaysia and Thailand.⁴ Strengths of the study include a clear econometric approach (ARDL/cointegration bounds), the use of time-series data to separate short-run and long-run effects, and policy-oriented recommendations based on identified determinants (exchange rates, trade openness, world prices). Its main weakness for the present research is topical scope: the paper focuses on agricultural export competitiveness rather than energy or fiscal/administrative frameworks, so it does not address how administrative law or fiscal policy regimes shape import/export governance. Methodologically, its econometric rigor is useful as a model for empirical sections, but its sectoral focus limits direct transferability to petroleum import fiscal-administrative questions.

Kisswani (2023) offers a methodologically focused review of econometric approaches to the oil price exchange rate nexus with lessons for ASEAN-5 countries.⁵ The paper's strength is its synthesis of econometric techniques and its explicit attention to macro-financial linkages relevant to energy policy and fiscal outcomes. This makes it valuable for understanding broader fiscal pressures (price shocks, exchange-rate pass-through) that underpin import policy. Its weakness, for the present comparative administrative-law study, is that it remains largely econometric and macroeconomic: it does not analyze administrative legal frameworks, institutional design, or regulatory practices that govern petroleum import procedures, taxation, or licensing in different legal systems. Thus, while it clarifies fiscal drivers that motivate policy choices, it leaves a gap in the procedural and governance mechanisms (administrative law) that translate fiscal needs into concrete import rules.

Mapping the literature reveals a significant conceptual gap. Existing research is largely dominated by economic analysis and sectoral policy evaluation, while administrative law studies remain analytically separate from fiscal policy discussions. No comprehensive study has systematically examined how administrative law design shapes the effectiveness of petroleum import fiscal policy, particularly through a comparative analysis of civil law and common law systems. This absence is especially significant given the contrasting administrative governance models of Indonesia and Singapore.

This study addresses that gap by integrating administrative law analysis with fiscal policy evaluation within a comparative legal framework, contributing theoretically by linking institutional design, procedural governance, and fiscal policy performance in petroleum import regulation, and practically by providing an analytical basis for evaluating regulatory reform through comparative institutional learning, particularly in relation to administrative integration, digital governance, and regulatory predictability. Accordingly, the study examines three interrelated dimensions: the regulation and implementation of petroleum import governance within Indonesia's administrative and fiscal framework, the institutional and procedural structure of petroleum import administration in Singapore, and

⁴ Rungrat Saeyang and Ayut Nissapa, "Factors Affecting Revealed Symmetric Comparative Advantage of Crude Palm Oil Exports of Indonesia, Malaysia and Thailand," *Songklanakarin Journal of Science and Technology* 44, no. 1 (2022): 32–39, <https://doi.org/10.14456/sjst-psu.2022.6>.

⁵ Khalid M. Kisswani and Mahelet G. Fikru, "A Review of Econometric Approaches for the Oil Price-Exchange Rate Nexus: Lessons for ASEAN-5 Countries," *Energies* 16, no. 9 (2023), <https://doi.org/10.3390/en16093839>.

the fundamental differences between the two systems together with their policy implications for strengthening petroleum import governance in Indonesia. Based on these research problems, the study aims to (1) examine the regulatory structure and administrative implementation of petroleum imports in Indonesia, (2) analyse the institutional and procedural design of petroleum import governance in Singapore, and (3) conduct a comparative evaluation of both systems to formulate policy-relevant implications for improving administrative effectiveness and fiscal governance of petroleum imports in Indonesia.

2. METHOD

This study employs normative juridical (doctrinal) research to analyse how administrative law shapes the fiscal governance of petroleum imports in Indonesia and Singapore. The research examines legal norms, institutional arrangements, and regulatory mechanisms by interpreting statutory frameworks, administrative regulations, and policy instruments governing petroleum import licensing and fiscal control. Three complementary legal approaches are applied. The statute approach analyses formal legal provisions regulating petroleum import governance in both jurisdictions. The comparative approach evaluates differences and similarities between Indonesia and Singapore across three analytical dimensions: institutional governance, administrative and licensing procedures, and the degree of digitalisation and regulatory integration. The conceptual approach interprets these regulatory structures through core administrative law principles, including legal certainty, accountability, efficiency, and regulatory coherence.

Singapore is selected as a comparator due to its relevance as a highly integrated global energy-import hub with an advanced administrative governance system grounded in the common law tradition, providing a contrasting regulatory model to Indonesia's civil law framework. This comparison enables an assessment of how differing administrative legal designs influence fiscal governance effectiveness. To maintain analytical focus, the study is limited to the administrative and fiscal governance of petroleum imports, specifically licensing arrangements, institutional coordination, and fiscal-administrative mechanisms, and does not address technical energy production or broader international trade dynamics beyond their regulatory implications.

The research relies on secondary legal materials, including legislation, administrative regulations, policy documents, institutional reports, and scholarly literature, collected through systematic legal and literature review. Data analysis is conducted through legal interpretation, classification of regulatory structures, and structured comparative evaluation of institutional and procedural arrangements to assess their implications for administrative effectiveness and fiscal policy performance.

3. RESULTS AND DISCUSSION

3.1 Regulation and Implementation of Fuel Imports in Indonesia

The regulation and implementation of petroleum imports in Indonesia must be understood not merely as a matter of energy supply management but as an administrative

governance framework that structures state control over strategic commodities. From the perspective of administrative law, petroleum import regulation reflects how licensing authority, institutional coordination, and regulatory supervision are organized to achieve fiscal stability and energy security. The effectiveness of this system therefore depends on the extent to which administrative arrangements uphold core principles of public law, including legal certainty, efficiency, accountability, and good governance in public service delivery.⁶

Indonesia is a nation where the public frequently utilizes vehicles, both public and private transportation. Gasoline is a primary requirement for operating these vehicles. Indonesia has several regulations governing the import of petroleum fuels (BBM), which serve as the legal basis for domestic energy trade and distribution activities. These regulations are essential for maintaining a balanced energy supply within the country and ensuring that all BBM import activities comply with prevailing legal requirements. One of the main legal foundations related to BBM trade and import is Law Number 22 of 2001 on Oil and Gas. Article 53 point d of Law Number 22 of 2001 on Oil and Gas establishes that trading activities in the petroleum sector, including import-related transactions, must be conducted under a valid trading license, and violations of this requirement are subject to criminal sanctions and substantial financial penalties.⁷ This provision makes clear that trading activities, including the export and import of petroleum fuels, must be conducted by businesses holding a government-issued trading license. Without such a license, business actors may face criminal sanctions and substantial fines. This demonstrates that licensing is considered a principal element by the government in upholding legality and oversight of national energy distribution.⁸

While licensing functions as the primary legal instrument for controlling petroleum import activities, its effectiveness must be evaluated in terms of administrative performance rather than merely formal legality. From the standpoint of legal certainty, the licensing regime remains characterized by multi-layered approvals involving several ministries and regulatory bodies, which increases procedural complexity and prolongs decision-making timelines. Such procedural fragmentation weakens regulatory predictability and creates uncertainty for market actors.

From an efficiency standpoint, the licensing regime generates significant administrative burdens for importers, particularly private fuel distributors that must comply with overlapping regulatory requirements across multiple authorities. The existence of complex and multi-layered approval processes increases compliance costs and constrains the responsiveness of supply management in a sector that is highly sensitive to global price

⁶ Mirawati Yanita and Suandi Suandi, "Determinant Export Volume Of Crude Palm Oil (Cpo) In Indonesia And Malaysia In The European Union Market," *Agricultural Socio-Economics Journal* 23, no. 1 (2023): 19–24, <https://doi.org/10.21776/ub.agrise.2023.023.1.3>.

⁷ Republik Indonesia, "Undang-Undang Nomor 22 Tahun 2001 Tentang Minyak Dan Gas Bumi" (2012).

⁸ Yanita and Suandi, "Determinant Export Volume Of Crude Palm Oil (Cpo) In Indonesia And Malaysia In The European Union Market."

volatility. At the same time, the fragmentation of regulatory authority across various institutions weakens accountability by complicating oversight mechanisms and obscuring responsibility for policy outcomes. Under such conditions, it becomes difficult to clearly attribute institutional responsibility for import performance, fiscal consequences, or supply stability. These structural characteristics suggest that, despite its formal legal status, licensing does not consistently function as an effective instrument of administrative control.

In addition, Article 55 of the same law regulates the misuse of subsidized fuel, with penalties of up to six years' imprisonment and a maximum fine of IDR 60,000,000,000.00 (sixty billion rupiah). This indicates the government's efforts to protect citizens' rights of access to subsidized energy and to prevent abuses that could harm both the state and the broader public. Another important legal foundation is Presidential Regulation Number 69 of 2021, which clarifies the definition of "fuel acquisition cost" in Article 14, paragraph (11). This acquisition cost not only includes the purchase price of crude oil but also covers all cost components arising from the production process through to the distribution of fuel to the public. As such, government-determined fuel pricing policy accounts for production, import, transportation, storage, and distribution considerations.⁹ However, based on research, global disruptions significantly influence Indonesia's commodity prices, highlighting how external market volatility directly impacts national economic stability. This correlates with Indonesia's regulation and implementation of fuel imports, where government policies such as import controls and price stabilization measures are essential to manage similar fluctuations in global oil markets. Effective regulation is therefore crucial to ensure a stable domestic fuel supply, reduce vulnerability to international shocks, and maintain economic resilience.¹⁰

The government's policy on regulating Fuel Oil (*BBM*) imports has a primary objective: to maintain the balance of the national trade balance and prevent deficits from increasing due to oil and gas imports, and to ensure the domestic energy supply remains secure and sustainable. This step is also taken to guarantee the continuous fulfillment of public energy needs within the context of national energy resilience. In its implementation, the government, through the Ministry of Energy and Mineral Resources (*ESDM*), collaborates with Pertamina and private Public Fuel Filling Stations (*SPBU*) to conduct *BBM* imports in the form of base fuel (pure fuel without additive mixtures). The blending of additives will be carried out in the respective *SPBU* tanks to ensure product quality and

⁹ Presiden Republik Indonesia, "Peraturan Presiden Republik Indonesia Nomor 69 Tahun 2021 Tentang Perubahan Kedua Atas Peraturan Presiden Nomor 191 Tahun 2014 Tentang Penyediaan, Pendistribusian Dan Harga Jual Eceran Bahan Bakar Minyak," Presiden Negara Republik Indonesia § (2021), <https://peraturan.bpk.go.id/Details/174729/perpres-no-69-tahun-2021>.

¹⁰ Arlinda Astri Frianti, Respitawulan, and Ichi Sukarsih, "Prediksi Harga Crude Palm Oil (CPO) Di Indonesia Dengan Menggunakan Metode Fuzzy Time Series Markov Chain," *Bandung Conference Series: Mathematics* 3, no. 1 (2023): 68–76, <https://doi.org/10.29313/bcsm.v3i1.6821>.

standards are maintained according to technical provisions.¹¹ Indonesia is governed by a government strategy aimed at reducing dependency on imported energy through blending policies and centralized procurement managed by the state-owned oil company, PT Pertamina (Persero).

Pertamina's dominant position in petroleum import governance illustrates a hybrid regulatory arrangement in which market participation is closely intertwined with administrative authority. From the perspective of administrative law, this dual institutional role necessitates clearly defined accountability mechanisms to mitigate the risk of regulatory capture and to safeguard the neutrality of policy implementation. When a state-owned enterprise operates simultaneously as a commercial entity and as a principal executor of government policy, the boundary between regulatory power and market activity becomes structurally indistinct. Such institutional overlap raises concerns related to transparency, competitive neutrality, and the effectiveness of regulatory oversight. In terms of public accountability, the concentration of import authority within a single dominant institution requires strong supervisory and control mechanisms to ensure that administrative decisions remain oriented toward public interest objectives rather than organizational or commercial considerations. The effectiveness of centralized import governance therefore depends not only on the formal design of regulation but also on the robustness of institutional checks and the degree of administrative transparency.

The fundamental regulatory framework for fuel provision is established by Presidential Regulation (*Perpres*) Number 191 of 2014, which generally allows licensed business entities to import fuel if domestic production is insufficient, provided they obtain a recommendation from the Ministry of Energy and Mineral Resources (ESDM) and approval from the Minister of Trade. In practice, however, the government has recently implemented a "single entry" or "single-gateway" policy, directing private retailers (like Shell, BP-AKR, and Vivo) to synchronize their fuel imports through Pertamina to manage stock shortages and maintain national energy security, with the Minister of ESDM recently revising the fuel-import permit period from one year to six months to strengthen oversight. Concurrently, the government is accelerating the implementation of national downstreaming policies, such as the mandatory B40 biodiesel program (blending diesel with 40% palm-based material) and the planned E10 ethanol blend to further cut down on imports, which previously cost the country an estimated Rp520 trillion (USD 31.23 billion) annually.¹²

The single-gateway import policy represents a centralizing administrative measure intended to strengthen state control over fuel procurement and supply. While centralization may enhance coordination and monitoring capacity, its effectiveness must be assessed

¹¹ Junaedi Junaedi, "Indonesia Is The Biggest Grant Of Oil Palm Crude Palm Oil (Cpo) In The World But Facing The Problem Of Oil Scarcity Surprise Cooking Oil Prices," *International Journal of Social Science* 2, no. 4 (2022): 1779–1790, <https://doi.org/10.53625/ijss.v2i4.4137>.

¹² Dwi Kurniawan, Adri Nora, and Rheysa Permata Sari, "Product, Process and Net Present Worth Analysis of a Palm Oil-Based Beta Carotene Industry," *International Journal of Applied Science and Engineering* 20, no. 3 (2023), [https://doi.org/10.6703/IJASE.202309_20\(3\).007](https://doi.org/10.6703/IJASE.202309_20(3).007).

against administrative law principles and market governance outcomes. Centralized import control limits sourcing flexibility and reduces competitive procurement channels for private distributors, potentially supporting short-term supply stability but weakening long-term market responsiveness and cost efficiency. The concentration of decision-making authority also increases reliance on administrative discretion, which may undermine legal certainty in the absence of transparent procedures and clear regulatory standards. From a public service and good governance perspective, centralized import arrangements must be evaluated based on their impact on consumer access, price stability, and supply reliability, as restrictions on competition or delayed supply adjustments ultimately affect public welfare.

From the perspective of oversight and transparency, the government and the business entities will conduct a joint survey to verify the quality of the *BBM* before shipment to Indonesia. Furthermore, the government mandates transparency of the *BBM* purchase price to ensure no party is disadvantaged in the energy distribution chain. Regarding policy execution, the ESDM Minister, Bahlil Lahadalia, confirmed that the national *BBM* stock is secure for the next 18-21 days, and imported supplies are targeted to arrive within a maximum of seven days of approval. This policy is supported by a strong legal basis, namely Article 14 Paragraph (1) of Presidential Regulation (*Perpres*) Number 61 of 2024 concerning the Commodity Balance, which grants authority to the relevant sectoral minister to determine the planned needs for strategic commodities, including *BBM*. Regarding market conditions, the market share for non-subsidized *BBM* belonging to private SPBUs increased from 11% in 2024 to approximately 15% in July 2025, indicating that import activities continue to meet the rising demand in the commercial energy sector. The government also asserts that import regulations are dynamic, subject to adjustment based on domestic supply conditions, national demand, and the global economic situation. As a form of support and facilitation, the government encourages business-to-business (B2B) cooperation between Pertamina and private SPBUs to maintain a stable supply of non-subsidized *BBM*. Despite various regulatory measures governing oil and gas trade, the regression results demonstrate that crude oil exports influence reserves by only 21.67%, crude oil imports by 17.32%, oil product exports by 29.03%, oil product imports by 9.86%, gas exports by 12.75%, and gas imports by 10.22%. These low coefficients show that existing regulations have not substantially shaped or controlled import outcomes, implying that the implementation of fuel-import policies is influenced more by external economic variables, such as global prices, domestic production decline, and market volatility, than by domestic regulatory provisions. Consequently, the correlation suggests that although regulations exist, their effectiveness in steering import levels remains limited, highlighting the need for stronger, more targeted regulatory interventions in Indonesia's fuel-import management.¹³

¹³ Intan Purnama et al., "The Influence of The Value of Oil and Gas Exports and Imports on The Country's Foreign Exchange from 2010-2017," *Luxury: Landscape of Business Administration* 2, no. 1 (2024), <https://doi.org/10.61230/luxury.v2i1.68>.

These empirical findings indicate limited regulatory effectiveness from an administrative law perspective. The weak statistical influence of regulatory variables on import outcomes suggests that existing administrative instruments function more as formal legal structures than as effective mechanisms of policy control. Normatively, this reflects a gap between regulatory design and practical effectiveness, as procedural authority is not supported by sufficient institutional coherence or operational capacity to shape import dynamics. The continued dominance of external factors, particularly global price volatility, further demonstrates the limited steering capacity of administrative regulation over fiscal import performance, highlighting a broader disconnect between formal compliance mechanisms and substantive policy control.

Declining crude oil and refined fuel imports, reaching only 40% of RUEN projections by 2020, reflect the effectiveness of regulations that prioritize domestic crude absorption, restrict oil exports, and mandate Pertamina to purchase contractor crude. At the same time, refinery development policies under the RDMP and GRR programs aim to increase domestic processing capacity, thereby reducing long-term dependence on imported gasoline and diesel. Clean energy policies, particularly mandatory biodiesel blending (B30–B35) and the expansion of the electric vehicle program under Perpres 55/2019, further contribute to the reduction of imported fuels by substituting diesel and gasoline consumption. Together, these regulatory measures show that Indonesia's fuel-import levels are closely shaped by deliberate government interventions designed to enhance energy security and transition the country toward a more resilient and sustainable energy system.¹⁴ Moreover, limited infrastructure and inter-regional connectivity pose a physical constraint, particularly in eastern Indonesia, indicating that regulations have not yet succeeded in ensuring equitable energy access. Finally, slow institutional capacity and protracted licensing bureaucracy also impede the pace of investment in the energy sector, hindering the overall efficiency and sustainability of the national energy system.¹⁵

The administrative framework governing petroleum imports generates direct consequences for both market actors and consumers. Complex licensing procedures and centralized procurement increase operational uncertainty for private distributors, restricting market entry and limiting competitive supply channels. For consumers, administrative inefficiencies may result in supply disruptions, price instability, and unequal distribution, particularly in infrastructure-constrained regions. These conditions indicate that petroleum import governance extends beyond formal regulatory compliance and must be evaluated based on administrative performance in ensuring equitable access, supply reliability, and price stability as core elements of good governance.

¹⁴ Ariana Soemanto et al., "The Role of Oil Fuels on the Energy Transition toward Net Zero Emissions in Indonesia: A Policy Review," *Evergreen* 10, no. 4 (2023), <https://doi.org/10.5109/7160867>.

¹⁵ Edy Soesanto, Thomas Komansilan, and Natasha Salsabillah, "Dinamika Harga BBM: Dampaknya Terhadap Ekonomi Nasional Dan Daya Beli Masyarakat," *Jupiter: Publikasi Ilmu Keteknikan Industri, Teknik Elektro Dan Informatika* 3, no. 1 (2025): 165–74, <https://doi.org/10.61132/jupiter.v3i1.686>.

Overall, the Indonesian petroleum import regulatory framework demonstrates a strong formal legal structure but limited administrative effectiveness. Licensing complexity, centralized procurement arrangements, and fragmented institutional authority collectively constrain regulatory efficiency, reduce market responsiveness, and weaken accountability mechanisms. Empirical evidence further indicates that existing regulatory instruments have not significantly influenced import behavior, suggesting that administrative law currently operates more as a procedural framework than as an effective tool of fiscal governance. Strengthening petroleum import governance therefore requires institutional integration, procedural simplification, and enhanced administrative accountability in order to align legal authority with regulatory performance.

3.2 Regulations and the Oil Import System in Singapore

Singapore's petroleum import system is structured around a regulatory architecture that balances administrative control, economic competitiveness, and the imperatives of energy security. Although statutory instruments such as the Energy Market Authority Act, the Fire Safety Act, and the Customs Act provide the formal legal basis for petroleum importation, the practical implementation of these laws is reflected in the regulatory mechanisms described throughout the literature on Singapore's energy and port governance. The legal analysis of Singapore's petroleum trading regime highlights how the state adopts an integrated approach combining administrative licensing, port oversight, and market supervision to maintain efficiency and safety in one of the world's most active energy and bunkering hubs.¹⁶ Singapore's historical development into a petroleum trading center reinforces the necessity of a strong legal framework. Domestic legislation has evolved to support both hazard regulation and commercial facilitation, enabling the state to manage significant volumes of imported oil while mitigating risks inherent to petroleum handling.

The effectiveness of Singapore's petroleum import governance cannot be separated from the structural characteristics of its common law system. The reliance on precedent and interpretative flexibility allows regulatory authorities to adapt administrative practices without requiring extensive legislative revision, thereby enhancing regulatory responsiveness. This institutional flexibility supports regulatory predictability, as administrative decisions are guided by established legal reasoning and consistent enforcement patterns. In the context of petroleum import regulation, such predictability reduces uncertainty for market actors and strengthens confidence in licensing and compliance procedures.

Regulatory oversight is distributed among several administrative bodies, each responsible for distinct elements of the petroleum import chain. The Energy Market Authority exercises supervisory authority over the broader energy sector, including the governance of fuel-handling facilities and the coordination of national energy security

¹⁶ Nguyen Hoang Phuoc Hanh and Tang Thi Bich Diem, "Legal Issues on Petrol and Oil Trading Activities – Experience from Singapore, China and Lessons for Vietnam," *Vietnamese Journal of Legal Sciences* 9, no. 2 (2023): 51–73, <https://doi.org/10.2478/vjls-2023-0009>.

policy, which has become increasingly important as Singapore accelerates its transition toward low-carbon pathways.¹⁷ Singapore Customs enforces import controls through documentary requirements and real-time surveillance mechanisms, ensuring that petroleum shipments comply with customs law, revenue protections, and import permit conditions. The Maritime and Port Authority functions as the primary regulator of maritime operations; studies of bunkering and vessel-traffic monitoring affirm that Singapore maintains a comprehensive framework for supervising ship-to-ship fuel transfers, regulating port access, and preventing illicit or unsafe petroleum movements.¹⁸ This multi-agency structure ensures that administrative law is operationalized across land-based and maritime environments, reinforcing regulatory coherence throughout the import system.

The integration of multiple regulatory bodies within a coordinated administrative framework represents a central determinant of governance effectiveness. Inter-agency coordination in Singapore operates through clearly defined institutional mandates supported by shared data systems and procedural interoperability. This arrangement reflects the principle of administrative coherence, in which regulatory authority is differentiated yet functionally synchronized. Such coordination minimizes jurisdictional overlap, reduces procedural duplication, and enables timely regulatory responses, thereby enhancing both efficiency and accountability in petroleum import administration.

Licensing and operational requirements for petroleum importers represent one of the central pillars of Singapore's regulatory model. The legal framework outlined in comparative studies emphasizes the mandatory nature of licensing for entities involved in the import, storage, and distribution of petroleum and flammable materials, aligning with the Fire Safety Act's safety-driven mandates for hazardous substances.¹⁹ At the first stage of the import chain, companies must secure TradeNet permits, which function as electronic declarations integrating customs requirements, hazardous material classifications, and port-entry authorisations. Once petroleum cargo enters Singapore's jurisdiction, operators must comply with conditions applicable to licensed storage facilities, including tank specifications, safety equipment, and operational safeguards. Research on the development of alternative marine fuels stresses that storage-related regulatory requirements are becoming increasingly stringent, as Singapore prepares its port infrastructure for the transition toward low- and zero-carbon fuels, thereby expanding the scope of compliance obligations for fuel importers and terminal operators.²⁰ These licensing rules ensure that

¹⁷ Jiong Rui Loh and Sreenivasulu Bellam, "Towards Net Zero: Evaluating Energy Security in Singapore Using System Dynamics Modelling," *Applied Energy* 358, no. 122537 (2024), <https://doi.org/10.1016/j.apenergy.2023.122537>.

¹⁸ Eisuke Watanabe and Ryuichi Shibasaki, "Extraction of Bunkering Services from Automatic Identification System Data and Their International Comparisons," *Sustainability (Switzerland)* 15, no. 24 (2023), <https://doi.org/10.3390/su152416711>.

¹⁹ Hanh and Diem, "Legal Issues on Petrol and Oil Trading Activities – Experience from Singapore, China and Lessons for Vietnam."

²⁰ Magdalena Klopott, Marzenna Popek, and Ilona Urbanyi-Popiołek, "Seaports' Role in Ensuring the Availability of Alternative Marine Fuels—A Multi-Faceted Analysis," *Energies* 16, no. 7 (2023): 3055, <https://doi.org/10.3390/en16073055>.

operational safety, commercial transparency, and environmental standards remain embedded in every phase of the petroleum supply chain.

Digital governance plays a decisive role in operationalizing administrative efficiency within Singapore's petroleum import system. The use of integrated electronic platforms such as TradeNet enables real-time processing of permit applications, data verification, and regulatory monitoring. Digitalization reduces procedural delays, standardizes administrative decision-making, and enhances transparency through traceable documentation. From an administrative law perspective, digital governance functions not merely as a technological tool but as an institutional mechanism that strengthens legal certainty, procedural fairness, and regulatory consistency.

The procedural workflow governing petroleum imports reflects Singapore's emphasis on administrative precision and maritime control. Petroleum importation begins with the submission of TradeNet permit applications, which require detailed declarations of product type, quantity, origin, and intended storage destination. Upon arrival, vessels carrying petroleum are subjected to the Maritime and Port Authority's operational protocols, including traffic-lane requirements, port-clearance procedures, and bunkering regulations. AIS-based monitoring systems, as analysed in studies of Singapore's bunkering industry, serve as a core enforcement mechanism by enabling real-time observation of vessel movements, transfer operations, and port-area congestion.²¹ After port clearance, Singapore Customs conducts a secondary review of import declarations, verifies compliance with tariff or duty exemptions, and determines whether consignments require additional inspection. Petroleum is subsequently transported to licensed fuel terminals, which operate under the safety and environmental provisions described in analyses of Singapore's port planning for alternative fuels.²² Through this procedural chain, Singapore maintains a tightly supervised import environment in which administrative controls, port governance, and energy policy operate as an integrated system.

Singapore's administrative model also demonstrates a structured approach to administrative discretion. Regulatory authorities possess operational flexibility in enforcement and supervision, yet such discretion is exercised within clearly defined legal and procedural boundaries. This balance between flexibility and rule-based governance reflects key principles of modern administrative law, including good governance, proportionality, and accountability. The structured use of discretion enables regulatory adaptation to changing market conditions while maintaining institutional legitimacy and procedural integrity.

Compliance and enforcement form the operational backbone of Singapore's petroleum regulatory regime. Monitoring obligations for petroleum importers include reporting of fuel

²¹ Watanabe and Shibasaki, "Extraction of Bunkering Services from Automatic Identification System Data and Their International Comparisons."

²² Klopott, Popek, and Urbanyi-Popiolek, "Seaports' Role in Ensuring the Availability of Alternative Marine Fuels—A Multi-Faceted Analysis."

quantities, storage conditions, and safety incidents, as well as adherence to inspection schedules imposed by regulatory authorities. Enforcement studies of Singapore's bunkering operations reveal a strong reliance on technological surveillance, particularly AIS-based tracking, which enables authorities to detect irregular fuel transfers, prevent fraudulent bunkering practices, and maintain Singapore's reputation as a trustworthy maritime fuel hub.²³ From a broader administrative perspective, energy policy research demonstrates that Singapore's strict enforcement posture is closely tied to the state's concern for energy security disruptions in fuel integrity, import flows, or storage safety may compound the vulnerabilities arising from Singapore's near-total dependence on imported energy resources.²⁴ In the jurisprudential analysis of petroleum trading frameworks, the Singapore model is characterized by its ability to ensure both market discipline and regulatory continuity through consistent supervision, predictable enforcement, and a legal culture oriented toward the minimization of systemic risk.²⁵

Despite its high level of administrative integration and efficiency, Singapore's petroleum import governance is not without structural constraints. The system's strong reliance on centralized regulatory control requires continuous institutional capacity, technological maintenance, and high levels of compliance monitoring, which may generate significant administrative costs. In addition, Singapore's regulatory model operates within the context of a relatively small territorial and institutional scale, which facilitates coordination but may limit the direct transferability of its governance mechanisms to larger and more complex jurisdictions. These structural conditions indicate that the effectiveness of Singapore's model is closely linked to its institutional capacity and scale-specific governance environment.

Through this regulatory architecture supported by licensing regimes, administrative controls, port governance mechanisms, and coordinated enforcement, Singapore operates a petroleum import system designed to uphold safety, transparency, and national energy resilience. By integrating statutory requirements with sophisticated maritime monitoring and energy-security planning, Singapore continues to maintain one of the most advanced and tightly regulated petroleum import systems in the world.

Overall, the effectiveness of Singapore's petroleum import governance derives not solely from regulatory stringency but from the interaction between legal structure, institutional coordination, and digital administrative capacity. The common law tradition supports regulatory adaptability, digital governance enhances procedural efficiency, and integrated institutional design ensures coherent enforcement. These elements collectively reflect core principles of modern administrative law, including legal certainty, regulatory

²³ Watanabe and Shibasaki, "Extraction of Bunkering Services from Automatic Identification System Data and Their International Comparisons."

²⁴ Loh and Bellam, "Towards Net Zero: Evaluating Energy Security in Singapore Using System Dynamics Modelling."

²⁵ Hanh and Diem, "Legal Issues on Petrol and Oil Trading Activities – Experience from Singapore, China and Lessons for Vietnam."

predictability, and accountable discretion. The Singapore model therefore illustrates how administrative design can function as an active determinant of regulatory performance rather than merely a formal legal framework.

3.3 Comparative Analysis and Policy Implications for Indonesia

The comparative analysis reveals that differences between Indonesia and Singapore in petroleum import governance are not merely legal-formal but structural and operational. These differences can be analytically organized into three interrelated dimensions: institutional design, administrative procedures, and fiscal-regulatory stability.²⁶ Examining these dimensions clarifies how variations in administrative law architecture directly influence regulatory effectiveness, market responsiveness, and the capacity of fiscal policy to manage import dependence.

This fundamental divergence affects all regulatory aspects, resulting in Singapore generally providing a higher degree of legal certainty and administrative efficiency due to its flexible, adaptive framework and reliance on precedent, which facilitates rapid adjustments to modern business practices, intellectual property rights, and investor protections. In contrast, Indonesia's more rigid, statute-driven framework often contends with challenges like regulatory instability and complexity in its centralized procedures. For instance, in the administrative law governing petroleum import fiscal policy, Singapore employs a highly integrated and digitalized structure supported by mechanisms that ensure predictable enforcement and strong market discipline, while Indonesia's civil law-based approach utilizes complex multi-agency coordination and subsidy schemes that are often cited as hindering efficiency and transparency.

From an institutional perspective, the Indonesian system is characterized by fragmented authority distributed across multiple ministries and sectoral agencies, with operational centralization through a dominant state-owned enterprise. This structure produces layered decision-making and complex coordination requirements, which weaken administrative coherence and reduce policy responsiveness. In contrast, Singapore's model demonstrates institutional integration through clearly delineated mandates and coordinated regulatory functions. The concentration of supervisory authority within a coherent administrative framework enables consistent enforcement, coordinated monitoring, and strategic policy alignment. The comparative finding indicates that institutional integration functions as a primary determinant of regulatory effectiveness in petroleum import governance.

The comparative analysis between Indonesia and Singapore demonstrates profound differences in administrative law frameworks and institutional design that directly shape the performance of fuel-import policies. Indonesia's administrative structure remains fragmented and highly procedural, with overlapping mandates across ministries and a

²⁶ Ratna Dewi Wuryandari, "Kegagalan Inovasi Pertamina Dalam Mengembangkan Rantai Supply Pemasaran Dan Ketergantungan Terhadap Impor BBM Produksi Kilang Minyak Singapura," *Jejaring Administrasi Publik* 13, no. 2 (2021): 84–100, <https://doi.org/10.20473/jap.v13i2.31829>.

centralized import mechanism reliant on Pertamina. This arrangement reduces market flexibility and slows regulatory responsiveness, as reflected in the single-gateway import policy that limits competitive sourcing options. The centralized import and distribution mechanism has also shown internal inefficiencies, highlighting Pertamina's failure to develop a robust domestic supply marketing chain, which perpetuated reliance on refined product imports from Singapore. Empirical findings further highlight that domestic fiscal measures exert limited influence on import volumes, as global oil price volatility and exchange-rate fluctuations remain the dominant determinants.²⁷

The fundamental difference in the administrative mechanisms for fuel-imports between the two nations lies in the orientation of their legal systems and institutional effectiveness. Indonesia, adhering to the Civil law system, implements procedures that are centralized and fragmented, involving coordination across multiple agencies such as the Ministry of Energy and Mineral Resources (ESDM), BPH Migas, and SKK Migas. This decentralization of supervisory functions frequently results in overlapping authority, lengthy licensing processes, and implementation that is hampered and not yet fully digitalized.²⁸

Procedural differences further distinguish the two systems. Indonesia's administrative process remains characterized by sequential licensing, multi-stage approvals, and limited digital integration, which collectively increase transaction costs and extend decision-making timelines. These procedural conditions reduce regulatory predictability and constrain market responsiveness in a sector sensitive to global price fluctuations. Singapore's administrative procedures, by contrast, are structured around integrated digital platforms and standardized processing mechanisms that enable real-time verification, streamlined approval, and coordinated inter-agency communication. The comparative evidence suggests that procedural integration and digitalization significantly enhance administrative efficiency and regulatory reliability.

In contrast, Singapore's administrative system is defined by integrated inter-agency coordination, strong regulatory stability, and extensive digitalization of trade and energy-governance processes. Cooperation between EMA, MPA, and Singapore Customs, supported by unified digital platforms, enables fuel-import procedures that are fast, transparent, and efficient. This institutional clarity and long-term policy consistency reinforce Singapore's position as a highly competitive international energy-import hub.²⁹

Differences in administrative structure and procedural design ultimately shape fiscal-policy stability. In Indonesia, fragmented governance and procedural complexity limit the capacity of regulatory instruments to influence import patterns, as reflected in the relatively

²⁷ Riza Dian Triwibowo and Sidik Pramono, "Kajian Implementasi Pengawasan Subsidi Bahan Bakar Minyak (BBM) Di Indonesia: Perspektif Teori Daniel A. Mazmanian Dan Paul A. Sabatier," *Jurnal Nasional Pengelolaan Energi MigasZoom* 7, no. 1 (2025): 61–72, <https://doi.org/10.37525/mz/2025-1/1090>.

²⁸ Purnama et al., "The Influence of The Value of Oil and Gas Exports and Imports on The Country's Foreign Exchange from 2010-2017."

²⁹ Watanabe and Shibasaki, "Extraction of Bunkering Services from Automatic Identification System Data and Their International Comparisons."

weak statistical relationship between regulatory measures and import outcomes. Fiscal policy therefore operates within a system where external market variables exert dominant influence. Singapore's integrated administrative model supports predictable enforcement and consistent policy implementation, enabling fiscal instruments to function within a stable regulatory environment. The comparative finding indicates that fiscal policy effectiveness depends not only on economic design but also on administrative coherence and regulatory predictability.

Recent developments in Indonesia's energy-law scholarship strengthen the argument that substantial regulatory reform is needed. A legal assessment of Indonesia's net-zero transition efforts reveals persistent inconsistencies between energy, environmental, and fiscal regulations, creating structural barriers to long-term governance effectiveness.³⁰ Complementary research evaluating renewable-energy investment policies indicates that although certain incentives have successfully stimulated hydropower and geothermal development, wider deployment of renewable energy remains hindered by institutional fragmentation, technical limitations, and regulatory uncertainty.³¹ These findings align with broader analyses of Indonesia's energy-governance challenges, particularly the rigidity of administrative procedures, delays in environmental permitting, and overlapping institutional mandates.³² Singapore's superior infrastructure readiness, standardized and technologically advanced port operations, and strong regulatory predictability further widen the administrative gap between the two countries.³³ This contrast illustrates that effective energy-import governance requires not only adequate physical capacity but also integrated regulation, legal clarity, and administrative efficiency.

These comparative findings demonstrate that differences in petroleum import governance are primarily institutional and procedural rather than purely legal-formal. The effectiveness of Singapore's model derives from administrative integration, procedural standardization, and regulatory predictability, whereas Indonesia's challenges stem from fragmentation, procedural layering, and limited institutional coherence. Policy implications for Indonesia must therefore be grounded in addressing these structural conditions rather than replicating institutional models in a purely formal manner.

Institutional integration emerges as a priority reform area. Strengthening the one-stop integrated service mechanism (PTSP) can function as an incremental strategy to reduce procedural fragmentation and improve administrative coordination. However, comparative findings suggest that effectiveness depends not merely on formal institutional establishment but on functional integration, digital interoperability, and standardized decision-making

³⁰ N Amalia, E A Napitupulu, and I Ermanda, "Legal Analysis of Indonesian Regulation and Policy on Commitment to Achieving Net Zero Emission (NZE) in Renewable Energy Transition in Electricity Sector," *Andalas Law Journal* 9, no. 2 (2024): 31–51, <https://doi.org/10.25077/alj.v9i2.89>.

³¹ Loso Judijanto et al., "Evaluation of the Effect of Green Energy Policy on Renewable Power Plant Investment in Indonesia," *West Science Nature and Technology* 2, no. 04 (2024): 192–98, <https://doi.org/10.58812/wsnt.v2i04.1535>.

³² Tania Stivani Pangestu and Edy Soesanto, "Analisis Strategi Indonesia Untuk Menghadapi Pasar Ekspor Migas."

³³ Klopott, Popek, and Urbanyi-Popiolek, "Seaports' Role in Ensuring the Availability of Alternative Marine Fuels—A Multi-Faceted Analysis."

authority. Reform should therefore focus on consolidating licensing procedures, integrating data systems across agencies, and ensuring procedural uniformity between central and regional administrations.³⁴

The comparative analysis also highlights the importance of coherent regulatory oversight. Rather than immediate institutional replication, Indonesia may pursue a gradual consolidation of supervisory authority through strengthened coordination mechanisms and clarified jurisdictional mandates. Over the longer term, the establishment of an independent regulatory body could be considered as an institutional evolution designed to reduce inter-agency overlap, enhance accountability, and improve policy consistency. Such reform must be calibrated to Indonesia's political, administrative, and fiscal capacity to ensure institutional sustainability.³⁵

The proposed institutional model establishes a centralized authority responsible for licensure, oversight, and the forecasting of energy requirements, thereby fostering more consistent policy determinations that are unaffected by inter-agency political friction. Furthermore, an independent regulatory body significantly enhances accountability, as supervision is insulated from sectoral political dynamics. With an integrated institutional structure, fuel-import regulations can become more responsive to market fluctuations, energy-related risks can be mitigated with greater efficiency, and policies can be formulated holistically based on robust market data and analysis. Ultimately, the simplification of oversight functions through an independent regulator not only reduces bureaucratic inefficiency but also fosters legal certainty, policy efficacy, and the development of a modern, highly responsive energy governance system in Indonesia.

Policy reform therefore requires a sequenced approach. Initial reforms should prioritize procedural simplification and digital integration to improve administrative efficiency. Medium-term reforms should focus on institutional coordination and regulatory harmonization. Long-term structural reform may involve the consolidation of supervisory authority within an integrated regulatory framework. This staged strategy reflects the comparative finding that administrative effectiveness develops through institutional capacity building rather than immediate structural transformation.

Overall, the comparative analysis demonstrates that petroleum import governance effectiveness is shaped primarily by administrative design rather than formal legal structure alone. Institutional integration, procedural standardization, and regulatory predictability function as core determinants of fiscal policy performance. Indonesia's reform priorities therefore lie in strengthening administrative coherence, simplifying licensing structures, and progressively consolidating regulatory authority. These measures, grounded in comparative

³⁴ Pung Karnantohadi, "Prinsip Hukum Pelayanan Perizinan Terpadu Satu Pintu (PTSP) Di Indonesia," *Airlangga Development Journal* 2, no. 2 (2020): 118–30, <https://doi.org/10.20473/adj.v2i2.18073>.

³⁵ Natasha Alexandra Gunawan and Wong Yew Chong Kester, "Analyzing the Open Electricity Market in Singapore Using Data Science Approaches," in *Proceedings of the International Conference on Industrial Engineering and Operations Management* (IEOM Society, 2021), 6580–91, <https://doi.org/10.46254/an11.20211128>.

institutional evidence, provide a realistic pathway for improving petroleum import governance while accommodating Indonesia's structural and socio-political context.

4. CONCLUSION

This study concludes that the effectiveness of petroleum import fiscal governance depends not only on substantive regulation but also on institutional architecture, procedural integration, and administrative capacity. The comparative analysis shows that Indonesia's fragmented institutional authority, multilayered licensing procedures, centralized import arrangements, and limited digital interoperability constrain regulatory predictability, accountability, and the effectiveness of fiscal instruments in influencing import dynamics, which remain strongly affected by global prices, declining domestic production, and market volatility. Singapore's coordinated institutional mandates, integrated digital procedures, standardized licensing, and consistent regulatory enforcement demonstrate the importance of administrative coherence in supporting regulatory stability and policy responsiveness. The novelty of this study lies in linking administrative law architecture with petroleum import fiscal governance through a comparative civil law and common law framework, thereby extending the analysis of petroleum import policy beyond economic determinants to institutional and procedural dimensions. Based on these findings, Indonesia's regulatory reform should focus on strengthening digital interoperability, integrating inter-agency administration, clarifying institutional authority, simplifying licensing procedures, and enhancing administrative accountability. Future research should empirically examine regulatory implementation and institutional performance to assess the applicability of these governance principles across Indonesia's diverse administrative contexts.

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