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Legal Dualism in Land Controlover *Grondkaart* between PT Kereta Api Indonesia (Persero) and The Yogyakarta Sultanate

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ABSTRACT

This study aims to analyze the legal consequences of the dualism of land control involving grondkaart land claimed by PT Kereta Api Indonesia (Persero) that overlaps with Yogyakarta Sultanate Land (Tanah Kasultanan), and to formulate a future legal framework to ensure legal certainty. This study employs a normative juridical method using statutory, conceptual, case, and historical approaches. The data are analyzed qualitatively through grammatical, systematic, historical, and sociological or teleological interpretation. The overlap between control over grondkaart land and Sultanate Land, which reflects the intersection of Indonesia's national agrarian law regime and the special legal regime of the Special Region of Yogyakarta, has not been specifically examined. This study proposes an integrated legal framework comprising the harmonization of legal norms, verification of land parcels, clarification of the legal status of grondkaart documents, regulation of the legal relationships governing land use, and administrative dispute resolution. The findings indicate that the dualism of land control creates uncertainty regarding land status and the legal basis for control because the relationship between, and the respective scopes of application of, Dictum IV point A of the Basic Agrarian Law (UUPA), Article 5 of the UUPA, and Article 32 of the Law on the Privileges of the Special Region of Yogyakarta remain unclear. This uncertainty affects land use, administration, registration, and the legal certainty of transactions involving land. Going forward, grondkaart documents should be positioned as historical and administrative records that support land identification and evidentiary assessment, rather than as substitutes for land title certificates. This approach should be accompanied by the clarification and regulation of the legal relationships between the parties.

Keywords: Grondkaart Land; Dualism in Land Control; Sultanate Land; Legal Certainty; Legal Harmonization.

1. INTRODUCTION

Land occupies a strategic position in the life of the nation and the state, as it serves not only as an economic resource but is also closely associated with the social, cultural, historical, and legal dimensions of society. In the Indonesian legal system, land governance is grounded in Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which stipulates that the land, waters, and natural resources contained therein shall be controlled by the state and utilized for the greatest prosperity of the people. Furthermore, Article 18B paragraph (2) of the 1945 Constitution recognizes and respects customary law communities and their traditional rights, provided that they meet the applicable constitutional requirements. These provisions demonstrate that land governance concerns not only the state's authority to regulate land use but also the need to recognize rights rooted in historical and customary traditions (Burhanuddin, 2021). In the context

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of the Special Region of Yogyakarta (Daerah Istimewa Yogyakarta, hereinafter referred to as DIY), the relationship between national land law and the recognition of the Sultanate's historical rights becomes particularly relevant when a land parcel has a history of control involving different legal foundations.

The enactment of Law Number 5 of 1960 on Basic Agrarian Principles (Undang-Undang tentang Peraturan Dasar Pokok-Pokok Agraria, hereinafter referred to as the UUPA) marked a significant step toward establishing a national agrarian legal system. Article 2 paragraph (1) of the UUPA establishes the state's right of control over land, water, and airspace, while Article 16 paragraph (1) regulates the types of land rights recognized under the national agrarian legal system. Although the UUPA was intended to eliminate the dualism of agrarian law arising from colonial legal systems and customary law, its enactment did not automatically resolve all issues concerning land control predating the law. Land previously controlled under colonial administrative arrangements or the governance systems of self-governing territories (swapraja) still requires an examination of its origin, the legal basis of control, and the status of the relevant rights under applicable law. Accordingly, historical documents must be assessed in terms of their function, legal basis, and relationship to the applicable conversion and land registration provisions, rather than solely on the basis of their existence.

One document relevant to this issue is the grondkaart, a map originating from colonial-era railway administration and used to indicate the location and boundaries of land parcels associated with railway operations. In this study, the grondkaart is treated as a historical and administrative document relevant to tracing the history of railway-related land control. However, this function must be distinguished from the legal status of a document as evidence of land rights within the national agrarian legal system. The existence of a grondkaart does not, in itself, establish that land rights have been validly acquired, converted, or registered under the applicable legal provisions. Conversely, its evidentiary value cannot be disregarded without examining the document's origin, the legal basis underlying the control it records, its relationship to the nationalization process, and the relevant land registration records. Accordingly, the legal status of a grondkaart must be determined through an assessment of the relevant legal materials and facts concerning the land parcel in question, rather than through generalizations about the document's evidentiary strength or limitations (Masykur et al., 2025).

In the history of Indonesia's railway sector, the nationalization of Dutch-owned companies under Law Number 86 of 1958 constituted an important stage in tracing changes in the control of railway assets. Nevertheless, the nationalization of a company and the determination of the legal status of each land parcel are distinct legal issues. The history of corporate asset transfers does not,

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by itself, establish whether a particular land parcel is subject to a land right recognized under the national legal system, how that right was affected by the enactment of the UUPA, or whether the parcel overlaps with land controlled on another legal basis. Within this framework, Dictum IV of the Conversion Provisions of the UUPA must be applied in accordance with its normative scope, particularly the provisions concerning rights and authority over land and water derived from swapraja or former swapraja territories that remained in existence when the UUPA came into force. These provisions cannot be interpreted as automatically resolving the legal status of all railway land parcels recorded in grondkaart documents. Determining the status of a particular parcel still requires an examination of the relevant legal basis of control and the legal provisions applicable to the property's history.

The issue becomes more complex when a land parcel recorded in a grondkaart is located within DIY and is alleged to overlap with Sultanate Land (Tanah Kasultanan). Sultanate Land has a history of control associated with the Yogyakarta Sultanate and is recognized within Indonesia's national legal system through Law Number 13 of 2012 on the Privileges of the Special Region of Yogyakarta. Article 32 paragraph (1) of this law establishes the Sultanate and the Duchy as legal entities. Article 32 paragraph (2) recognizes both entities as subjects of ownership rights over Sultanate Land and Duchy Land (Tanah Kadipaten), while Article 32 paragraph (3) stipulates that such ownership encompasses Tanah Keprabon and Tanah Bukan Keprabon throughout DIY. Furthermore, Article 32 paragraphs (4) and (5) regulate the authority of the Sultanate and the Duchy to manage and utilize these lands for cultural development, social purposes, and public welfare. These provisions demonstrate that the recognition of Sultanate Land has a basis in positive law. However, applying this recognition to a particular land parcel still requires consideration of the parcel's identity, the legal basis of control, and the applicable land registration provisions.

Further regulations concerning Sultanate Land are provided in Yogyakarta Special Region Regulation Number 1 of 2017 on the Management and Utilization of Sultanate Land and Duchy Land. Article 1 point 1 defines Sultanate Land as land owned by the Sultanate, comprising Tanah Keprabon and Tanah Bukan Keprabon, also referred to as Dede Keprabon, within DIY. Article 2 paragraph (1) establishes the principles of recognizing historical rights, ensuring governmental effectiveness, and utilizing local wisdom in the management and use of such land. Meanwhile, Article 2 paragraph (2) identifies values that must be taken into consideration, including legal certainty, justice, orderly administration, and transparency. These provisions must be read in conjunction with Article 4, which addresses the scope of land management and utilization, and Article 5, which regulates the status of the Sultanate and the Duchy as legal entities and subjects of ownership rights over their respective lands. Accordingly, Yogyakarta Special Region Regulation

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Number 1 of 2017 provides a framework for the management and utilization of Sultanate Land. Nevertheless, the applicability of its provisions to land parcels claimed or recorded as railway land must be determined by examining the specific parcel and its relevant legal basis, rather than relying solely on its geographical location.

The intersection between the historical control of railway land and the legal recognition of Sultanate Land gives rise to legal issues when both bases of control refer to the same parcel or involve overlapping boundaries. This situation cannot immediately be characterized as a conflict of norms between the UUPA and the Law on the Privileges of the Special Region of Yogyakarta (Huang et al., 2025). The two legal regimes have distinct regulatory scopes; therefore, the central issue is how their respective provisions apply to a specific parcel with a layered history of control. On the one hand, a grondkaart may provide evidence for tracing the history of railway-related land control, but its evidentiary weight and legal consequences must be assessed in light of the relevant legal basis of control and applicable legal provisions. On the other hand, recognition of the Sultanate as a legal entity holding ownership rights over Sultanate Land does not eliminate the need to identify and verify whether a particular parcel actually falls within the scope of Sultanate Land. The two bases of control must therefore be analyzed systematically by distinguishing historical documents, corporate assets, land rights, and land administration records.

This issue can be examined through the perspective of legal pluralism as discussed by Achmad Hariri and Basuki Babussalam. This perspective is relevant to understanding the existence and interaction of different legal orders that possess distinct sources, characteristics, and forms of legitimacy within a society. In the context of this study, the history of colonial railway administration and the legal recognition of Sultanate Land interact within the national land law system applicable in the Special Region of Yogyakarta (DIY). Nevertheless, legal pluralism does not imply that every basis of land control has equal legal standing or that the existence of two claims over the same parcel automatically gives rise to rights of equal legal strength. The legal consequences for the disputed land must still be determined through an analysis of the hierarchy of laws and regulations, the conversion of land rights, the legal status of the land parcel, and the applicable land registration mechanisms. Accordingly, legal pluralism is used to explain the existence and interaction of the various normative orders underlying the dualism of land control, whereas the legal standing of each party must be determined on the basis of positive law and relevant legal materials (Hariri and Babussalam, 2024).

Uncertainty regarding the relationship between historical documents, the legal basis of control, and the status of land rights directly affects the legal certainty of the parties. Uncertainty concerning the identity of the land parcel, its boundaries, or the legal authority of the party

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exercising control may give rise to differing interpretations among PT Kereta Api Indonesia (Persero), the Yogyakarta Sultanate, and land administration authorities. This issue is also relevant to notarial practice and land law, particularly when a land parcel becomes the subject of a legal transaction. Article 16 paragraph (1) point (a) of Law Number 30 of 2004 on the Office of Notary Public, as amended by Law Number 2 of 2014, requires notaries to act in good faith, honestly, carefully, independently, impartially, and in the interests of the parties involved in a legal transaction. Meanwhile, the authority to execute deeds relating to land is addressed in Article 15 paragraph (2) point (f) of the same law. These provisions do not empower notaries to determine the legal status of land rights; rather, they emphasize the importance of exercising due care in verifying the land parcel and the authority of the parties when executing deeds (Habib, 2018). Accordingly, clarity regarding the legal basis of control and the legal status of the land is necessary to reduce the risks associated with legal transactions involving properties whose status still requires verification.

Previous studies cited in this research have examined issues concerning grondkaart documents and Sultanate Land from several perspectives. Huang, in the article entitled "Overlapping Land Rights between Railway Grondkaart Land and Community Land Rights," examines the factors contributing to overlaps between railway land recorded in grondkaart documents and community land rights, as well as possible approaches to resolving such conflicts. This study focuses on conflicts between control based on railway administrative documents and community land rights. In contrast, the present study examines the intersection between PT Kereta Api Indonesia (Persero)'s basis of land control and Sultanate Land, thereby requiring an analysis that connects the history of railway administration with the special legal provisions governing Sultanate Land in DIY (Huang et al., 2025). Eti Karini's study, entitled "The Legal Status of Grondkaart as Evidence of Land Control (A Study at PT Kereta Api Indonesia (Persero), Regional Division IV Tanjung Karang, 2021)," as identified in the thesis's originality comparison table, focuses on the status of grondkaart as evidence of land control by PT Kereta Api Indonesia (Persero). This study is relevant to understanding debates concerning the evidentiary function of grondkaart documents. However, its focus differs from that of the present study, which examines the relationship between such documents and the legal recognition of Sultanate Land (Karini, 2021).

Based on a comparison of the focus and objects of these two studies, the novelty of the present research does not rest on the claim that grondkaart, Sultanate Land, or overlapping land control in DIY has never previously been studied. Instead, its novelty lies in examining the intersection between PT Kereta Api Indonesia (Persero)'s basis of control over grondkaart land and Sultanate Land within an integrated legal framework that connects the conversion provisions of the

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UUPA, the nationalization of railway companies, the recognition of Sultanate Land under Law Number 13 of 2012, and the regulations governing its management under Yogyakarta Special Region Regulation Number 1 of 2017. By limiting its scope to land parcels for which an overlap is indicated by relevant legal materials, this study seeks to analyze the legal consequences arising from the intersection of these two bases of control while identifying the need for future legal arrangements to clarify the legal status of the land parcels and the mechanisms for resolving related disputes.

Based on the foregoing discussion, this study aims to analyze the legal consequences of the dualism of control over PT Kereta Api Indonesia (Persero)'s grondkaart land that overlaps with Yogyakarta Sultanate Land and to formulate future legal arrangements to ensure legal certainty. The analysis examines the conversion provisions of the UUPA, regulations concerning the nationalization of Dutch-owned companies, Law Number 13 of 2012, Yogyakarta Special Region Regulation Number 1 of 2017, and other legal materials relevant to the research object. Through this approach, the study is expected to contribute to the development of agrarian law and notarial studies, particularly by clarifying the relationship between historical documents, the legal basis of land control, the status of land rights, and land administration mechanisms when a land parcel has overlapping histories of control.

2. RESEARCH METHODS

This study employs a normative legal research method using statutory, conceptual, case, and historical approaches. The case approach examines Yogyakarta District Court Decision Number 137/Pdt.G/2024/PN Yyk, dated 17 October 2024, which was purposively selected because it directly concerns the dispute between the Ngayogyakarta Hadiningrat Sultanate and PT Kereta Api Indonesia (Persero), particularly with regard to the grondkaart land in dispute and the overlapping legal bases of land control. The decision was selected based on its relevance to identifying the disputed land, the legal grounds advanced by the parties, and the judge's legal reasoning in relation to the research issues. The use of this decision is not intended to conclude that all grondkaart land in the Special Region of Yogyakarta is subject to overlapping control or that all claims asserted by the Sultanate have been substantiated.

The legal materials were analyzed qualitatively through the identification, classification, and examination of primary, secondary, and tertiary legal materials obtained through library research. The court decision was analyzed by identifying the disputed object and legal issues, comparing the legal bases of control asserted by the parties, and examining the ratio decidendi, or the judge's legal reasoning, in light of the relevant legal provisions. These include the Basic

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Agrarian Law, regulations concerning nationalization and state asset management, and regulations governing Sultanate land. Grammatical, systematic, historical, and teleological interpretations were employed to assess the legal status of grondkaart as an administrative document relating to assets and to distinguish its evidentiary function from that of land rights recognized under applicable law. The findings were used to formulate the legal consequences of overlapping land control and to develop a legal framework capable of supporting legal certainty, while limiting the conclusions to the facts and issues relevant to the court decision under examination.

3. RESULTS AND DISCUSSION

Legal Consequences of the Dualism in Land Control over Grondkaart between PT Kereta Api Indonesia (Persero) and the Yogyakarta Sultanate

Based on the research findings, the dualism of land control involving Grondkaart between PT Kereta Api Indonesia (Persero) (PT KAI) and the Yogyakarta Sultanate requires an analysis that distinguishes the historical background of land control, the recording of corporate assets, evidence of land possession, and land rights under the national land law framework. Historically, Grondkaart was a cartographic and administrative document indicating the location and boundaries of land designated for railway purposes during the colonial period. Although the nationalization of Dutch-owned companies under Law Number 86 of 1958 provides a basis for tracing the origins of railway assets, nationalization and the continued management of such assets do not automatically establish that all land listed in a Grondkaart constitutes land over which PT KAI holds legally recognized land rights. Under Law Number 5 of 1960 on Basic Agrarian Principles (Undang-Undang tentang Peraturan Dasar Pokok-Pokok Agraria, hereinafter the UUPA), particularly Article 16(1), Grondkaart is not an independently recognized category of land right. Nevertheless, it may retain evidentiary value depending on its authenticity, function, correspondence with the land in question, and relationship to other land documents. This issue is relevant to Article 19 of the UUPA, Government Regulation Number 24 of 1997, as amended by Government Regulation Number 18 of 2021, and Article 32(1) of Government Regulation Number 24 of 1997, which establishes a land certificate as strong evidence of the physical and juridical data contained therein. In addition, Article 46(1) of Law Number 23 of 2007 on Railways requires the certification of land within railway track corridors and railway operating areas in accordance with applicable laws and regulations. Accordingly, this dualism of land control creates legal uncertainty that must be addressed by examining the Grondkaart alongside nationalization documents, land-possession archives, land acquisition or transfer documents, decisions granting land rights, and land registration records. Consequently, the recording of assets and the use of land by PT KAI cannot

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automatically be equated with lawful ownership of land rights. Huang et al. similarly demonstrate that the overlap between Grondkaart and other land rights may give rise to legal uncertainty (Huang et al., 2025).

The legal basis for the control of Sultanate Land (Tanah Kasultanan) must also be examined in light of its historical background and the development of national agrarian law. Before the enactment of the UUPA, the Yogyakarta Sultanate maintained its own land tenure system. However, the legal consequences of that system following Indonesian independence must be determined in accordance with the applicable legal provisions. Dictum IV, letter A, of the UUPA's Conversion Provisions stipulates that rights and authority over land and water belonging to self-governing territories (swapraja) or former self-governing territories that still existed when the UUPA came into force were extinguished and transferred to the state, while letter B delegates further regulation to a Government Regulation. These provisions cannot automatically be applied to all land with historical ties to the Sultanate, nor do they confer ownership rights on PT Kereta Api Indonesia (Persero). Furthermore, the UUPA was fully implemented in the Special Region of Yogyakarta only following Presidential Decree Number 33 of 1984 and its implementing regulations. Subsequently, Article 7(2)(d) and Article 32 of Law Number 13 of 2012 on the Privileges of the Special Region of Yogyakarta designate land affairs as a matter of special autonomy and recognize the Sultanate and the Duchy as legal entities eligible to hold ownership rights over Sultanate Land and Duchy Land, encompassing both Tanah Keprabon and non-Keprabon land. Nevertheless, recognition of the Sultanate as a subject of land rights does not automatically establish that a particular parcel constitutes Sultanate Land. Identification of the parcel, its history of possession, historical documents, physical and juridical data, and registration in accordance with applicable provisions are therefore required. Accordingly, the relationship between Dictum IV of the UUPA and Article 32 of Law Number 13 of 2012 must be analyzed systematically by considering the history, legal status, and characteristics of each parcel of land. Such an analysis must not conclude that Dictum IV eliminates every possibility of recognizing Sultanate Land or that the Law on the Privileges of the Special Region of Yogyakarta automatically revives historical rights and authority that have already been extinguished.

Yogyakarta District Court Decision Number 137/Pdt.G/2024/PN Yyk is examined using the case approach because it concerns a dispute over land use in the railway yard area of Yogyakarta Tugu Station between the Yogyakarta Sultanate (Kasultanan Ngayogyakarta Hadiningrat) and PT Kereta Api Indonesia (Persero). The central issue in this case is relevant to the present research on the legal position of Grondkaart, particularly in reconciling the basis of land control derived from railway administration with claims to Sultanate Land under land law and the

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regulations governing the special status of Yogyakarta. The analysis focuses on the relationship between the facts of the dispute, the legal bases of land control advanced by the parties, and their relevance to the UUPA and Law Number 13 of 2012 on the Privileges of the Special Region of Yogyakarta. However, because the case was resolved through a deed of settlement, it is not possible to identify a ratio decidendi concerning the validity or priority of land rights in the same manner as in a judgment that examines the merits of a case and determines the dispute on the basis of substantive legal considerations. Accordingly, this decision is used to analyze the dispute resolution process and its factual relevance to the research questions, rather than as a basis for concluding that the court has determined the legal status of Grondkaart in relation to rights over Sultanate Land. Further assessment of the legal consequences of the parties' settlement must be based on the complete text of the deed of settlement, while the status of Grondkaart as a historical document and its evidentiary value in relation to land rights must continue to be assessed under the applicable laws and regulations.

The relationship between the UUPA, Law Number 13 of 2012 on the Privileges of the Special Region of Yogyakarta, Law Number 23 of 2007 on Railways, and Law Number 86 of 1958 on the Nationalization of Dutch-Owned Companies must be examined in terms of the legal subjects, objects, scope of the relevant provisions, and transitional arrangements, rather than solely through the principle of lex specialis derogat legi generali. The UUPA governs national agrarian law, including land rights and land registration, and addresses, through Dictum IV of its Conversion Provisions, the rights and authority over land belonging to self-governing territories or former self-governing territories that still existed when the UUPA came into force. Meanwhile, the Law on the Privileges of the Special Region of Yogyakarta regulates land-related special authorities and recognizes the Sultanate and the Duchy as legal entities holding ownership rights over their respective lands, without automatically overriding the UUPA. The Railway Law, in turn, regulates land requirements for railway infrastructure but does not automatically establish Grondkaart as proof of land rights. The legal consequences of nationalization for a particular parcel must likewise be demonstrated through the relevant documents and history of transfer. Accordingly, the UUPA, the Law on the Privileges of the Special Region of Yogyakarta, and the Railway Law must be interpreted harmoniously, taking into account the relevant implementing regulations, including Government Regulation Number 24 of 1997 in conjunction with Government Regulation Number 18 of 2021, as well as Government Regulation Number 27 of 2014, as amended by Government Regulation Number 28 of 2020, where the land or assets concerned are established to fall within the regime governing state or regional property. PT KAI's asset status cannot automatically be equated with state property without examining the underlying

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ownership basis and applicable asset management regime. Therefore, the applicable law must be determined by reference to the history of land control, the status of the rights, the legal standing of the parties, and verifiable documents. This approach ensures that the application of the lex specialis principle does not lead to the conclusion that one legal regime must invariably prevail without a concrete examination of the circumstances.

From the perspective of legal pluralism, as discussed by Achmad Hariri and Basuki Babussalam, multiple legal systems may coexist within a single society, including state law, customary law, and religious law. In Indonesia, legal pluralism is associated with the colonial past and the country's sociocultural diversity, which have shaped layered legal practices. Hariri and Babussalam distinguish between two perspectives on legal pluralism: juridical legal pluralism, which refers to the state's formal recognition of other legal systems, particularly customary law, and empirical legal pluralism, which refers to the reality that people encounter more than one normative order in their social lives. Both perspectives are relevant to explaining the relationship between the national land law system, the historical administrative records of railway land, and the legal recognition of Sultanate Land in the Special Region of Yogyakarta (Hariri & Babussalam, 2024).

In this study, the ideas of Hariri and Babussalam are operationalized through four analytical parameters developed by the authors: (1) the existence of multiple normative orders, examined through colonial-era railway land administration, the continuity of asset control following nationalization, and the recognition of Sultanate Land under Law Number 13 of 2012 on the Privileges of the Special Region of Yogyakarta; (2) forms of legal recognition, analyzed by distinguishing the status of Grondkaart as a historical and administrative document relating to railway land control from the legal basis for controlling Sultanate Land, which receives recognition under national law, without assuming that the two bases automatically have equivalent legal standing or determine the status of land rights; (3) manifestations of legal pluralism in land administration, examined through concrete relationships among documents, claims of control, land use, and the authority exercised by the parties over the same or overlapping parcels in the Special Region of Yogyakarta; and (4) interactions and consequences between normative orders, analyzed through the facts and legal reasoning in Yogyakarta District Court Decision Number 137/Pdt.G/2024/PN Yyk, particularly to identify issues of legal recognition, overlapping authority, and legal uncertainty arising from the different bases of land control. These four parameters constitute the authors' operational framework derived from the legal pluralism perspectives of Hariri and Babussalam; they are not indicators explicitly formulated by those authors.

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Uncertainty surrounding the relationship between Grondkaart, PT KAI's asset records, claims to Sultanate Land, and land registration data may lead to differing interpretations in the identification, measurement, registration, utilization, and determination of authority over land. However, discrepancies in data or competing claims do not automatically establish the existence of duplicate rights or constitute grounds for cancelling a land certificate. Instead, such discrepancies must be assessed by considering the object concerned, the basis on which the documents were issued, the status of the rights, and the dispute resolution mechanisms prescribed by applicable laws and regulations. In this context, Article 16(1)(a) and Article 15(2)(f) of the Law on the Office of Notary Public emphasize the notary's duty to act carefully and the authority to draw up deeds relating to land matters, respectively, without authorizing a notary to determine the status of land rights or adjudicate land disputes. Notaries and Land Deed Officials (Pejabat Pembuat Akta Tanah, PPAT) must therefore examine the identity of the land object, the validity of the documents, the authority of the parties, and the consistency of the land records before executing a deed, without usurping the authority of land administration agencies or the courts. Accordingly, the dualism of land control affects not only PT KAI and the Sultanate but also creates legal risks for third parties. Comprehensive document verification, coordination with the competent authorities, and the postponement of legal transactions where the status of the land or the authority of the parties remains uncertain are therefore necessary.

Resolving the dualism of land control involving Grondkaart requires more than prioritizing the older document or automatically favoring one legal regime. Instead, it requires a resolution framework integrating five steps: harmonization of legal provisions through an examination of Dictum IV of the UUPA's Conversion Provisions, Articles 5 and 16 of the UUPA, and Articles 32–35 of Law Number 13 of 2012, together with their implementing regulations; integrated identification and verification of the land object, boundaries, area, history of possession, acquisition and nationalization documents, Grondkaart, Sultanate Land archives, and land registration data, involving the competent authorities, PT KAI, and the Sultanate; clarification of the status of Grondkaart as a historical and administrative document for tracing the history of land control rather than as proof of rights that automatically determines ownership; regulation of the legal relationship governing land use between PT KAI and the Sultanate on the basis of the legally established status of the rights, without disregarding the rights of other parties; and administrative or judicial resolution within the respective authorities' jurisdictions, followed by the updating of land records. The analytical contribution of this study lies in integrating the history of railway land control, the legal consequences of nationalization, the regulation of former self-governing territories' land under Dictum IV of the UUPA, and the recognition of Sultanate Land under Law

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Number 13 of 2012 through normative, historical, case-based, and legal pluralism approaches. Accordingly, this study does not assume that PT KAI or the Sultanate automatically has the stronger legal position. Instead, it proposes a mechanism for determining the status of each parcel according to verifiable legal criteria in order to achieve substantive and administrative legal certainty. Masykur's analysis of the resolution of Grondkaart land disputes reinforces the view that legal certainty requires improvements to the land law framework rather than merely resolving disputes arising from individual parcels (Masykur, 2022). Similarly, Koeswahyono, Muchsin, and Soimin's discussion of agrarian law and land control underscores the importance of understanding legal relationships concerning land in terms of authority, the social function of land, and orderly land administration (Koeswahyono, I., Muchsin, & Soimin, 2019).

Based on the analysis of legislation, the factual context of the case, and legal pluralism theory, the dualism of land control involving Grondkaart between PT KAI and the Yogyakarta Sultanate cannot be resolved solely by reference to the age of the documents or by applying the lex specialis principle in the abstract. Grondkaart has historical and administrative value as evidence of the history of land control, but it does not, in itself, create land rights. Conversely, recognition of the Sultanate's ownership rights under Article 32 of Law Number 13 of 2012 still requires proof that the disputed parcel constitutes Sultanate Land. Dictum IV of the UUPA's Conversion Provisions and the special regulatory framework governing Sultanate Land must be interpreted systematically by considering the legal subjects, objects, scope of the provisions, developments in land status, and relevant transitional arrangements. Yogyakarta District Court Decision Number 137/Pdt.G/2024/PN Yyk may serve as a basis for examining the application of legal provisions to a concrete dispute through an analysis of the ratio decidendi and operative ruling, based on a complete copy of the decision. From the perspective of legal pluralism, the existence of multiple bases of land control does not displace the obligation to determine the status of land rights under positive law. Therefore, harmonization of legal provisions, integrated identification and verification, clarification of the legal status of Grondkaart, regulation of land-use relationships, and coordination of administrative and judicial resolution are necessary to clarify the legal relationships between the parties, strengthen orderly land administration, and protect third parties without prejudicially disregarding any basis of land control.

4. CONCLUSION

The dualism of land control involving Grondkaart between PT Kereta Api Indonesia (Persero) (PT KAI) and the Yogyakarta Sultanate highlights the need to distinguish the history of land control, asset records, evidence of possession, and land rights. Grondkaart is a historical and

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administrative document that does not, in itself, establish land rights, while the recognition of the Sultanate as a legal entity eligible to hold ownership rights under Law Number 13 of 2012 does not automatically establish that a particular parcel constitutes Sultanate Land. Therefore, the Basic Agrarian Law (UUPA), the Law on the Privileges of the Special Region of Yogyakarta, the Railway Law, and the Nationalization Law must be interpreted systematically by taking into account the legal status and history of each parcel. Yogyakarta District Court Decision Number 137/Pdt.G/2024/PN Yyk is relevant as a context for dispute resolution; however, it cannot be regarded as establishing the priority of land rights because the case was resolved through a deed of settlement. From the perspective of legal pluralism, legal certainty requires the examination of each basis of land control in accordance with positive law and verifiable evidence.

Resolving this dualism requires five steps: (1) identifying overlapping land parcels; (2) verifying Grondkaart, nationalization documents, Sultanate archives, land acquisition documents, and land registration records; (3) reviewing and reconciling data across institutions, involving the competent land authorities, PT KAI, and the Sultanate; (4) determining the appropriate administrative registration procedure or dispute resolution mechanism based on the applicable legal status and jurisdiction; and (5) adjusting land records and regulating land-use arrangements in accordance with the lawfully established outcome, while continuing to protect the rights of third parties. This study contributes by integrating historical, normative, case-based, and legal pluralism analyses to emphasize that the determination of land rights cannot rely solely on the age of documents or asset records. Instead, it requires verification of the land object, supporting evidence, and legal status to achieve legal certainty and orderly land administration.

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