



THE CONSTITUTIONAL COURT'S AUTHORITY TO REVIEW GOVERNMENT REGULATIONS IN LIEU OF LAW (PERPPU) FROM THE PERSPECTIVE OF SEPARATION OF POWERS

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Article History :

Submission : February 20,
2025

Revised : May 12, 2025

Accepted : June 10, 2025

Published : June 20, 2025

Keywords : Constitutional
Court, Government
Regulation,
Constitutionality Review**Abstract**

The Constitutional Court (Mahkamah Konstitusi), as the guardian of the Constitution, plays a crucial role in reviewing the constitutionality of legal norms, including Government Regulations in Lieu of Law (Perppu). Although Article 24C paragraph (1) of the 1945 Constitution normatively mentions only "laws" (undang – undang), jurisprudential practice has categorized Perppu as part of statutory law, thus allowing its constitutionality to be reviewed. This study aims to examine the Constitutional Court's authority to review Perppu from the perspective of the theory of separation of powers, while also critically assessing its implications for the stability of Indonesia's constitutional system. The research method employed is a normative juridical approach with qualitative analysis based on literature review, supported by secondary data including Constitutional Court decisions, statutory regulations, and academic literature. The findings indicate that the Court's authority to review Perppu opens up space for checks and balances on executive power. However, it also carries the potential for disharmony among branches of state power and biased interpretations of the condition of "compelling urgency." The study concludes that while the Constitutional Court legally holds the legitimacy to review Perppu, clearer juridical boundaries are needed to prevent disproportionate expansion of its authority. This research contributes to the discourse on constitutional law reform in Indonesia by upholding constitutional supremacy and maintaining the balance of powers.

Abstrak

Mahkamah Konstitusi, sebagai penjaga konstitusi, memainkan peran penting dalam menguji konstitusionalitas norma hukum, termasuk Peraturan Pemerintah Pengganti Undang-Undang (Perppu). Meskipun Pasal 24C ayat (1) UUD 1945 secara normatif hanya menyebutkan "undang-undang", praktik yurisprudensi telah mengkategorikan Perppu sebagai bagian dari peraturan perundang-undangan, sehingga memungkinkan untuk dilakukan pengujian konstitusionalitasnya. Penelitian ini bertujuan untuk mengkaji kewenangan Mahkamah Konstitusi dalam menguji Perppu dari perspektif teori pemisahan kekuasaan, sekaligus menilai secara kritis implikasinya terhadap stabilitas sistem ketatanegaraan Indonesia. Metode penelitian yang digunakan adalah pendekatan yuridis normatif dengan analisis kualitatif berbasis studi kepustakaan, didukung oleh data sekunder yang mencakup putusan Mahkamah Konstitusi, peraturan perundang-undangan, dan literatur akademik. Temuan penelitian menunjukkan bahwa kewenangan Mahkamah untuk menguji Perppu membuka ruang checks and balances terhadap kekuasaan eksekutif. Namun, hal ini juga berpotensi menimbulkan disharmoni antar lembaga negara serta penafsiran yang bias terhadap kondisi "kegentingan yang memaksa". Penelitian ini menyimpulkan bahwa meskipun Mahkamah Konstitusi secara hukum memiliki legitimasi untuk menguji Perppu, diperlukan batasan yuridis yang lebih jelas guna mencegah perluasan kewenangan yang tidak proporsional. Penelitian ini berkontribusi pada wacana reformasi hukum konstitusi di Indonesia dengan menegakkan supremasi konstitusi dan menjaga keseimbangan kekuasaan.

INTRODUCTION

In Indonesia's constitutional system, the Constitutional Court (Mahkamah Konstitusi/MK) serves as a constitutional judicial body whose primary role is to act as the guardian of the constitution (Febri et al., 2025). One of its most strategic authorities is to review laws against the 1945 Constitution of the Republic of Indonesia (UUD 1945) (Andy Omara, 2025). However, a legal dilemma arises when the Court also conducts judicial review of Government Regulations in Lieu of Law (Perppu), which are not explicitly mentioned in the Constitution as objects of judicial review. This situation has sparked both juridical and theoretical debates in the field of constitutional law, particularly concerning the principle of separation of powers (Munif, 2023).

Perppu is essentially an executive legal product issued by the President in a state of compelling urgency. Yet through Decision No. 138/PUU – VII/2009, the Constitutional Court declared that it holds the authority to review both the formal and material aspects of a Perppu—even before it is ratified into law by the House of Representatives (DPR). This raises a fundamental question: Is the Court overstepping its constitutional boundaries, and is such action consistent with the separation of powers principle that underpins a democratic system?

This study seeks to fill the normative and conceptual gap surrounding the increasingly frequent practice of Perppu review by the Constitutional Court within Indonesia's political and legal dynamics. Literature review indicates a disparity between theory and practice, particularly in understanding the limits of judicial intervention in emergency executive policies. Within this context, an in-depth analysis is necessary regarding the Court's position as a counterbalance to power amid the potential concentration of presidential authority through Perppu issuance.

The objective of this research is to analyze the constitutional basis for the Constitutional Court's authority to review Perppu, to critique the constitutional implications of this authority within the framework of the separation of powers, and to offer reform-oriented ideas for restructuring the relationship among branches of power in upholding constitutional supremacy.

METHODS

This study employs a normative juridical method with both conceptual and statutory approaches. This methodology is chosen to analyze the Constitutional Court's authority to review Government Regulations in Lieu of Law (Perppu) based on the existing legal framework and fundamental principles of constitutional governance. The focus of the analysis is on the legal norms enshrined in the 1945 Constitution (UUD 1945), Law Number 24 of 2003 concerning the Constitutional Court (and its amendments), as well as relevant Constitutional Court decisions, particularly Decision Number 138/PUU-VII/2009, which serves as the main jurisprudential foundation for this issue.

The data in this study are secondary in nature, obtained through a literature review of primary, secondary, and tertiary legal materials. Primary legal materials include statutory regulations and Constitutional Court decisions; secondary materials consist of academic literature such as journals, books, and previous research; and tertiary legal materials are used to support a deeper understanding of legal terms and principles.

The analysis technique is qualitative, emphasizing systematic and historical interpretation of legal norms, and examining the relationship between judicial authority and executive power within the framework of the theory of separation of powers. Theories used as analytical tools in this

research include the theory of separation of powers, the theory of checks and balances, and the theory of constitutional supremacy. These are applied to assess whether the practice of reviewing Perppu by the Constitutional Court remains within the boundaries of democratic constitutionalism or instead creates ambiguity in the distribution of powers within Indonesia's constitutional system.

RESULT AND DISCUSSION

The Constitutional Authority of the Court to Review Government Regulations in Lieu of Law (Perppu)

The Constitutional Court of the Republic of Indonesia was established as a state institution tasked with preserving the purity of the constitution through the mechanism of constitutional review of legal norms (Abdurrahman, 2022). One of its primary functions is to conduct both substantive and formal reviews of laws alleged to contradict the 1945 Constitution (UUD 1945). Normatively, this authority is stipulated in Article 24C paragraph (1) of the 1945 Constitution, which affirms that the Constitutional Court is authorized to adjudicate at the first and final level with final decisions regarding the judicial review of laws against the Constitution.

Although the text of the Constitution only mentions "laws" as objects of review, constitutional practice has shown that the Constitutional Court also accepts and adjudicates petitions for judicial review of Government Regulations in Lieu of Law (Perppu). This raises debate regarding the limits of the Court's authority, especially considering that Perppu is a presidential regulation issued in an emergency context and belongs to the executive, not legislative, domain (Aneka Rahma et al., 2024).

Perppu is a legal norm issued by the President in situations of compelling urgency as provided in Article 22 of the 1945 Constitution. In the framework of emergency law, the President holds discretionary power to enact a Perppu as a swift solution to legal gaps. The Perppu must then be approved by the House of Representatives (DPR) in the subsequent legislative session; otherwise, it must be revoked. The Constitutional Court's practice of accepting judicial review of Perppu, particularly with respect to its formal aspects (i.e., whether the "compelling urgency" requirement is met), has shifted the constitutional paradigm. Some legal scholars see this as a form of progressive judicial control over executive power, while others criticize it as an overreach of judicial function into the realm of political policymaking.

Decision Number 138/PUU-VII/2009 of the Constitutional Court marked a pivotal moment affirming that Perppu could be subject to judicial review. In this ruling, the Court asserted that Perppu is, in functional terms, a law and thus falls within the scope of review. Furthermore, the Court stated that the phrase "compelling urgency" is not solely a presidential prerogative but may be objectively evaluated by the judiciary. This functional shift indicates a phenomenon of judicialization of politics within Indonesia's constitutional practice. In this context, the judiciary no longer merely safeguards the constitution passively but actively engages in assessing public policies, including those enacted in emergency contexts (Haryono, 2022).

Perppu as an Object of Formal and Material Judicial Review: Doctrinal and Practical Controversies

The controversy intensifies when the review of Perppu extends beyond its normative substance to the formal aspects of its issuance. The Constitutional Court not only evaluates the content of a Perppu but also judges whether the objective situation behind its issuance truly warrants a state of emergency. This creates tension between judicial and

executive powers. On one hand, the Court upholds its mandate as guardian of the constitution; on the other, it steps into the presidential domain as head of state. The absence of clear boundaries on how far the Court may assess emergency situations renders the review of Perppu highly susceptible to interpretative bias.

From the perspective of classical constitutional law, particularly the Montesquieuan doctrine, the separation of powers is designed to prevent the concentration of power in a single institution. When the Court assesses executive discretionary policies, there is concern that it exceeds its judicial authority, which should be confined to evaluating norms rather than political facts.

Nevertheless, in modern legal systems, especially in states adopting checks and balances, institutional oversight is deemed essential for maintaining constitutional stability. In this context, the Constitutional Court plays a vital role in restraining executive dominance, particularly when the legislative branch fails to function effectively. The debate over the Constitutional Court's authority to review Perppu is closely tied to the effectiveness of political oversight by the DPR. Numerous cases show that Perppu are approved hastily by the DPR without thorough examination of their urgency or impact. In such cases, the Court is seen as a more objective counterbalance, free from political pressure.

However, positioning the Court as a "judge of emergency policy" introduces legitimacy challenges. Do constitutional judges possess the competence and capacity to objectively assess socio-political conditions? Is this not the domain of the executive, which has bureaucratic and intelligence instruments to evaluate field conditions? Moreover, judicial review of Perppu by the Court also introduces temporal dilemmas. Perppu are meant to take immediate effect in emergencies, but if subject to judicial review beforehand, their emergency function may be delayed. This highlights the conflict between the need for executive speed and the slow pace of judicial oversight.

The practical implications of Perppu review by the Court are far-reaching. A Perppu annulled by the Court can nullify entire government policies based on it, creating legal uncertainty and administrative disruption. This reality demands a conceptual revision of the relationship between the Constitutional Court and the President in the context of Perppu issuance. A constitutional formula is needed to guarantee the supremacy of the Constitution without sacrificing the effectiveness of emergency policy. As such, the constitutional review of Perppu must be framed within clear mechanisms and parameters.

The Role of the Court in Emergency Contexts: Between Legal Oversight and Political Intervention

The Constitutional Court of the Republic of Indonesia was established as a state institution tasked with preserving the purity of the constitution through the mechanism of constitutional review of legal norms. One of its primary functions is to conduct both substantive and formal reviews of laws alleged to contradict the 1945 Constitution (UUD 1945). Normatively, this authority is stipulated in Article 24C paragraph (1) of the 1945 Constitution, which affirms that the Constitutional Court is authorized to adjudicate at the first and final level with final decisions regarding the judicial review of laws against the Constitution (Sulastri Caniago et al., 2024).

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Legal Interpretation and Judicial Activism in the Review of Perppu

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In several cases, the Court has annulled Perppu on formal grounds, leading to legal uncertainty, especially when the regulation had already been widely implemented. An ex post facto annulment by the Court may cause administrative disruption and potential legal harm to the public. This situation reveals the need for a conceptual reform of the relationship between the Constitutional Court and the President in the context of Perppu issuance. A constitutional formula is necessary to ensure constitutional supremacy while preserving the effectiveness of emergency governance. Therefore, the constitutional review of Perppu must be limited by clear mechanisms and legal parameters.

The controversy surrounding the Court's authority becomes even more complex when connected to high-profile case studies. One notable example is the 2017 Perppu on Mass Organizations, issued by President Joko Widodo to disband groups deemed contrary to state ideology. This Perppu was challenged in the Constitutional Court on the grounds that the emergency justification was unsubstantiated and the content violated constitutional rights (Prabowo, 2022).

In this case, the Court acknowledged the President's discretion in determining urgency but emphasized that such discretion is not absolute and remains subject to formal review. This decision demonstrates that the Court recognizes a distinction between political control by the DPR and legal review by the Court, while still allowing normative scrutiny of emergency contexts.

Another example is the review of Perppu Number 1 of 2020 on State Financial Policy for COVID-19 Response. Here, the Court faced a dilemma between the state's need to act swiftly during a crisis and the constitutional requirement to constrain executive power. The Court ultimately upheld the Perppu, declaring it constitutional. However, dissenting opinions criticized the lack of clear parameters for defining "compelling urgency" and warned of potential abuse of fiscal authority. This illustrates internal disagreement within the Court itself regarding the extent to which constitutional judges should assess emergency policymaking.

In legal theory, the review of Perppu reflects a shift from a positivistic to a hermeneutic and teleological approach. Judges no longer act merely as the "mouth of the law" (bouche de la loi) but as interpreters who consider the social, political, and constitutional consequences of the norms under review. This aligns with the theory of a living constitution, which sees the constitution as a dynamic document responsive to changing times (Triningsih et al., 2022).

However, such progressive approaches also carry the risk of excessive judicial activism. When the Court actively assesses policy substance and urgency contexts, it risks becoming a political actor rather than a legal interpreter. This raises concerns about judicial supremacy—the dominance of the judiciary over other branches of government.

At the same time, Perppu review underscores the importance of proportionality in constitutional law. Is the Court's intervention proportional to the risk of constitutional rights violations arising from the Perppu's implementation? While not always explicit in rulings, this principle implicitly informs judicial balancing between public interest and individual rights.

Procedural Challenges and Institutional Legitimacy in Perppu Judicial Review

Procedural critiques also arise, especially when judicial petitions are filed near the time a Perppu is ratified into law by the DPR, making the object of review moot. Hence, there is an urgent need to establish time limits for Perppu review to avoid normative clashes and inconsistencies in judicial authority (A. Zaenurrosyid et al., 2024).

Institutionally, the Court is called to be more transparent and accountable in Perppu review cases. Public delivery of decisions and publication of dissenting opinions are essential for maintaining institutional legitimacy. However, in highly politicized contexts, transparency alone may not suffice to uphold public trust.

Public confidence in the Constitutional Court depends greatly on the integrity of its justices and the consistency of its legal reasoning. The Court must not appear partial to the executive or swayed by political tides. Independence is its most crucial asset for ensuring that all rulings, including those on Perppu, are viewed as lawful and legitimate.

In many controversial cases, the Court has faced pressure from civil society and media. While public scrutiny is a form of accountability, it can also exert unhealthy influence over judicial independence. The Court must reinforce that Perppu review is a constitutional matter—not a political preference. Although normatively there is no explicit prohibition against reviewing Perppu, the lack of clear regulation creates a legal grey area that invites varied judicial interpretation. This highlights the urgent need for prescriptive legal norms governing the Court's authority over emergency regulations.

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Comparative Perspectives and Reform Recommendations for Perppu Review

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In comparative perspective, countries like Germany do not allow constitutional courts to review emergency policies unless they involve human rights violations. In South Africa, judicial review of emergency actions is limited to legality and excludes considerations of policy wisdom. Indonesia, with its semi-presidential system, occupies a more flexible position but is equally vulnerable to power abuse. If the Constitutional Court continues to allow judicial review of Perppu, it must be accompanied by detailed legal guidance, including criteria for urgency, procedures for fast-track constitutional review, and reasonable time limits. This would prevent the Court from becoming entangled in political evaluations better handled by the executive.

The Court must also clarify its methodological approach when reviewing Perppu—whether it is textual, historical, sociological, or teleological. Such explanation is crucial for legal scholars and the public to assess decisions on proper grounds. Integrity and ethical standards among justices are equally vital. Public perception of judicial neutrality is shaped by the reputation and conduct of the justices. Allegations of conflicts of interest or political affiliations can undermine even legally sound rulings.

Recent ethical violations by constitutional justices have eroded public trust in the Court. For instance, controversy surrounding Decision Number 90/PUU—XXI/2023, which modified presidential age requirements and was seen as favoring certain figures, illustrates how perceived partiality can damage institutional credibility—even in cases unrelated to Perppu.

The connection between ethics and authority in Perppu review becomes critical when judicial decisions directly affect governmental stability. If the public perceives the Court as merely extending executive power, the constitutional system of checks and balances loses its substantive value. In a democracy, legitimacy stems not only from legal norms but also from public confidence.

Hence, reviewing a Perppu is not only about testing a legal norm but also testing the institutional quality of the Court itself. The public evaluates whether the Court genuinely protects the constitution or merely participates in political dynamics. For this reason, the Court must maintain distance from political interests to avoid being caught in the politicization of law. Such politicization can also occur through the justice appointment process. Under the current system, Constitutional Court justices are selected by the President, DPR, and Supreme Court—all political actors or affiliates. This structure risks producing judges vulnerable to external pressure, including in politically sensitive Perppu cases.

Moreover, the decision-making process in Perppu cases should be methodologically transparent, enabling the public to understand the Court's legal reasoning. Whether the Court relies on the original intent of the 1945 Constitution's framers or the living constitution approach must be clearly stated. This enhances transparency and dispels the notion that the Court merely endorses government policy.

In various academic forums, discussions have emerged calling for reform of the Constitutional Court Law, particularly to clarify the scope of reviewable objects. Currently, no provision explicitly regulates the Court's authority to review Perppu. This absence invites broad interpretation and enables judges to subjectively expand constitutional meanings.

Legal reform may take the form of a limited amendment to the Constitutional Court Law, stipulating that Perppu may be reviewed substantively, while formal review is

permitted only after rejection by the DPR. Such a model balances political and judicial oversight and avoids premature Court intervention.

Additionally, Indonesia requires an objective framework for assessing "compelling urgency" as the basis for issuing Perppu. Presently, such evaluation is highly subjective and reliant on presidential reasoning. The lack of normative indicators opens the door to politicization of emergencies for specific agendas.

In this context, the Constitutional Court may advocate for the enactment of derivative legislation or regulations establishing strict and measurable parameters for urgency—such as disasters, national security crises, or economic instability substantiated by empirical data. This would assist the Court in conducting more structured formal reviews.

The current system's shortcomings are also evident in the slow process of reviewing Perppu. Given that Perppu are emergency instruments, their oversight mechanism must be swift and efficient. Thus, a judicial fast-track scheme for Perppu is needed to ensure the Court can assess constitutionality before the DPR ratifies or rejects it. Such a system would prevent the Court from losing jurisdiction once a Perppu becomes law—an outcome that has repeatedly caused wasted resources and procedural inefficiency.

Ultimately, judicial review of Perppu by the Constitutional Court concerns not only legal interpretation but also the direction of Indonesia's constitutional development. If the Court continues to expand its authority without clear boundaries, there is a risk it may evolve from guardian of the constitution into a covert policymaker. This could harm democratic equilibrium in the long term.

The authority of the Constitutional Court to review Perppu reflects the dynamic nature of the constitutional system. In a constitutional democracy, the Court must not only interpret the law but also protect citizens' constitutional rights from potential executive overreach. Therefore, Perppu review must strike a balance between effective governance and constitutional supremacy.

As emergency legal products, Perppu embody two critical traits: speed and risk of misuse. Oversight, including by the Constitutional Court, is essential—but must not nullify the urgency that justifies a Perppu. From a doctrinal standpoint, two approaches exist to evaluating the Court's authority: a conservative textual approach and a progressive functional one. The conservative view holds that the Court lacks authority over Perppu since only "laws" are explicitly mentioned as reviewable objects. In contrast, the functional approach equates Perppu with laws while they remain unrevoked, making them subject to judicial review (Fernando et al., 2024).

Each approach has strengths and weaknesses. The conservative stance preserves strict separation of powers and avoids judicial interference in executive policymaking but may allow unconstitutional Perppu to take effect unchecked. Conversely, the functional approach enhances judicial oversight but risks blurring judicial and political functions.

In practice, the Constitutional Court has opted for a middle path: acknowledging its authority to review Perppu while emphasizing that assessments of urgency are primarily political and best handled by the DPR. Unfortunately, this moderate stance lacks consistency and may shift with the composition of the bench or prevailing political context.

Consistency remains the Court's greatest challenge. Without it, the Court risks losing its legal and academic legitimacy. When the public perceives that decisions on Perppu vary with political circumstances, trust in constitutional justice erodes. This is particularly dangerous given that the Court is the final guardian of constitutional supremacy (Abadi, 2025).

Therefore, a reformulated legal framework is needed to clarify the scope, procedures, and time limits for Perppu review. This includes not only amending the Constitutional Court Law but also the Law on the Formation of Legislation. The revised law must explicitly state that Perppu can be reviewed and define a mechanism for fast-track review.

Beyond normative reform, institutional strengthening of the Court is essential. Justice selection must be merit-based, transparent, and insulated from political interference. Only with independent and high-integrity justices can the Court fairly and objectively review Perppu.

The practical implications of Perppu review are wide-ranging. A Perppu annulled by the Court may invalidate entire government policies based on it. If not managed carefully, this can cause legal uncertainty and administrative turmoil. Thus, a proportional approach balancing public interest with constitutional principles is required.

The Court must also set standard normative criteria for evaluating "compelling urgency." Currently, no clear parameters exist, leaving assessments open to subjective interpretation and criticism. Such standards may be developed through internal Court rules or academic treatises supporting jurisprudential practices.

Another challenge is maintaining the Court's function in Perppu review without succumbing to political entanglement. The Court must show that its rulings are grounded in legal principle, not political expedience. Clarity, transparency, and strong legal argumentation will be key indicators of the Court's institutional integrity.

Theoretically, the Constitutional Court's authority to review Perppu represents an evolution from rigid separation of powers to an adaptive checks and balances model. This adaptation is vital for modern democracies, which demand accountability across all branches of power—even in emergencies. However, such flexibility must be bounded by judicial self-restraint. The Court must know when to speak and when to remain silent in defense of constitutional balance.

In conclusion, the judicial review of Perppu by the Constitutional Court is inevitable in a legal system that upholds the constitution as the supreme law. However, its implementation must be designed proportionally and carefully, not as a tool to invalidate every executive policy, but solely to ensure that presidential actions remain within constitutional bounds.

This study recommends: first, the drafting of a law explicitly regulating the Constitutional Court's authority over Perppu; second, improving the selection process and ethical oversight of justices; third, formulating objective standards for assessing "compelling urgency"; and fourth, establishing a fast-track review mechanism for Perppu.

These steps will strengthen the Constitutional Court's role as an effective, proportional guardian of the constitution, while respecting the separation of powers in Indonesia's constitutional framework.

CONCLUSION

The Constitutional Court holds a strategic authority in safeguarding constitutional supremacy through the mechanism of judicial review of laws against the 1945 Constitution. In practice, this authority has been expanded to include the review of Government Regulations in Lieu of Law (Perppu), even though Perppu is not formally mentioned in Article 24C paragraph (1) of the Constitution as an object of review. Based on the analysis of Decision No. 138/PUU-VII/2009 and subsequent constitutional practice, it can be concluded that the Court has constructed a new legal framework that

allows for both formal and substantive review of Perppu, grounded in its constitutional role as guardian of the constitution.

This expansion of authority is not without theoretical and legal controversy concerning the principle of separation of powers. On one hand, the Court acts as a counterbalance against potential misuse of presidential power in issuing Perppu unilaterally. On the other hand, judicial review of executive discretion during emergencies may disrupt the balance among branches of power and open space for unchecked judicial activism. This study affirms that the review of Perppu by the Constitutional Court can be accepted within the framework of checks and balances, provided it is grounded in prudence, legal clarity, and firm constitutional boundaries. To ensure stability in the constitutional system, legal reforms are necessary to explicitly define the scope of judicial review over Perppu, both in formal and substantive terms. In this way, the Court's role as the final safeguard of the constitution can be preserved without violating the fundamental principles of democracy and separation of powers. The Constitutional Court plays a vital role in monitoring the President's use of Perppu. Although Perppu serves as a response to emergencies, its constitutional justification must remain aligned with democratic values and the rule of law. The Court has demonstrated courage in several decisions, but greater consistency and rigor in setting standards of urgency are still needed. Looking ahead, more rigid parameters must be established to determine when a Perppu is genuinely required, to prevent it from being misused as a political tool. Furthermore, strengthening the role of the public and the legislature in overseeing the use of Perppu is important as a form of democratic participation. Reordering the Constitutional Court's authority over the review of Perppu is part of a broader effort to improve a more accountable and transparent constitutional governance system.

AKNOWLEDGEMENTS

The authors would like to express their sincere gratitude to Universitas Islam Negeri Sjech M. Djamil Djambek Bukittinggi for the support and facilitation provided throughout the research process. Special appreciation is also extended to the funding bodies and academic mentors whose guidance was instrumental in the completion of this study. The authors also thank the resource persons who contributed valuable insights. All individuals and institutions mentioned have granted permission to be acknowledged.

AUTHOR CONTRIBUTIONS STATEMENT

Muhammad Febri Eka Saputra was responsible for designing the research framework and writing the introduction and background. Nadya Fransiska conducted the literature review and methodology section. Nanda Ariadi contributed to data analysis and interpretation of findings. Taufiq Hidayat worked on the discussion and provided revisions to the manuscript structure. Rais Jamhary finalized the manuscript, ensured compliance with academic standards, and supervised the overall research process. All authors have reviewed and approved the final version of the manuscript.

CONFLICT OF INTEREST

The authors declare that there is no conflict of interest regarding the publication of this article.

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