Sustainable Tourism as a Development Strategy in Indonesia

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Abstract
In recent years, Indonesia has increasingly shown its dependence on the tourism sector by adopting the idea of sustainable tourism as a development strategy. Based on doctrinal legal research method with a statutory and conceptual approach, this article used the concept of sustainable tourism to explore the opportunities and challenges faced by Indonesia in developing tourism sector. This article argues that even though Indonesia has the 2009 Tourism Law that specifically regulates tourism governance based on a multisectoral approach, this law does not clearly adopt the concept of sustainable tourism, resulting in different perceptions between actors at various levels of tourism administration. The sustainable tourism agenda in particular still depends on the initiatives of each actor, is fragmented and heavily influenced by various factors of power relations, financial capacity, and human resources. This article suggests the need for strengthening legal and institutional frameworks to achieve the 2030 Agenda for Sustainable Development Goals that place communities as the subject of tourism development.

Keywords: Sustainable tourism, the 2009 Tourism Law, the 2030 Agenda for Sustainable Development Goals, tourism governance.

INTRODUCTION
Tourism is an industrial sector that has grown steadily in the last few decades and has contributed positively to the development, poverty alleviation, and increased prosperity globally. The United Nations World Tourism Organization (UNWTO), the highest organization in global tourism governance, reported that around 1.5 billion travelers made international trips in 2019 [1]. A total of 85% of aviation mobility is highly dependent on the demand for the tourism sector, which includes international and domestic flights [2]. The tourism industry is estimated to contribute 10.2% of gross domestic product (GDP) or about $7.6 trillion in money transactions and provides around 432 million jobs worldwide [3]. Many small islands, especially those with warm climates, rely heavily on the sun, sea, and sand for tourist attractions, and these natural resources have traditionally been the basis of their industry [4]. The tourism sector has also been proven to develop micro, small and medium enterprises in urban and rural areas that allow local communities to get additional income from tourism activities. Although Covid 19 outbreak has dramatically hit the tourism business and hampered human mobility, many countries remain optimistic that the tourism industry will revive if a vaccine is rolled out soon [5]. The scale of broad influence and the large dependence of various economic sectors - especially in low and middle-income countries - on the tourism value chain has raised awareness of the need for each country to develop tourism governance that is effective in distributing benefits to all communities.

One of the contemporary tourism development strategies that are often advocated by Non-Governmental Organizations (NGOs) and multilateral institutions is a sustainable tourism strategy. This strategy is relatively preferred by many developing countries because it can increase the demand for tourism while simultaneously allowing for a balance between the environment, social, and economic communities. Through the case in many economic sectors, the concept of sustainability has become a mainstream concept that offers a green paradigm in line with the environmental challenges and climate change mitigation of the 21st century [6].

As a visiting destination that is on the rise, Indonesia is also actively developing the tourism sector to exploit the growing global tourism market. The contribution of the tourism sector to

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Indonesia’s GDP is estimated to reach 4.8% and has contributed around 15.4% of the national foreign exchange reserves in 2019 [7]. The World Economic Forum released Indonesia’s tourism competitiveness index, which climbed 2 points to rank 40 in 2019 from 42 in 2017 [8]. While certain destinations such as Bali, Lombok, and Yogyakarta have served as tourist hubs for decades, the Government is actively starting to orbit tourism destinations in less well-known areas [9]. The government places the tourism sector as a national development priority, with a target of 20 million foreign tourists and 275 million domestic tourists by 2019 [10]. However, despite its crucial contribution, the impact of tourism activities on basic environmental issues raises significant questions about the Government’s commitment to implementing tourism development as a tourism development strategy in Indonesia. The enormous increase in tourism in Indonesia since the reformation has created a double-edged phenomenon between economic growth on the one hand and environmental damage on the other hand.

This article employed the concept of sustainable tourism to explore the development strategy adopted by Indonesia in developing the tourism sector. Apart from its progressive role in helping to maintain biodiversity and socio-economic balance, the concept of sustainable tourism also represents one of the few recommendations in international legal regimes relating to environmental issues [11]. This article aimed to explain the extent of the sustainable tourism concept adopted in the tourism legal regime in Indonesia and its impact on society and the environment.

METHOD

This article involved library research based on the normative or doctrinal legal research method. The authors used the statutory and conceptual approaches to explore the developments of sustainable tourism in Indonesia. This article investigated the regulation and policy on Indonesian tourism that has employed the concept of sustainable tourism. We specifically review tourism-related regulations and policies regarding the opportunities and constraints of a tourism development strategy in Indonesia. We examined to what extent the concept of sustainable tourism has been adopted in Indonesian regulation and its constraint and challenge in its implementation. While the statutory approach aimed to understand the theoretical framework of law and tourism management in Indonesia, a conceptual approach refers to the sustainable tourism concept that was intended to understand the Indonesian tourism regulation within the non-law factors in the field.

The first part of this article discusses the main points of sustainable tourism by reviewing the literature on tourism, environmental law, and international development. Understanding the basic ideas of sustainable tourism and its position in the international legal regime is highly relevant given Indonesia’s membership in the UNWTO, which creates a legal obligation to adopt sustainable tourism in domestic policies. The next section analyzes the position of sustainable tourism in tourism governance in Indonesia. This section demonstrates Indonesia’s fragmented approach to tourism governance which has the potential to hinder progress on the sustainable tourism agenda.

RESULTS AND DISCUSSION

Tourism Governance and the Concept of Sustainable Tourism

The concept of sustainable tourism is widely regarded as a means of overcoming the negative impacts of tourism activities by conceptualizing environmental aspects such as conserving resources, conserving ecosystems, and controlling environmental damage in tourism governance. Sustainable tourism practices can be found in various forms of alternative tourism, such as ecotourism, pro-poor tourism, and village-based tourism, which are closely related to the issue of sustainable development [12]. Referring to the dominant neo-institutionalism literature in international development theory, UNWTO defines tourism governance as follows [13].

“Tourism governance is the process of managing tourist destinations through synergistic and coordinated efforts by the Government, at different levels and in different capacities, involving civil society that lives or is directly affected by tourism activities and business sectors engaged in tourism.”

In this regard, the United Nations Environment Program (UNEP) and UNWTO define sustainable tourism as tourism that dutifully concerns its current and future economic, social and environmental impacts, addressing the needs of visitors, industry, environment, and host communities [14]. The concept of sustainable tourism includes how tourism industry activities that have adverse
impacts on the environment, biodiversity, and vulnerable local cultural heritage can be controlled in such a way as to contribute to the needs of the present without overlooking the future.

This idea is widespread in various soft law regimes, especially the Sustainable Development Goals 2030 program adopted by the United Nations on September 25, 2015. Soft law refers to the approval of a principle or behavior that does not actually imply a binding obligation [11].

“The program of Sustainable Development Goals 2030 includes 17 agendas and 169 targets, which introduce a series of multilateral frameworks for poverty alleviation, protection of the planet from the threat of the climate crisis, and ensuring prosperity for all humanity.”

In the context of the tourism business, this program includes the goal of pursuing economic growth, creating employment, green-oriented consumption and production, circular economy, preservation of water sources and inclusive social development. Initiatives to make tourism more inclusive can be seen as an effort to improve the quality of human interaction and to ensure that tourism benefits those who have previously been economically marginalized [15]. It is also directly related to the fulfillment of human rights, gender equality, empowering women and mitigating climate change and preserving biodiversity [16]. It raises a new awareness of the need to develop sustainable tourism, marked by changing perceptions in society about environmental protection priorities that affect the economic structure, patterns of business relationships, and characteristics of the tourism industry [17]. The concept of sustainable tourism has been adopted as a policy and planning approach by governments globally. It seeks a minimal impact on the local environment and culture while helping to generate income and jobs for local people and to promote the conservation of local ecosystems [18].

The main difficulty in managing sustainable tourism is that it requires multisectoral arrangements such as policies and laws relating to planning, transportation, employment, culture, natural resources, and regional development [19]. Sustainable tourism requires effective governance, including appropriate institutions, rules for decision-making, and policy evaluation and monitoring practices to meet the economic, socio-cultural, and environmental dimensions of sustainable development [20]. Dinica stated that the state’s public authorities have the necessary competence to influence how the design of tourism policies should be developed so that the sustainable tourism agenda is, in turn, highly dependent on adequately designed legal rules and clearly defined development strategies [21]. All aspects that support tourism activities are based on a series of multi-scale arrangements covering the duties and authorities of the state; private-public partnerships; governing body; government at the local, regional, and national levels; community; and the role of private companies [22]. UNWTO defines three important indicators in policy and regulation of sustainable tourism, namely: utilization of environmental resources based on minimal use; respect for the socio-cultural identity of the host community and local traditional values; and redistribution of benefits to the entire community, including employment and opportunities for access to social services for host communities [23]. These three indicators were used to assess how the concept of sustainable tourism has been adopted in tourism regulations in Indonesia.

Sustainable Tourism in Indonesia’s Tourism Legal Regime

The rapid development of the tourism industry after reform is often associated with a shift in the orientation of market-based policies that emphasize the strength of private actors in the implementation of national tourist destinations. In the 1980s, Suharto’s New Order regime began to see tourism as an alternative engine of economic growth to reduce Indonesia’s economic dependence on exports of raw commodities [24]. The government has begun to develop the province of Bali as the center of the tourism industry for the international market segment by facilitating facilities and infrastructure for travelers, such as star hotels, international airports, shopping centers, culinary services, and tour guide services. The state also provides investment opportunities for foreign and domestic capital as business actors in organizing tourism.

With the advent of the reform era that drastically changed the economic and political landscape, the domestic tourism industry has gradually grown in several regions along with the ease information technology has offered, communication, and the emergence of the low-cost transportation market. The tourism industry sector also offers clear and relatively cheap
opportunities in terms of capital for regions to increase their respective original income. Many Local Governments autonomously take the initiative to engage in public-private partnerships in the provision of infrastructure for tourism, investment liberalization and tourism promotion activities both at home and abroad which often target specific tourism markets [25]. These significant advances culminated in the issuance of Law No. 10 of 2009 on Tourism, which replaced Law No. 9 of 1990 on Tourism inherited from the New Order Era. This section analyzes the extent to which the law responds to sustainable tourism, which is the current mainstream tourism policy.

The 2009 Tourism Law

Although Indonesia already has a Tourism Law which is designed to expand the potential and interest in tourism investment in the tourism business, the recognition of tourism activities as a spiritual and cultural necessity of human nature is normatively only declared in the 2009 Tourism Law. This law considers that

“Tourism is an integral part of development, nationally carried out in a systematic, planned, integrated, sustainable and responsible manner while still protecting religious values, the culture that lives in society, sustainability and quality of the environment, as well as national interests.”

In this context, the implementation of sustainable tourism is needed to increase national economic growth and community welfare while celebrating ecological and natural resource preservation, cultural mainstreaming, strengthening national identity and unity, as well as eradicating poverty and unemployment [26].

Every individual, both tourists and tourism operators, is obliged to preserve the environment in tourist destination areas (Articles 25 and 26). In complying with international human rights law standards, the 2009 Tourism Law recognizes that freedom to travel and enjoy leisure is part of human rights that must be protected. The right to freedom of movement, travel, and live in and outside the country is the basis of view in identifying the right to travel as one of the pillars that safeguard human dignity [27]. Recognition of these rights is also intended to facilitate and ensure the mobility of groups of people who are disadvantaged due to problems of racism, xenophobia, and strict border controls [26].

To build an inclusive society, one of the significant advances that reflects the supremacy of human rights for tourists is specially regulated in Article 21 [28], which stipulates that

“tourists with disabilities, children, and elderly people have the right to special facilities according to their needs.”

It is in line with a shift in the post-reform disability legal regime, moving away from paternalism to an inclusive, rights-based society [29]. Article 16 of the 2016 Disability Law guarantees cultural and tourism rights for persons with disabilities, including the right to obtain equality and the opportunity to participate in arts and cultural activities actively.

“It includes obtaining equal opportunities to carry out tourism activities, conducting tourism businesses, becoming tourism workers, and/or playing a role in the tourism development process; and getting easy access, treatment, and reasonable accommodation according to their needs as tourists.”

Article 6 states that tourism development is carried out through a development plan taking into account biodiversity, cultural uniqueness, and uniqueness as well as human needs for tourism. The law divides the types of tourism operations, namely tourism destinations, marketing, and tourism institutions. The main feature that underlies a more comprehensive development is carried out through the designation of an area based on its comparative advantage in the tourism sector as a tourism strategic area (Article 12 of the 2009 Tourism Law). Tourism strategic areas have the main function or potential for tourism development which has an important influence in one or more aspects, such as economic, social, and cultural growth, empowerment of natural resources, environmental carrying capacity, and defense and security. The establishment of a strategic tourism area is an important instrument in determining the extent to which a tourism arrangement based on a multi-sectoral institutional framework will be determined.

Local governments can also have an important role to play in tourism relations and the conservation of biodiversity as a result of planning and site-specific development decisions at the local level [11]. In connection with the legal obligations of stakeholders in tourism development, the Law gives the Government and Regional Governments the authority to formulate and stipulate a master plan for national tourism development; coordinate the development of cross-sector and cross-regional tourism; carry out international cooperation in the tourism sector in
accordance with statutory provisions; determine the national tourist attraction; determine national tourism destinations; establish norms, standards, guidelines, procedures, criteria and supervision system in the administration of tourism; develop policies for human resource development in the tourism sector; maintain, develop, and preserve national assets that become tourist attractions and untapped potential assets; conduct and facilitate the promotion of national tourism; provide facilities that support tourist visits; provide information and/or early warning related to security and safety of tourists; increase community empowerment and tourism potential owned by the community; supervise, monitor and evaluate the tourism administration; and allocate a tourism budget.

This instrument was reconstructed again in Law No. 23 of 2014 on Regional Government which included tourism affairs as the government’s preferred affairs. This division of affairs includes developing tourist destinations, tourism marketing, developing the creative economy through the use of intellectual property, and developing human resources for tourism and the creative economy. This kind of authority normatively allows various regions to initiate diversification strategies that complement existing livelihoods and increase the ability of local communities to earn income [30].

In ensuring inclusive tourism, the Government and Local Governments are also obliged to guarantee accessibility for persons with disabilities to obtain cultural and tourism services, such as the provision of tourism information in the form of audio, visual and tour guides that have the ability to describe tourist objects for tourists for persons with disabilities (Article 85 Law on Persons with Disabilities). Article 86 paragraph (1) of the Law on Persons with Disabilities obliges the Government and Regional Governments to provide incentives to tourism companies that provide tourism travel services that are easily accessible to Persons with Disabilities.

Article 5 letter g of 2009 on Tourism Law states that one of the principles of organizing tourism is complying with international agreements in the tourism sector. This article was inspired by Indonesia’s membership in the UNWTO, which requires Indonesia to comply with the UNWTO Framework Convention on Tourism Ethics. Through this convention, public authorities must ensure protection for tourists and their belongings; and pay attention to the safety of foreign tourists while in the host country. This provision also requires stakeholders in Indonesia to be actively involved in the process of drafting international agreements in the tourism sector to avoid rules of the game that are inconsistent with national principles that have been established in tourism administration [31].

The 2009 Tourism Law emphasizes that culture is one of the pillars of tourism development, but it does not recognize and protect culture as a source of tourism economy [32]. However, the use of cultural heritage in the development of local tourism is not only seen as having a detrimental impact on the cultural sustainability of local communities. Conversely, such cultural tourism often has a positive impact on tourism and cultural sustainability as a part of the identity of local communities; it can even be a means of social cohesion by encouraging the integration of multiethnic communities [33].

The 2009 Tourism Law also establishes a Tourism Promotion Board at national and regional levels, which is responsible for enhancing Indonesia’s image in the tourism sector, increasing tourist visits and expenditures, and collecting alternative sources of funding outside the state budget [34]. This agency is responsible for providing recommendations on social and environmental issues facing the tourism industry to strengthen sustainable tourism development plans. Through the Tourism Promotion Board, every tourism actor can be involved in the process of formulating tourism policies and planning. This idea is strongly influenced by the concept of networking, which is useful for enhancing collaboration between communities and private sectors [35].

The government also launched further economic development policies for the tourism sector in 2016 through the Regulation of the Minister of Tourism Number 14 of 2016 on Guidelines for Sustainable Tourism Destinations. These guidelines cover destination management, economic use for local communities, culture, and environmental preservation. It was designed to respond to UNWTO guidelines released in 2005, where sustainable tourism must take full account of current and future economic, social and environmental impacts while taking into account the needs of visitors, industry, the environment and host communities [27]. On the basis of this policy, President Joko Widodo plans to develop what he calls the new Bali at several potential points throughout Indonesia. This strategic
tourism area consists of Lake Toba (North Sumatra), Borobudur (Central Java), Bromo-Tengger-Semeru (East Java), Tanjung Lesung (Banten), Thousand Islands (Jakarta), Tanjung Kelayang (Bangka Belitung), Mandalika (West Nusa Tenggara), Wakatobi (Southeast Sulawesi), Komodo Island (East Nusa Tenggara) and Morotai Island (North Maluku) [36]. These destinations are 10 out of 88 of the National Tourism Strategic Areas (KSPN), which have their unique characteristics and high prospects to become another Bali Island. These ten destinations are a priority for the development of national tourism areas, with the protection of the Tourism Authority Board (BOP), which was appointed directly through Presidential Regulation [37]. These policies are focused on dramatically increasing the role of the private sector in the development and implementation of tourism policies [38]. The government plans to make tourism a core of the economy in Indonesia, where the tourism industry in Indonesia is projected to be the largest source of foreign exchange for the country and is expected to increase the prestige of Indonesian tourism at the international level [39]. In addition, the Ministry of Villages, the Development of Disadvantaged Regions, and Transmigration also plan to gradually transform 2000 village areas into tourism villages that have local community-based tourism potential [40]. In 2017, for example, 44 villages on the Bali Island were officially included in the category of tourism villages with a rural tourism-based management approach. The development of tourism in the village can generate additional income for villagers, which enables them to keep the community alive [41]. Village transformation with the support of regulations and the active role of the Regional Government can bring beneficial contributions to local communities that provide accommodation, catering services, including attractions or exhibition activities [41].

Constraints and Challenges for Sustainable Tourism

More than just an important foreign exchange earner, tourism, if treated in a sustainable manner, can be utilized to contribute to sustainable development and an important goal of millennial development by providing employment in cities and villages, thereby spreading the development to poor and isolated areas [42]. The sustainable tourism model opens opportunities for diversification of livelihoods for people living in and around tourism object areas by developing new income business activities, which in turn encourages them to protect natural resources [43].

However, these economic benefits cannot be separated from a large number of negative side effects on social, economic, and environmental aspects driven by the intensity of activities and the high number of tourists [38]. The concept of sustainable tourism development adopted in the 2009 Tourism Law on a limited basis has resulted in partial understanding in the field to allow environmental, social, and economic exploitation. The high egocentrism of experts with educational backgrounds other than tourism has led to a narrow and partial orientation and understanding of sustainable tourism development that solely understands tourism as a trip to nature (back to nature) which spoils the unity of the ecosystem [44].

Efforts to achieve sustainable tourism in Indonesia, and in other developing countries, are often constrained by poor infrastructure (e.g. roads, electricity, clean water supply, waste management), limited human resource capacity in the public and private sectors, and unequal power relations causing an unfair distribution of business opportunities and tourism income, including for disadvantaged communities who can benefit from tourism activities [45]. This uneven development of tourism infrastructure benefits more western parts of Indonesia, such as Java, Bali, and Sumatra, where most foreign visitors can enjoy highly accessible tourist destinations and luxury hotel accommodation available for upscale tourists [46].

The failure of sustainable tourism development also occurs because of overlapping management, disharmony of policies, laws, and regulations, as well as sectoral egos in each ministry as the person in charge of ecotourism development [44]. Although Indonesia has a development plan related to sustainable tourism, this policy is uniformly translated at the local level according to the capacity, local political background, history, and interests of each local tourism policy [25]. Inconsistencies in the distribution of authority contained in various laws and regulations have created a phenomenon of tug of interest in the development of the tourism industry [44]. These overlapping laws and regulations also occur because human resources in various ministerial institutions do not fully understand that the form of sustainable tourism development is multi-
disciplinary and multi-sectoral in nature, so its implementation must be contained objectively and in detail [44].

In fact, the most vulnerable socio-economic groups of society are often marginalized due to the expansion of the tourism industry into their living space. Legal uncertainty over communal land rights allows land grab that seizes lands owned by marginalized groups such as indigenous peoples. This kind of seizure often occurs even in the name of conservation, giving rise to what is known as green grabbing [47]. In the case of the development of the Wakatobi National Park, for example, the use of spatial planning and zoning regulations blocked access of the indigenous people of Wakatobi to the national park area, which became the living space for indigenous peoples even before the area was designated as a national park [37]. In practice, the expansion of the tourism industry has made the younger generation of indigenous peoples choose to migrate outside the village or switch professions as laborers in the tourism industry because there are no local natural resources that can be cultivated to generate income.

Tourism activities can disrupt wildlife’s natural habitat, which is vulnerable to human crowds, noise, and contamination of food sources. The sustainability of animal habitats is very dependent on low human intervention in nature. Thus, the expansion of the tourism industry to remote areas can threaten highly vulnerable natural ecosystems. The loss of biodiversity is caused by the impacts of tourism, such as pollution, contamination of invasive species, exploitation of water sources, air pollution, and climate change which is supported by transportation activities to tourist destinations [11]. The case of maritime tourism development in the Thousand Islands shows that the potential of underwater and coastal areas can be both a blessing and a curse for biodiversity. Tourism has been shown to create new business opportunities and attractive employment opportunities for the younger generation, but at the same time, it has a negative impact on socio-cultural problems such as a decline in social cohesion and the spirit of mutual cooperation in the community [9].

In addition, the intensity of interaction between people with different cultural backgrounds can bring different perspectives to local residents. This process may have a negative impact on the younger generation where the modernity perspective that emerges due to tourism activities makes them less respectful to tourist attractions and sacred cultural heritage that have been trusted from generation to generation.

Although the availability and access to water are one of the economic indicators in the concept of sustainable tourism, the policies of public authorities often ignore this problem, which can lead to the struggle for access to resources between the community and tourism entities and their supporting economic sectors [48]. In the case of tourism in Yogyakarta, the rapid development of the cultural tourism industry, which has triggered the growth of hotel and apartment accommodation, has led to a decrease in the land surface due to excessive groundwater exploitation. Hotels that are considered to be the objects of tourism regulations do not consider making savings on groundwater, causing drought in the residential areas around the hotel. The hotel basically has the responsibility to engineer the technology of rainwater storage/retain buildings so as to reduce dependence on groundwater use [49]. Uncontrolled tourism expansion can suck up water sources which in turn cause water scarcity that is detrimental to society and agriculture.

Towner and Milne stated that the increasing number of tourists enjoying surfing the Mentawai Islands does not always contribute positively to local communities. The absence of a sustainable tourism regulation binding on the Regional Government impedes local authorities from controlling the number of tourists visiting coastal tourism objects, thus threatening the environmental carrying capacity of the Mentawai Islands [50]. The inability of local governments to facilitate an integrated waste management system with tourism destinations also affects the quality of tourism service provision that has the potential to pollute the local coastal and marine environment [50].

In a study of the transformation of the tourism economy in Komodo National Park, Lasso and Dahles argued that green tourism development narrows the opportunities for local communities to gain access to the tourism market. In an effort to secure wildlife, the Komodo National Park management only allocates a limited space for local traders to sell food snacks and souvenirs with limited room capacity. As a result, local residents experience a very significant decrease in income and can hardly make ends meet during low holiday
seasons [30]. In addition, local initiatives in sustainable tourism development can also be changed under Law No. 23/2014 on Regional Government, which implies the transfer of spatial planning and natural resources such as forests and oceans from regencies or cities to provincial governments that represent the center in the regions. This transfer leads to a recentralization of governance powers for tourism to higher levels of government if Local Governments fail to manage their tourism potential [43].

All of these problems pose obstacles (Table 1) to the sustainable tourism development agenda, and therefore a comprehensive approach is needed in structuring tourism regulations that can maintain a balance between the needs for economic growth and the preservation of the environmental, social, and economic interests of local communities. The importance of community involvement in supporting the tourism development of the population, raising awareness of the potential impacts of tourism, and strengthening respect for culture and values leads to stronger conservation management and tourism governance [51]. In integrated management, tourism managers must be able to go beyond short-term economic and political interests by taking a precautionary approach to maintaining social cohesion and environmental preservation in tourism areas. Every effort to implement the principles of sustainable development in the implementation of tourism will indeed be faced with political choices that actually hinder business interests that often clash with ecological problems.

The essence of sustainable tourism development is a harmonious relationship between human activities and nature that does not diminish the prospects of future generations for hope and a good living environment [52]. Extending the collaboration involved in tourism management to existing village-owned enterprises, community empowerment agencies, and other organizations can provide opportunities for citizens to be involved in all aspects of development [51]. Tourism management that involves the active participation of local communities must be put forward in the implementation of a sustainable tourism strategy so that it provides financial benefits without neglecting social and environmental cohesion.

### Table 1. Constraints and Challenges for Sustainable Tourism

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<td>1. lack of legal and institutional frameworks in adopting the concept of sustainable development</td>
<td>1. unifying perceptions among actors (government, communities, and business sectors) in managing tourism and encouraging potential destinations</td>
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<td>2. different perceptions among Central/Local Government, communities, and business sectors in implementing the concept of sustainable development in the field</td>
<td>2. Developing an effective legal and institutional framework to support communities participation and protect the vulnerable environment</td>
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<td>3. overlapping regulatory jurisdictions among the ministries or agencies</td>
<td>3. Improving financial capacity and human resources to increase market demand</td>
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<td>4. Sectoral ego and conflict of authority between Central Government vis-à-vis Local Government and among ministries in regulating tourism</td>
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### CONCLUSION AND RECOMMENDATIONS

Apart from the efforts to develop tourism based on a sustainable development strategy, implementation in the field is challenging because the policy choices that are oriented towards economic growth have the potential to override the issue of sustainability substantially. This article argues that even though Indonesia has a law that specifically regulates tourism governance based on a multisectoral approach, this law does not clearly adopt the concept of sustainable tourism, resulting in different perceptions regarding the sustainable tourism agenda between actors and at various levels of tourism administration. The sustainable tourism agenda, in particular, still depends on the initiatives of each actor, is fragmented and heavily influenced by various factors of power relations, financial capacity, and human resources. Based on the explanation above, although various actors have initiatives to expand the adoption of sustainable tourism, multi perceptions regarding this concept often hinder the goals pursued. Addressing such problems requires a more apparent, coordinated, and predictable legal and institutional framework for the business sectors but, at the same time, can accommodate the needs and participation of local communities in tourism operations.

This article specifically recommends the need for amendments to the 2009 Tourism Law by incorporating the concept of sustainable tourism that is more participatory and more friendly for the interests of environmental protection and
socio-economic activities of the community. However, ensuring that there is a legal and institutional framework that supports sustainable tourism is not sufficient to keep public authorities and tourism economy actors on a socially and environmentally friendly development path. The sustainable tourism development agenda also requires a firm political commitment that supports the goals of environmental conservation and involves direct community participation in the planning and implementation process below. Therefore, this article suggests that the sustainable tourism agenda should be started from the bottom with the empowerment of local communities. Society must be placed as the subject of development to maintain social ethical obligations imposed on each actor (state, business sectors, and society) to maintain social and ecological balance.

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