

# Review of: "Human Rights Aspects in Infrastructure Projects in the President Regulation Number 120 Year 2022"

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**Potential competing interests:** No potential competing interests to declare.

## General Comment

Please consider what you are trying to achieve. It does not adequately explain the law. The footnotes are to show the source of your information, but in most cases, what they are doing is telling me that I have to go to the law to find out. I also fear that you have a limited understanding of the development and implementation of infrastructure projects. Try to get hold of a construction contract developed as part of an Asian Development Bank or World Bank project to see how the issues that you have raised are dealt with. A road construction contract would be the easiest. You need to look at the General Conditions of Contract (GCC) and Special Conditions of Contract (SCC).

As it stands, this article is more like a student assignment.

## Detailed Comments

Please extend the abstract as it really does not explain what the article is about.

One of the issues I find with Indonesian authors is that they keep on spelling out the full name of the legislation in the text, which makes the article hard to read. As full details are in the footnotes. For instance, I would amend the first two sentences of the Introduction to something like: "This article specifically analyses the President Regulation concerning Special Assignments for Expediting Infrastructure Development (President Regulation 120/2022). It focuses on Article 1(2) of the Regulation.

In section 2, put the first two paragraphs into a table, which will make it much easier to read and understand.

In Section 2, para. 3 - you need to describe what the Regulations say. What are the environmental regulations?

In Section 2, para. 4. This is totally unrealistic. Whilst the President is at the top of the tree, he should not be getting into the nitty-gritty at the project level or even at the program level. There are other players in the structure that have key roles to play. Likewise, the Minister of Public Works and Housing will not personally be involved. The Ministry must ensure that rigorous checks and balances are in place before the commencement of the project, with inspections by environmental agencies, the Human Rights Commission, and other agencies as appropriate.

