



The Effectiveness of the Online Single Submission Risk-Based Approach (OSS RBA) in Simplifying Business Licensing

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ABSTRACT

In order to enhance national and international competitiveness, the government has undertaken reforms in business licensing through the implementation of an electronic-based licensing system known as Online Single Submission Risk-Based Approach (OSS RBA), as mandated by Law Number 11 of 2020 concerning Job Creation. This study aims to examine the effectiveness of business license issuance through the OSS RBA as a public service innovation, particularly in Palembang City. The research employs a normative juridical method combined with descriptive qualitative research using a case study approach. Data were obtained from laws and regulations, academic journals, and other relevant documents. The findings indicate that the implementation of OSS RBA significantly facilitates business actors, especially Micro and Small Enterprises (MSEs) categorized as low-risk and low-medium risk, as licenses are issued automatically, leading to an increase in the number of business licenses. However, business actors classified as non-MSEs with medium-high and high-risk activities still encounter obstacles, including delays in license issuance caused by a lack of understanding among business actors and inefficiencies in the verification process. Furthermore, the OSS RBA system continues to face challenges related to personal data protection and institutional coordination. Therefore, continuous improvements are required in terms of system development, regulatory frameworks, and capacity building for both business actors and government officials to achieve an effective, transparent, and equitable business licensing system.

Keywords: Online Single Submission (OSS), Risk-Based Approach (RBA), business licensing, Job Creation Law, public service

ABSTRAK

Dalam rangka meningkatkan daya saing nasional dan internasional, pemerintah melakukan reformasi perizinan berusaha melalui penerapan sistem perizinan berbasis elektronik, yaitu Online Single Submission Risk Based Approach (OSS RBA), sebagai implementasi Undang-Undang Nomor 11 Tahun 2020 tentang Cipta Kerja. Penelitian ini bertujuan untuk mengetahui efektivitas penerbitan perizinan berusaha melalui OSS RBA sebagai inovasi pelayanan publik, khususnya di Kota Palembang. Metode penelitian yang digunakan adalah yuridis normatif yang dipadukan dengan penelitian deskriptif kualitatif melalui pendekatan studi kasus. Data diperoleh dari peraturan perundang-undangan, jurnal ilmiah, dan dokumen terkait. Hasil penelitian menunjukkan bahwa OSS RBA memberikan kemudahan signifikan bagi pelaku Usaha Mikro dan Kecil (UMK) dengan tingkat risiko rendah dan menengah rendah karena izin diterbitkan secara otomatis, sehingga meningkatkan kepemilikan izin usaha. Namun, pada pelaku usaha Non-UMK dengan tingkat risiko menengah tinggi dan tinggi masih ditemukan kendala berupa keterlambatan penerbitan izin akibat kurangnya pemahaman pelaku usaha serta proses verifikasi yang belum optimal. Selain itu, sistem OSS RBA masih menghadapi tantangan, terutama terkait perlindungan data pribadi dan koordinasi kelembagaan. Oleh karena itu, diperlukan perbaikan berkelanjutan baik dari sisi sistem, regulasi, maupun peningkatan kapasitas pelaku usaha dan aparatur guna mewujudkan penyelenggaraan perizinan berusaha yang efektif, transparan, dan berkeadilan.

Kata Kunci: Online Single Submission (OSS), Risk Based Approach (RBA), perizinan berusaha, Undang-Undang Cipta Kerja, pelayanan publik

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INTRODUCTION

Business legality is a fundamental aspect of implementing business activities, as it is the basis for state recognition and provides protection for business actors. This legality is obtained through the business licensing process, which contains official information regarding business identity, Business Identification Number (NIB), business licenses, and other supporting data. The existence of an effective and efficient licensing system is one of the important factors in creating a conducive business climate.¹

To increase national economic competitiveness and support good governance practices, the government has carried out business licensing reforms by implementing an electronic licensing system. This digital transformation in public services is a response to the development of globalization and regional economic integration, especially in the ASEAN region. One concrete form of this policy is the implementation of the Online Single Submission (OSS) system as part of the implementation of *Electronic Governance* (E-Governance).²

The OSS system is designed to simplify the business licensing process by integrating different types of licensing in one electronic platform that can be accessed online. The implementation of OSS is expected to be able to increase efficiency, transparency, and ease of doing business, while contributing to increasing *Ease of Doing Business* (EODB) in Indonesia. Compared to conventional licensing systems, OSS offers convenience in terms of time, procedures, and accessibility for business actors.³

However, the implementation of OSS, especially Risk-based OSS (OSS RBA), still faces a number of obstacles. Relatively new system and technology changes have not been fully understood by all business actors, so they have the potential to hinder the effectiveness of licensing registration. In addition, the effectiveness of the implementation of business activities through OSS RBA and the quality of services provided by Ministries/Institutions to business actors are still issues that need to be studied further.⁴ Therefore, this research is important to analyze the effectiveness and efficiency of the implementation of OSS RBA and assess the quality of business licensing services in meeting the needs of business actors.

METHOD

The research method used in writing this article is a normative juridical method. Normative juridical research is research that relies on legal materials, including laws and regulations, scientific journals, and other documents relevant to the problem being

¹ Fathoni, L. A., Raodah, P., Wardani, N. K., & Mulyana, S. P. (2025). Business Legality as an Effort to Protect Law for Micro, Small and Medium Enterprises (MSMEs) in the Area Around the Rinjani Geopark, Sesaot Village, West Lombok. *Journal of Fundamental Justice*, 6(1), 141-150.

² Dewi, R., Priyanti, H., Aisyah, T., & Hasyem, M. (2025). The implementation of e-government based on Online Single Submission (OSS) in an effort to improve the quality of digital public services. *Journal of Government and Politics*, 10(3), 579-593.

³ Rokhman, B., Rokhman, A., & Kurniasih, D. (2024). Implementation of risk-based business licensing through the Online Single Submission (OSS) system. *Journal of Social and Economic Research*, 6(1), 1562-1580.

⁴ Fitriyani, D., & Suryani, D. A. (2025). Implementation of the Use of Online Single Submission (OSS) in the Issuance of Business Entity Certificates (SBU) in Construction: A Case Study of Multi-License Cv. Professional: *Journal of Communication and Public Administration*, 12(2), 923-932.

studied. This approach places law as a system of norms that is analyzed based on concepts, principles, legal theories, and provisions of laws and regulations related to the object of research.⁵ The analysis is carried out qualitatively by examining the legal material in depth, then compiled in the form of a systematic, logical, and continuous description in accordance with the subject matter discussed, in order to gain a comprehensive understanding of the legal issues being studied.

RESULTS AND DISCUSSION

1. Business Licensing Problems in Indonesia

Before the implementation of the electronic-based business licensing system, licensing services in Indonesia faced various structural and normative problems that hindered the effectiveness of the implementation of business activities. One of the main problems is the still strong sectoral ego between government agencies, both at the central and regional levels. This condition causes each agency to tend to maintain its own authority in the permit issuance process, so that coordination between agencies becomes weak and not integrated.⁶

The long and layered business licensing procedure is also a serious obstacle for business actors. The licensing process, which must go through various administrative stages and involves many agencies, results in high costs and uncertainty in the timing of permit completion. In practice, business actors are often faced with repetitive requirements, overlapping documents, and unclear service standards, thereby reducing the efficiency and transparency of public services.⁷

Another problem is the overlap of regulations between central and regional regulations, as well as between sectoral regulations. This regulatory inharmony creates legal uncertainty for business actors, especially in determining the type of permits that must be fulfilled and the authority of the agency authorized to issue them. As a result, the licensing process is often delayed and has the potential to cause administrative disputes.⁸

The impact of these various problems is not only felt by domestic business actors, but also affects the interests of foreign investors. The length of the licensing process and the lack of legal certainty make Indonesia less competitive than other countries in

⁵ Tan, D. (2021). Legal research method: To explore and review the methodology in conducting legal research. *Nusantara: Journal of Social Sciences*, 8(8), 2463-2478.

⁶ MANGUNSONG, N. (2025). STRUCTURING REGULATIONS FOR THE IMPLEMENTATION OF BUSINESS LICENSING IN THE SPECIAL REGION OF YOGYAKARTA TOWARDS EFFECTIVE GOVERNANCE (Doctoral dissertation, Law Study Program, Doctoral Program, Faculty of Law, UII).

⁷ Lakoro, A. (2024). The contribution of risk-based business licensing to the simplification of licensing administration procedures in Gorontalo. *Journal of Multidisciplinary Sciences*, 2(1), 1-14.

⁸ Busroh, F. F., Khairo, F., & Zhafirah, P. D. (2024). Harmonization of Regulations in Indonesia: Simplification and Synchronization for Increasing Legal Effectiveness. *Journal of Legal Interpretation*, 5(1), 699-711.

attracting investment. This condition is inversely proportional to the government's need to encourage economic growth and create a conducive business climate.⁹

Realizing these various obstacles, the government has carried out business licensing reforms through the implementation of an integrated and information technology-based system. This reform aims to simplify licensing procedures, eliminate overlapping authority, and improve service efficiency and transparency. The implementation of an electronic-based licensing system is expected to be able to provide legal certainty, speed up the licensing process, and create fair business opportunities for all business actors.¹⁰

Thus, the transformation of the licensing system is an urgent need in order to improve governance and increase national economic competitiveness. This reform is an important foundation for the birth of the Online Single Submission (OSS) system as a solution to various business licensing problems in Indonesia.

2. The Concept of Risk-Based Business Licensing in the RBA OSS

As part of the regulatory reform in the field of business licensing, the government introduced the Online Single Submission Risk-Based Approach (OSS RBA) system as an improvement from the previous OSS system. The normative implementation of OSS RBA is regulated in Government Regulation Number 5 of 2021 concerning the Implementation of Risk-Based Licensing, which is the implementing regulation of Law Number 11 of 2020 concerning Job Creation. The presence of OSS RBA marks a fundamental change in the business licensing paradigm in Indonesia, from a *license-based approach* to a *risk-based approach*.¹¹

The risk-based approach places the level of risk of business activities as the main basis for determining the type and level of permits that must be fulfilled by business actors. In this paradigm, not all business activities are treated uniformly, but are differentiated based on the potential impact on the environment, health, safety, and social and economic aspects. Thus, licensing regulations are directed to be proportionate and not burden business activities that have a low level of risk.¹²

⁹ Fitri, E. U. (2021). Legal Protection for Foreign Investors Based on Law Number 25 of 2007 concerning Investment in the Acquisition of Raw Materials at PT Riau Perkasa Steel in Riau Province (Doctoral dissertation, Riau Islamic University).

¹⁰ Margaretha, V. (2025, June). REGULATORY REFORM TO MODERNIZE THE BUSINESS PROCESS IN INDONESIA. In SenHIB: National Seminar on Sustainable Law and Investment (Vol. 1, No. 1, pp. 17-35).

¹¹ Amalia, S. W. (2023). THE INFLUENCE OF POSITIVE FICTITIOUS PRINCIPLES IN THE ISSUANCE OF BUSINESS LICENSES THROUGH THE ONLINE SINGLE SUBMISSION RISK BASED APPROACH (OSS RBA) SYSTEM = THE INFLUENCE OF POSITIVE FICTITIOUS PRINCIPLES IN THE ISSUANCE OF BUSINESS LICENSES THROUGH THE ONLINE SINGLE SUBMISSION RISK BASED APPROACH SYSTEM (OSS RBA) (Doctoral dissertation, Hasanuddin University).

¹² Susanto, I., & Ikhwan, M. N. (2022). PROBLEMS OF THE JOB CREATION LAW IN THE IMPLEMENTATION OF RISK-BASED LICENSING. *Kajen: Journal of Development Research and Development*, 6(01), 32-41.

In the RBA OSS system, business activities are classified into four levels of risk. First, business activities with a low level of risk are only required to have a Business Identification Number (NIB), which functions as both an identity and a legality of the business. The issuance of NIB is carried out automatically through the OSS system by the central government without the need for additional verification. Second, business activities with medium and low risk levels require NIB and Standard Certificates (SS) obtained through a *self-declaration* mechanism, where business actors express their ability to meet the established business standards.¹³

Third, business activities with a medium and high risk level also require a NIB and Standard Certificate, but the certificate must go through a verification process by the government or authorized institution before business activities can be carried out. Fourth, business activities with a high level of risk are required to have an NIB and Permit, and can be accompanied by a Standard Certificate in accordance with the provisions of sectoral laws and regulations. In this category, the government conducts more in-depth assessments, including administrative, technical, and, in some cases, field inspections.¹⁴

The determination of the level of risk of business activities in the OSS RBA is based on several parameters, including the level of danger inherent in business activities, the potential for risk, the scale of the business, and the impact that may be caused on the environment, public health, occupational safety, and socio-economic conditions. This approach reflects the government's efforts to strike a balance between the interests of ease of doing business and the need to protect the public interest. With the implementation of risk-based business licensing, the government is expected to focus supervision and resources on high-risk business activities, while low-risk business activities can develop with minimal regulatory barriers. This concept is in line with the principles of *good governance*, especially effectiveness, efficiency, and legal certainty in the implementation of public services in the field of business licensing.¹⁵

3. Division of Government Authority in the OSS RBA

The implementation of the Online Single Submission Risk-Based Approach (OSS RBA) system has important implications for the regulation of authority between the central government and local governments in the implementation of business licensing.

¹³ Mandala, O., Taufik, M., Efendi, S., Wahyudi, I., & Kholid, I. (2024). Implementation of the Single Submission Risk Based Approach (OSS-RBA) Online Application to Facilitate MSMEs in the Issuance of Business Licenses in Mataram City. *Journal of Community Service of the Archipelago*, 5(4), 5353-5367.

¹⁴ Waluyo, B., Agustanti, R. D., & Herbawani, C. K. (2025). Assistance in registering for Household Industrial Food Production Certification (SPP-IRT) to business actors. *Altifani Journal of Research and Community Service*, 5(6), 1102-1112.

¹⁵ Mortheza, D., Thamrin, M. H., & Mustain, A. (2025). IMPLEMENTATION OF ONLINE SINGLE SUBMISSION (OSS) RISK BASED APPROACH (RBA) IN THE SUPERVISION OF LOW RISK MICRO ENTERPRISES AT THE PALEMBANG CITY INVESTMENT AND ONE-STOP INTEGRATED SERVICES OFFICE. *Journal of Syntax Literate*, 10(2).

This division of authority is a consequence of a change in the risk-based licensing paradigm, as well as an effort to create an integrated, efficient, and legally certain licensing system for business actors.¹⁶

In the RBA OSS, the authority to issue licenses is adjusted to the level of risk of business activities. For business activities with a low risk level, the issuance of Business Identification Numbers (NIB) is carried out automatically through the OSS system managed by the central government. In this category, local governments do not have the authority to issue permits, but still have a strategic role in supervising and coaching the implementation of business activities in their areas. This arrangement is intended to reduce the administrative burden and speed up the legalization process of low-risk businesses.¹⁷

In business activities with a medium level of risk, the licensing authority involves the role of the central government and local governments proportionately. The central government is authorized to issue and, at a medium-high risk level, verify the Standard Certificate, which is a condition for licensing. Meanwhile, local governments carry out the functions of supervision, guidance, and control of business activities in accordance with the limits of their regional authority. This synergy aims to ensure that the established business standards are actually applied in practice.¹⁸

As for business activities with a high level of risk, the division of authority is carried out based on the scale and impact of business activities. The district/city government is authorized to handle business licensing that has a local impact, the provincial government is authorized for businesses that have a cross-district/city impact, while the central government is authorized for businesses that are strategic nationally, across provincial regions, or have a major impact nationally. In this category, the licensing process involves a more in-depth assessment, including technical and administrative examinations, to ensure the protection of the public interest.¹⁹

The division of authority is designed to ensure that business activities with higher levels of risk meet the requirements of safety, environmental protection, and social interests more strictly. In addition, this arrangement reflects the government's efforts to balance the principle of decentralization with the need for the integration of the national licensing system. With the existence of the RBA OSS, it is hoped that there will

¹⁶ Siagian, L. M., & Halim, S. G. I. THE POSITION AND AUTHORITY OF LOCAL GOVERNMENTS IN THE IMPLEMENTATION OF THE OSS-RBA SYSTEM AS A SINGLE REFERENCE FOR RISK-BASED BUSINESS LICENSING AFTER THE ENACTMENT OF GOVERNMENT REGULATION NUMBER 8 OF 2025.

¹⁷ Larus, A. P., & Ni'mah, F. U. (2025). Business License Issuance Service System through OSS RBA at DPMPSTP Sukoharjo Regency. *Journal of Public*, 19(01), 14-27

¹⁸ Yuliana, Y. (2025). Reform of the OSS System and Business Licensing Government Regulation (PP) Number 28 of 2025 concerning the Implementation of Risk-Based Business Licensing to Increase Foreign Investment in Indonesia. *Media Legal Indonesia (MHI)*, 3(4).

¹⁹ Ramadhan, M. H. Weakening the Concept of Decentralization in the Granting of Business Licenses After the Issuance of Law No. 6 of 2023 concerning Job Creation.

be no overlap of authority between the central and regional governments, and more effective coordination will be created in the implementation of business licensing.²⁰

However, in practice, this division of authority still faces challenges, especially in terms of coordination and resource readiness at the regional level. Therefore, strengthening institutional capacity and harmonizing regulations is still needed so that the implementation of the RBA OSS can run optimally and in accordance with the purpose of its formation.

4. Business Sector Coverage in the RBA OSS

The Online Single Submission Risk-Based Approach (OSS RBA) system is designed as a cross-sectoral and integrated business licensing mechanism. This is normatively affirmed in Article 6 paragraph (2) of Government Regulation Number 5 of 2021 concerning the Implementation of Risk-Based Licensing, which states that OSS RBA provides business licensing services in various strategic sectors. These sectors include marine and fisheries, agriculture, environment and forestry, energy and mineral resources, nuclear power, industry, trade, public works and public housing, transportation, health, education and culture, tourism, religion, posts, telecommunications, broadcasting, electronic systems and transactions, land and security, and employment.²¹

The breadth of the business sector coverage in the OSS RBA demonstrates the government's commitment to creating a single national licensing system that is integrated and no longer fragmented by sector. Before the implementation of the RBA OSS, business licensing in various sectors was regulated separately through sectoral regulations and different licensing systems, resulting in policy disintegration and difficulties for business actors in meeting licensing requirements. With the RBA OSS, all business sectors are integrated into one electronic platform, making it easier for business actors to access licensing services in an integrated manner. The regulation of the broad scope of the business sector also has important implications for coordination between ministries and institutions. Each sector still has its own characteristics, technical standards, and special provisions regulated in sectoral regulations. However, through the RBA OSS, these standards and requirements are embedded into the OSS system, so that business actors do not need to deal directly with many agencies in the

²⁰ Kusnandar, S., & SH, M. *Legal Strategy in Cross-Border Business Transactions from an Indonesian Perspective (A Comprehensive Guide to Protecting Business Interests in the Era of Globalization)*. Publisher Adab.

²¹ Namiroh, D. P., Lituhayu, D., & Setianingsih, E. L. (2024). IMPLEMENTATION OF THE SINGLE SUBMISSION RISK BASED APPROACH (OSS RBA) ONLINE SYSTEM IN BUSINESS LICENSING SERVICES AT THE SEMARANG REGENCY INVESTMENT AND INTEGRATED SERVICES OFFICE (DPMPTSP). *Journal of Public Policy and Management Review*, 13(4), 19-52.

licensing process. This mechanism is expected to be able to reduce sectoral egos and increase the effectiveness of coordination between government agencies.²²

The broad coverage of the business sector in the RBA OSS also reflects the application of the principle of *equal treatment* for all business actors. Every business sector, both small and large-scale, gets equal access to the licensing system, with adjustments to requirements based on the level of risk of business activities. Thus, the OSS RBA not only functions as an instrument of ease of doing business, but also as a means of structuring licensing regulations that are fairer and more proportionate.²³ However, the breadth of business sector coverage in the RBA OSS also poses challenges in its implementation. Differences in the level of system readiness and human resources in each ministry/institution have the potential to affect the effectiveness of licensing integration. Therefore, it is necessary to harmonize sectoral regulations and strengthen coordination and system integration so that the goals of the RBA OSS as an integrated and cross-sectoral business licensing system can be optimally achieved.

5. Benefits of Implementing OSS RBA

The implementation of the Online Single Submission system based on the Risk-Based Approach (OSS RBA) brings a number of strategic benefits to business actors in Indonesia. First, this system provides easy access to online licensing. With the integration of the entire licensing process in one official portal, business actors no longer have to physically visit various government agencies. This not only reduces the administrative burden but also allows businesses to utilize information technology in the registration of permits, including for those who have limited time or remote geographical locations. Second, the RBA OSS improves time and cost efficiency. With the mechanism of automating the registration of NIB and Standard Certificates based on risk classification, the licensing process that previously took days or even weeks can now be completed faster. For micro, small, and medium enterprises (MSMEs), this reduction in layered procedures has significant implications for competitiveness, because business actors can focus more on business development than bureaucratic affairs.²⁴

Third, this system provides legal certainty for business actors. All permits issued are officially recorded in the RBA OSS system, so that business legality can be ensured and business actors are protected from the risk of administrative disputes or overlapping licenses. This legal certainty also makes it easier for the government to

²² Utomo, B. S., Kurniawan, S. A., & Nugraha, R. A. (2025). Analysis of the Effectiveness of OSS-RBA in Simplifying the Business Licensing Process for Providing Electricity for Self-Interest. *Knowledge on Sustainability, Longevity, and Interdisciplinary*, 1(1), 15-28.

²³ Yunizar, D., Saptomo, P., & Wulandari, R. AUTHORITY AND IMPLEMENTATION OF ONLINE SINGLE SUBMISSION RISK-BASED APPROACH (OSS-RBA) BUSINESS LICENSING BY LOCAL GOVERNMENTS.

²⁴ Syarif, M. (2023). Implementation of the Online Submission Risk Based Approach (Oss Rba) System in Improving Service Quality at the Investment and One-Stop Integrated Services Office of Aceh Tamiang Regency.

supervise and develop businesses, so that a balance is created between ease of doing business and compliance with regulations. In addition to internal benefits for business actors, the RBA OSS also has a macroeconomic impact in the form of increased investment attraction. A risk-based approach allows governments to focus oversight on high-risk businesses, while low-risk businesses can thrive with minimal regulatory burden. With a more transparent, predictable, and efficient system, domestic and foreign investors become more confident in investing their capital, which in turn drives national economic growth.²⁵

Furthermore, the OSS RBA functions as an instrument to harmonize the principles of good governance in the field of licensing. Cross-sector integration, risk-based oversight, and digitalization of licensing services reflect the government's efforts to deliver transparent, accountable, and credible governance. Thus, the implementation of OSS RBA not only increases the ease of doing business for business actors but also supports the creation of a more professional and structured investment ecosystem.²⁶

6. Comparison of OSS Version 1.1 and OSS Risk-Based Approach (RBA)

Compared to OSS version 1.1, OSS RBA brings significant updates that are more adaptive and structured. First, the integration of licensing services becomes more comprehensive, so that business actors can take care of various types of permits in one integrated platform, without having to move between government agencies. This reduces the risk of duplication of procedures and inconsistencies between sectoral regulations that were previously an obstacle.²⁷

Second, the OSS RBA provides certainty about the period of permit fulfillment, which was previously less clear in OSS version 1.1. Information about the estimated completion time of each type of permit helps business actors plan operational and investment activities more efficiently.²⁸

Third, the OSS RBA introduced the Standard Certificate (SS) as a risk-based licensing instrument, replacing the rigid traditional licensing model. With the use of SS, licensing requirements are adjusted to the level of business risk, including potential

²⁵ Agustina, A. (2022). The Role of Notaries in the Implementation of Location Permits for Housing or Industrial Business Actors Through the Risk-Based Single Submission (OSS) Online System at the National Land Agency of Semarang Regency (Master's thesis, Sultan Agung Islamic University (Indonesia)).

²⁶ Irawan, N. C. Basic Concepts of the External Environment. STRATEGIC MANAGEMENT OF THE PUBLIC SECTOR, 103(1), 50.

²⁷ CANDRA, R. (2023). PUBLIC SERVICES IN THE FIELD OF BUSINESS LICENSING IN THE PERSPECTIVE OF SMART SERVICE IN INDONESIA (Doctoral dissertation, JAMBI UNIVERSITY).

²⁸ Agustina, A. (2022). The Role of Notaries in the Implementation of Location Permits for Housing or Industrial Business Actors Through the Risk-Based Single Submission (OSS) Online System at the National Land Agency of Semarang Regency (Master's thesis, Sultan Agung Islamic University (Indonesia)).

impacts on the environment, safety, health, and socio-economy, so that the licensing approach becomes more proportionate.²⁹

Fourth, the OSS RBA presents clarity on licensing fees, which previously, in OSS version 1.1, still depended on the relevant institutions and could cause uncertainty. Transparent fees that can be paid directly through the system increase accountability and minimize convoluted administrative practices.³⁰

Fifth, the supervisory mechanism at the RBA OSS is more structured and systematic. The central and regional governments have a clear division of authority according to the classification of business risks, so that supervision can be focused on high-risk businesses, while low-risk businesses still get easy access to licensing.³¹

These changes reflect the government's efforts to improve the business licensing system to be more responsive to business characteristics, more efficient in administrative processes, and more adaptive to the complexity of risks posed by business activities. Thus, OSS RBA is not only a technical improvement but also a representation of the principles of good governance in the practice of implementing business licensing in Indonesia.

7. Challenges of Implementation and Data Protection of Business Actors

Although the OSS RBA system provides significant ease in the licensing process, its implementation still faces several operational and regulatory challenges. One of the main challenges is the understanding of business actors to meet the requirements of standards (Standard Certificates) and business commitments. Many business actors think that the licensing process is completed after obtaining a Business Identification Number (NIB), even though the risk-based licensing process requires business actors to meet additional requirements, especially for medium and high-risk businesses. This ignorance can lead to regulatory violations or non-compliance that ultimately impact the effectiveness of oversight and legal certainty.³²

In addition, the protection of personal data of business actors is still a crucial issue. The OSS RBA requires businesses to upload sensitive data, including identities, business legal documents, and financial information. Although there is an obligation for

²⁹ Rahmadani, A. E., Pangestu, Y., & Halizhah, N. (2024). Analysis of the Implementation of Business Licensing through a Risk-Based Single Submission (OSS) Online System. *Media Legal Indonesia (MHI)*, 2(4), 174-179.

³⁰ Mayasari, D. N. (2025). Legal certainty for business people in obtaining business licenses through the Online Single Submission (OSS) licensing institution. *Indonesian Legal Media (MHI)*, 3(3).

³¹ Siti Kotijah, S. H., Ventyrina, M. I., & SH, M. RISK-BASED BUSINESS LICENSING.

³² Walla, N., & Tuanaya, W. (2024). IMPLEMENTATION OF ELECTRONIC-BASED LICENSING SERVICES THROUGH THE ONLINE SINGLE SUBMISSION RISKED BASED APPROACH (OSS RBA) SYSTEM AT THE ONE-STOP INTEGRATED SERVICES INVESTMENT OFFICE (PMPTSP) OF CENTRAL MALUKU REGENCY. *Journal of Strategy and Management Studies*, 5(4).

OSS managers to protect personal data as stipulated in Government Regulations and related Ministerial Regulations, the mechanism for handling data leaks and sanctions for violations has not been regulated in detail. The absence of clear regulations opens up the potential risk of data misuse, both administratively, civilly, and criminally.³³

From a juridical-normative perspective, this challenge requires strengthening the legal framework for digital data protection that binds OSS system managers and provides certainty for business actors. The government needs to develop operational guidelines that govern data security procedures, routine audits, and emergency response mechanisms in the event of a leak. In addition, socialization and education of business actors are crucial so that they understand the entire risk-based licensing process, including meeting standard requirements, so that legal compliance can be increased and potential disputes can be minimized.³⁴

Thus, although the RBA OSS improves ease of doing business and administrative efficiency, the effectiveness of this system is highly dependent on the readiness of human resources, understanding of business actors, and strengthening data protection regulations, so that the principles of good governance can be implemented comprehensively.

8. Impacts, Benefits, and Problems of Implementing Business Licensing through OSS

The implementation of the Online Single Submission (OSS) system, especially the Risk-Based Approach (RBA)-based OSS, has a significant impact on business licensing governance in Indonesia. This system not only changes the technical mechanism of licensing registration, but also affects the pattern of relations between business actors and the government, as well as the structure of supervision of business activities.³⁵

One of the main advantages of implementing OSS is the simplification of the business licensing process. Through an integrated system, business actors are no longer required to take care of licensing to various agencies separately. The entire registration process is carried out in one electronic platform, thereby reducing convoluted bureaucracy and accelerating the issuance of business legality. This condition makes it

³³ Utami, Y. P., Abdulkadir, W. S., Pamudi, B. F., Karim, A. A., Rohimah, A., Maulidya, V., ... & Rahmadani, R. (2025). Halal Industry Management. CV Eureka Media Aksara.

³⁴ Sari, C. F., & Rahayu, S. A. P. (2025). Analysis of the Application of Risk-Based OSS in Realizing Legal Certainty for Investors in Indonesia. *NUSANTARA SCIENTIFIC JOURNAL*, 2(3), 577-591.

³⁵ Duri, R., Hidayat, B. A., & Sinaga, R. D. (2024). The Effectiveness of the Online Single Submission Risk Based Approach (OSS RBA): Innovation in Micro and Small Business Licensing in Urban Areas. *Update: Journal of Policy Innovation*, 8(2), 103-116.

easier for business actors, especially micro, small, and medium enterprises (MSMEs), to obtain legality quickly and efficiently.³⁶

Another advantage is the ease of access to the registration process. The OSS system allows business actors who have limited time or understanding of digital technology to give power to third parties in licensing management. This shows that OSS provides flexibility in the implementation of business registration, while encouraging the participation of business actors who were previously constrained by administrative and technical factors.³⁷

In addition, the OSS RBA provides a new approach to licensing assessment by classifying business activities based on risk levels. This approach is no longer solely oriented to the amount of business capital, but considers the impact of business activities on the environment, health, safety, and social aspects. Thus, government oversight can be focused on businesses with higher levels of risk, while low-risk businesses can thrive with minimal regulatory burden. This approach is considered more proportionate and in line with the principle of the effectiveness of legal regulation.³⁸

In terms of impact, the implementation of the RBA OSS contributes to increasing legal certainty for business actors. The legality of businesses issued through the OSS system is officially recorded in government databases, thereby reducing the potential for licensing conflicts and increasing investor confidence. In addition, the transparency of the licensing process helps improve the national investment climate and supports the improvement of *Ease of Doing Business* in Indonesia.³⁹ The implementation of OSS also faces a number of problems. One of the main obstacles is the low level of understanding of business actors towards the RBA OSS mechanism, especially related to the fulfillment of commitments or standard requirements after the issuance of NIB. Many business actors consider the licensing process to be completed when the NIB is issued, even though there are still further obligations that must be fulfilled according to the level of business risk.⁴⁰

Another problem is the digital skills gap among business actors, especially in remote areas. Limited internet access and low digital literacy have the potential to

³⁶ Dewi, R., Priyanti, H., Aisyah, T., & Hasyem, M. (2025). The implementation of e-government based on Online Single Submission (OSS) in an effort to improve the quality of digital public services. *Journal of Government and Politics*, 10(3), 579-593.

³⁷ MARYUDANTO, S. (2025). NOTARY PROBLEMS WITH THE DEED OF ESTABLISHMENT OF A LIMITED LIABILITY COMPANY LEGAL ENTITY IS ASSOCIATED WITH THE LICENSING OF THE SINGLE SUBMISSION (OSS) ONLINE SYSTEM IN SEMARANG CITY (Doctoral dissertation, Sultan Agung Islamic University Semarang).

³⁸ Teresia Din, S. H., & Kn, M. (2025). *TRADE AND TRANSPORTATION LAW*. CV Rey Media Grafika.

³⁹ Khaidar, N. (2023). *Juridical Analysis of Business License Registration through Online Single Submission (OSS) System by Notary* (Master's thesis, Sultan Agung Islamic University (Indonesia)).

⁴⁰ Kusmiati, N. I., S. I., & Elly Ruslina, S. H. (2025). *Investment Law in Economic Concentration*. Greenbook Publisher.

hinder the effectiveness of the implementation of OSS evenly. In addition, there are still coordination problems between the OSS system and the internal systems of ministries/agencies and local governments, which can cause delays in verification or supervision.⁴¹

Thus, although OSS RBA provides various benefits and positive impacts on the ease of doing business, the effectiveness of its implementation still requires support in the form of increased socialization, strengthening the capacity of business actors, and harmonizing systems and regulations between agencies. These efforts are important so that the main goal of implementing risk-based business licensing, which is to create an efficient, fair, and sustainable business climate, can be optimally achieved.

CONCLUSION

The implementation of the Online Single Submission (OSS) system shows significant developments in the government's efforts to reform business licensing in Indonesia. Through continuous improvement, especially with the implementation of a risk-based licensing approach, OSS is able to simplify the business licensing registration process and increase ease of access for business actors. This system provides efficiency in terms of time and procedures, and contributes to creating legal certainty and a more conducive business climate. The division of business risk levels in risk-based OSS is also a major advantage, because business classification is no longer solely based on the amount of capital, but on the potential impact of business activities on the environment, health, safety, and society. This approach allows for more proportionate and effective regulation and supervision according to the characteristics of each business activity. However, the implementation of OSS still faces a number of challenges, especially related to the protection of personal data of business actors that have not been regulated comprehensively and in detail. In addition, business actors' understanding of the fulfillment of standard requirements and business commitments still needs to be improved. Therefore, it is necessary to strengthen regulations, increase socialization, and ensure optimal supervision so that the risk-based OSS system can run effectively and sustainably in accordance with the purpose of its formation.

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⁴¹ Wahyudi, A. (2025). STRATEGY OF THE EDUCATION AND CULTURE OFFICE IN IMPROVING DIGITAL LITERACY IN ELEMENTARY AND JUNIOR HIGH SCHOOLS IN TANJUNG JABUNG BARAT REGENCY (Doctoral dissertation, Sultan Agung Islamic University Semarang).

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