

Criminal Sanctions for the Misuse of MyPertamina QR Codes in the Distribution of Subsidized Fuel

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Abstract

The MyPertamina application is a digital service that facilitates the distribution of subsidized fuel and enhances monitoring of its distribution. However, the misuse of QR Codes in Karawang Regency highlights weaknesses in both regulations and digital oversight. This study employs a normative legal approach by examining relevant legislation while considering the presumption of innocence to maintain objectivity in the analysis. The findings indicate that the misuse of QR Codes to obtain subsidized fuel illegally, including hoarding and reselling, violates distribution regulations, harms state finances, and involves technological manipulation. These actions demonstrate elements of intent and are subject to criminal sanctions. The case falls under *concursum realis*, where multiple offenses occur independently in separate events, making the Electronic Information and Transactions Law and the Oil and Gas Law more applicable than the Criminal Code.

Keywords: Criminal Sanctions, QR Code Misuse, MyPertamina, Subsidized Fuel Distribution, Karawang Case

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Introduction

The MyPertamina application is a digital service provided by PT Pertamina (Persero) to make it easier for the public to access various services. In response to the global increase in oil prices, the Indonesian government took steps to limit the consumption of subsidized fuels such as Peralite and Solar. Starting from July 1, 2022, the public wishing to use subsidized fuel is required to register through the MyPertamina application or Pertamina's official website. This policy aims to ensure that fuel subsidies are distributed accurately, utilizing data from the application to identify consumers who are eligible to receive the subsidy.[1]

The main functions of MyPertamina are to ensure the accurate distribution of subsidized fuel, monitor fuel distribution, and enhance digital services. Through the registration of vehicles and user identities, subsidies such as Solar and Peralite are provided only to eligible recipients in accordance with Presidential Regulation of the Republic of Indonesia Number 191 of 2014 on the Provision, Distribution, and Retail Selling Price of Fuel Oil, as well as Decree of the Head of the Downstream Oil and Gas Regulatory Agency Number 118 of 2022 concerning Technical Guidelines for the Registration of Consumer Users and Distribution of Certain Types of Fuel.[2][3] This application also supports distribution monitoring by the government and PT Pertamina to promote transparency and subsidy control, as mandated by Law Number 22 of 2001 on Oil and Gas, Article 53(c) (Oil and Gas Law). In addition, MyPertamina facilitates cashless payments, loyalty programs, and access to service information and promotions, in line with Presidential Instruction of the Republic of Indonesia Number 3 of 2003 concerning the National Policy and Strategy for E-Government Development.[4]

The distribution of subsidized fuel (BBM) is one of the government's efforts to provide economic support to specific groups in need, including farmers, fishermen, and small business owners.[5] To improve accuracy and efficiency in distribution, the government, together with Pertamina, implemented the MyPertamina digital application, which utilizes QR Codes as a means of verification and authorization in the purchase of subsidized fuel. This innovation is expected to reduce fraudulent practices and ensure that subsidies are distributed appropriately.

A QR Code, or two-dimensional barcode, is a square-shaped image consisting of black and white patterns used to store information such as links, text, or specific data that can be quickly read using a phone camera or scanner.[6] Unlike traditional barcodes, which store data only horizontally, QR Codes store information both vertically and horizontally, allowing them to hold more data. Therefore, they are commonly used in daily life for digital payments, viewing restaurant menus, online attendance, and electronic tickets. A QR Code is personal and non-transferable, meaning it may only be used by the registered vehicle owner. Any form of exchange or use by another party is strictly prohibited.[7]

However, in practice, this system faces serious issues in the form of cybercrime.[8] One notable incident occurred in Karawang Regency, where several individuals were identified as having misused farmers' QR Codes to illegally obtain subsidized diesel fuel. Their tactics involved duplicating or borrowing QR Codes from authorized users to acquire large quantities of subsidized fuel, which were then resold at market prices for personal profit. This act not only caused financial losses to the state but also created social injustice for communities who were rightfully entitled to the subsidy, violating the values embodied in Pancasila.[9]

In the context of this research, criminal sanctions refer to punishments prescribed by law that may be imposed on individuals proven legally and convincingly guilty of committing a criminal act, based on a final and binding court decision (inkracht).[10] This study discusses sanctions within a normative framework, outlining the criminal penalties stipulated by law for acts of misusing the MyPertamina QR Code in the distribution of subsidized fuel, **without rendering judgment or presuming guilt on any party prior to a court decision.**

This phenomenon indicates deficiencies in legal regulations and weaknesses in digital oversight related to the subsidized fuel distribution system. Although several laws already exist such as Articles 372 and 378 of the Indonesian Criminal Code (KUHP) concerning fraud and

embezzlement, Law No. 22 of 2001 on Oil and Gas, and Law No. 11 of 2008 on Electronic Information and Transactions (ITE Law) Article 35 in conjunction with Article 51 Paragraph (1), as amended by Law No. 19 of 2016 their implementation within the context of digital subsidy distribution still leaves many questions unanswered.

This research is grounded in the Theory of Criminal Liability, which asserts that punishment can only be imposed if there is an element of fault, either through intent (*dolus*) or negligence (*culpa*).^[11] The application of this theory is crucial in analyzing the misuse of MyPertamina QR Codes in subsidized fuel distribution, as such actions concern the protection of public interests and require the imposition of appropriate and proportional sanctions.

This issue has significant impacts, ranging from state financial losses and disruption of subsidy distribution to decreased public trust in the government's digital service systems. These conditions call for comprehensive legal research to ensure that sanctions for violations in subsidized fuel distribution are both targeted and deterrent.

The study employs a normative legal approach, examining the relevant statutory provisions, and focuses on analyzing the forms of criminal sanctions for the misuse of the MyPertamina QR Code in the distribution of subsidized fuel, as well as evaluating the effectiveness of law enforcement, particularly in the Karawang case, as an effort to strengthen digital-based subsidy distribution regulations.

Based on these considerations, the author establishes the research title: **“Criminal Sanctions for the Misuse of MyPertamina QR Codes in the Distribution of Subsidized Fuel.”**

Research Methodology

This research employs a normative juridical method, which aims to examine applicable laws and regulations, legal theories, and relevant legal principles in explaining the criminal sanctions for the misuse of the MyPertamina QR Code.^[12] The study is descriptive-analytical in nature, as it seeks to describe and analyze legal issues systematically and in depth. Data were obtained through library research, which includes primary legal materials such as laws and regulations, as well as secondary legal materials such as books and legal journals. In addition, a news-based case approach was used, utilizing current news reports related to the misuse of QR Codes as study materials, since the case in question has not yet resulted in a court decision. The data analysis technique used is qualitative normative analysis, which involves interpreting legal provisions and linking them with legal theories and principles to draw logical and systematic conclusions regarding criminal sanctions in the context of digital subsidy misuse.^[13]

Results

In March 2025, law enforcement authorities uncovered a case of MyPertamina QR Code misuse related to the distribution of subsidized fuel in the Karawang region. In this case, five suspects were detained for allegedly purchasing subsidized diesel fuel illegally by using another person's QR Code or a counterfeit QR Code. The *modus operandi* involved repeated purchases of subsidized diesel at gas stations using different barcodes, after which the fuel was collected and stored at a warehouse. Once the quantity was sufficient, the diesel was resold on the open market at non-subsidized prices for personal profit. As a result of this operation, the police seized approximately 8,600 liters of subsidized diesel as evidence.^[14] This case illustrates a form of deviation in the distribution of subsidized energy, which harms the state and disadvantages rightful beneficiaries. It also highlights weaknesses in the MyPertamina digital system, particularly in data monitoring and validation.

The misuse of QR Codes in the distribution of subsidized fuel constitutes a violation of law, as it contradicts government regulations. Such actions breach the established procedures for subsidy distribution, which should only benefit eligible recipients, cause financial losses to

the state due to misdirected subsidies, and involve technological manipulation of the MyPertamina application to gain illegal profit by hoarding and reselling subsidized fuel. These elements demonstrate intentional wrongdoing, thus making such acts subject to criminal sanctions.

Several previous studies have discussed the issue of subsidized fuel distribution, but none have specifically examined criminal sanctions for the misuse of MyPertamina QR Codes. A study by Rohim Kusuma Putra et al. analyzed legal enforcement of violations in the transportation and trade of subsidized fuel in Rokan Hulu Regency under Law No. 22 of 2001 on Oil and Gas, Article 55, revealing weak enforcement and difficulties in uncovering offender networks, but without discussing digital aspects.[15] Gusti Yosi Andri and Djuariah examined MyPertamina as an electronic system under Law No. 11 of 2008 on Electronic Information and Transactions (ITE Law), Article 35 jo. Article 51, focusing on normative aspects of electronic systems, without addressing criminal sanctions related to QR Code misuse.[16] Meanwhile, Rifky Mizan Ramadhan et al. explored the responsibility of gas stations (SPBU) in the distribution of subsidized fuel in Aceh Besar, covering social, technical, and legal issues related to QR Code usage, but focusing on administrative accountability rather than individual criminal liability.[5]

The principle of presumption of innocence is a fundamental legal concept stating that any person suspected, arrested, or charged cannot be deemed guilty until proven by a court decision with permanent legal force.[17] In this study, this principle serves as a legal safeguard, ensuring that the analysis of criminal sanctions does not presume guilt on the part of the suspects involved in the MyPertamina QR Code misuse without valid legal proof. The study does not rely on court rulings, as the Karawang case is still under police investigation. Therefore, the discussion of criminal sanctions in this research is normative, based on applicable legal provisions and criminal law theory, not on judgments against specific individuals.

According to the theory of criminal liability, a person may be subject to criminal sanctions if their actions violate the law and are committed with fault (*schuld*), whether intentionally (*dolus*) or negligently (*culpa*). In the MyPertamina QR Code misuse case, the act violates government regulations on subsidized fuel distribution. It involves breaching proper subsidy allocation procedures, causing potential state financial losses by diverting subsidies from rightful recipients, and manipulating technology through QR Code misuse to gain unlawful profit. Additionally, there is evidence of subsidized fuel exploitation through hoarding and resale practices. Altogether, these actions demonstrate intentional elements and have the potential to warrant criminal sanctions under the prevailing laws.[16]

In this case, the theory is applied solely to analyze the nature of the act whether it was committed intentionally to obtain subsidized fuel illegally or due to negligence without attributing guilt to any specific individuals.

Based on Article 33 paragraphs (2) and (3) of the 1945 Constitution of the Republic of Indonesia, fuel (BBM) is considered a strategic sector that affects the livelihood of many people and forms part of the natural resources controlled by the state for the greatest prosperity of the people.[18] This state control includes regulating distribution, pricing, and allocation of fuel to ensure fairness and accuracy. The misuse of MyPertamina QR Codes disrupts the state's role in managing this strategic sector, deprives citizens of their subsidy rights, and can lead to scarcity or misuse of subsidy funds. From a criminal law perspective, such conduct is not merely an administrative or technical violation, but a breach of constitutional mandate. Therefore, criminal sanctions should reflect the protection of public interest and serve as a deterrent to prevent future violations.

Presidential Regulation No. 191 of 2014 defines the criteria for recipients of subsidized fuel and its distribution system, making any use of QR Codes by unauthorized parties a clear violation of this policy. In this case, the suspects duplicated legitimate QR Codes to obtain subsidized fuel illegally and resold it for personal gain.

Criminal Sanctions for the Misuse of MyPertamina QR Codes in the Distribution of Subsidized Fuel

3.1 Legal Basis for Criminal Sanctions

From the perspective of criminal law, perpetrators who misuse the MyPertamina QR Code may be subject to the following legal provisions:

1. The Indonesian Criminal Code (KUHP) Articles 372, 378, and Article 55 Paragraph (1)

In the Karawang case, there were indications of the use of QR Codes belonging to farmers who were legally entitled to receive subsidized fuel, but these codes were exploited in violation of procedures. This act can be analyzed as a form of fraud or embezzlement, as the QR Code was used to gain personal profit unlawfully.[19] Moreover, manipulation occurred within the digital-based fuel distribution system, creating the appearance that the purchase was made by an eligible recipient. If proven, such actions meet the elements of Article 378 concerning the use of deceit for personal gain, which carries a maximum imprisonment of four years, and Article 372 on embezzlement, which carries the same maximum imprisonment or a fine of up to nine hundred rupiah.[20]

The Karawang case also involved several acts that may constitute legal violations in the misuse of subsidized fuel distribution. Article 55 paragraph (1) not only addresses the main act of using another person's QR Code but also covers acts of assisting, instructing, or financing the misuse. This shows that the law provides a framework for evaluating all forms of participation in the misuse scheme, without declaring anyone guilty until a final and binding court decision is issued.

2. Law Number. 11 of 2008 on Electronic Information and Transactions (ITE Law) Article 35 in conjunction with Article 51 Paragraph (1), as amended by Law No. 19 of 2016

The misuse of a QR Code in the MyPertamina application can be analyzed as an act involving manipulation of electronic data. A QR Code constitutes a form of electronic information or document protected by law. The use of a QR Code by unauthorized parties indicates unauthorized access and manipulation of electronic identity. If a QR Code is duplicated or altered, it may be categorized as falsification of an electronic system. Such conduct, if proven, falls under Article 35 jo. Article 51 Paragraph (1) of the ITE Law, which regulates manipulation of electronic systems to unlawfully obtain subsidized fuel. Based on this law, falsifying or creating false electronic data or documents carries a maximum sentence of 12 years of imprisonment and a fine of up to Rp 12 billion.[21]

3. Law Number. 22 of 2001 on Oil and Gas, Article 53 Letter (c) in conjunction with Law No. 11 of 2020 on Job Creation, Article 40 Number IX

Using subsidized fuel unlawfully such as duplicating an entitled person's QR Code and reselling the fuel for profit falls within the category of misuse in the trade and distribution of subsidized fuel. This act violates Article 53(c) of the Oil and Gas Law (Law No. 22 of 2001), which imposes a maximum imprisonment of three years and a fine of up to Rp 30,000,000,000.00 (thirty billion rupiah).[22] The Job Creation Law No. 11 of 2020 Article 40 Number IX provides technical provisions related to oil and gas exploitation activities. The misuse of subsidized fuel in distribution can have serious impacts on the legally regulated fuel trade chain. For example, if subsidized fuel is illegally diverted to unauthorized distribution channels, it disrupts the national oil and gas trading system. Therefore, this article reinforces the legal framework, emphasizing that misuse of subsidized fuel is not merely an administrative offense but a violation of national energy security and stability.[23]

3.2 Lex Specialis

Based on the principle of *Lex Specialis derogat legi generali* that a specific law overrides a general one when both govern the same matter.[24] In the ITE Law and the Oil and Gas Law have more appropriate application compared to the KUHP. Articles 378 and 372 of the KUHP regulate general acts of fraud and embezzlement, whereas the ITE Law focuses specifically on crimes related to electronic systems, including misuse of QR Codes. Similarly, the Oil and Gas Law, reinforced by the Job Creation Law, specifically governs trade and distribution of fuel. Therefore, in cases of subsidized fuel misuse through QR Code manipulation, the application of the ITE Law and the Oil and Gas Law is more appropriate as they serve as special laws designed to address such offenses.

3.3 Combined Sentencing (Concursus Realis)

In Indonesia's criminal law system, the concept of combined sentencing (*conkursus realis*) applies when a person commits multiple distinct criminal acts at different times or under separate circumstances.[24] This is regulated under Article 66 of the KUHP, which states that each offense can be punished separately. However, if the penalties involve imprisonment for a certain period, the total cumulative sentence must not exceed 20 years. This means that even if a perpetrator is convicted of multiple offenses, there remains an upper limit to the total punishment.[25]

The Karawang case involves multiple distinct acts in both time and type. First, there was alleged manipulation of an electronic system by using another party's QR Code to unlawfully obtain subsidized fuel. Second, there was misuse of fuel distribution through illegal purchase and resale for personal gain. Because these acts occurred separately and involve different legal elements, the case constitutes a *conkursus realis*, or a real concurrence of multiple criminal acts.

Conclusion

The misuse of QR Codes in the MyPertamina application for hoarding and reselling fuel for personal profit constitutes an unlawful act because it violates the procedures for the distribution of subsidized fuel, causes losses to the state, and is carried out with intent. Based on Article 33 Paragraphs (2) and (3) of the 1945 Constitution of the Republic of Indonesia, fuel is a strategic sector that affects the livelihood of many people and is part of the natural resources controlled by the state for the greatest prosperity of the people. From a criminal law perspective, the perpetrators may be charged under several provisions, namely: Articles 372, 378, and 55 Paragraph (1) of the Indonesian Criminal Code (KUHP) concerning embezzlement and fraud, which carry a maximum imprisonment of four years; the Electronic Information and Transactions Law (ITE Law), as the act involves elements of electronic data manipulation, with a maximum penalty of twelve years of imprisonment and a fine of up to Rp 12 billion; and Article 53 letter (c) of the Oil and Gas Law (Law No. 22 of 2001) in conjunction with Article 40 number IX of the Job Creation Law, which imposes a maximum imprisonment of three years and a fine of up to Rp 30 billion. This case falls under the category of *conkursus realis* (real concurrence), as several distinct criminal acts occurred separately and involve different legal elements. The application of the principle of *Lex Specialis derogat legi generali* affirms that the ITE Law and the Oil and Gas Law are more appropriate as the legal basis for imposing sanctions compared to the Criminal Code, as they specifically address offenses related to electronic systems and subsidized fuel distribution.

Suggestion

The recommendations include strengthening regulations and supervision of subsidized fuel distribution, enhancing security and verification mechanisms within the MyPertamina application, conducting public education to raise awareness about the proper use of subsidized fuel and the legal consequences of misuse, as well as enforcing the law firmly to create a deterrent effect for offenders.

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