

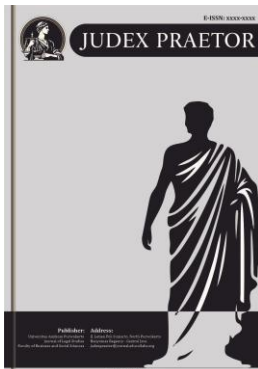


Review of Tourism Law on the Double Ticket Payment System (Dieng Wonosobo Tourism Case Study)

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ABSTRACT

This study evaluates the legal and practical implications of the double ticket payment system in the Dieng Wonosobo tourist destination from the perspective of Indonesian tourism law. Despite its status as a major cultural and natural attraction, Dieng faces significant governance challenges due to overlapping ticket levies, where visitors are required to pay multiple entrance fees for a single tourist zone. Employing an empirical normative-juridical method with a descriptive qualitative approach, data were gathered through semi-structured interviews with key stakeholders, field observations, and legislative documentation analysis. The findings reveal a clear discrepancy between regional tourism policy and actual implementation, driven primarily by uncoordinated cross-agency management and ambiguous local regulations. This dual-ticketing scheme undermines Law No. 10 of 2009 on Tourism and Law No. 8 of 1999 on Consumer Protection by violating principles of legal certainty, transparency, and fairness. Consequently, the practice diminishes tourist satisfaction, harms the destination's overall reputation, and risks fostering illegal levies. To address these systemic issues, the Wonosobo regional government and relevant stakeholders must synchronize local regulations, establish a unified single-window ticketing framework preferably integrated through digital payment solutions and strengthen inter-agency oversight to ensure fair, transparent, and sustainable tourism management.

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INTRODUCTION

Tourism is a form of activity that is carried out directly, touching, and also involving elements of the surrounding community as the main factor.¹ The tourism sector can attract quite a high level of attention, because this affects the community in various aspects. The changes can be felt in the fields of economy, socio-culture, environment, social values, science, and many job opportunities. Compared to other sectors, tourism is one of the fastest growing sectors in a region, this is due to the independence of management or the contribution of the local government in managing the place. The tourism sector itself can support the need for sustainable development.

The development of the tourism sector raises questions in the community about the role of local governments in handling tourism. The role of government will have an impact on all levels of society and existing industries. Therefore, it is important to conduct an in-depth study at all levels of government so that the policies taken do not harm the community. If managed properly, tourism can become a source of foreign exchange for the country and make a significant contribution to the development of society, local governments, and the state.²

Central Java Province is one of the regions in Indonesia that has many popular tourist attractions. One of the favorite destinations for tourists is the Dieng area in Wonosobo, which offers a natural panorama of the mountains with a breathtaking view. This area is located between several districts, namely Wonosobo, Banjarnegara, Batang, Pemalang, and Temanggung, making it a strategic and easily accessible destination.³

The Dieng Highlands area is a priority tourist destination in Wonosobo Regency with tourist interest that continues to increase every year. This is reflected in the increasing number of visits. Based on data from the Regional Financial Revenue and Asset Management Agency (BPPKAD) of Wonosobo Regency, the levy from the tourism and sports sectors in this region contributes 49.28% to the total regional revenue. The largest contribution comes from the main tourist attractions, namely the Dieng Highland Area Entrance, Tuk Bimo Lukar, Dieng Plateau Theater, and Telaga Menjer.⁴

In the middle of the Dieng Plateau, there is a tourist destination that attracts the attention of tourists from all directions, namely Sikidang Crater. Its strategic location in Dieng Kulon Village, Batur District, Banjarnegara Regency, makes this place easy to reach and one of the popular tourist attractions in Dieng.

¹ Bafadhal, A. S., *Perencanaan Bisnis Pariwisata*. Malang: Media Nusa Creative, (2021), p. 1

² Lijan Poltak Sinambela, *Reformasi Pelayanan Publik: Teori, Kebijakan, dan Implementasi* (Jakarta: Bumi Aksara, 2006), p. 96.

³ Rahayuningsih, M., & Wati, Y. H., Strategi Pengembangan Pariwisata Kawasan Dieng Kejajar Wonosobo, *Jurnal Geosains West Science*, Vol. 1, No. 01, (2023), p.18.

⁴ Novianti, R., Baga, L. M., & Baga, L. M., Strategi peningkatan pendapatan asli daerah melalui retribusi sektor pariwisata (studi kasus kawasan wisata dataran tinggi dieng kabupaten wonosobo), *Jurnal Nasional Pariwisata*, Vol. 9, No. 1, (2017), p. 19.



Dieng and all its beauty also have problems in the entrance ticket payment system. If going to the Dieng tourist area is biased through two different entrance routes, namely the Wonosobo route and also the Banjarnegara route, tourists who enter through the Wonosobo route must pass through the entrance on the road and be dismissed to pay the Dieng tourist entrance ticket levy, but if we go through the Banjarnegara route we can freely enter the Dieng area without having to pay an entrance ticket first.

Regional levies are mandatory contributions paid by the community to local governments as one of the official sources of revenue to support the implementation of development and public services in the region. These payments are given in exchange for the use of public services or facilities. The types of services subject to the levy include various fields, such as public services, business activities, and certain licensing. In Regional Regulation Number 11 of 2023 concerning Regional Taxes and Regional Levies, Article 114 regulates levy rates for services in the recreation, tourism, and sports sectors.

Table 1. Fee Levy for Entrance Ticket to Dieng Wonosobo Tourist Attraction

NO	Recreational Places	Rate (Rp)	Information
1.	Sights		
	a. Dieng highland area		
	1) Gardu Pandang Tieng	5.000	Per Person (Including insurance)
	2) Squirrelly	5.000	Per Person (Including insurance)
	3) Dieng Plateau Theater	5.000	Per Person (Including insurance)
	b. Menjer Lake	5.000	Per Person (Including insurance)

Source: Wonosobo Regency Regional Regulation Number 11 of 2023, Appendix VIII.

The payment process that occurred was repetitive, due to the lack of information related to the ticket system imposed at the Dieng Wonosobo Tourist Attraction and the lack of thorough socialization related to the implementation of entrance tickets at the Dieng tourist attraction. At the entrance gate of the Dieng area, tourists are drawn an entrance ticket of Rp. 15,000, this is mandatory for anyone who wants to enter the Dieng area of the Wonosobo route, except for local residents, the ticket is issued by the local government, based on Wonosobo Regency Regional Regulation Number 11 of 2023 concerning Regional Taxes and Regional Levies, but the required entrance ticket



does not cover all tourist attractions in Wonosobo, only valid for certain places that are managed by the local government of Wonosobo Regency such as the Tieng Lookout Lookout, Dieng Plateau Area, Tuk Bima Lukar, and Dieng Plateau Theater.⁵

In practice, tours are managed by the local government, but they still have to pay for an entrance ticket twice. One of the tours is the Menjer Lake, where it is known that this Menjer Lake is one of the tours managed by the local government. In practice, when tourists are going to enter the lake, the tourists are asked to pay an entrance ticket of Rp 20.000, - and there are also those who pay Rp 15.000, - here it is clear that there is a difference in entrance ticket payment. The ticket payment system applied in the lake tour is not in the form of a counter but when tourists have arrived at the location, they are immediately directed to park, and strangely the one who directs tourists is not only one person but there are several people where each person directs has a different rate when entering the tourist attraction. In addition, there is helmet storage, where helmet storage seems forced for tourists, because if there are tourists who may not want to leave their helmets, then the person said that the tourist party would not be responsible for the loss. The storage of this helmet is also subject to a sincere rate, but in its application the sincere rate is limited to a minimum of Rp 5.000, - of course this is not included in the rules in the Regional Regulation.

The same thing is felt by almost every tourist who comes to the location, the payment made at the initial entrance gate does not contain the entire payment at the tourist attractions available in it, even some tourists are required to pay additional parking fees. When arriving at the tourist location, this makes tourists feel disadvantaged in terms of ticketing services, because there is uncertainty regarding the facilities obtained when making payments at the initial entrance gate Dieng Wonosobo. The determination of this policy is not even contained in complete information by the management, especially related to the tourist entrance levy in the Dieng Area and the facilities obtained by tourists when paying for tickets at the initial entrance gate of the Dieng Wonosobo Area. Currently, the initial payment only covers the entrance to the area and insurance for every tourist who enters, does not cover facilities including parking and tourist entrance in the Dieng area, only a few tourist attractions.

Another problem also occurs because not all tourists who pass through the Dieng area intend to travel. Most of the surrounding communities or road users who only pass by are still dismissed to pay for entrance tickets to the Wonosobo area. This certainly causes injustice, because the levy is carried out without considering the purpose of the trip of tourists or people who are just passing by. Even tourists who intend to visit tourist attractions that are administratively located in the Banjarnegara Regency area, such as Sikidang Crater, are also still required to pay an entrance ticket to the Dieng Wonosobo area, even though the tourist destination is in another district. This condition shows the overlap of the authority to manage tourist areas between

⁵ Magdalena Natasya, "Telaga Menjer Wonosobo: Harga Tiket Masuk, Rute dan Daya Tariknya", <https://travel.tempo.co/read/1838773/telaga-menjer-wonosobo-harga-tiket-masuk-rute-dan-daya-tariknya>, accessed on January 6, 2026.



Wonosobo and Banjarnegara Regencies, which has an impact on the emergence of double levies and legal uncertainty for visitors.

A ticket withdrawal system like this not only has an impact on the image of Dieng tourism as a leading destination in Central Java, but also raises questions from the aspect of tourism law.

METHOD

This study utilizes an empirical qualitative field research method⁶ to analyze social dynamics, organizational practices, and legal conditions within a specific community context.⁷ A normative-descriptive approach is applied to evaluate the correlation between formal legal regulations, public policies, field implementation, and the resulting impacts on affected third parties.⁸ The research was conducted at the Dieng Tourist Attraction in Wonosobo Regency, focusing on the legal review of Tourism Law regarding the double-ticket payment system. The research subjects comprised destination managers, ticket counter attendants, local residents, and visiting tourists.

Data were gathered from both primary and secondary sources. Primary data were obtained directly through field observations and semi-structured interviews with key stakeholders, including ticket guards, local community members, and tourists. Systematic field observation⁹ was conducted to record operational ticketing practices and visitor interactions in real time, capturing empirical realities directly from the subjects' perspectives.¹⁰ Secondary data were collected through documentation techniques, sourcing relevant local government regulations, statutory laws, academic journals, textbooks, and prior research literature on tourism levies and consumer protection.

Data analysis was conducted using qualitative descriptive analysis. The collected data comprising interview transcripts, observational field notes, and regulatory documents were systematically organized, categorized, and synthesized. By cross-referencing empirical field data with normative legal frameworks, the analysis delivers a comprehensive descriptive evaluation to draw structured and objective conclusions regarding the double-ticketing practice in Dieng.

⁶ Septiani, R. A. D., & Wardhana, D., Implementasi program literasi membaca 15 menit sebelum belajar sebagai upaya dalam meningkatkan minat membaca. *Jurnal Perseda: Jurnal Pendidikan Guru Sekolah Dasar*, Vol. 5, No. 2, (2022), p. 132.

⁷ Almahdi Syahza, *Metodologi Penelitian (Edisi Revisi Tahun 2021)*, Pekanbaru: UR Press. Politeknik Ilmu Pemasarakatan 81, (2021), p. 27.

⁸ I. M. P. Diantha, *Metodologi penelitian hukum normatif dalam justifikasi teori hukum*, Denpasar: Prenada Media, (2016), p.152.

⁹ Suci Arischa, Analisis Beban Kerja Bidang Pengelolaan Sampah Dinas Lingkungan Hidup dan Kebersihan Kota Pekanbaru, *JOM FISIP Journal*, Vol. 6, No. 1, (2019), p. 7.

¹⁰ Lexy J. Moleong, *Metode Penelitian Kualitatif*, Bandung: PT. Remaja Rosdakarya, (2014), p. 175.



RESULT & DISCUSSION

A. Incompatibility of Ticket Withdrawal Practices with the Basic Principles of Tourism Law

The results of the study show that the implementation of the double ticket payment system in the Dieng Wonosobo tourist area is not in line with the basic principles of tourism law as stipulated in Article 5 of Law Number 10 of 2009 concerning Tourism, which emphasizes that the implementation of tourism must be carried out based on the principles of benefit, justice, balance, independence, and sustainability.

In fact, tourists who enter the Dieng area through the Wonosobo route are required to pay an entrance ticket to the area of IDR 15,000, even though the ticket only covers three tourist attractions, namely the Tieng Lookout Station, Tuk Bima Lukar, and Dieng Plateau Theater. Meanwhile, other tourist attractions such as Telaga Menjer, Sikidang Crater, and Telaga Warna still require additional ticket payments at their respective locations. This condition causes tourists to have to pay more than once to enjoy the same tourist area.

Legally, this practice does not meet the principle of "one destination, one levy" that should be applied by local governments in the management of integrated tourist areas. This also creates legal uncertainty for tourists who do not get clarity regarding the scope of the facilities covered in the original ticket.

According to Article 25 letter a of Law No. 10 of 2009, every tourist has the right to obtain accurate, correct, and responsible information about the tourism products to be consumed. With double ticket withdrawals without transparent explanations, the tourist's right to obtain such information has been violated.

B. Institutional Aspects and Overlapping Authority Between Regions

The Dieng Highlands area is geographically located in two administrative areas, namely Wonosobo Regency and Banjarnegara Regency, which causes the problem of overlapping authority in the management of tourist attractions.

Based on the results of interviews and field observations, tourists who go to tourist attractions in the Banjarnegara area are still dismissed at the Wonosobo area levy post and are required to pay for the entrance ticket to Dieng Wonosobo, even though the tourist destination is in another district. This situation raises legal questions because the levy is carried out outside the area of authority for tourist attractions that are not the responsibility of Wonosobo Regency.

According to Article 6 paragraph (2) of Law No. 10 of 2009, local governments have the authority to regulate, foster, and supervise the implementation of tourism only in their jurisdiction. Thus, the withdrawal of the levy by Wonosobo Regency against tourists who want to go to tourist attractions in the Banjarnegara area can be considered beyond the limits of the jurisdiction of authority and not in accordance with the principle of the legality of regional levies.

In addition, weak coordination between local governments, BUMDes, and field managers leads to the absence of uniformity of tariffs and service standards.



In practice, some tour managers in Dieng charge additional fees such as parking, helmet storage, and local guide services without clarity of legal basis or official proof of the law. This has the potential to cause illegal levies that are contrary to the principle of transparency in public services as stipulated in Article 20 letter e of Law No. 10 of 2009, which requires every tourism operator to ensure safety, comfort, and regularity of services to tourists.

C. Legal Implications for Tourism Consumer Protection

From a consumer protection legal perspective, the practice of double ticketing in the Dieng Wonosobo area can be categorized as a form of violation of the consumer rights of tourists, because they do not get clarity on the products and services purchased.

Article 4 letter c of Law Number 8 of 1999 concerning Consumer Protection emphasizes that every consumer has the right to true, clear, and honest information about the condition of goods and services, and has the right to be heard for their opinions and complaints. When tourists are required to pay double tickets without adequate explanation or socialization, then this right has been ignored by the manager and the local government.

In addition, Article 8 paragraph (1) letter f of Law No. 8 of 1999 prohibits business actors from providing false or misleading information about the price, tariff, or benefit of a service. Thus, a double ticket system that is not accompanied by details of facilities and boundaries of tourist attraction areas can be considered a form of misleading information in the context of legal protection for tourists.

D. Relevance to the Principles of Good Tourism Governance

The concept of Good Tourism Governance requires that tourism management be carried out based on the principles of transparency, accountability, community participation, and legal certainty. In the context of Dieng Wonosobo, the implementation of the double ticket system shows the weak implementation of these principles.

Government Regulation Number 50 of 2011 concerning RIPPARNAS stipulates that every local government is obliged to establish integrated tourism governance, by ensuring that every tariff and levy policy does not harm tourists or local communities. However, the results of the study show that the double ticket policy in Dieng actually hinders the development of tourism because it causes negative perceptions from tourists and creates social injustice for the surrounding community who only pass by but are still charged entrance fees.

Thus, this practice is contrary to the purpose of tourism law, which is to provide fair economic benefits, environmental sustainability, and social welfare for the local community, as stated in Article 3 of Law No. 10 of 2009.

E. Efforts to Improve the Tourism Levy System

From the results of the analysis, the legal solution that can be taken by the local government is to revise Wonosobo Regency Regional Regulation Number 11



of 2023 to clarify the scope and limits of the authority to withdraw levies in the Dieng area. Implementing a digital-based integrated ticket system (one gate system), so that tourists only need to pay once for all tourist areas under the official coordination of the local government. Improve coordination between regions (Wonosobo–Banjarnegara) through inter-regional cooperation agreements (MoU) to avoid overlapping levies. Uphold the principles of transparency and public accountability, by requiring every tour manager to provide official proof of payment and clear fare information boards at tourist sites.

CONCLUSIONS

The implementation of the double-ticket payment system in the Dieng Wonosobo tourist area deviates from national legal principles, specifically violating Law No. 10 of 2009 on Tourism, Law No. 8 of 1999 on Consumer Protection, and Law No. 23 of 2014 on Regional Government. The field practice reveals a significant discrepancy with regional regulations, where vague operational boundaries force tourists to pay multiple entrance fees within a single tourist zone, infringing upon consumer rights to transparent information. Furthermore, ticket collection by the Wonosobo Regency Government for destinations located within Banjarnegara Regency's administrative boundaries creates jurisdictional overlaps that disrupt legal order and inter-regional governance.

This dual-ticketing scheme contradicts Good Tourism Governance (GTG) principles particularly transparency, accountability, efficiency, and legal certainty as a result of weak coordination among municipal authorities, BUMDes, and local business operators. This regulatory non-conformity severely diminishes tourist trust and destination reputation. To rectify these systemic issues, regional authorities must undertake comprehensive regulatory synchronization and institutional reform to establish an integrated, single-window ticketing framework that guarantees fairness for tourists and respects inter-district administrative boundaries.

SUGGESTION

First, the Wonosobo Regency Government should revise Regional Regulation No. 11 of 2023 on Regional Taxes and Retributions to clearly define destination boundaries and establish legal frameworks for cross-border ticketing. This regulatory update must be supported by a formal Memorandum of Understanding (MoU) between the Wonosobo and Banjarnegara Regency Governments to eliminate jurisdictional overlaps and guide BUMDes in legal, accountable levy management. Concurrently, both municipalities need to implement a unified, digital one-gate e-ticketing system across the entire Dieng zone to eliminate double levies, maximize administrative efficiency, and enhance regional revenue transparency.

Second, local authorities must strengthen administrative supervision and legal enforcement to eradicate unauthorized levies and ensure statutory compliance. To rebuild destination trust, the Tourism Office should conduct strategic public information campaigns detailing ticket coverage, pricing, and tourist rights. Finally, tourism governance in Dieng should embrace a participatory, community-centered



approach that engages local stakeholders, safeguards environmental and social sustainability, and ensures equitable economic benefits for the surrounding community.

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