

## CIVIL SOCIETY COUNTER-FRAMING: LICENSING RELIGIOUS ORGANIZATIONS IN INDONESIA'S MINING SECTOR UNDER PRESIDENT JOKOWI

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### Abstract

*Indonesia is renowned for its abundant natural resources, yet it continues to face challenges in governing them equitably and sustainably, particularly in the mining sector. On 30 May 2024, the government issued Government Regulation (PP) No. 25 of 2024, revising PP No. 96 of 2021 on mineral and coal mining operations. The revision prioritizes religious mass organizations to manage Special Mining Business Permit Areas (WIUPK) to enhance economic empowerment. However, the policy has sparked controversy and created dilemmas in resource governance. This study employs a qualitative approach emphasizing observation and interpretation of social phenomena through exploratory and descriptive strategies. It also mobilizes the concept of counter-framing—constructing alternative narratives to reshape public interpretations by contesting dominant views, including government policy. Civil society has responded with advocacy, campaigns, and research to reveal potential harms and encourage inclusive, transparent dialogue. Accordingly, prudent, participatory policymaking is needed to secure social justice and environmental sustainability.*

**Keywords:** Government Regulation (PP) No. 25/2024, Counter-Framing, Natural Resource Governance, Religious Mass Organizations, Indonesia's Mining Sector.

## INTRODUCTION

Indonesia is endowed with abundant natural resources but continues to face challenges in governing them fairly and sustainably. The mining sector—long regarded as a “backbone” of the national economy—is also a recurrent source of conflict, including environmental degradation, corruption, lack of transparency, violations of Indigenous peoples’ rights, and inequitable distribution of economic benefits. Given these risks, government policy is essential to determine who is authorized to manage natural resources and how such management should proceed.

On 30 May 2024, the government issued Government Regulation (PP) No. 25 of 2024, revising PP No. 96 of 2021 on the implementation of mineral

and coal mining activities (BPK J., 2024). The key amendment—Article 83A (1-7)—authorizes the central government to prioritize the offer of Special Mining Business Permit Areas (WIUPK) to religious mass organizations (ormas keagamaan), framed as a measure to promote empowerment and public welfare (Indonesia, 2024). Article 83A (1) states:

*“... Pemerintah Pusat dalam pengelolaan Pertambangan Mineral dan Batubara berwenang melaksanakan penawaran Wilayah Izin Usaha Pertambangan Khusus (WIUPK) secara prioritas. Penawaran WIUPK secara prioritas dimaksudkan guna memberikan kesempatan yang sama dan berkeadilan dalam pengelolaan kekayaan alam.*

*Selain itu, implementasi kewenangan Pemerintah tersebut juga ditujukan guna pemberdayaan (empowering) kepada Badan Usaha yang dimiliki oleh ‘organisasi kemasyarakatan keagamaan’.” (PP No.25, 2024).*

‘Organisasi kemasyarakatan keagamaan’ (religious mass organizations) refers to organizations that, among other functions, maintain units engaged in economic activity to advance members’ economic empowerment and broader social welfare.

The Article 83A (1) states that the central government, in managing mineral and coal mining, is authorized to prioritize the offering of Special Mining Business Permit Areas (WIUPK). This prioritization is intended to ensure fair and equal access to the management of natural resources and to empower business entities owned by religious mass organization (PP No.25, 2024).

The revision to PP No. 25 of 2024 expands space for religious mass organizations to participate in decisions about, and the management of, mining businesses in Indonesia (BPK J., 2024). Enacted under President Joko Widodo, the change has produced a “new dilemma,” polarizing responses across society and government. In practice, however, the regulatory change has generated controversy, particularly among civil society. The perceived dilemma has sparked controversy and diverse reactions across society and government, effectively dividing stakeholders into two sides (Masitoh, 2024).

Proponents argue that involving religious mass organizations can strengthen public participation in natural resource management and create new revenue streams for faith-based constituencies (Yudha, 2024).

Opponents counter that the policy risks conflicts of interest, lack of transparency, and environmental harm; they warn that it could undermine sustainable resource governance while overlooking the rights of Indigenous and local communities (Marta, 2024).

In response, civil society groups have pursued counter-framing—constructing alternative narratives to contest dominant interpretations—through advocacy, public campaigns, and research aimed at illuminating potential negative impacts and pressing for more inclusive and transparent policymaking in natural resource governance, particularly in mining sector. These groups call on the government to give greater weight to the voices of local communities, Indigenous peoples, and other constituencies that have often been marginalized in mining-related decision-making.

The framing and counter-framing literature underscores that struggles over meaning in the public sphere shape policy acceptance and legitimacy. Snow and Benford's classic framework—diagnostic (problem definition), prognostic (proposed solutions), and motivational (rationales for mobilization)—offers tools to trace how actors define a policy's beneficiaries and those who bear its costs (Snow & Benford, 2000). In Indonesia, Sumarwan shows how two opposing frames—There are two social movements whose contributions were most prominent in this case: *Gerakan Bela Islam* (GBI) and *Gerakan Merawat Keagamaan* (GMK)—construct who benefits and who is harmed and mobilize support, indicating that the politics of meaning influences policy trajectories (Sumarwan, 2018). These insights are salient for the extractive sector, where claims of “justice” or “empowerment” are often products of frame contestation rather than neutral facts.

The communication and organization literature underscores that Entman's model (problem–cause–remedy) and Pan and Kosicki's approach (syntactic, script, thematic, and rhetorical structures) help dissect how state and corporate actors craft official narratives that define problems, attribute causes, recommend remedies, and shape risk perceptions (Prasty, 2016). Through this lens, policy statements and press releases are not mere information; they are framing efforts capable of shifting public judgments

about conflicts of interest, licensing transparency, and socio-environmental impacts—issues that are crucial to mining licensing. PP No. 25/2024 permits the prioritized offering of WIUPK to religious mass organizations, justified as expanding “equal and equitable opportunity” and “empowerment”. Existing legal analyses map the regulation’s urgency and procedures but largely overlook how it is accepted or contested in public discourse (Putri et al., 2024).

From these literature reviews and the policy’s prioritized WIUPK scheme, this research will use a counter-framing lens to examine how civil society redefines problems, attributes responsibility, and proposes remedies vis-à-vis the state’s empowerment frame.

Counter-framing refers to the act and process of constructing alternative narratives to challenge or discredit an opponent’s frame—the dominant way an issue is defined and understood—with the aim of shifting public interpretation by offering competing explanations. It not only rejects prevailing frames but also develops persuasive counter-narratives that reorganize how the public understands the issue (Snow & Benford, 2000). Accordingly, in this case study, civil society counter-framing is needed as a critical response to the government’s narrative advanced by a range of stakeholders.

Building on this perspective, this research will answer how civil society actors construct counter-frames in response to the state’s licensing of religious mass organizations to manage mining operations under President Joko Widodo. The research objective is to analyze civil society counter-framing toward this licensing policy during the Jokowi era, with particular attention to its diagnostic, prognostic, and motivational framings, as well as the implications for transparent, accountable, and sustainable natural resource governance (Snow & Benford, 2000).

This research will use a qualitative case-study design to answer the how question—how civil society constructs counter-framing toward the state’s policy of prioritizing Special Mining Business Permit Areas (WIUPK) for religious mass organizations during President Joko Widodo’s administration.

Exploratorily, the research examines the policy object and context in depth; descriptively, it maps narrative patterns and practices without statistical procedures, consistent with the subjective-inductive character of qualitative inquiry (McCusker, 2015).

Data are gathered through literature-based sources: Government Regulation No. 25/2024 and related implementing documents, official government statements, religious mass organizations release, media reports, and relevant scholarly articles. Analysis proceeds via a diagnostic-prognostic-motivational framing map to identify problem definitions, causal attributions, proposed remedies, and mobilizing rationales advanced by the state versus civil society (Snow & Benford, 2000).

## **DISCUSSION**

### **Profile and Characteristics of Civil Society in Indonesia**

Civil society is commonly understood as the sphere of voluntary, collective action by citizens that is autonomous from the state and the market, providing social oversight and normative guidance for public life.

In Indonesia, the strengthening of civil society is grounded in the constitutional doctrine of the '*negara hukum*' (rule-of-law state) and associated characteristics—democracy, tolerance, pluralism, openness and press freedom, social justice, and institutional pillars that uphold civil society (Nugroho, 2000). As codified in Article 1 (2)-(3) of the 1945 Constitution (UUD 1945), Indonesia affirms that sovereignty resides in the people and is exercised pursuant to the Constitution, and Indonesia is a state based on law" (BPK, 2001).

Civil society comprises diverse citizen groups that enjoy freedoms and egalitarian standing in public affairs, including the rights to associate, assemble, and express opinions, as well as equal opportunity to advocate their interests in the public sphere (Sinaga, 2013). In practice, civil society actors operate independently and critically to advance the public interest without government interference; they include activists, academics, and non-governmental organizations (NGOs).

In Indonesia, NGOs—often referred to as lembaga swadaya masyarakat (LSM)—are private, non-profit, voluntary organizations formed by groups of individuals to address specific issues such as the environment, education, health, human rights, and community empowerment. Their core functions include public advocacy, policy critique, and community service. Frequently cited examples include *Wahana Lingkungan Hidup Indonesia* (WALHI), *Palang Merah Indonesia* (PMI), *Peduli Konservasi Alam* (PEKA), *Perhimpunan Bantuan Hukum dan Hak Asasi Manusia* (PBHI), *Lembaga Penelitian dan Advokasi Masyarakat* (ELSAM), *Yayasan Lembaga Bantuan Hukum Indonesia* (YLBHI), *Yayasan Konservasi Laut* (YKL), *Lembaga Perlindungan Anak Indonesia* (LPAI), and *Komisi untuk Orang Hilang dan Korban Tindak Kekerasan* (Kontras) (Qothrunnada, 2023).

### **Profile and Characteristics of Religious Mass Organizations in Indonesia**

Mass organizations (*organisasi kemasyarakatan*—Ormas) are legally defined as voluntary associations established by citizens on the basis of shared aspirations, needs, interests, activities, and purposes, formed to participate in national development in pursuit of the goals of the Unitary State of the Republic of Indonesia grounded in Pancasila (Law No. 17/2013 on Mass organizations, Article 1 (1); Kemenkumham, 2013).

Substantively, mass organizations share core attributes with Non-Governmental Organizations (NGOs): they are voluntary, independent, social, and non-profit, and—crucially—must uphold democratic values. All activities must conform to Pancasila and the 1945 Constitution. Their organizational scope and territorial representation are regulated by Law of the Republic of Indonesia No. 17 of 2013 on Mass organizations, Articles 23, 24 and 25 (Kemenkumham, 2013).

First, mass organizations operating at the national level must maintain organizational structures in at least 25% of Indonesia's provinces (for 38 provinces, minimally nine to ten). Second, mass organizations operating at the provincial level must be present in at least 25% of the province's regencies/municipalities (e.g., seven to eight of thirty). Third, mass

organizations operating at regency/municipality-level must, at minimum, be organized in one district within that area.

These thresholds are intended to ensure representative coverage across jurisdictions and to prevent the misuse of claimed operational scope. Statutory aims include delivering public services, expanding community empowerment, and increasing civic participation. In effect, mass organizations help safeguard constitutionally protected freedom of association by enabling citizens to organize while ensuring that activities advance national objectives and remain within legal bounds. By field of focus, mass organizations span religion, education, economy, social services, culture, human rights, and more. Among religious Ormas, five are widely cited for national influence: *Nahdlatul Ulama* (NU), *Muhammadiyah*, *Persatuan Islam* (Persis), *Persatuan Umat Islam* (PUI), and *Al-Irsyad Al-Islamiyah* (Hasibuan, 2024), but *Nahdlatul Ulama* (NU) and *Muhammadiyah* are the most dominant in Indonesia.

*Nahdlatul Ulama* (NU), founded on 31 January 1926 in Surabaya by K.H. Hasyim Asy'ari and K.H. Wahab Chasbullah, articulates a traditionalist Islamic approach that integrates religious teachings with local culture; in *Fiqh* it follows the *Shafi'i Madzhab* and espouses Ash'ari and Maturidi theology (Wibisono, 2022) Its purpose is to cultivate Muslim society in line with 'Ahl al-Sunna wa al-Jama'a' (Aswaja). Historically, NU played a formative post-independence role, including issuing the 'Resolusi Jihad' to defend Indonesia's sovereignty (Wibisono, 2022). According to the Ministry of Religious Affairs, NU's adherents exceeded 95 million in 2021. NU's social infrastructure is extensive: approximately 23,372 Islamic boarding schools (pondok pesantren) out of roughly 28,000 nationwide and 12,094 schools across elementary, junior, and senior secondary levels (Wibisono, 2022), as well as 200+ higher-education institutions (Syakir, 2020).

*Muhammadiyah*, established on 18 November 1912 in Kauman, Yogyakarta, *Muhammadiyah* emerged from the educational initiative *Madrasah Ibtidaiyah Diniyah Islamiyah* founded by K.H. Ahmad Dahlan. It advances a modernist Islamic orientation—eschewing local customary

practices and not binding itself to a single *madzhab*—while remaining grounded in the Qur'an and Hadith. Muhammadiyah articulates a mission of '*rahmatan lil 'alamin*' (mercy to all creation) through '*tajdīd*' (renewal) and '*amar ma'ruf nahi munkar*' (enjoining good, forbidding wrong) (Muhammadiyah, 2024).

Internationally, Muhammadiyah maintains 30 special branches overseas, with membership commonly estimated at 30–40 million, though some sources project substantially higher figures for 2024 (Hasibuan, 2024). Its social infrastructure is significant: by 2023, 3,334 educational institutions nationwide—1,904 primary schools, 1,128 junior high schools, 558 senior high schools, 554 vocational high schools, and 172 higher-education institutions (83 universities, 28 institutes, 54 colleges, 6 polytechnics, 1 academy) (Kapitan, 2023). In health services, Muhammadiyah reported 122 hospitals, 20 under construction, and 231 clinics (Hatami, 2024). In religious education, it had established 444 pesantren across 38 provinces by 2024 (Agustina, 2024).

NU and Muhammadiyah—alongside other religious mass organizations—play pivotal roles in empowerment across religious, educational, economic, social, and cultural domains. Within the framework of Law of the Republic of Indonesia No. 17 of 2013 on Mass Organizations, the governance of these organizations is expected to be transparent, accountable, and aligned with constitutional values, thereby safeguarding civic participation in national development and resource governance while ensuring that organizational activities neither harm the public interest nor contravene the principles of the state.

## **Involvement and Risks of Religious Mass Organizations in Mining Governance**

The participation of religious mass organizations should, in principle, reflect civil society's role in a checks-and-balances system within a democratic state. Positioned as intermediaries between societal interests and the government, these organizations are expected to articulate public concerns across ideological, political, economic, social, cultural, defense, and security

domains, provided their activities remain consistent with democratic norms and applicable law (Nugroho et al., 2022). Empowering religious mass organizations is therefore often framed as a means to strengthen civil society so that it does not become merely an object of elite or state interests.

In practice, however, this normative ideal frequently diverges from reality. Rather than symbolizing societal autonomy, religious mass organizations are vulnerable to co-optation, becoming instruments for particular political or economic groups. This tension is sharpened by Government Regulation (PP) No. 25 of 2024, which amends PP No. 96 of 2021 and, in Article 83A (1–7), authorizes the prioritized offering of Special Mining Business Permit Areas (WIUPK) to religious mass organizations (BPK, 2024). Issued on 30 May 2024 under President Joko Widodo (PP No.25, 2024), the reform is officially justified as advancing community empowerment and public welfare but has generated a widely discussed “new dilemma” The expectation is that these organizations will leverage the opportunity to broaden empowerment in the political, economic, and social spheres, thereby contributing to public well-being

Yet the policy also entails significant governance risks. **First**, it may enable abuse of power through “patronage” (spoils-style) politics—the allocation of resource access to favored groups—which can distort competition in Indonesia’s mining industry (Carina, 2024). Such practices may catalyze corruption and nepotism, produce inequitable outcomes, and erode public trust in both government institutions and religious mass organizations. **Second**, expanded discretion over licensing heightens vulnerabilities to rent extraction: embezzlement of mining revenues; unfair licensing and contracting predicated on patron-client ties with particular organizations; and declining transparency and accountability due to weak oversight of mining operations, including gold mining (Bernike, 2024).

Indirectly, the regulatory change risks eroding the autonomy and independence of religious mass organizations. As access to state-provided funding and facilities for mining operations expands, these organizations may develop dependence on government support, which can, in turn, compromise

their objectivity. By tying licensing and operational discretion to the executive, the state gains leverage to steer policies and activities of particular organizations, blurring the line between civic actors and governmental instruments.

This dynamic produces an institutional dilemma. On one hand, religious mass organizations are expected to act as drivers of democracy: when granted opportunities to manage mining ventures, they could generate positive socio-economic outcomes by advancing community empowerment and enhancing the welfare of their constituencies through faith-informed stewardship of natural resources. On the other hand, they can become mechanisms of democratic control: preferential licensing may tighten their alignment with the executive, embed them in patronage networks, and weaken their capacity for independent oversight. In such conditions, the government can more easily amplify its influence over organizational agendas, undermining pluralism and the checks-and-balances function that civil society is meant to provide.

### **Pros and Cons of Licensing Religious Mass Organizations to Manage Mining Operations**

**Pros.** Supporters argue that licensing religious mass organizations to manage mining operations can deliver tangible public benefits. Senior figures such as PBNU Chairman Yahya Cholil Staquf (Gus Yahya) and MUI Deputy Chair Anwar Abbas have welcomed the policy as an institutional innovation that could diversify revenue streams for religious mass organizations and strengthen their social mandate to advance public welfare through community empowerment and service delivery (Yudha, 2024). In this view, involvement in the extractive sector would not replace religious or social functions but rather provide fiscal capacity to scale education, health, and poverty-alleviation programs, aligning resource governance with faith-informed conceptions of the common good.

**Cons.** Opposition takes two forms. First, cautious religious mass organizations—exemplified by Muhammadiyah—signal prudence, indicating they will assess internal capacity before engaging in the scheme (Marta,

2024). Second, rejecting organizations argue the policy is harmful; among those voicing resistance are the Communion of Churches in Indonesia (PGI), the Indonesian Catholic Students Association (PMKRI), Huria Kristen Batak Protestan (HKBP), and the Indonesian Bishops' Conference (KWI), among others (Costa, 2024). Substantive concerns raised by religious mass organizations include:

**Mission drift.** The policy may sideline core religious and social functions by reorienting organizational effort toward profit-seeking, thereby weakening commitments to faith-based education, social justice, and community service and eroding public trust and credibility (Yudha, 2024).

**Religious politicization and reciprocal politics.** Preferential licensing risks mobilizing large faith constituencies for partisan ends, shaping and steering public opinion in ways that entrench oligarchic ties and quid pro quo dynamics between government and religious mass organizations. Critics also recall that the licensing agenda was linked to a political promise attributed to President Joko Widodo to grant mining permits (coal and nickel) to Nahdlatul Ulama at its 2021 congress, suggesting that permits could be instrumentalized to consolidate power (Nadeak, 2024; Suhamdani, 2024).

**Social conflict risks.** Granting operating authority to religious mass organizations may heighten tensions with Indigenous and local communities, especially where religious differences or divergent interests exist, potentially escalating into ethnic, religious, racial, and intergroup (SARA) conflicts (Lolindu, 2024).

**Capability and environmental risk.** Mining is a high-risk, capital- and knowledge-intensive sector. Limited technical capacity within religious mass organizations could result in poor environmental stewardship, unfair licensing and contracting practices, and potential economic losses for the state; robust transparency and oversight would be required to prevent revenue leakage and governance failures (Irsyad, 2024).

Overall, while the policy is promoted as an empowerment vehicle, critics warn that—absent stringent safeguards on transparency, conflict-of-interest,

and environmental and social protections—it could foster dependence on state patronage, politicize religious authority, and undermine the independent, accountability-enhancing role that religious mass organizations are expected to play in a democratic system.

### **Civil Society Counter-Framing of Licenses for Religious Mass Organizations to Manage Mining Businesses**

This article analyzes the case through counter-framing, drawing on Snow and Benford's formulation that framing performs three core functions—diagnostic, prognostic, and motivational—which together shape both consensus mobilization (building agreement on what the problem is) and action mobilization (spurring collective action) (Snow & Benford, 1988; 2000). Using this lens, the article maps how civil society, religious mass organizations, and the state each define problems and assign responsibility, propose remedies, and articulate reasons for action in the debate over prioritized licensing of mining operations.

#### **Diagnostic Framing**

Diagnostic framing entails first identifying the core problem so that the aspects requiring correction or change become clear. It addresses two questions: (1) What is—or has gone—wrong? and (2) Who or what is to blame? In practice, diagnostic framing often recasts events or situations as injustices; even when the term “injustice” is not stated explicitly, it is frequently implied through the delineation of harms, victims, and responsible mechanisms evident in public life (Snow & Benford, 2000).

Civil society identifies the root problems in licensing mining operations to religious mass organizations as concentrated conflicts of interest, heightened environmental risk, and unequal, opaque access to permits and rents. Civil society groups argue that instead of empowerment, the mining sector often has a great contribution to environmental damage, economic disparities, and exacerbates poverty in the mining area (Sagung Dyah A.N.A & Dewi, 2020). In diagnostic terms, the answers are: What is (or went) wrong? — an unjust and non-transparent licensing pathway privileging specific

actors; and Who/what is to blame? — the state (as designer and gatekeeper of licensing) and religious mass organizations that accept or seek privileged access. By recasting these developments as injustices (even without using the word explicitly), civil society highlights concrete harms to affected communities and ecosystems, as well as the mechanisms — preferential rules, weak oversight—through which those harms may arise.

### **Prognostic Framing**

Prognostic framing advances alternative courses of action—plans, strategies, and implementation frameworks—to address the diagnosed problem. It answers the questions “What should be done?” and “How should it be done?” by proposing solutions that may include re-examining problems as they manifest in society. Such proposals are subject to contention: stakeholders may endorse, modify, or reject them (Snow & Benford, 2000).

To resolve these problems, civil society advances a set of remedial proposals. First, a regulatory review of the licensing scheme to ensure consistency with equality-before-the-law and environmental-social safeguards. Second, independent oversight and auditing of licensing decisions and financial flows. Third, full transparency of WIUPK data, contracts, beneficial ownership, and environmental impact assessments. Fourth, meaningful participation of local and Indigenous communities—prior consultation and consent—in all stages of the licensing cycle. These proposals specify what should be done and how to do it, while recognizing that alternative solutions will be contested among stakeholders.

### **Motivational Framing**

Motivational framing supplies the vocabularies of motive and urgency that encourage individuals and groups to act, building on diagnostic and prognostic claims. It addresses “Why should one contribute to solving the problem?” and “How urgent is it?” and thereby functions as a driver of collective action (Snow & Benford, 2000).

Civil society also articulates reasons to act—moral urgency, environmental stewardship, protection of community rights, and defense of

democratic accountability—to convert agreement into mobilization. Calls to action appear through public campaigns, petitions, investigative reports, and digital advocacy, which seek to raise costs for opaque practices and lower barriers to participation. In this way, motivational framing answers why stakeholders should contribute resources or accept risks, and how urgent the issue is relative to competing priorities, thereby sustaining collective action over time.

Drawing on the three framing strands—diagnostic, prognostic, and motivational—this article first maps the issue on an actor-specific basis, comparing how civil society, religious mass organizations, and the state define problems and responsibility, propose remedies, and articulate reasons for action. The comparative results are summarized in Table 1:

**Table 1.** Comparative Mapping of Framing Stages by Actor Groups  
 (Diagnostic, Prognostic, and Motivational)

<b>Framing Stage</b>	<b>Civil Society</b>	<b>Religious Mass Organizations</b>	<b>Government</b>
<b>Diagnostic Framing</b>	<ul style="list-style-type: none"> <li>• The presence of conflicts of interest;</li> <li>• Environmental degradation; and</li> <li>• Inequitable access to resources and decision-making.</li> </ul>	<ul style="list-style-type: none"> <li>• Licenses were obtained lawfully and are codified in written legislation.</li> </ul>	<ul style="list-style-type: none"> <li>• Licenses are granted formally in accordance with applicable regulations.</li> </ul>
<b>Prognostic Framing</b>	<ul style="list-style-type: none"> <li>• Reassess licensing decisions;</li> <li>• Conduct independent audits;</li> <li>• Ensure transparency throughout the policy cycle; and</li> <li>• Mandatorily involve local communities in decision-making and oversight.</li> </ul>	<ul style="list-style-type: none"> <li>• Mining operations can support community empowerment in the economic domain.</li> </ul>	<ul style="list-style-type: none"> <li>• Revise policies governing mining management to improve governance and accountability.</li> </ul>

<b>Motivational Framing</b>	<ul style="list-style-type: none"> <li>• Cultivate moral appeals to safeguard the environment; and</li> <li>• Foster critical awareness of risks and externalities arising from the licensing scheme.</li> </ul>	<ul style="list-style-type: none"> <li>• Respond to public criticism by underscoring mining's role as social contribution and national economic advancement.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce societal conflict and contention by implementing transparent policies and procedures.</li> </ul>
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Building on this mapping, the article then sets out the counter-framing strategies deployed by civil society in response to the state's licensing of religious mass organizations to manage mining operations. For analytic clarity, these strategies are organized by diagnostic, prognostic, and motivational elements and presented in Table 2:

**Table 2.** Comparative Mapping of Civil Society's Counter-Framing Efforts  
(Diagnostic, Prognostic, and Motivational)

<b>Aspect</b>	<b>Diagnostic Framing</b>	<b>Prognostic Framing</b>	<b>Motivational Framing</b>
<b>Primary Focus</b>	Identify the core problems and the actors who should be held responsible.	Propose solutions and organize collective action to address the problems.	Generate moral impetus, urgency, and clear reasons for action.
<b>Counter-Framing Efforts</b>	<p>Civil society identifies that granting mining licenses to religious mass organizations may:</p> <p>1) Create conflicts of interest between socio-religious missions and commercial objectives;</p> <p>2) Lead to environmental harms due to limited</p>	<p>Civil society proposes to:</p> <p>1) Revoke mining licenses held by religious mass organizations;</p> <p>2) Codify that mining activities must be managed by professional entities meeting sustainability standards; and</p> <p>3) Strengthen oversight of state-organization</p>	<p>Emphasize awareness of:</p> <p>1) Moral urgency — protecting local communities from environmental damage;</p> <p>2) Effectiveness of collective action — coordinated pressure on government; and</p> <p>3) Legal priority — upholding rules and preventing</p>

	mining-governance competencies; and 3) Involve potential abuses of power by state actors.	relations to prevent conflicts of interest.	injustices in resource distribution.
<b>Purpose</b>	Highlight structural problems and the adverse impacts of the licensing policy.	Direct attention to solutions that are realistic and implementable.	Motivate stakeholders to join collective action through advocacy, litigation, and policy dialogue.
<b>Collective Action Options</b>	1) Media advocacy spotlighting environmental damage linked to mining by religious mass organizations; 2) Publicly accessible impact reports addressed to both the public and government.	1) Petitions urging government to revise or revoke licenses; 2) Coalitions among environmental NGOs, scholars, and Indigenous/local communities to strengthen advocacy.	1) Public campaigns on digital platforms (e.g., “Mining for People, Not for Organizations”); 2) Community mobilization for peaceful demonstrations; 3) Reinforcing that environmental stewardship is a shared responsibility.

## CONCLUSION

Viewed through Snow and Benford's threefold lens, this study finds that civil society's counter-framing around the licensing of religious mass organizations to manage mining operations operates along complementary tracks. Diagnostic framing has successfully foregrounded the core problems—conflicts of interest, transparency deficits, environmental risk, and unequal access—thereby focusing attention on what is wrong and who bears responsibility. Prognostic framing has articulated actionable remedies, including regulatory review, independent oversight, full disclosure of licensing and ownership information, and meaningful participation by local and Indigenous communities. Motivational framing has generated moral and

political urgency, encouraging collective action through campaigns, petitions, investigations, and digital advocacy (Snow & Benford, 2000).

Whether counter-framing is “successful” or “unsuccessful” depends on how these elements interact. It is successful when the three frames are coherent and mutually reinforcing: the public recognizes the problem (diagnostic salience), stakeholders and government seriously consider and adopt proposed remedies (prognostic uptake), and mobilization exerts sufficient pressure to secure concrete changes (motivational effectiveness)—for example, revisions to licensing rules, strengthened oversight, or procedural safeguards. It is unsuccessful when one or more elements underperform: insufficient public salience of the problem, proposals that are dismissed or not implemented, or weak and unsustained mobilization, resulting in policy inertia, continued opacity, and foregone accountability gains.

Ultimately, outcomes hinge on reciprocal relations between top-down responsiveness (government and regulators) and bottom-up capacity (civil society networks and communities). Counter-framing alone cannot substitute for institutional openness; nor can institutional reform proceed without societal pressure and participation. Effective translation of discursive critique into policy change requires alignment across diagnostic, prognostic, and motivational strands, coupled with credible channels for engagement and redress. Where governments are receptive to evidence and public scrutiny—and where civil society sustains organized, inclusive advocacy—the licensing of religious mass organizations can be steered toward transparent, accountable, and environmentally responsible governance. Where these conditions are absent, counter-framing is likely to yield limited returns, and the risks it highlights will persist.

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