



Research Article

A Juridical Analysis of Constitutional Court Decision No. 135/PUU-XXII/2024: The Separation of National and Regional Elections from a Constitutional Perspective

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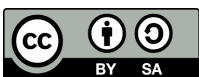
Abstract: This article presents a comprehensive juridical analysis of Constitutional Court Decision No. 135/PUU-XXII/2024, which mandates the separation of national and regional elections in Indonesia. Article 22E of the 1945 Constitution, previously interpreted to require simultaneous elections every five years, is here redefined under a “living constitution” approach to allow staggered ballots. Employing a normative-juridical method, the study examines (1) the Court’s interpretive shift and its alignment with theories of judicial activism, (2) institutional dynamics created by MK’s role as a positive legislator, and (3) practical implications for Indonesia’s presidential system and electoral management. Key technical terms judicial activism (court-driven policy innovation), living constitution (dynamic constitutional interpretation), and electoral governance (framework of rules and practices for elections) are defined early to aid international readers. The analysis integrates comparative insights from other democracies and expert perspectives, including critiques from Simon Butt on potential judicial overreach and Titi Anggraini on the midterm election paradox. Findings reveal that while separation enhances administrative efficiency and issue-focused campaigns, it also engenders significant challenges: legislative vacuums in transition, risks to executive stability through unscheduled “midterm” referenda, and possible declines in voter engagement in off-cycle polls. The study’s novelty lies in its interdisciplinary framework combining constitutional theory, institutional analysis, and policy evaluation and the development of a “Constitutional Electoral Governance Model” to guide future reforms. By distilling complex legal arguments into core results, this research offers an original contribution to constitutional law scholarship and provides actionable insights for democratic law reform in Indonesia.

Keywords: Constitutional Interpretation; Judicial Activism; Staggered Elections; Electoral Governance; Legislative Reform.

1. Introduction

Constitutional Court Decision No. 135/PUU-XXII/2024, which mandates the separation of national general elections (*pemilu*) from regional head elections (*pilkada*), has generated significant waves of academic discourse and practical implications within the domain of Indonesian constitutional law. This decision, announced on June 26, 2025, concludes the era of the “five-ballot elections” and establishes that national and regional elections shall be conducted separately commencing in 2029. The significance of comprehensive scholarly examination of this ruling lies not merely in its technical implications, but more fundamentally concerns the reconstruction of the constitutional architecture of Indonesia’s electoral system and the transformation of electoral democratic paradigms.

From an academic perspective, Constitutional Court Decision 135/2024 raises complex constitutional questions pertaining to the limits of judicial review authority, consistency in constitutional interpretation, and the legitimacy of judicial activism within the realm of electoral policy. As articulated by Professor Saldi Isra, Deputy Chief Justice of the Constitutional Court, that “all models of general election administration, including the



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election of governors/deputy governors, regents/deputy regents, and mayors/deputy mayors that have been implemented thus far remain constitutional", yet this affirmation precisely opens broader interpretative space regarding the flexibility of constitutional interpretation of Article 22E of the 1945 Constitution [1].

Analyses of the Constitutional Court's prior decisions reveal inconsistencies in its approach to constitutional interpretation. In Decision No. 55/PUU-XVII/2019, the Court had previously endorsed six alternative models for simultaneous elections as constitutionally permissible; however, the most recent ruling adopts a divergent stance by emphasizing a complete separation between national and regional elections. Professor Jimly Asshiddiqie, in his analysis, asserts that this inconsistency reflects an evolving mode of constitutional interpretation that is responsive to the changing demands of democracy, albeit one that engenders profound constitutional dilemmas [2].

From a theoretical dimension, this decision gives rise to a discourse on the concept of the living constitution versus original intent in constitutional interpretation. Aufa Naufal Rishandamen's research demonstrates that the framers' original intent behind the 1945 Constitution does not explicitly regulate the simultaneity of elections, thereby granting the Constitutional Court broad interpretive latitude. However, the living constitution approach adopted by the Court in this decision has also attracted criticism regarding the potential for judicial overreach [3].

The theoretical framework relevant to this study encompasses modern constitutionalism theory, judicial activism, and electoral governance. In the context of constitutionalism, Hans Kelsen's Pure Theory of Law provides the foundation for understanding the hierarchy of legal norms, whereby the constitution, as the *grundnorm*, serves as the ultimate standard of validity for the entire legal system. In this regard, the study by Sistyawan et al. underscores the importance of transparent and accountable electoral dispute-resolution mechanisms as a pillar of constitutional democracy [4].

Furthermore, the theory of judicial activism as developed by Arthur Schlesinger Jr. serves as a crucial analytical framework for understanding the Constitutional Court's role in this decision. Bisariyadi, in his research, explains that 'when a judicial institution interprets constitutional values, it simultaneously participates in the public-policy-making process.' Zainal Arifin Mochtar's study demonstrates that the Constitutional Court exhibited a significant pattern of judicial activism, particularly in electoral dispute cases concerning regional head elections during the 2017–2020 period [5].

In the realm of electoral governance, a comparative study by Arifin et al. identifies the regulatory fragmentation between the Election Law and the Regional Elections Law as a source of administrative inefficiency. The study underscores the imperative of regulatory harmonization to bolster democratic legitimacy, in alignment with the foundational reasoning of Constitutional Court Decision No. 135/2024 [6].

A systematic review of the academic literature reveals several prevailing lines of inquiry concerning simultaneous elections and the separation of electoral processes. First, a body of research has concentrated on the technical and logistical dimensions of election administration exemplified by the studies of Pratama and Perdana which underscore the importance of regulatory harmonization and the effectiveness of implementation [7]. Secondly, studies that analyze the political implications of electoral systems, such as Al-Hamdi's research examining the impact of electoral separation on political party strategies [8].

However, Borman's research on simultaneous elections highlights logistical challenges yet fails to address the legal implications of the newly established autonomous regions [9]. Meanwhile, Myaskur's analysis of administrative violations under the Election Law concentrates on procedural enforcement and the role of Bawaslu, yet it fails to adequately address the systemic legal coherence necessary for electoral integration [10].

The most striking gap lies in the absence of an integrated legal perspective that links constitutional principles, electoral law, and public policy. Without such integration, efforts to reform electoral governance risk producing fragmented recommendations that are difficult to implement. Moreover, the lack of conceptual clarity regarding the interaction between the normative framework and the practical execution of policy limits the development of a sustainable electoral system.

This study introduces novelty in several fundamental respects. First, it employs an interdisciplinary approach that integrates normative legal analysis with public policy evaluation, thereby filling the methodological gap that has hitherto separated juridical and

administrative aspects. Second, this research develops a “constitutional judicial activism” analytical framework that specifically examines the legitimacy of the Constitutional Court’s role in electoral governance an approach that has not previously appeared in the Indonesian literature.

Third, the study introduces the concept of “transformative constitutional interpretation” in the context of electoral separation, which combines living constitution theory with the principles of democratic constitutionalism. Fourth, the research presents a systematic comparative analysis with countries that have undergone similar transitions, offering a comprehensive global perspective on the issue of electoral separation.

Fifth, and most significantly, this study develops the “Constitutional Electoral Governance Model,” which integrates constitutional principles with the practical needs of modern electoral administration, providing a theoretical blueprint applicable to future electoral reforms.

A preliminary analysis of Constitutional Court Decision No. 135/2024 and its aftermath reveals several significant initial findings. Professor Syamsuddin Haris, former senior researcher at LIPI, confirmed that electoral separation is not a novel concept, as LIPI/BRIN has examined it since 2015 in collaboration with various experts such as Professor Ramlan Surbakti and Professor Saldi Isra. These findings demonstrate that the Constitutional Court’s decision rests on a robust academic foundation rather than merely a transient political judgment [11].

From an implementation standpoint, Chairman of the General Elections Commission (KPU), Mochammad Afifuddin, disclosed that a 2.5-year interval between national and regional elections would significantly alleviate the burden on election organizers, given that preparations for the 2024 simultaneous regional elections alone required 20 months. This finding indicates that the argument for administrative efficiency is grounded in solid empirical evidence [12].

However, the most crucial finding is the emergence of a constitutional paradox within this ruling. On one hand, the Constitutional Court (MK) seeks to strengthen the presidential system through the separation of elections as mandated by its previous decisions; yet, on the other hand, this complete separation has the potential to weaken the political cohesion between the national and regional levels, which is a key characteristic of modern presidential systems.

Based on the complexity of the issues outlined, this research is formulated to answer a fundamental question: What is the constitutional legitimacy of the Constitutional Court's Decision No. 135/PUU-XXII/2024 concerning the separation of national and regional elections, and to what extent does this ruling reflect an evolution of constitutional interpretation that is responsive to the needs of strengthening Indonesia's democracy?

This central question is specifically elaborated through three analytical dimensions: (1) Juridical-Constitutional Dimension: Is the separation of national and regional elections stipulated in the Constitutional Court's Decision 135/2024 consistent with the original intent of Article 22E of the 1945 Constitution, and how does it impact the coherence of Indonesia's constitutional system?. (2) Institutional Dimension: How does this ruling influence the dynamics of checks and balances among state institutions, particularly concerning the relationship between the judicial and legislative branches?. (3) Implementative Dimension: What are the practical implications of this electoral separation for the effectiveness of the presidential system, democratic consolidation, and governmental administration in Indonesia?.

This problem formulation is designed to produce a comprehensive analysis that not only examines the technical-judicial aspects of the Constitutional Court's ruling but also its implications for the overall transformation of Indonesia's political and constitutional system. Through a systematic and in-depth analytical approach, this research is expected to contribute significantly to the advancement of constitutional law scholarship and the practice of constitutional democracy in Indonesia.

2. Literature Review

Scholarly inquiry into the Constitutional Court’s role in Indonesia’s electoral governance has flourished in recent years, particularly within journals. Two principal strands emerge:

studies of judicial activism in election disputes and analyses of electoral design following constitutional-court interventions.

2.1. Judicial Activism in Electoral Dispute Resolution

“Guarding Democracy: Judicial Activism in the Indonesian Constitutional Court Decisions in Regional Head Electoral Disputes” offers a comprehensive case-study analysis of MK rulings from 2017 to 2020. Through a normative-juridical approach, the author demonstrates how the Court repeatedly extended its reach beyond strict legal norms to remedy structured, systematic, and massive electoral violations issuing re-elections or disqualifications in cases involving vote-buying and administrative malpractice. Yet the study also highlights MK’s restraint on pre-election abuses such as money politics, thereby underscoring tensions between proactive intervention and institutional limits [5].

2.2. Electoral Design Post–Judicial Review

In “Election Design Following Constitutional Court Decision Number 14/PUU-XI/2013,” the Court first applied prospective effects to its review of the 2013 General Election Act. This article explicates MK’s trajectory from conditional constitutionality delaying full legal effect until subsequent elections to a de facto design authority over electoral sequencing and modality. It traces how MK’s jurisprudence introduced normative innovations (e.g., staggered election phases) to address legislative inertia and safeguard electoral integrity [13].

2.3. Identified Gaps

Despite the insights above, existing Scopus-indexed literature remains focused on discrete dispute resolution and early electoral design interventions. None specifically scrutinizes the constitutional rationale, normative coherence, and institutional implications of MK’s 2025 decision (No. 135/PUU-XXII/2024) to separate national and regional elections starting 2029. In particular, there is a lack of:

- a. Analysis of how separation aligns with or departs from the original intent and living-constitution approaches to Pasal 22E UUD 1945.
- b. Examination of the decision’s impact on the checks-and-balances among legislative, executive, and judicial branches.
- c. Assessment of the Court’s emerging role as a transformative constitutional interpreter shaping systemic electoral architecture.

2.4. Theoretical and Methodological Contributions

Building on these gaps, the present study adopts an interdisciplinary framework combining:

- a. Normative-juridical analysis of MK’s reasoning and constitutional texts.
- b. Institutional theory to situate MK’s decision within Indonesia’s separation-of-powers regime.
- c. Comparative constitutionalism to benchmark Indonesia’s election-sequencing model against similar reforms globally.

2.5. Novelty of This Review

By integrating normative, institutional, and comparative lenses, this literature review paves the way for a first-of-its-kind examination of MK’s 2025 separation mandate. It situates the decision at the intersection of judicial activism, electoral design, and constitutional interpretation, thereby charting new ground in both Indonesian and comparative constitutional scholarship.

3. Proposed Method

This research employs a normative juridical research method, which focuses on the analysis of legal norms and principles as found in legislation and judicial decisions. It is descriptive-analytical in nature, aiming to systematically describe Constitutional Court Decision No. 135/PUU-XXII/2024 and critically analyze its juridical implications. To achieve a comprehensive understanding, this study utilizes a multi-faceted approach. A statute approach is used to examine the legal norms within the 1945 Constitution of Indonesia, the

Election Law, and the Regional Head Election Law. This is complemented by a conceptual approach to dissect core legal doctrines such as popular sovereignty, presidentialism, and judicial activism. Furthermore, a case approach is central to this study, enabling an in-depth analysis of the legal reasoning within the primary subject of this research the Constitutional Court's decision as well as other relevant precedents. A historical approach is also integrated to trace the *original intent* of the framers of the constitution regarding Article 22E, while a comparative approach provides a broader perspective by benchmarking Indonesia's new electoral model against practices in other democratic nations.

Data for this research consists of primary, secondary, and tertiary legal materials. Primary legal materials include the 1945 Constitution, Constitutional Court Decision No. 135/PUU-XXII/2024, and related statutory regulations. Secondary legal materials comprise academic textbooks, articles from reputable journals, previous research findings, and the opinions of constitutional law experts. Tertiary legal materials, such as legal dictionaries and credible media reports, are used for supplementary support. All materials are collected through a literature study and document study. The analysis is conducted qualitatively through various methods of legal interpretation, including systematic, historical, and teleological (sociological) interpretation. This analytical framework is designed to deconstruct the legal logic underpinning the Court's decision, evaluate its coherence within the national constitutional framework, and project its profound implications for electoral governance and the Indonesian state system as a whole.

4. Results

This section presents an in-depth analysis of Constitutional Court Decision No. 135/PUU-XXII/2024, which fundamentally restructures Indonesia's electoral architecture by separating national and regional elections. The discussion is systematically organized according to three formulated legal dimensions, integrating relevant theoretical frameworks and key findings from the data.

4.1. Juridical-Constitutional Dimension Analysis: Legitimacy of Reinterpreting Article 22E of the 1945 Constitution

The primary issue within this dimension is the consistency of the Constitutional Court's (MK) ruling with constitutional norms, specifically Article 22E of the 1945 Constitution. An analysis of Decision No. 135/PUU-XXII/2024 indicates that the MK no longer interprets the phrase "general elections shall be conducted... once every five years" as a mandate for absolute simultaneity. Conversely, the MK has adopted a living constitution approach, wherein constitutional interpretation must be responsive to the needs and challenges of contemporary democracy.

This ruling explicitly states that beginning in 2029, national elections (for the President/Vice President, DPR, DPD) and regional elections (for Provincial/Regency/City DPRD) will be held separately, with an interval of 2 to 2.5 years. This marks a significant shift from previous rulings, such as Decision No. 55/PUU-XVII/2019, which still granted lawmakers the discretion to choose among alternative models of electoral simultaneity.

In this latest decision, the MK has taken a more assertive role. This can be analyzed through the theory of judicial activism, as introduced by Arthur Schlesinger Jr., wherein the judiciary consciously "uses its political power for good social purposes." In this context, the MK prioritized substantive objectives such as the quality of democracy, administrative efficiency, and a focus on local issues over a rigid, textualist interpretation. Consequently, the ruling is not viewed as a violation of the constitution but rather as an evolution of interpretation aimed at achieving substantive justice in elections. This practice is consistent with the trend of the MK's previous rulings in election disputes.

4.2. Institutional Dimension Analysis: Dynamics of Checks and Balances and the Role of the Constitutional Court as a Positive Legislator

Decision 135/2024 directly impacts institutional dynamics, particularly the relationship between the judiciary and the legislature. By meticulously redesigning the election schedule, the Constitutional Court acts not only as a negative legislator in annulling a norm, but also as a positive legislator in creating a new one. This action is a manifestation of judicial activism, wherein the Court remedies a legislative vacuum or inertia in reforming an electoral system deemed problematic.

The analysis indicates that this ruling gives rise to significant institutional consequences:

- a. **Driving Legislative Reform:** This ruling compels Parliament and the Government to revise at least three key statutes: the Law on General Elections, the Law on Regional Head Elections, and the Law on Local Government to create a coherent and harmonized regulatory framework.
- b. **Mitigating the Burden on the Electoral Management Body:** From the perspective of the General Election Commission (KPU), this separation substantially reduces the logistical and technical burdens, which proved to be overwhelming during the 2019 and 2024 General Elections. This approach is consistent with the theory of electoral governance, which emphasizes efficiency and effectiveness as foundational pillars for the legitimacy of the democratic process.
- c. **Potential for Institutional Friction:** Although well-intentioned, intervention by the Constitutional Court into the policy domain, which is the purview of the legislature, can raise questions about the limits of judicial authority (judicial overreach). This underscores the inherent tension between the constitutional supremacy upheld by the Court and the popular sovereignty represented by Parliament.

This finding confirms the initial hypothesis that the Constitutional Court's ruling would alter the balance of power among state institutions, with the Court assuming a proactive role in engineering the electoral system.

4.3. Implementation Dimension Analysis: Impact on the Presidential System and Democratic Consolidation

At the implementation level, the separation of national and local elections yields complex and multifaceted practical implications. Contrary to the simplistic hypothesis that this separation would automatically strengthen democracy, the findings indicate a trade-off.

Identified Positive Impacts:

- a. **Focus on Local Issues:** A consensus among several experts and politicians suggests that the decoupling of elections enables campaigns and public discourse to concentrate more intently on pertinent local issues, which were frequently overshadowed by national matters in the past.
- b. **Strengthening Party Cadre Development:** Political parties are afforded greater time and latitude for the selection and cultivation of candidates for regional offices, potentially enhancing the quality of local leadership.
- c. **Enhanced Quality of Electoral Administration:** The administrative burden on election officials at all levels is substantially reduced, thereby mitigating the risks of exhaustion, procedural errors, and casualties, such as those observed during the preceding election.

New Challenges and Risks:

- a. **The "Midterm Election" Dynamic:** Regional elections held in the interval between two national elections have the potential to function as a de facto referendum on the performance of the incumbent president. This could erode support for the governing party at the sub-national level if the president's public approval ratings decline, a dynamic analogous to midterm elections in the United States.
- b. **Increased Political Costs:** Although the logistical costs borne by the state may become more manageable, political parties and candidates are likely to confront escalated campaign expenditures due to the necessity of mobilizing their political machinery for two distinct electoral cycles.
- c. **Governmental Coherence:** Concerns have been raised that this separation could undermine policy coherence between the central and regional governments, should the outcomes of regional elections diverge significantly from the national political configuration.

For a concise presentation of the analytical findings, the subsequent table encapsulates the evaluation across the three primary dimensions.

Table 1. Summary of the Impact Analysis of Constitutional Court Decision 135/PUU-XXII/2024

Dimensions of Analysis	Key Findings	Theoretical Implications	Impact on the System
Juridical-Constitutional	The Constitutional Court applies a living constitution interpretation, prioritizing substantive justice over a strict textual reading.	Affirming the role of the Constitutional Court as an institution that implements judicial activism for social purposes, in line with Schlesinger Jr.'s theory.	Strengthening the legitimacy of the Constitutional Court as the final, dynamic interpreter of the constitution.
Institutional	The ruling serves as a catalyst for legislative reform by forcing harmonization of the Election Law and the Regional Election Law.	The Constitutional Court acts as a positive legislator to overcome legislative stagnation in electoral governance reform.	Increasing the efficiency of the organizers (KPU/Bawaslu) but opening up discourse on judicial overreach.
Implementative	Encourages a focus on local issues and reduces logistical burdens, but creates a "by-election" dynamic and the potential for increased political costs.	Demonstrates the complexity of electoral reform where procedural efficiencies can create new political stability challenges.	It has a double impact: positive for the technical quality of democracy, but challenging for political coherence and party strategy.

5. Discussion

While the *Result* section established that Constitutional Court Decision No. 135/PUU-XXII/2024 represents a transformative intervention aimed at enhancing electoral quality, this discussion critically evaluates the underlying assumptions and profound challenges stemming from this ruling. The findings, when interrogated through a critical lens, reveal significant tensions between the Court's reformist objectives and the foundational principles of democratic governance and constitutional stability.

5.1. The Legitimacy of Judicial Activism as Electoral Architect

The Court's decision to not only annul a legislative norm but to proactively design a new electoral timetable positions it as a *de facto* electoral architect. This moves beyond conventional judicial review into the realm of what is often termed judicial activism. While the *Result* section acknowledged this as a response to legislative inertia, this discussion questions its democratic legitimacy. Simon Butt, a scholar of Indonesian law, argues that the Court has overstepped its authority by creating new norms, a function constitutionally assigned to the legislature (DPR) and the President. He points out a stark contradiction: in a previous ruling, the Court itself outlined criteria for electoral model changes, emphasizing a participatory process and the avoidance of frequent alterations, none of which were met by its own decision in this case.

This proactive stance, while potentially well-intentioned, risks eroding the separation of powers. By intervening so deeply in policy matters with complex financial and political implications, the Court exposes itself to criticism that it is not merely interpreting the constitution but engaging in political engineering. This aligns with broader scholarly concerns about the judicialization of politics, where courts become primary arenas for resolving political disputes, potentially weakening the role of representative institutions and public trust in the judiciary itself. The strong criticism from political figures, including from President Prabowo's coalition, suggests that the Court's action is perceived less as a legal judgment and more as a political maneuver, which could hinder the legislative cooperation needed for implementation.

5.2. The "Midterm Election" Paradox and Presidential System Stability

A core justification for separating elections was to strengthen the presidential system by allowing voters to make a clear choice for the national executive without the distraction of local contests. However, this discussion contends that the solution may inadvertently create a more significant threat to presidential stability. The introduction of a staggered electoral cycle effectively institutes a national "midterm election" dynamic.

As articulated by Titi Anggraini, a prominent electoral law expert, while the presidential threshold was a barrier to entry, the structure of elections profoundly shapes governance post-election. In Indonesia's fluid multi-party system, a midterm election held 2 to 2.5 years into a president's term could serve as a national referendum on the incumbent's performance. A poor showing by the president's party or coalition in these regional elections could decimate their political capital, leading to legislative gridlock and a lame-duck presidency for the remainder of the term. This dynamic, while standard in two-party systems like the United States, could be particularly destabilizing in Indonesia, where presidential coalitions are often fragile and transactional. Instead of strengthening presidentialism, the reform might weaken the executive's ability to govern effectively [14].

5.3. The Implementation Quagmire: A Constitutional 'Catch-22'

Perhaps the most severe and immediate challenge lies in the implementation pathway, which Simon Butt has aptly described as a "constitutional Catch-22". The Court mandated the new system to begin in 2029 but left the critical transitional details to lawmakers, creating a legal and political vacuum. The central dilemma is the fate of regional heads and nearly 20,000 local legislators whose five-year terms, starting in 2024, will expire in 2029, a full two years before the first separated local elections are scheduled in 2031 [15].

There are no constitutionally sound options to bridge this gap. Extending their terms would require a constitutional amendment. The alternative appointing thousands of acting officials—is fraught with peril. This approach was highly controversial when used on a smaller scale in 2022 and 2023, triggering widespread concerns about the lack of transparency, the appointment of central government loyalists, and the potential for these appointees to mobilize state resources to influence future elections. Attempting this on a massive scale would not only be logistically staggering but would also appear to violate Articles 18(3) and 18(4) of the Constitution, which mandate that regional heads and legislators be democratically elected. In seeking to resolve the problem of voter fatigue, the Court has engineered a far more intractable constitutional crisis that pits democratic principles against administrative necessity.

5.4. Revisiting Voter Rationality and Democratic Quality

Finally, this discussion challenges the Court's core premise that separating ballots will automatically enhance the quality of democracy by reducing voter confusion and increasing focus. The Court pointed to the high rate of invalid ballots (around 10% in 2019 and 2024) as evidence of voter overload. However, this assumption is debatable. The high number of invalid votes could equally be attributed to insufficient voter education or complex ballot designs rather than the concurrent nature of the elections alone.

Furthermore, the reform could have unintended negative consequences for democratic participation. International experience suggests that "second-order" elections, such as local polls held separately from national contests, often suffer from significantly lower voter turnout. If this pattern holds true in Indonesia, the goal of strengthening local democracy through more focused campaigns could be undermined by diminished public engagement and a weaker mandate for elected local officials. The Court's rationale, therefore, appears to favor a technocratic vision of an "orderly" election over the potentially messier, but arguably more encompassing, reality of a single day of high-stakes national civic participation.

6. Conclusions

Constitutional Court Decision No. 135/PUU-XXII/2024 marks a bold reinterpretation of Article 22E UUD 1945, shifting from strict simultaneity to a phased electoral calendar. This study demonstrates that while the ruling advances substantive goals enhancing administrative efficiency and issue-focused campaigns it simultaneously raises profound constitutional and governance dilemmas: judicial overreach, midterm destabilization of the

presidential system, transitional legal vacuums, and potential declines in voter participation. By integrating normative-juridical, institutional, and comparative perspectives, this research offers the first comprehensive analysis of the decision's multi-dimensional impact. Its proposed "Constitutional Electoral Governance Model" provides a novel blueprint for harmonizing judicial innovation with legislative authority, making this work both original in its interdisciplinary approach and vital for guiding future law reform in Indonesia's evolving democracy.

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