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Institutional Architecture and Tourism Policy; A Comparative Study of Indonesia, Thailand, and Malaysia

Natasha Gieserren Tivany
[1]Universitas Maritim Raja Ali Haji. Tanjungpinang City. Indonesia

Corresponding Author: gieserrenatasya@gmail.com[1]
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Abstract:
Tourism is a strategic sector in Southeast Asia, but its performance is shaped by the institutional arrangements through which public authorities distribute responsibilities, coordinate policy instruments, and engage stakeholders. This article compares the tourism administrative architecture of Indonesia, Thailand, and Malaysia and identifies lessons relevant to Indonesian policy reform. A qualitative, descriptive-analytical comparative design was employed using documentary evidence, national tourism plans, legal instruments, and recent peer-reviewed research. The analysis covers five dimensions: institutional architecture, distribution of authority, planning instruments, collaborative governance, and adaptive policy capacity. The findings distinguish Thailand's centrally coordinated system, supported by a long-established destination promotion agency; Malaysia's federal system, structured by national strategies and recurrent development planning; and Indonesia's decentralized model, supplemented by centrally directed interventions in priority destinations. Central coordination may improve consistency but can constrain local responsiveness, whereas decentralization enables contextual innovation while exposing gaps in intergovernmental coordination. Federal planning provides a more regular policy cycle without eliminating uneven territorial outcomes. Across all three countries, formal participation does not automatically confer decision-making influence on communities. The article concludes that Indonesia's principal administrative challenge is not simply regulatory scarcity but weak connections between institutions, governmental tiers, planning cycles, and community actors. Permanent coordination mechanisms, interoperable information, consistent evaluation, and meaningful local representation are therefore essential to an integrated tourism governance framework.

Keyword: Institutional, Tourism, Policy, Architecture

INTRODUCTION

Tourism is frequently described as an economic activity in which visitors consume experiences, enterprises provide services, and destinations receive income. Such an account is incomplete because public authorities create many of the conditions under which the sector operates. Governments regulate entry, connectivity, safety, licensing, environmental protection, spatial planning, investment, marketing, and

responses to disruption. They also determine which destinations receive infrastructure and which groups participate in the resulting opportunities. Tourism performance, therefore, cannot be attributed solely to attractive landscapes, heritage, or market demand. It is influenced by the administrative rules and collective decisions that connect destination resources with public interests. Recent assessments of Indonesian tourism policy demonstrate that the existence of plans and promotional ambitions does not necessarily produce effective interagency coordination or environmental management (Koerner et al., 2024).

Indonesia, Thailand, and Malaysia provide an instructive comparison within Southeast Asia. All three countries contain distinctive cultural landscapes, tropical coastal destinations, urban attractions, and established domestic and international visitor markets. They also face pressures to reconcile employment and investment with conservation, social inclusion, and territorial balance. Yet their tourism administrations are organized differently. Thailand has long relied on a prominent national promotional organization operating within a centrally coordinated system. Malaysia combines federal policy direction with responsibilities exercised at state and local levels. Indonesia distributes important tourism functions across national, provincial, and district or municipal governments, while using special institutions for selected priority destinations. Differences in institutional design make it possible to examine how similar policy aspirations can generate contrasting administrative challenges.

This comparison does not assume that tourist arrivals alone measure policy success. Visitor numbers are sensitive to exchange rates, connectivity, geopolitical disruptions, disasters, and promotional cycles; they do not reveal whether local residents can influence decisions or retain benefits. A destination may attract investment and still experience disagreements over land, environmental carrying capacity, and the distribution of economic opportunities. Conversely, a smaller community-led destination may demonstrate meaningful participation without appearing prominent in national growth indicators. Contemporary work on Indonesia and Malaysia illustrates the importance of distinguishing economic or promotional performance from the institutional capacity needed to implement sustainable tourism policy (Aldhila, 2025; Herawati et al., 2026).

Institutional architecture refers here to the enduring arrangement of agencies, mandates, reporting lines, and operational organizations involved in tourism governance. It differs from a particular policy instrument, such as an incentive, destination designation, or marketing campaign. The distinction matters because the same instrument may operate differently under a unified command structure, a federal negotiation process, or decentralized administrative arrangements. Distribution of authority determines who may issue decisions and finance programs, while the planning system influences whether those decisions are aligned over time. Collaborative governance concerns whose knowledge and interests shape implementation, and adaptive capacity concerns the ability to revise instruments when circumstances change. The five dimensions are analytically separate but interact in practice.

Recent scholarship gives increasing attention to these interactions. Comparative analysis of intellectual-property arrangements shows that the three countries possess different regulatory approaches to connecting cultural assets with sustainable tourism, without any regulatory architecture automatically resolving implementation difficulties.

Research on Indonesia's tourism legislation likewise identifies potential tension between the ambition to orchestrate an integrated tourism ecosystem and the practical capacity of institutions to coordinate it. These perspectives suggest that the question is not which country has the longest list of tourism regulations, but how obligations are assigned, how agencies cooperate, and whether governance arrangements translate national objectives into destination-level outcomes (Disemadi et al., 2026; Putri, Prawira, & Rumba, 2026).

The literature also indicates why community participation requires closer scrutiny. Destination partnerships may formally bring together governments, businesses, universities, civil organizations, and local residents, yet participation can be concentrated on project delivery rather than strategic decisions. A study of collaborative governance in Indonesian rural tourism identifies government-centered relationships even when several stakeholder groups participate. Research from Labuan Bajo similarly shows that coordination across agencies may improve without equivalent influence for community representatives. These findings warn against treating the presence of stakeholder meetings or destination committees as sufficient evidence of shared authority (Kuswandi et al., 2026; Teguh & Scott, 2026).

The aftermath of the COVID-19 crisis adds urgency to the comparison. Restrictions on international mobility demonstrated how rapidly tourism demand could collapse and how decisively public measures could influence recovery. Recovery programs also exposed gaps between national announcements and the capacity of local enterprises to understand or meet changing requirements. In Thailand, evaluation of the Phuket Sandbox illustrates how an innovative reopening instrument can coexist with uncertainty over procedures, communication, and contingency planning. In Malaysia, debate about post-pandemic transformation questions whether rebuilding the previous growth model is sufficient to achieve social and ecological improvements (Wijesinghe, 2022; Zhu & Yasami, 2022).

Indonesia's current policy setting is important because the institutional separation of tourism and creative-economy portfolios was followed by a new amendment to the national tourism legislation. Law No. 18 of 2025, enacted on 29 October 2025, amended Law No. 10 of 2009 and gave explicit attention to the tourism ecosystem, community-based tourism, information technology, and interactions among stakeholders. The revised terminology is meaningful as a policy orientation, but the presence of an ecosystem concept does not by itself determine how ministries, subnational administrations, special authorities, private actors, and communities should resolve conflicting priorities. That operational question provides a central concern of the present analysis.

Existing studies address particular aspects of these issues but do so separately. Some examine destination planning and tourism competitiveness within one country; others focus on local collaborative arrangements or sustainable resource use. A documentary comparison of tourism policies among ASEAN members offers a broader regional view, while research on community-based tourism compares the social conditions of individual destinations in Indonesia and Thailand. These contributions are useful, yet a focused comparison integrating administrative design, intergovernmental authority, planning cycles, collaboration, and learning across Indonesia, Thailand, and

Malaysia can reveal relationships that remain fragmented when each dimension is considered alone (Phob-udom et al., 2025; Azahra et al., 2025).

Accordingly, this study addresses two questions. How do the institutional architecture and public policy arrangements of the tourism sector differ among Indonesia, Thailand, and Malaysia? What lessons follow from those differences for improving Indonesian tourism administration? The article does not attempt to produce a statistical ranking of the three systems, demonstrate a causal effect from a single institutional variable, or claim that one country offers a model that can be copied without adjustment. Instead, it compares the administrative logic of each system, identifies recurring implementation problems, and considers how institutional lessons might be translated into Indonesia's decentralized context.

Its contribution lies in a five-dimensional comparative framework that places tourism administration, rather than promotional performance alone, at the center of analysis. The framework enables national institutions and destination-level arrangements to be discussed withsequentially: institutional mandates shape authority; authority is expressed through plans and instruments; implementation requires collaboration; and the quality of learning determines whether the system can adapt. The analysis also distinguishes policy text from observed performance, treating documented rules as evidence of declared responsibilities and peer-reviewed studies as contextual evidence about implementation. This distinction reduces the risk of describing an ambitious policy statement as an accomplished governance outcome.

RESEARCH METHOD

The research uses a qualitative, descriptive-analytical comparative design. A qualitative approach is suitable because the questions concern institutional relationships, the interpretation of public responsibilities, and the organizational logic of policy systems rather than numerical relationships between variables. The national tourism administrative system is the primary unit of analysis in each country, including its connections to provincial, state, district, municipal, or destination-level organizations. The comparison follows a structured, focused approach: the same five questions are asked of each national case, and their answers are summarized in a common analytical matrix. This design supports transparent comparisons without treating administrative arrangements as identical across constitutional and territorial contexts.

Three cases were selected purposively rather than statistically. They share membership in ASEAN and regard tourism as an important development sector, yet differ in governance structure. Thailand represents a unitary state with centralized national direction; Malaysia combines federal institutions and state-level responsibilities; and Indonesia is a unitary state with extensive decentralization and additional national interventions in selected destinations. The differences provide analytical variation in authority allocation while retaining a broadly comparable regional setting. Case selection does not imply that these countries have equal land area, infrastructure, population, or tourism volume. Those differences are acknowledged as contextual conditions rather than controlled variables.

The evidence consists exclusively of documentary sources, not interviews, questionnaires, or direct observation. Primary materials include Indonesia's Law No. 10

of 2009 as amended by Law No. 18 of 2025, Law No. 23 of 2014 concerning regional government, Government Regulation No. 50 of 2011 on the National Tourism Development Master Plan for 2010–2025, Malaysia's National Tourism Policy 2020–2030, and Thailand's Third National Tourism Development Plan for 2023–2027. Earlier laws and plans are retained as historical primary documents even though all forty journal articles in the reference list were published from 2022 through 2026. This distinction is necessary to describe institutional continuity and policy change accurately.

Recent journal articles were used to interpret how these formal arrangements operate and to identify recurring implementation issues. The literature covers national policy assessment, multilevel coordination, community participation, destination organizations, sustainability, digital transformation, and crisis recovery. Sources were selected for direct relevance to one or more analytical dimensions, an identifiable publication venue, and traceable bibliographic details. Articles about specific destinations were treated as contextual illustrations of governance mechanisms rather than automatically representative of an entire country. The documentary design also avoids attributing private motivations or unrecorded negotiations to institutions when the available evidence does not establish them.

Collection and organization followed four stages. First, legal instruments, national plans, and journal studies were identified through official policy portals, journal websites, and scholarly search results. Second, titles, abstracts, and accessible full texts were screened against the comparative questions. Third, relevant statements were entered into a conceptual extraction matrix indicating the country, responsible institutions, authority relationships, planning instruments, participating actors, reported barriers, and source. Fourth, the extracted material was reviewed for consistency, when official policy descriptions and empirical case studies differed. Because the purpose is interpretation rather than statistical synthesis, no numerical frequency is presented as evidence of national institutional performance.

The analytic process combined deductive organization with inductive interpretation. Five dimensions guided deductive coding: institutional architecture, distribution of authority, planning instruments and cycles, collaborative governance and community participation, and adaptive capacity or policy learning. The analyst then examined patterns emerging from individual cases, including the continuity of destination promotion organizations, the existence of exceptional authorities, local influence over decisions, and the relationship between policy ambitions and implementation capacity. Each dimension was analyzed first within countries and then across countries. Contrasting examples were retained when they complicated a general statement; the method was not designed to force every case into an uncomplicated national stereotype.

Trustworthiness was addressed through source triangulation and cautious inference. Statements about formal rules were grounded in the corresponding government documents, while claims about operational problems were linked to empirical or analytical journal research. Different studies of similar arrangements were compared where possible, and conclusions were expressed at the level supported by those studies. For example, observations from Labuan Bajo, Mandalika, or a particular Thai community can illustrate a possible coordination problem; they cannot establish its prevalence in every destination. This boundary is central to a credible documentary

comparison and to the distinction between a policy recommendation and a verified implementation outcome.

The study has methodological limitations. Policy documents may present organizational responsibilities more than they are exercised in practice, and published research is uneven across places and sectors. Some Thai and Malaysian planning material was accessed through English-language explanations or secondary analyses, which may not reproduce every administrative nuance. The design does not directly examine internal ministerial negotiations or collect new perceptions from community actors. The analysis therefore emphasizes institutionally plausible mechanisms and documented outcomes rather than causal certainty (Alinsunurin & Shinkai, 2025). These constraints are considered when interpreting apparent strengths and weaknesses of centralized, federal, and decentralized arrangements.

RESULTS AND DISCUSSION

1. Institutional Architecture of Tourism Administration

Thailand's tourism administration is distinctive for the continuing prominence of national promotion alongside ministerial policy direction. The Ministry of Tourism and Sports is associated with strategy and policy, while the Tourism Authority of Thailand (TAT) has a long-established promotional identity. The separation can provide continuity in destination branding and allow specialized personnel to concentrate on marketing functions. At the same time, it requires coordination between policy formulation, promotional campaigns, and agencies responsible for infrastructure or environmental safeguards. The apparent stability of institutional names should not be confused with the absence of change: strategic priorities can be revised within an otherwise continuous organizational arrangement.

Recent Thai research adds nuance to this structure. A technology roadmap for sustainable tourism describes how national strategic ambitions must be connected to knowledge, implementation sequencing, and operational capabilities. Research on community-based tourism in the Eastern Economic Corridor similarly emphasizes the capacity of local actors to participate rather than assuming national programs are sufficient. Together, these studies indicate that centralized steering can create a common strategic direction, but the achievement of local benefits depends on resources, skills, and mechanisms that connect central initiatives with destination practice (Manotungvorapun & Gerdsri, 2025; Lee-Anant & Kungwansith, 2025).

Malaysia follows a federal configuration led by the Ministry of Tourism, Arts and Culture (MOTAC). Tourism Malaysia serves as a recognizable promotional agency, while national development planning interacts with policies and responsibilities exercised by state and local institutions. The National Tourism Policy 2020–2030 provides a medium-term orientation, and periodic Malaysia Plans offer a wider framework for development priorities and resource allocation. This arrangement differentiates the roles of policy direction, promotion, and territorial implementation. Nevertheless, federal coordination is not the same as hierarchical control over all location-specific decisions, when land, community development, and infrastructure require cooperation with state authorities.

Indonesia possesses the most layered administrative structure of the three cases. The national ministry operates alongside provincial and district or municipal administrations, tourism promotion arrangements, state-owned enterprises involved in

designated areas, and specific destination authorities. The separation of the tourism portfolio from the creative economy in late 2024 adds another phase to institutional restructuring. Specialized institutions can accelerate coordination of national resources at priority destinations, but they may also increase the number of actors whose mandates intersect. Research on government-led destination management in Labuan Bajo shows that an authority body may connect several jurisdictions while still facing unresolved questions about the influence of local stakeholders. The organizational issue is thus not simply the number of institutions, but the clarity of their relationships (Hajar et al., 2026).

Table 1 synthesizes these differences without implying that every agency has an equivalent legal status. Thailand and Malaysia display durable promotional organizations, whereas Indonesia's policy and delivery structure contains variation between central and subnational levels. The table also identifies how country-specific plans are embedded in different administrative cycles. It represents an overview of governance arrangements rather than as a complete inventory of all public agencies involved in tourism.

Table 1. Comparative Institutional Architecture of Tourism Administration

Aspect	Indonesia	Thailand	Malaysia
State structure and authority	Unitary state with extensive decentralization; tourism is an optional regional government function	Unitary state with comparatively centralized administration	Federal state; national leadership with state roles in local matters
Policy-leading institution	Ministry of Tourism, separated from creative economy in 2024	Ministry of Tourism and Sports	Ministry of Tourism, Arts and Culture (MOTAC)
Tourism promotion	Tourism promotional bodies envisaged by legislation; ministry continues major promotional responsibilities	Tourism Authority of Thailand (TAT)	Tourism Malaysia (Malaysia Tourism Promotion Board)
Special destination institutions	Destination authorities and state-owned enterprises supporting selected priority destinations	Government-designated bodies for sustainable destination management	Tourism investment zones within the national policy framework
Principal planning documents	RIPPARNAS 2010–2025 (Government Regulation 50/2011); Law 18/2025	Third National Tourism Development Plan 2023–2027	National Tourism Policy 2020–2030; recurring five-year Malaysia Plans

Source: Authors, 2026

The institutional comparison indicates that stability can support organizational memory, consistent destination positioning, and predictable relationships with tourism businesses. Frequent restructuring can be justified when new priorities require different capabilities, but it also creates a need to transfer staff knowledge, budgets, and agreements between organizational units. Indonesia's difficulty is therefore not that it has multiple levels of government; decentralization is a deliberate governance choice. The difficulty arises when specialized national authorities and regular subnational administrations are not linked by durable protocols specifying information sharing, approval processes, and the settlement of disputes. Recent studies of regulatory fragmentation and institutional obstacles in Indonesian destination development are consistent with this concern (Rudiyansah & Sucipto, 2025; Kusumah, 2024).

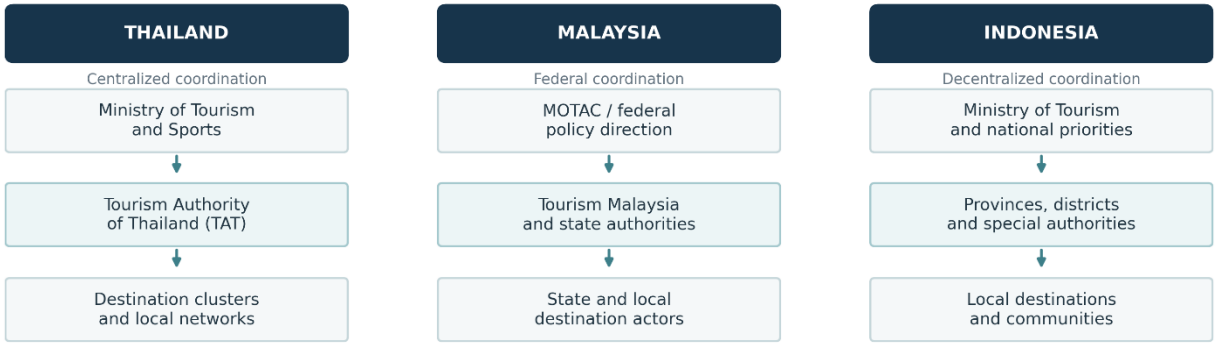


Figure 1. Institutional of Tourism Governance in Indonesia, Thailand, and Malaysia
Source: Authors' conceptual, 2026

Another distinction is the relationship between promotional institutions and broader public objectives. Promotion-oriented agencies can build market recognition and respond quickly to changing visitor preferences, but sustainability, inclusion, and regional equity need additional institutional functions. Planning offices, environmental authorities, regional administrations, and communities may not assign the same priority to destination growth. A robust architecture must therefore provide spaces where these competing objectives can be considered before investment or branding decisions become irreversible. The comparative lesson is not to copy a promotional agency wholesale, but to ensure that marketing capacity is complemented by policy coordination and accountability for social and environmental outcomes.

2. Distribution of Authority: Centralization, Federalism, and Decentralization

The allocation of decision-making authority produces the most visible contrast among the three systems. In Thailand, national priorities are established centrally and translated through sectoral organizations and territorial networks. Such an arrangement can support a recognizable direction for standards and campaigns, when a common message is required across destinations. It may also simplify the adoption of national response instruments during crises. Yet central decisions must still operate across locally different ecosystems, community livelihoods, and business structures. The quality of implementation depends on whether local information can travel upward and whether national instruments are sufficiently flexible to respond to it.

Research on Thailand's national parks shows how environmental conservation and tourism-related livelihoods can create disputes that require negotiated institutional arrangements. Collaborative governance in the context of community ecotourism does not eliminate the state's authority, but it can provide a process through which protected-area management, local residents, and tourism actors clarify their interests. A separate legal analysis cautions that ecotourism development may expand into sensitive landscapes when public-land rules and local biodiversity protection are weak. These findings qualify a purely positive view of centralized tourism development: consistent national control requires enforceable environmental standards and credible avenues for local participation (Akahat, 2025; Waikavee, 2024).

Malaysia lies between centralized administration and extensive decentralization. Federal institutions establish national direction, while state administrations retain responsibilities affecting local development. The country's planning tradition creates formal opportunities to align tourism with broader economic programs. However, institutional coherence at the center does not eliminate differences in local resource endowments or administrative reach. The tourism priorities of developed urban regions may be easier to fund and promote than those of geographically distant communities. These conditions make coordination among federal, state, and local actors an enduring requirement rather than a challenge solved solely by the existence of an official national plan.

The tension between national priorities and local benefits is important in sustainable tourism. A comparative study of Indonesia and Malaysia describes distinct configurations of green tourism governance and argues that policy effectiveness depends on institutional capacity and implementation arrangements, not only environmental aspirations. Research on digital tourism governance in the two countries likewise identifies differences between promotion-oriented technological initiatives and more integrated service approaches. Both studies suggest that organizational design influences which actors can turn a national commitment into functioning destination services. They do not, however, demonstrate that one governance form will always outperform another across all locations (Aldhila, 2025; Herawati et al., 2026).

Indonesia formally recognizes tourism as a governmental function distributed across levels of administration. This gives regional governments an opportunity to design programs around local landscapes, cultural practices, and development priorities. The model is appealing for a large archipelagic country whose destinations differ substantially in accessibility, population, and environmental conditions. However, divided responsibilities can also produce duplicated programs, inconsistent enforcement, and uncertainty about who should finance connecting infrastructure. Problems become apparent when a destination requires action by several administrations and national agencies at once. The public value of decentralization therefore depends on effective intergovernmental mechanisms rather than on the transfer of responsibilities alone.

At nationally prioritized destinations, Indonesia also uses exceptional coordination arrangements that can concentrate investment and facilitate projects across administrative boundaries. These initiatives represent selective central intervention within the wider decentralized framework. Research on Mandalika indicates that state-led tourism development may improve administrative coordination without

consistently meeting community livelihood priorities. Work on Labuan Bajo identifies vertical misalignment, interagency fragmentation, and limited community engagement in a destination receiving policy attention. The implication is that accelerated delivery cannot be treated as proof of integrated governance unless the distribution of decision-making rights and local outcomes are also examined (Widaningrum et al., 2025; Hajar et al., 2026).

Neither centralization nor decentralization is intrinsically superior on the evidence reviewed. Centralization can promote standardization and continuity but risks insufficient sensitivity to local circumstances. Federal arrangements establish channels through which national policy and state-level responsibilities must be negotiated, yet may retain spatial inequalities. Decentralization permits local adaptation but creates stronger demands for coordination, where several authorities share a destination system. The more productive comparison concerns the mechanisms that help each model compensate for its structural limitations. Such mechanisms include shared information, transparent mandates, predictable budget cycles, and participation that extends beyond consultation.

These conclusions should not be overinterpreted as a ranking of political systems. A centrally coordinated destination may still rely heavily on voluntary partnerships, while a decentralized destination may receive binding national standards. Administrative practice also changes across time and place. The value of the comparison lies in identifying recurring tensions between control and responsiveness, coherence and autonomy, or speed and inclusiveness (Hastuti et al., 2026). For Indonesia, those tensions suggest the need for institutions that connect levels of government without replacing local discretion with improvised central commands whenever a destination becomes strategically important.

3. Planning Instruments and Policy Cycles

Planning instruments translate broad tourism ambitions into defined priorities, budgets, responsibilities, and performance expectations. The three countries employ long-term and medium-term documents, but their planning cycles are arranged differently. Thailand's Third National Tourism Development Plan for 2023–2027 provides a current multi-year strategic period emphasizing higher-value tourism and sustainable development. The regular cycle creates an opportunity to revisit objectives in response to market and environmental change. A review of the Thai strategy highlights ecotourism and sustainable tourism while noting the importance of specifying coordination and oversight mechanisms if the declared goals are to become operational (Sorthong et al., 2024).

Thailand's planning approach illustrates the advantage of explicitly linking a national vision with implementation pathways. Nevertheless, a five-year plan should not be assumed to create effective feedback merely because its duration is defined. Administrators need usable monitoring systems, clear task allocation, and opportunities to revise action when an instrument fails. Research on tourism technology roadmapping provides an example of how knowledge-based planning can identify linked actions rather than treating digital transformation as a standalone objective. Such approaches can improve the intelligibility of a plan while leaving important questions of local resources, regulation, and political commitment unresolved.

Malaysia uses a layered system combining its National Tourism Policy 2020–2030 with recurring national development plans. The longer policy framework identifies transformation directions, including governance, digitalization, investment opportunities, sustainability, visitor experiences, and human capital. A recurring development-plan cycle can help connect such ambitions with changing budgetary priorities. The distinctive institutional advantage is not simply the length of the document, but the opportunity to make broad tourism objectives visible within an established national planning process. Implementation still depends on how federal policy directions are negotiated with state-level conditions and the capabilities of destination organizations.

Indonesia's National Tourism Development Master Plan, RIPPARNAS 2010–2025, was established through Government Regulation No. 50 of 2011. It organized destination development, tourism industries, marketing, and institutions within a longer planning horizon. The period ended in 2025, while government priorities and destination investment initiatives evolved through shorter political and fiscal cycles. When long-term spatial and sectoral plans are insufficiently connected with annual and five-year instruments, new programs may emerge alongside the earlier framework rather than through an openly documented revision of it. Law No. 18 of 2025 provides an opportunity to align a subsequent planning regime with the revised ecosystem approach.

Current analysis of the tourism ecosystem paradigm emphasizes the need to connect functional responsibilities across sectors rather than assuming that deregulation or a new conceptual label will coordinate actors automatically. Recent research mapping Indonesian tourism policy scholarship likewise indicates that studies of governance, sustainability, and planning are distributed across numerous topics. The institutional challenge is to convert this fragmented knowledge into comparable planning information and a shared basis for decision-making. In practical terms, program indicators should show not only the number of visitors or projects, but also the capacity of public services, environmental pressure, community participation, and distribution of destination benefits (Putri, Prawira, & Rumba, 2026; Situmorang, 2026).

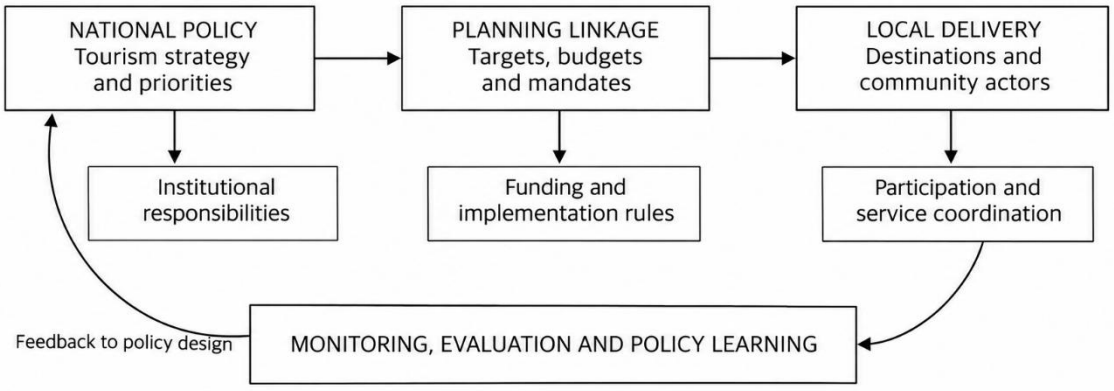


Figure 2. Alignment Between Tourism Policy, Planning Instruments, and Destination Implementation
Source: Authors, 2026

All three countries state commitments to sustainability and digitalization. Similar language, however, does not guarantee a similar implementation trajectory. A

promotional digital campaign may be successful at disseminating destination images but remain disconnected from permit systems, local business information, mobility management, or environmental monitoring. Conversely, digital service integration may yield administrative improvements without meaningfully including small businesses that lack connectivity or technical skills. Comparative assessment therefore requires attention to what the technology enables institutions to do together and whose decisions it informs. Digitalization is an instrument of governance only when it supports cooperation, traceability, and usable public information.

The relationship between tourism and intellectual-property protection demonstrates another planning problem. Cultural resources can provide distinctive tourism experiences, but their use raises questions about recognition, appropriation, and benefit distribution. Comparative legal research finds different strengths and weaknesses in the protection arrangements of Indonesia, Malaysia, and Thailand. Rather than treating cultural content solely as a marketing resource, planning institutions need to make conservation and local rights visible within decisions about destination products. This argument extends the focus beyond promotional outcomes and illustrates how cultural policy can become an integral component of tourism governance (Disemadi et al., 2026). Specific research on halal tourism likewise shows that market identity depends on connected institutions and coherent regulatory responsibilities (Rachmiatie et al., 2024; Ruhaeni et al., 2024).

The policy cycle should also distinguish between objectives that can be set nationally and choices that require local deliberation. National governments may establish common standards, evaluation requirements, and minimum protections, while destinations need room to decide how those standards are achieved under different environmental and cultural conditions. A shared planning calendar and interoperable data definitions can enable comparison without demanding identical destination programs. For Indonesia, this approach would connect the next long-term tourism plan to provincial and local development plans, budget review, environmental monitoring, and consultation arrangements. The relevant lesson from neighboring countries is planning continuity and coordination, not the wholesale importation of their constitutional or ministerial structures.

4. Collaborative Governance and Community Participation

Tourism services emerge from the actions of multiple organizations rather than one public agency. Transport providers, accommodation businesses, cultural institutions, conservation authorities, small enterprises, residents, and civil groups all shape the visitor experience. This makes collaborative governance essential, but it also creates unequal bargaining positions. Some actors control investment or licensing, while others contribute local knowledge, cultural continuity, or environmental stewardship without comparable financial power. Formal stakeholder representation should therefore be evaluated in terms of access to information, agenda-setting rights, decision-making influence, and the capacity to hold dominant organizations accountable.

In Thailand, participation is incorporated into centrally framed destination and cluster initiatives. Community-based tourism programs can create space for local entrepreneurship and stewardship while retaining dependence on national guidance. Research in Chumphon shows that local networks and shared operational mechanisms

can support community-based tourism through cooperation, mapping, joint marketing, and standards. A study from Northeast Thailand highlights the role of local leadership, traditional cultural resources, and community decision-making in recovery after the pandemic. These cases suggest that local capacity can complement national direction when relationships are supportive rather than merely supervisory (Na Thongkaew et al., 2025; Poo-Udom, 2025).

Further Thai evidence indicates that the social foundations of participation matter. A study of community-based service development under uncertainty identifies the difficulty of coordinating sustainability, market expectations, and local organizational capabilities. Research involving an ethnic community in Uthai Thani points to the importance of matching integrating mechanisms to local knowledge and capacities. These studies do not imply that community autonomy requires the absence of government; rather, they indicate that external support should not replace decisions communities are capable of making. Coordination must therefore be judged by the relationships it enables as well as by the number of partnerships it creates (Rukpollmuang et al., 2026; Chooma et al., 2026).

Malaysia's tourism framework recognizes community development and links sector strategy to national transformation objectives. At the same time, a federal policy may reach local communities through several institutional layers, each with different priorities and resources. Community interests can be acknowledged in policy documents while remaining secondary during project design or investment negotiations. The broader question is whether participation is confined to local implementation or provides an avenue to influence priorities. In comparative analysis, a written promise of empowerment is therefore evaluated as a policy commitment, not as direct evidence that power has been redistributed to all communities across Malaysia.

Indonesia has an extensive practical foundation for community involvement through tourism-awareness groups, tourism villages, and local enterprises. These arrangements can make residents visible in destination development and create opportunities for household income. However, their existence does not resolve whether communities influence site selection, concessions, investment timing, or environmental safeguards. Research on the Betawi Cultural Village at Setu Babakan points to the need for formal cooperative agreements and communication platforms. A study of Karampuang Island in West Sulawesi similarly observes that multi-actor collaboration can produce facilities while durable coordination remains weak when formal commitments and capacity are insufficient (Mulyanto & Rahayu, 2025; Idris et al., 2025).

The gap between formal participation and substantive influence also appears in cultural and heritage settings. Evidence from the Majapahit House heritage area illustrates how community, government, and cultural organizations may cooperate around heritage preservation and tourism development. Research on Bali's tourism policy links collaborative governance with locally rooted principles and the challenge of aligning destination development with environmental and cultural protection. These cases suggest that community involvement should not be interpreted only as an economic instrument. It may also perform a public function by defending cultural identity, knowledge, and long-term environmental quality (Basyar et al., 2025; Kerti et al., 2025).

Different destinations require different forms of collaboration. In an urban heritage setting, the main challenge may be coordinating site managers, cultural organizations, local businesses, and city government. In a remote island destination, transportation, basic infrastructure, and cross-boundary authority may be more significant. In a protected area, conservation and access rights can become central. A single mandatory partnership diagram is unlikely to capture these variations. What can be standardized are procedural expectations: clear rules for representation, transparent records of decisions, accessible grievance channels, and shared responsibilities for monitoring outcomes (Chareanporn et al., 2025; Dwipati et al., 2025).

Recent research from Papua demonstrates why local ownership should be analyzed separately from nominal support for community-based tourism. Public assistance may establish organizations or provide infrastructure, but the translation of that support into inclusive economic development depends on whose values guide decisions and where benefits remain. Research on collaborative tourism in rural Indonesia similarly highlights how institutional asymmetry can persist within formal networks. These findings reinforce the need to evaluate power distribution as part of collaborative governance, rather than treating every additional actor as evidence of democratic decision-making (Bajari et al., 2026; Kuswandi et al., 2026).

For Indonesian policymakers, a meaningful participation framework would specify when communities enter a planning process and which choices remain open at that stage. Consultation after the designation of an investment project has different consequences from participation during the formulation of destination priorities. Equally important are access to understandable information, representation of groups with different livelihoods, and feedback on how community input influenced the final decision. The 2025 legislative recognition of community-based tourism can support such improvements, but procedural guarantees and implementation practices determine whether the recognition becomes operational. Community participation should be treated as a condition of policy quality, not merely as a project output.

5. Adaptive Capacity and Policy Learning

Adaptive capacity refers to the ability of the tourism administration to detect changes, interpret evidence, adjust instruments, and maintain legitimate cooperation during disruption. It is broader than the capacity to issue emergency regulations quickly. Destinations face health crises, extreme weather, environmental degradation, shifts in demand, and changing expectations concerning social responsibility. Each event can reveal weaknesses that are less visible during periods of growth. The important analytical question is whether institutions can learn across administrative boundaries, transmit lessons into future plans, and revise performance measures without losing their responsibility to affected communities.

Thailand's response to the pandemic illustrates both rapid policy innovation and coordination difficulties. The Phuket Sandbox offered a staged means of reopening international tourism, but its implementation raised concerns regarding documentation, changing requirements, and communication. Comparative studies of crisis support show that residents' perceptions of governmental responsiveness and information transparency can influence trust and willingness to support recovery policies. These findings indicate that fast decisions alone are not enough: public information needs to be

intelligible and reliable, and changes should be supported by procedures that businesses and residents can follow (Zhu & Yasami, 2022; Wong & Lai, 2022).

The recovery experience also demonstrates the territorial variation of resilience. The economic and organizational conditions of large tourism enterprises differ from those of small community businesses. A destination-focused recovery plan may therefore require practical support that is adapted to different service providers, rather than relying only on general marketing or a reopening announcement. A systematic review of tourism governance in disaster-affected regions identifies coordination and institutional learning as important considerations for resilience, while a study of a Thai community describes local knowledge and leadership as resources for adaptation. These findings support the argument that resilience is jointly produced by public administration and local organizational capacities (Zhang et al., 2024; Poo-Udom, 2025).

Malaysia's policy agenda includes governance transformation and sustainability, but its post-pandemic prospects must be interpreted in relation to implementation incentives. A return to higher arrival counts may improve employment and public revenue while leaving older environmental and distributional problems unresolved. The question is whether monitoring and institutional learning will assess the quality of development, not only recovery speed. Studies of Malaysia's post-crisis tourism debate emphasize the possibility of transformation and the simultaneous pressure to return to earlier growth priorities. The resulting tension is not unique to Malaysia; it is present wherever performance systems reward short-term volume more readily than social inclusion or ecological resilience.

For Indonesia, policy learning is complicated by administrative scale and the number of responsible organizations. Changes can arise through national legislation, ministerial restructuring, destination-specific authorities, or local experiments. Each may generate lessons, but they are not automatically transferred across agencies and regions. A shared evidence system could document why a program was changed, which actors participated, and whether environmental or community objectives were achieved. Recent research integrating reviews and stakeholder analysis identifies several forms of fragmentation in Indonesian tourism governance, including vertical, horizontal, temporal, and spatial gaps. Such findings explain why collecting information is useful only when institutions can exchange and act upon it (Hubner et al., 2026).

Adaptive learning also requires a distinction between technical correction and changes in policy purpose. Adjusting a marketing budget or introducing an online service may improve an instrument without changing the objective of destination growth. Reconsidering whose livelihoods matter, what environmental thresholds constrain investment, or how communities share authority involves a deeper revision of policy priorities. The distinction prevents the language of transformation from being applied automatically to routine administrative changes. An adaptive governance system should make this difference explicit in evaluation documents, so that the administration can explain whether it has changed an operational tool or reconsidered its underlying definition of success.

An additional implication concerns the management of complex risks. The resilience of a tourism destination depends on transport links, information networks, health and environmental services, and viable local enterprises. Policy arrangements that isolate tourism promotion from these other functions may create blind spots during

disruption. The purpose of coordination is therefore not solely to improve administrative efficiency but also to anticipate risks crossing organizational boundaries. The comparative cases suggest that Thailand's national direction, Malaysia's planning framework, and Indonesia's localized initiative can each contribute to adaptation when linked to transparent learning mechanisms and practical channels for sharing evidence.

6. Comparative Synthesis and Lessons for Indonesia

The cross-country synthesis identifies three distinctive but overlapping administrative models. Thailand combines centralized direction with a durable national promotion organization. Malaysia relies on federal policy direction supported by recurrent national planning and a designated promotional body. Indonesia disperses governmental responsibilities more widely but supplements decentralization with national direction in selected destinations. The five-dimensional comparison in Table 2 summarizes how these arrangements create different combinations of stability, flexibility, territorial coordination, community participation, and capacity to respond to disruption. The table is not a performance league table. Its purpose is to show which institutional features require explanation when similar tourism objectives yield uneven administrative consequences.

Table 2. Five-Dimensional Comparison of Tourism Administration

Dimension	Indonesia	Thailand	Malaysia
Institutional architecture	Layered and frequently reconfigured; additional authorities and state enterprises in certain destinations	Comparatively stable ministry–TAT division of roles	Comparatively stable federal ministry and Tourism Malaysia
Distribution of authority	Extensive decentralization with selective central intervention in priority destinations	Central direction with cluster and local implementation	Federal coordination mediated by national planning and state responsibilities
Planning instruments	Long-term master planning historically insufficiently linked to five-year review cycles	Five-year national tourism development planning	Five-year Malaysia Plans plus a ten-year national tourism policy
Collaborative governance	Large community-based foundation, but unequal influence can persist	Tiered participation largely framed by national direction	Organized policy framework with uneven destination-level implementation
Adaptive capacity	Tourism ecosystem orientation in Law 18/2025; performance indicators remain challenged by growth orientation	Capacity for rapid experimentation, alongside procedural uncertainty and external political risks	Governance transformation prioritized, while growth-oriented incentives persist

Source: Authors, 2026

The first lesson for Indonesia is to establish enduring mechanisms of vertical coordination between central, provincial, and district or municipal administrations. Special destination authorities may help deliver concentrated investment, but they should not replace predictable channels that connect regular agencies. A standing intergovernmental forum could review overlapping responsibilities, align tourism investment with basic services, and resolve disagreements before they delay implementation. Such a forum should be designed as a venue for negotiation under decentralization rather than as a means to extinguish regional discretion. The policy objective is coherence with legitimate local variation.

The second lesson concerns institutional continuity. Thailand and Malaysia illustrate the possible value of maintaining recognizable national promotional functions over successive policy cycles. For Indonesia, continuity would involve protecting organizational memory and preserving relationships with regions and business partners even when ministerial nomenclature changes. However, institutional stability is not an argument against reform. A reorganization may be justified when mandates are duplicative or important functions are neglected. The decisive requirement is that transitions include clear responsibility for ongoing programs, staff capabilities, records, agreements, and evaluation systems, rather than allowing those resources to fragment with each administrative change.

Third, national planning should be aligned with budget cycles and destination-level instruments. The completion of RIPPARNAS 2010–2025 and the amendments introduced in 2025 make it important to specify how a successor framework interacts with regular national and subnational development plans. Common indicators and data standards would help regional governments report outcomes without being required to adopt identical programs. Comparisons should incorporate visitor quality, local economic retention, environmental pressure, infrastructure reliability, and effective participation. More sophisticated promotion can support these goals, but it should not substitute for mechanisms that track whether tourism investment produces public value.

Fourth, community participation should move from implementation toward the formulation of priorities. Indonesia already possesses numerous community-based organizations and tourism initiatives. Their contribution will be more meaningful if they receive timely access to planning documents, a recognized role in deliberation, and clear feedback about decisions. A review of participation barriers in developing countries identifies structural, operational, and cultural constraints. That perspective reinforces the difference between inviting residents to carry out a project and allowing them to influence which project is chosen and how its benefits are shared (Reindrawati, 2023).

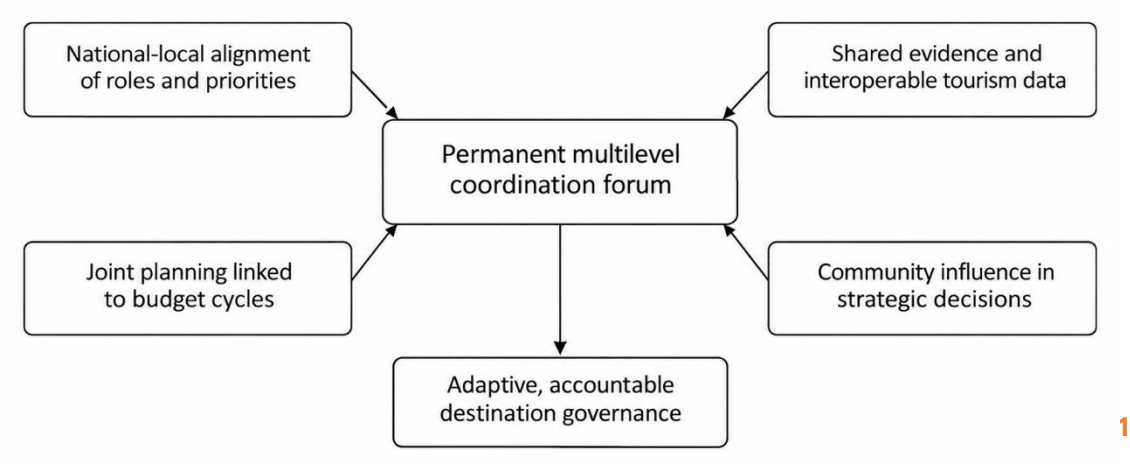


Figure 3. Proposed Coordinated-Decentralization Framework for Indonesian Tourism Governance
Source: Authors, 2026

Fifth, tourism institutions require connected information systems and adaptive oversight. Digital platforms can make planning decisions, destination indicators, and program evaluations visible across administrative tiers, but only if their datasets and responsibilities are coordinated. Policies should specify who contributes data, who checks its quality, and how the information affects decisions. Digital integration also needs safeguards against excluding small enterprises or communities with limited connectivity. Lessons from Indonesia's and Malaysia's different digital governance approaches suggest that information technology is most valuable when linked to service integration and organizational responsibility, not when its role is restricted to destination promotion.

These recommendations must be interpreted within Indonesia's constitutional and territorial circumstances. The centralized form associated with Thailand cannot be transferred directly into an archipelagic, decentralized administration. Malaysia's federal institutions likewise operate within different constitutional and fiscal arrangements. What can reasonably be considered for adaptation are the functional principles of role clarity, continuity, regular planning review, and accountable participation. Comparative learning becomes useful only when an adopted mechanism addresses an identified Indonesian coordination problem and remains compatible with local authority and community interests.

The synthesis also cautions against equating governance quality with the amount of regulation. A sophisticated legal framework may coexist with overlapping mandates or insufficient enforcement capacity. Conversely, an administratively simple arrangement may work poorly if stakeholders lack access to decisions. The comparative cases repeatedly draw attention to relationships between institutions rather than institutional names alone. A more integrated Indonesian tourism system would therefore be visible in practical changes: fewer contradictory instructions, predictable coordination meetings, shared evidence, accessible local consultation, transparent decisions, and evaluation that can prompt revisions when results are unsatisfactory.

Finally, the findings point to a research agenda that goes beyond nationally declared strategies. Destination-level comparisons could investigate whether similar coordination arrangements generate different outcomes in coastal, urban, and protected-area settings. Budget analysis could test whether policy priorities are reflected in expenditure, while interviews might reveal informal bargaining that documentary evidence cannot capture. Longitudinal studies could track whether the 2025 legislative changes alter community influence, institutional coordination, or sustainability indicators over time. Such research would provide stronger tests of the mechanisms inferred here and help distinguish policy aspiration from enacted governance.

CONCLUSION

This article compared tourism institutional architecture and public policy in Indonesia, Thailand, and Malaysia across five dimensions: organizational structure, distribution of authority, planning instruments, collaborative governance, and adaptive capacity. Thailand displays a centralized arrangement with durable promotional functions and coherent national direction, yet it can encounter difficulties in local responsiveness and crisis implementation. Malaysia combines federal responsibilities with a regular development-planning framework, while continuing to confront uneven territorial capacity. Indonesia relies on extensive decentralization accompanied by central intervention in selected priority destinations. That combination creates space for local initiatives but makes vertical and horizontal coordination demanding.

The central finding is that Indonesia's main challenge is not a simple absence of tourism policy or regulatory ambition. Rather, it lies in the insufficient connections among levels of government, sectoral organizations, planning cycles, and communities. The recognition of an integrated tourism ecosystem in Law No. 18 of 2025 provides a policy opportunity, but meaningful integration requires operational arrangements. Priorities include permanent intergovernmental forums, transparent institutional mandates, coordinated data, alignment of plans with budgets, and community participation that influences decisions instead of merely supporting implementation. The experiences of Thailand and Malaysia offer functional lessons, not administrative blueprints to be copied without regard to Indonesian decentralization.

The study contributes a structured way to compare tourism administrations without reducing their performance to visitor totals or the existence of promotional agencies. Its conclusions remain limited by dependence on public documents and published research, the uneven distribution of destination-level evidence, and the inability to observe informal policy negotiations directly. Future research should combine documentary comparison with interviews, fiscal evidence, and longitudinal destination assessments to examine whether proposed coordination mechanisms improve policy coherence, environmental management, and equitable local benefits. Tourism governance should ultimately be evaluated by the public outcomes that institutions can achieve together, rather than by the formal completeness of their organizational charts.

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