Global Journal of Social Science and Innovation, June, 2025, Vol 2 (2), 1-10
E-ISSN: xxxx.xxxx & P.ISSN: xxxx.xxxx, http://doi.org/xx.xxxxx/xx-xxxx-xxxx-xx

Legal Analysis of the Constitutional Court Decision Number 112/Puu-XX/2022 on the Testing of Law Number 19 of 2019 on the Corruption Eradication Commission

Ady Suprya,[1*] Rena Aminwara,[2] Tin Yuliani,[3] Asri[4]

[4] *Law program, Faculty of Law, Universitas Muhammadiyah Mataram, Indonesia.*

[*]Corresponding author, email: adysupryadi8@gmail.com

ABSTRACT

This research examines the interplay Constitutional Court Decision Number 112/PUU-XX/2022 regarding the judicial review of Article 29 letter e and Article 34 of Law of the Republic of Indonesia Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission which states that it grants the applicant's request in its entirety related to the age and term of office of the KPK leadership. The formulation of the problem studied is what is the impact of constitutional losses on the applicant and what is the basis for the consideration of the panel of judges in the decision of case Number 112/PUU-XX/2022. The type of research used in this study is normative legal research with a statutory and conceptual approach method. The purpose of the study is to determine and analyze the two articles submitted for judicial review to the Constitutional Court. The results of the research and discussion show that the applicant cannot re-apply to become the KPK Leader in the next period and/1this decision is erga omnes (applicable to everyone) which must be obeyed and implemented.

Keywords: material test; constitutional court; corruption eradication commission.

INTRODUCTION

Corruption comes from Latin, namely corruption. This word itself has the verb corrumpere which means rotten, damaged, shaking, twisting or bribing. While in the Indonesian Language College (KBBI), corruption is the misappropriation or misuse of state money, companies, etc., for personal or other people's benefit. Several countries in Asia have various terms for corruption whose meanings are close to the definition of corruption. In China, Hong Kong and Taiwan, corruption is known as yumcha, or in India corruption is termed bakhesh, in the Philippines with the term lagay and in Thailand with the term gin moung. Indonesia is one of the countries with a fairly high level of corruption (Digdowiseiso & Sugiyanto, 2021; Ngatikoh et al., 2020; Tacconi & Williams, 2020; Yustiarini & Soemardi, 2020). This is indicated by Indonesia's ranking in the Indonesian Corruption Perception Index in 2022, which was recorded at 34 and ranked 110th out of 180 countries surveyed. This score has worsened by four points from 2021, which was at 38 (Ang, 2020; Muqsith et al., n.d.; Putri & Ilboudo, 2024; Suardi et al., 2024).

The Corruption Eradication Commission (KPK) has not been fully able to make this country clean from corruption that has been carried out by government officials and others. Indonesia has been independent for 78 years but development and welfare have

Citation in APA style: Suprya, A., Aminwara, R., & Yuliani, T., & Asri. (2025). Legal Analysis of the Constitutional Court Decision Number 112/Puu-XX/2022 on the Testing of Law Number 19 of 2019 on the Corruption Eradication Commission, *Global Journal of Social Science and Innovation, Vol. 2* (2), 1-10.

Received; 12 April, 2025; Revised: 15 May, 2025; Accepted: 20 June, 2025

not been fully felt by the people.

After the amendment of Law Number 30 of 2002 concerning the Corruption Eradication Commission into Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission, the position of the Corruption Eradication Commission (KPK) is included in the group of branches of government power (Auxiliary State Organ). The change in the position of the KPK is not without reason, based on the decision of the Constitutional Court Number 36/PUU-XV/2017, the KPK is included in the branch of government power institutions that carry out their duties independently and free from the influence of any power.

The Corruption Eradication Commission itself is a state institution that has the function of eradicating and preventing criminal acts of corruption in Indonesia. The United Nations Convention Against Corruption as an international anti-corruption convention has mandated that the state can eradicate and prevent corruption effectively and efficiently through corruption eradication institutions (Brody et al., 2020; Daud, 2024; Salihu & Jafari, 2020; Yeh, 2020).

Indonesia has also ratified the anti-corruption convention with Law Number 7 of 2006 concerning the Ratification of the United Nations Convention Against Corruption in 2003 in order to establish international cooperation in the framework of eradicating and preventing corruption locally and internationally. Previously, the Corruption Eradication Commission was established based on the mandate of Article 43 of Law Number 31 of 1999 concerning the Eradication of Corruption and Law Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning the Eradication of Corruption. The article stipulates that no later than two years after the Corruption Law is passed, a special institution must be formed that is given the authority to eradicate corruption. The Corruption Eradication Commission is present as one of the legal reform programs in eradicating corruption. The public has high expectations of the Corruption Eradication Commission. Therefore, the Corruption Eradication Commission is given comprehensive authority in eradicating corruption, namely conducting investigations, inquiries, and prosecutions at the same time in criminal acts of corruption (Abdulrauf, 2020; Othman et al., 2022; Syahuri et al., 2022).

This authority is emphasized in Article 6 of Law Number 30 of 2002 which states that the Corruption Eradication Commission has the following duties (Indonesia, Corruption Eradication Commission Law, Law Number 30 of 2002, LN Number, - TLN No. 4250) :

1.1. Coordinating with agencies authorized to eradicate criminal acts of corruption.
1.2. Supervising agencies authorized to eradicate criminal acts of corruption.
1.3. Conducting investigations, inquiries, and prosecutions of criminal acts of corruption.
1.4. Preventing criminal acts of corruption.
1.5. Monitoring the implementation of state governance

The regulation of the term of office of the KPK leadership which is different from the term of office of the leadership/members of commissions or independent institutions, especially those of constitutional importance, has violated the principles of justice, rationality, reasonable reasoning and is discriminatory and thus contradicts the provisions of Article 280 paragraph (1) of the 1945 Constitution. Therefore, according to the Court, the term of office of the KPK leadership should be equal to the term of office of commissions and independent institutions which are included in the group of commissions and institutions which have constitutional importance, namely 5 years so as

to fulfill the principles of justice, equality and equity.12 "Taking into account the term of office of the current KPK leadership which will end on 20 December 2023 which is only approximately 6 (six) months away, then without intending to assess the concrete case, it is important for the Court to immediately decide on the a quo case to provide legal certainty and equitable benefits.

The KPK leadership recruitment system with a 4-year scheme based on Article 34 of Law 30/2002 has resulted in the performance of the KPK leadership being assessed twice by the President and the DPR in the same term of office. The two-time assessment of the KPK can threaten the independence of the KPK because with the authority of the President and the DPR to be able to conduct selection or recruitment of KPK leaders twice in the period or term of office of their leadership, it has the potential to not only affect the independence of the KPK leadership, but also the psychological burden and conflict of interest for the KPK leadership who wish to re-register for the next KPK leadership candidate selection.

Thus, based on the entire description of the legal considerations above, according to the Court, the Applicant's argument regarding the provisions of Article 34 of Law 30/2002 is contrary to the 1945 Constitution and has no binding legal force as long as it is not interpreted that the Leadership of the Corruption Eradication Commission, both the leadership who are appointed simultaneously and the replacement leadership who is appointed to replace the leadership who resigns during his/her term of office, holds office for 5 years, and thereafter can only be re-elected for one term of office. Based on the above background, the following problems can be formulated: 1. What is the impact of the applicant's constitutional loss on the judicial review of Law Number 19 of 2019 concerning the Corruption Eradication Commission?

LITERATURE REVIEW

General Overview of the Constitutional Court

2.1. History of the Constitutional Court

The idea of establishing an institution dedicated to upholding the constitution—as the supreme law of the land—has evolved significantly, shaped by diverse historical processes and experiences across countries. In its functional development, the role of constitutional review was initially placed within older institutions such as the Supreme Court, assigned to special bodies, or in some countries, not established at all (Abotsi, 2020; Zhu, 2022b, 2022a).

Indonesia adopted the model of a Constitutional Court. Article 24 Paragraph (2) of the 1945 Constitution of the Republic of Indonesia states:

"Judicial power shall be exercised by a Supreme Court and judicial bodies under it within the general court system, religious courts, military courts, administrative courts, and by a Constitutional Court."

Based on this provision, the Constitutional Court is one of the bodies that exercises judicial power alongside the Supreme Court. Judicial power refers to an independent authority responsible for administering justice to uphold law and justice. Therefore, the Constitutional Court is a judicial institution—an integral part of the judicial branch—empowered to handle specific cases as mandated by the 1945 Constitution (Coloay, 2023; Isra & Faiz, 2024; Rudy et al., 2023).

The Constitutional Court was established following the amendments to the 1945 Constitution. In the context of state governance, it is conceptualized (Jimly Asshiddiqie, 2010) as:

2.2.1. A guardian of the constitution, functioning to uphold constitutional justice within society.
2.2.2. An institution tasked with promoting and ensuring that the constitution is respected and implemented consistently and responsibly by all components of the state.
2.2.3. An interpreter of the constitution, particularly in light of deficiencies in the constitutional system, ensuring that the spirit of the constitution continues to guide and shape the life of the nation and society.

In essence, the primary function of the Constitutional Court is to oversee the consistent implementation of the constitution (as *guardian of the constitution*) and to interpret it when necessary (as *interpreter of the constitution*). Through these roles, the Constitutional Court holds significant importance and plays a strategic role in the development of constitutional governance. Today, all decisions or policies made by state institutions can be assessed for their constitutionality through judicial review by the Constitutional Court.

2. 2 Authority of the Constitutional Court of the Republic of Indonesia

The authority of the Constitutional Court is specifically regulated in Article 24C Paragraph (1) of the 1945 Constitution of the Republic of Indonesia in conjunction with Article 10 Paragraph (1) of Law No. 24 of 2003 concerning the Constitutional Court. Article 24C Paragraph (1) states:

2.2.1. The Constitutional Court has the authority to adjudicate at the first and final level, with decisions that are final and binding, to review laws against the Constitution.
2.2.2. It has the authority to resolve disputes over the authority of state institutions whose powers are granted by the Constitution. For example, the House of Representatives (DPR) may propose the dismissal of the President and/or Vice President to the People's Consultative Assembly (MPR) if proven to have violated the law as regulated in Article 7A of the 1945 Constitution.
2.2.3. The Court is authorized to decide on the dissolution of political parties.
2.2.4. It also has the authority to decide disputes concerning the results of general elections.

2.3. Types of Judicial Review in the Constitutional Court

2.3.1. Material (Substantive) Review

Material or substantive review refers to the assessment of the content of a law. Article 51 Paragraph (3) Letter b of the Constitutional Court Law requires that petitioners must clearly explain how the content of a paragraph, article, and/or part of a law is considered contrary to the 1945 Constitution.
This scope was broadened through Article 2 Paragraph (4) of PMK No. 2 of 2021 on Procedures for Judicial Review Cases, which states:

"Material review as referred to in paragraph (2) is a review related to the substance contained in paragraphs, articles, and/or sections of laws or Government Regulations in Lieu of Law (Perppu) which are considered to contradict the 1945 Constitution of the Republic of Indonesia."

2.3.2. Formal Review

Article 4 Paragraph (3) of PMK No. 06/PMK/2005 defines formal review as: "Formal review is the review of laws related to the legislative process and matters not included in material review."

Sri Soemantri (1986) defines formal review as the authority to assess whether a law has been enacted in accordance with proper procedures as outlined in existing regulations. Harun Alrasid adds that formal review concerns the legitimacy of the legislative body enacting the law. Meanwhile, Mahfud MD emphasizes that formal review involves procedural or mechanism errors—such as the absence of a proper quorum or deviation from discussion stages.

2.4. General Overview of the Corruption Eradication Commission (KPK)

2.4.1. Definition

The Corruption Eradication Commission (Komisi Pemberantasan Korupsi, or KPK) is an independent executive institution of the state, free from any external influence in the execution of its duties. It was established not only to combat corruption but also to serve as a watchdog over state governance.

2.4.2. Duties, Authorities, and Obligations

The duties of the KPK were originally regulated in Law No. 30 of 2002 on the Eradication of Corruption, and later amended by Law No. 19 of 2019, particularly Article 6, which mandates the KPK to:

1. Prevent the occurrence of corruption;
2. Coordinate with relevant institutions to eradicate corruption and improve public service delivery;
3. Monitor the implementation of state governance;
4. Supervise the institutions authorized to handle corruption cases;
5. Conduct investigations, inquiries, and prosecutions of corruption crimes;
6. Execute court decisions and orders that have obtained permanent legal force.

Further, Article 7 Paragraph (1) of Law No. 19 of 2019 elaborates the preventive authority of the KPK, which includes:

1. Registering and auditing the assets of state officials;
2. Receiving and determining the status of gratification reports;
3. Organizing anti-corruption education in the national education system;
4. Planning and executing public awareness programs on corruption eradication;
5. Conducting anti-corruption campaigns to the public;
6. Engaging in bilateral or multilateral cooperation in efforts to combat corruption.

METHODS

The research method used in writing this proposal is normative legal research or doctrinal legal research or dogmatic legal research or legal research which in the Anglo American literature is referred to as legal research which is internal research in the legal discipline.

Normative legal research is usually "only" a document study, namely using legal material sources in the form of laws and regulations, court decisions/rules, contracts/agreements/contracts, legal theories, and opinions of scholars. Another name for normative legal research is doctrinal legal research, also known as library research or document study. It is called doctrinal legal research because this research is conducted or

directed only at written regulations or legal materials. It is called library research or document study because this research is conducted more on secondary data in the library. while the approaches used in this research are the legislative, conceptual and sociological approaches. In this study, after the legal materials are collected, the legal materials are analyzed to obtain conclusions, the form of legal material analysis techniques using content analysis which shows an integrative analysis method and conceptually tends to be directed at finding, identifying, processing, and analyzing legal materials to understand their meaning, significance, and relevance. By using this analysis method, a result or understanding of the content of the communication message conveyed by laws and regulations, other sources of information will be obtained objectively, systematically, and sociologically relevant.

RESULTS

4.1. Impact of the Applicant's Constitutional Losses on the Judicial Review of Law Number 19 of 2019 Concerning the Corruption Eradication Commission.

The applicant as an individual citizen of the Republic of Indonesia who in this case serves as Deputy Chairperson of the Corruption Eradication Commission for the 2019-2023 period, as a State Official/state organ in the executive group who is Independent, his term of office is determined for 4 (four) years as stated in Article 34 of the KPK Law. Factual The periodization of the applicant's office as the leader of the KPK based on the a quo provisions is as follows: "The Leader of the Corruption Eradication Commission holds office for 4 (four) years and can be re-elected for only one term of office" (Rositawati, 2005).

In order to achieve its goals, Indonesia has created and has many Non-Ministerial State Institutions since the reform era. The Applicant has traced and there are at least 12 Commissions or non-ministerial State institutions other than the KPK with a term of office of 5 (five) years. The term of office of commissioners/officials/leaders of these state institutions is the same (Fair), namely 5 (five) years. This is very different from the term of office of the KPK leadership, although the position in the state structure and its independent nature are the same as the KPK (Ayunita, 2017).

From the description above, it is clear that the enactment of Article 29 letter (e) of the a quo Law has violated, harmed the Applicant's Constitutional Rights, including the following constitutional rights: The right to recognition, guarantee, protection and certainty of fair law before the law; The right to obtain equal opportunities in government. The right to be free from discriminatory treatment on any basis and has the right to receive protection against such discriminatory treatment.

In the description above, the applicant describes a lot about the loss of constitutional rights due to the enactment of Law Number 19 of 2019, the second amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission. So in this case, the applicant considers that the Law/1 is contrary to the 1945 Constitution. The loss of constitutional rights experienced by/1Nurul Ghufron as the Applicant is the Deputy Chairperson of the KPK who has been appointed to meet the qualifications based on Law Number 30 of 2022 (the first KPK Law). However, the

enactment of Article 29 letter (e) of the KPK Law has reduced the Applicant's constitutional rights.

The enactment of the provisions of the a quo article which originally required a minimum age of 40 years and a maximum of 65 years, after the amendment to a minimum of 50 years and a maximum of 65 years, resulted in applicants who were under 50 years of age not being able to nominate themselves again as KPK leaders for the next period. This contradicts Article 34 of Law Number 30 of 2002. So that applicants cannot nominate themselves in the election of KPK leaders in the next period. Applicants who have experience in a position must also be considered to have "met the legal requirements" to fill the position.

As for the enactment of the a quo article, the right to fair legal certainty, equal treatment before the law, and to obtain employment with fair treatment is lost. If we refer to the existing regulations, it is indeed impossible to follow or register for the election of the KPK leadership in the next period, but this will also harm the applicant's constitutional rights.

Article 45 paragraph (10) of Law No. 24 of 2003 concerning the Constitutional Court mandates that the opinions of different members of the Panel of Judges be included in the decision. Dissenting opinions are indeed possible, and in practice often occur, because decisions can be taken by majority vote if deliberation cannot reach consensus.65

Different opinions can be divided into two types, namely (1) dissenting opinion; and (2) concurrent opinion or consenting opinion. Dissenting opinion is a different opinion in terms of substance that influences the difference in the verdict. While concurrent opinion is a different opinion that does not affect the verdict. The difference in concurrent opinion is the difference in legal considerations underlying the same verdict. Concurrent opinion because its content is in the form of different considerations with the same verdict does not always have to be placed separately from the majority judges, but can be used one in the legal considerations that strengthen the verdict.

DISCUSSION

Meanwhile, dissenting opinion, as a different opinion that affects the verdict must be stated in the verdict. Dissenting opinion is one form of moral responsibility of constitutional judges who have different opinions and a form of transparency so that the public knows all the legal considerations of the Constitutional Court's decision. The existence of a dissenting opinion does not affect the legal force of the Constitutional Court's decision. The Constitutional Court's decision taken by consensus by 9 constitutional judges without dissenting opinions has the same force, no less and no more, with the Constitutional Court's decision taken by a majority vote with a composition of 5 to 10.

The Constitutional Court granted this petition on the grounds that there was discrimination due to injustice to the KPK if it was equated with other independent institutions that also have constitutional importance, which have a 5-year term of office. Also because it is based on the principle of benefit and efficiency, it would be more

beneficial and efficient if the term of office of the KPK leadership was in accordance with the presidential period.

This decision certainly raises the question of the position of the Constitutional Court as a negative legislator. The extension of the KPK's term of office should be carried out through the law-making institution, namely the legislative institution. In addition, this Constitutional Court Decision should be applied to the next period of KPK leadership. Because in reality the Constitutional Court Decision cannot be retroactive. The judge's considerations regarding this decision in Article 29 letter (e) of the KPK Law where the applicant feels disadvantaged by the change in the provisions of the minimum and maximum age limits for KPK Leadership which were originally at least 40 (forty) years old and a maximum of 65 (sixty-five) years old in the election process changed to a minimum of 50 (fifty) years old so that if you look at the latest provisions, the applicant cannot re-apply to become KPK Leadership in the next period. According to the Court, the provisions of the norm of Article 29 letter e of Law 19 of 2019 a quo, although related to the minimum age and maximum age for filling public office which are formal requirements, do not explicitly conflict with the Constitution, but implicitly the norm a quo raises issues of injustice and is discriminatory when associated with substantive requirements, for example someone who has served or is currently serving as a KPK leader and has a good track record related to integrity and other requirements regulated in Article 29 of the KPK Law a quo.

CONCLUSION

Based on the discussion that has been described, the author provides the following conclusions is the impact of constitutional losses on the applicant in the judicial review of Law Number 19 of 2019 concerning the Corruption Eradication Commission is that the applicant does not obtain his rights as the leader of the KPK in the next period, the applicant only serves his term as deputy chairman of the KPK. So that the decision is not erga omnes which should apply to everyone but this decision only applies to the applicant for that this decision becomes pros and cons in society and has social implications in the community and the legal basis for the panel of judges' considerations in the Decision on Case Number 112/PUU-XX/2022 is that in the decision, it is for the current KPK leadership, not the future KPK leadership/1, thus explaining more specifically the decision based on the judge's decision comprehensively.

Declaration of Conflicting Interests
The authors declare that there is no conflict of interest of this article.

Acknowledgments
The author would like to express thanks to *Universitas Muhammadiyah Mataram* for supporting this research.

REFERENCES

Abdulrauf, L. A. (2020). Using specialised anti-corruption agencies to combat pervasive corruption in Nigeria: A critical review of the ICPC and EFCC. *African Journal of*

Legal Studies, *12*(3–4), 215–241.
Abotsi, E. K. (2020). Introspecting the Office of the Special Prosecutor's Act and Ghana's Constitutional Framework on Anti-Corruption. *African Journal of International and Comparative Law*, *28*(2), 219–243.
Ang, Y. Y. (2020). Unbundling corruption: Revisiting six questions on corruption. *Global Perspectives*, *1*(1), 12036.
Ayunita, K. (2017). *Introduction to Constitutional Law and Constitutional Court Procedure, Mitra Wacana Media, Jakarta.*
Brody, R. G., Gupta, G., Ekofo, A. N., & Ogunade, K. M. (2020). The need for anti-corruption policies in developing countries. *Journal of Financial Crime*, *28*(1), 131–141.
Coloay, J. D. (2023). The Constitutional Court's Role in the Protection of Citizen's Constitutional Rights: A Review of Monumental Decisions. *Barelang Journal of Legal Studies*, *1*(2), 151–167.
Daud, Y. M. (2024). A review of effectiveness of anti-corruption strategies and institutions in Kenya. *African Journal of Commercial Studies*, *4*(4), 303–318.
Digdowiseiso, K., & Sugiyanto, E. (2021). How effective is institutional quality for the creation of small & medium enterprises (SMEs) in Indonesia? *Economics & Sociology*, *14*(1), 263–274.
Isra, S., & Faiz, P. M. (2024). The Indonesian Constitutional Court: An Overview. *Courts and Diversity*, 55–94.
Muqsith, S. P., Krishti, N. S., & Makalew, B. A. (n.d.). *Systematic literature review on corruption prevention efforts towards sustainable economy in Indonesia: ICT perspective*.
Ngatikoh, S., Kumorotomo, W., & Retnandari, N. D. (2020). Transparency in government: a review on the failures of corruption prevention in Indonesia. *Annual Conference of Indonesian Association for Public Administration (IAPA 2019)*, 181–200.
Othman, I. W., Mokhtar, S., & Esa, M. S. (2022). Corruption Offences Education Literacy in Preventing the Loss of National Treasures: A Review of Challenges and Concerns. *International Journal of Education, Psychology and Counseling*, *7*(47), 639–665.
Putri, C. M., & Ilboudo, T. A. S. (2024). Corruption in Village Governments: A Bibliometric Review and Future Research Agenda. *Public Accounting and Sustainability*, *1*(1), 35–49.
Rositawati, D. (2005). *Series of Reading Materials for Human Rights Courses for Lawyers X (2005), Material: Judicial Review Mechanism, Jakarta, Institute for Community Studies and Advocacy.*
Rudy, I., Afrintina, R. W., & Martha Riananda, R. P. (2023). THE INDONESIAN CONSTITUTIONAL COURT DECISIONS, DECENTRAL-IZATION, AND LOCAL AUTONOMY: A SYSTEMATIC REVIEW CON-CERNING ARTICLE 18 OF THE 1945 CONSTITUTION. *BiLD Law Journal*, *8*(1), 166–179.
Salihu, H. A., & Jafari, A. (2020). Corruption and anti-corruption strategies in Iran: An overview of the preventive, detective and punitive measures. *Journal of Money Laundering Control*, *23*(1), 77–89.
Suardi, I., Rossieta, H., Djakman, C., & Diyanty, V. (2024). Procurement governance in reducing corruption in the indonesian public sector: a mixed method approach. *Cogent Business & Management*, *11*(1), 2393744.
Syahuri, T., Saleh, G., & Abrilianti, M. (2022). The role of the corruption eradication

commission supervisory board within the indonesian constitutional structure. *Cogent Social Sciences*, *8*(1), 2035913.

Tacconi, L., & Williams, D. A. (2020). Corruption and anti-corruption in environmental and resource management. *Annual Review of Environment and Resources*, *45*(1), 305–329.

Yeh, S. S. (2020). APUNCAC and the International Anti-Corruption Court (IACC). *Laws*, *10*(1), 1.

Yustiarini, D., & Soemardi, B. W. (2020). A review of corruption in public procurement in Indonesia. *IOP Conference Series: Materials Science and Engineering*, *849*(1), 12013.

Zhu, G. (2022a). Constitutional Review "With Chinese Characteristics"*: Law, Institutions and Recent Developments. *Routledge Handbook of Constitutional Law in Greater China*, 113–134.

Zhu, G. (2022b). Law, Institutions and Recent Developments. *Routledge Handbook of Constitutional Law in Greater China*.