# PROBLEMS OF IMPLEMENTATION OF ENVIRONMENTAL DISPUTE INKRACHT DECISIONS IN RELATION TO SUSTAINABLE DEVELOPMENT

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**Abstract**
This study examines the problems of the implementation of court decisions that have permanent legal force (*inkracht*) in environmental disputes in Indonesia and their relationship with the achievement of sustainable development. This problem arises from the anthropocentric development paradox, which often ignores ecological balance. This study uses normative juridical methods with *statute approaches*, *case approaches*, and *theoretical approaches* to analyze the obstacles that occur. The results of the study show that execution problems are caused by multi-dimensional factors, including juridical constraints before the birth of Supreme Court Regulation (PERMA) Number 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases, institutional obstacles, and corporate resistance. The main obstacle to pre-Perma was the focus of execution on monetary compensation alone, which often had no impact on true environmental restoration. Perma No. 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases is present as a legal breakthrough that shifts the execution paradigm from compensatory to restorative, by requiring an environmental restoration plan and allowing the execution of direct restoration actions. Nevertheless, the success of Perma is highly dependent on strengthening institutional capacity, improving coordination between law enforcement officials, and changing the legal culture. It was concluded that failure in the execution of environmental judgments not only damages the ecosystem but also erodes public trust in the justice system, thereby fundamentally hindering the achievement of the Sustainable Development Goals (SDGs), especially SDG 16 regarding effective and accountable institutions. Therefore, effective and consistent law enforcement is a fundamental prerequisite for realizing ecological justice and guaranteeing environmental rights for current and future generations.
**Keywords:** *Problematika, Incracht, Environmental Disputes, Sustainable Development*

## 1. Introduction

Economic development in Indonesia over the past few decades has adopted a paradigm that is highly oriented towards material growth, often known as anthropocentric development (Hutajulu et al. 2024). This paradigm places humans at the center of all interests and views nature as a mere object, an infinite resource that can be exploited to meet ever-increasing consumptive needs and desires. According to Andini (2022), as a result, the exploitation of natural resources is carried out greedy and massively, which in turn triggers a widespread ecological crisis. This phenomenon is not just a side effect of development, but a direct consequence of this unbalanced orientation.

Data from the Environmental Forum (WALHI) confirms that this development pattern has created various ecological disasters, unresolved social conflicts, and worryingly multidimensional crises (Wicaksana and IP, 2020). Policies that facilitate investment, as reflected in Government Regulation Number 24 of 2018 concerning Electronically Integrated Business Licensing (OSS) Services, often place environmental permits (Amdal/UKL-UPL) as a mere administrative prerequisite, not as a substantive damage prevention instrument. The legal framework, which was supposed to function as a fortress of protection, has instead transformed into a facilitator for exploitation (Mulyani, Muryati, and SH. (2023). This raises profound questions about whether our legal system is indeed designed to protect environmental functions or actually facilitates ecosystem degradation.

Despite these challenges, Indonesia actually has a strong legal foundation for environmental protection. Law Number 32 of 2009 concerning Environmental Protection and Management (PPLH Law) is a major milestone in the national environmental law framework. This law philosophically affirms that a good and healthy environment is the human right of every Indonesian citizen, which is guaranteed by Article 28H of the 1945 Constitution of the Republic of Indonesia. The purpose of the PPLH Law is to realize

systematic and integrated environmental protection and management to ensure safety, health, and human life as well as ecosystem sustainability (Suhariyanto et al. 2025). As explained by Maulidyna (2022), this law explicitly mandates the principles of sustainable and environmentally sound development as the basis for implementing national economic development. Thus, environmental law in Indonesia normatively functions as an *agent of change* to balance economic and ecological interests, which aims to ensure the fulfillment of justice for current and future generations.

According to Ruslan, Firdaus, and Hidayatullah (2024), sustainable development is not only a national commitment, but also a global mandate manifested in the 2030 Agenda through 17 *Sustainable Development Goals (SDGs*). Environmental law enforcement plays a central role in the achievement of the SDGs, especially SDG 16 on Peace, Justice and Resilient Institutions. This goal emphasizes the importance of building effective, accountable, and inclusive institutions at all levels to achieve sustainable prosperity. Strong law enforcement can provide a deterrent effect to polluters and environmental destroyers, which is a crucial effort to prosper communities and realize sustainable development. This principle emphasizes that the sustainability of the ecosystem and human welfare are highly dependent on obedience to the law. The right to a good and healthy environment is an integral part of human rights that must be guaranteed by the state, not only for the current generation, but also for future generations. Failure to guarantee this right is tantamount to violating the human rights of future generations (Dwiprigitaningtias, 2024).

Although the legal and philosophical foundations have been well established, there is a significant gap between theory and practice, especially in the phase of execution of court decisions that have permanent legal force (*inkracht*). Executions are often stalled, making decisions that are supposed to have a deterrent and restorative effect, just a meaningless legal text. Data from the Ministry of Environment and Forestry (MoEF) reveals that the value of fines for environmental case decisions that have not been executed reached a very large number, namely IDR 20.79 trillion during the 2015-2022 period. This figure is not just a statistic, but a real manifestation of systematic failures in law enforcement. Failure to execute creates a cycle of impunity for corporations that pollute the environment. They see that even if they are punished by the courts, the sanctions will not actually be implemented. Examples such as PT Jatim Jaya Perkasa which was sentenced to compensation of Rp491 billion but did not show good faith to pay, or the case of PT Kallista Alam which continued to refuse the verdict despite being *inkracht*, show how economic and political forces can bend the legal process. This cycle not only allows environmental damage to continue, but also fundamentally erodes public trust in the justice system and government. This phenomenon directly hinders the achievement of SDG 16, which demands effective and accountable institutions as the foundation of sustainable development.

## 2. Literature Review

### *2.1. Central Concepts in Environmental Disputes*

To analyze the problems of the execution of environmental dispute judgments, it is important to understand some of the central legal concepts. First, *an inkracht* decision or a decision with legal force remains a court decision that can no longer be submitted by ordinary legal remedies, so that it is finally binding on the parties and must be implemented (Mukti, 2023). Second, strict *liability* is a legal principle applied in certain environmental cases, which allows the plaintiff not to have to prove the existence of an element of fault on the part of the polluter. This principle is very important because it is often difficult to prove the causality and element of error relationship in complex environmental pollution cases (Tumangger, Rahmi, & Hartati, 2024). Third, the polluter pays principle (*Polluter Pays Principle*) asserts that the party responsible for pollution or environmental damage must bear the full cost for remedial action and/or compensation (Ramadhan & Salmi, 2024). These three concepts, although they have been accommodated in the PPLH Law, often face significant obstacles at the implementation stage.

### *2.2. Legal Effectiveness Theory: A Problem Analysis of Five Factors*

According to the theory of legal effectiveness developed by Soerjono Soekanto, the effectiveness of a legal norm is influenced by five factors, namely (1) the law itself, (2) law enforcement officials, (3)

facilities and facilities, (4) society, and (5) culture (Orlando, 2022). The application of this theory can holistically explain why environmental court decisions often fail to be executed:

- Legal Factors: Prior to Perma Number 1 of 2023, the applicable civil procedure law (HIR/RBG) did not specifically regulate the relevant enforcement mechanisms for environmental cases, creating a serious legal vacuum. Executions tend to focus only on monetary damages and not on actual remedial measures, which are at the heart of environmental law enforcement.
- Law Enforcement Officials: The Ministry of Environment and Forestry, as a plaintiff in many cases, faces the issue of capacity and commitment from the executors. The limited number of civil servant investigators (PPNS), which is only 129 people, is one of the obstacles in handling complex environmental crimes. Ineffective coordination between the Ministry of Environment and Forestry, the prosecutor's office, and the courts also caused the execution process to be hampered, as happened in the case of PT Kallista Alam.
- Facilities and Facilities Factors: The availability of inadequate facilities, such as technical constraints on the Supreme Court Decision Directory website, makes access and monitoring of environmental decisions difficult. This hinders transparency and accountability which are crucial elements of effective law enforcement.
- Community Factors: Victims of environmental pollution are often in a position of economic and legal weakness when dealing with corporations with financial strength and a strong legal network. This imbalance often leads to a reluctance for victims to take the path of litigation.
- Cultural Factors: Execution problems also reflect a legal culture that has not fully taken sides with ecological justice. The existence of a culture of impunity, in which corporations feel "immune from the law" even after a court decision, is a sociological obstacle that is difficult to overcome.

The problem of environmental decision execution is not caused by a single factor, but by the complex interaction of these five factors. Progressive laws will not be effective if they are not supported by officials who have the capacity, adequate facilities, and empowered community. A partial approach, such as simply revising the law, will not be adequate to address the challenges rooted in these various dimensions.

### *2.3. Legal Realism Theory: The Role of Judges as Lawmakers*

Legal realism *theory* highlights that law is not only limited to regulatory texts, but also includes social, political, and economic realities in their application. This theory places judges in an important position as "*law makers*", not just "*law finders*" (Suwasta & Juhana, 2024). In the context of environmental disputes, this theory is particularly relevant because environmental damage is often complex, multi-sectoral, and harms the public at large. Analysis from this perspective shows that judges are often bound by the *ultra petita* principle, which limits the verdict to only what the plaintiff claims. This can be a significant obstacle, as the lawsuit may not cover the full cost of the recovery required or the most effective restorative measures. The weakness of this approach is that it ignores the most important victim, the environment itself. The damage done to the environment is often greater and more complex than can be measured and prosecuted in a lawsuit document. Therefore, *legal realism* underscores the need for judges to take a proactive and progressive role, beyond formalistic boundaries, in order to realize true ecological justice.

## 3. Methodology

This research uses a type of normative legal research. Normative legal research is based on literature studies that examine secondary data, such as laws and regulations, legal documents, court decisions, scientific journals, and related literature. The research approaches used are:

- *Statute Approach*: This approach is carried out by examining laws and regulations relevant to the topic, including Law Number 32 of 2009 concerning Environmental Protection and Management and Supreme Court Regulation Number 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases.
- *Case Approach*: This approach is used to examine court decisions that have been inkracht in environmental disputes. The analysis is focused on relevant case studies to identify patterns,

obstacles, and successes in the execution process, such as the cases of PT Kallista Alam, PT Jatim Jaya Perkasa, and other cases for which data are available.

- *Theoretical Approach*: This approach is used to analyze research findings through the framework of relevant legal theories. The theory of legal effectiveness by Soerjono Soekanto is used to identify the factors that affect the success of environmental law enforcement, while the theory of legal realism is used to understand the role of judges in deciding and interpreting laws beyond their formal text.

The data analysis technique used is qualitative analysis. The data collected is interpreted in depth, synthesized to find cause-and-effect relationships, patterns, as well as implications of the observed phenomena. This critical analysis aims to produce strong arguments and structured recommendations.

## 4. Results and Discussion

### *4.1. Problems of Environmental Decision Execution before Perma Number 1 of 2023*

#### a. Juridical Constraints and Absence of Execution Guidelines

According to Saleh et al. (2024) before the enactment of Supreme Court Regulation Number 1 of 2023, the execution of environmental dispute decisions, both criminal and civil, faced serious obstacles due to the absence of specific legal guidance. The execution process generally refers to the Civil Procedure Law (HIR/RBG), which is not designed to handle the complexity of environmental cases. Court decisions often focus only on monetary compensation. This is a fundamental problem because the compensation fund has no guarantee to actually be used to restore the damaged environment. As a result, executions have stalled, and environmental damage has continued for years. This condition shows a serious legal vacuum, where legal decisions that have been in force do not have a significant impact on ecological conditions on the ground.

#### b. Institutional and Coordination Barriers

In addition to juridical constraints, execution problems are also caused by complex institutional barriers. The Director General of Law Enforcement of the Ministry of Environment and Forestry, Rasio Ridho Sani, explicitly admitted that there are still many decisions that have not been executed due to the issue of "capacity and commitment of the executor". There are obstacles in coordination between the Ministry of Environment and Forestry as the plaintiff and the court as the executor is the main obstacle.

As a concrete example, the case of an environmental dispute between the Ministry of Environment and Forestry and PT Kallista Alam is empirical evidence of this problem. Although the Supreme Court's ruling has been inkracht since 2015, the execution of the ruling that sentenced companies to pay fines and environmental restoration costs worth Rp251.765 billion continues to be hampered. Public Relations of the Suka Makmue District Court, Bagus Erlangga, explained that the execution had not yet taken place because the court was still waiting for the results of the asset calculation by the appraisal team. Obstacles like these, which include technical, bureaucratic and lack of coordination, suggest that an already robust legal instrument will be meaningless without solid institutional support and effective coordination.

#### c. Corporate Resistance and Power Imbalance

The biggest challenge in the execution of environmental judgments is resistance from corporations that have strong economic and legal power. The position of the victim, who is often a civilian or non-governmental organization, is in a relatively weak and unbalanced position. The unbalanced power of the parties often causes reluctance to litigate. Even after the inkracht verdict, corporations can continue to carry out legal resistance that stalls time and hinders execution (Moningka, 2024). The case of PT Jatim Jaya Perkasa is a classic example where a company that was awarded Rp119.8 billion in damages and Rp371.1 billion in recovery costs did not show good faith to carry out the verdict. The company even replanted oil palm in burned areas, a move that reflects a culture of impunity. Similarly, PT Kallista Alam has repeatedly filed legal challenges, including a lawsuit against execution, even though the verdict has permanent legal force. This creates the perception that the law only applies on paper, while on the ground, economic forces can ignore justice.

### *4.2. Perma Number 1 of 2023: A Restorative Breakthrough Towards Ecological Justice*

#### *4.2.1. Paradigm Shift from Compensatory to Restorative*

In response to various long-standing problems, the Supreme Court issued Perma Number 1 of 2023 which marks a fundamental paradigm shift in environmental law enforcement. This Perma expressly shifts the focus of execution from a compensatory (money-based) approach to a restorative (direct recovery-based) approach. The definition of "Environmental Restoration" in Article 1 number 20 of the Perma is very explicit, namely "efforts and actions to improve the quality of the polluted and/or damaged environment so that it returns to its original state or returns to a certain environmental quality". This means that if a forest has been burned, the restoration that must be done is replanting, not just compensation payments. This is the spirit of ecological justice that the Supreme Court wants to realize (Gaol, 2021).

#### *4.2.2. Innovative Mechanisms in Execution*

Perma Number 1 of 2023 introduces several innovative mechanisms designed to overcome previous execution barriers. There are three main pillars that are worth looking at:

1. **Mandatory Recovery Plan**: One of the most progressive steps is the obligation for the plaintiff to file environmental restoration plan documents that must be proven at trial. The court's decision must include actions in accordance with this plan. This ensures that the verdict is not only abstract but also concrete and *evidence-based*.
2. **Direct Recovery by the Plaintiff**: If the defendant refuses to carry out the judgment voluntarily, Perma Number 1 of 2023 mandates the plaintiff to continue to carry out recovery actions at the expense of the defendant. The funds paid by the defendant should be used entirely for ecological restoration actions and should not be used for other purposes.
3. ***Dwangsom* (Forced Money):** To ensure compliance, the judgment may include the forced money (*dwangsom*) that must be paid by the defendant every day of delay in implementing the judgment. This mechanism provides constant and significant financial pressure to compel corporations to comply.

The following table 1 briefly compares the execution paradigm before and after Perma Number 1 of 2023:

**Table 1: Comparison of Environmental Decision Execution Paradigms**

| Aspects | Before PERMA 1/2023 | After PERMA 1/2023 |
|---|---|---|
| Execution Focus | Compensatory (money-based) | Restorative (remedial action-based) |
| Legal Basis | HIR/RBG (Civil Procedure Law) | PERMA No. 1/2023 as *lex specialis* |
| Key Mechanism | Monetary damages judgment without a recovery guide | Mandatory recovery plan, direct recovery by the plaintiff, and *dwangsom* |
| Potential Effectiveness | Low, because the verdict often has no significant impact | High, as the execution is geared towards concrete recovery |

*Source: Author's processed data, year 2025*

### *4.3. Critical Analysis of the Implementation of Perma Number 1 of 2023 and Its Potential Impact*

Perma Number 1 of 2023 is a significant step forward at the normative level. However, the success of its implementation depends on how the previously identified institutional and social challenges can be addressed. The critical question is the extent to which these normative reforms can penetrate the empirical reality on the ground.

This analysis shows that Perma Number 1 of 2023 provides a strong legal tool, but the real challenge is in strengthening institutional capacity and changing socio-economic behavior. Do certified environmental judges, as stipulated in KMA Decree No. 134/KMA/SK/IX/2011, have adequate technical understanding to assess complex recovery plans? Will the coordination between the Ministry

of Environment and Forestry, the courts, and related parties run smoothly on the ground, overcoming the obstacles that occur in cases such as PT Kallista Alam? Can the culture of corporate impunity be changed with just the threat *of dwangsom*?

The success of this PERMA will also be greatly influenced by the support of the community and independent institutions. Initiatives such as *the I-LEAD* portal launched by the Indonesian *Center for Environmental Law (ICEL)* are important as a forum for inventorying and analyzing important decisions, which can be a reference for judges and the wider community.
Here are some case studies that show the scale of the problem of the execution of judgments before Perma Number 1 of 2023:

**Table 2: Case Study of *Inkracht*'s Unexecuted Environmental Judgment**

| Company Name | Case Type | Value of Compensation / Fine (Rs) | Year of Verdict | Execution Status |
|---|---|---|---|---|
| PT Kallista Alam | Forest and Land Fires | 251,765 billion (recovery) | 2015 (*Force*) | Stagnant, hampered asset valuation |
| PT Jatim Jaya Perkasa | Forest and Land Fires | 491 billion (compensation) | 2018 (*Force*) | Not executed, no good faith |
| Total Accumulation | Various cases | 20.79 trillion | 2015-2022 | Not executed yet |
| PT HAYI | Environmental Pollution | 12 billion (fine) | 2020 | Guilty verdict |

Source:*https://mongabay.co.id/2023/01/24/tujuh-tahun-vonis-mengapa-pengadilan-belum-bisa-eksekusi-pt-kallista-alam-1/*

### *4.4. The Close Relationship of Law Enforcement with Substainable Development*

Andin, Evantrino, and Pertiwi (2024) emphasized that the failure and success of environmental law enforcement have a direct and significant impact on the achievement of sustainable development. Failure to execute trillions of rupiah fines and stagnant restoration decisions directly hamper efforts to restore damaged ecosystems, such as polluted peatlands or rivers. This impact is not only felt on the survival of other creatures, but also threatens the rights of future generations to a good and healthy environment, violating the principle of intergenerational justice.

On the other hand, the success of law enforcement shows that the justice system can be environmentally friendly, which is an important prerequisite for sustainable development. The victory of the MoEF lawsuit of Rp721 billion or the case of PT BKI being sentenced to pay Rp282.8 billion is clear evidence that the law can function as an instrument to pressure corporations and encourage compliance. Strong law enforcement also provides an essential deterrent effect to ensure that economic activities do not compromise the quality of the environment, in line with the main goal of sustainable development.

### *4.5. Recommendations for Improving the Effectiveness of Data-Based and Theoretical Executions*

Based on an in-depth analysis, several holistic recommendations are put forward to improve the effectiveness of environmental dispute adjudication execution:

1. Strengthening the Capacity of Judges and Apparatus: Continuing and strengthening the environmental judge certification program and providing technical training to prosecutors and investigators of the Ministry of Environment and Forestry. Training should cover aspects of scientific and ecological complexity to ensure an in-depth understanding of the proposed recovery plan.

2. Optimization of Inter-Agency Coordination: Overcoming coordination barriers between the Ministry of Environment and Forestry, the courts, and other relevant agencies in the execution process, particularly in terms of asset assessments and measures on the ground. An integrated and sustainable collaboration mechanism needs to be established.
3. Increased Transparency and Public Access: Encourage initiatives such as *the I-LEAD* portal and *other platforms* that provide easy access to court judgments. Transparency will encourage public oversight and increase the accountability of law enforcement agencies.
4. Consistent Implementation of Perma Number 1 of 2023: Considering that Perma Number 1 of 2023 is a progressive legal instrument, all law enforcement officials need to apply its provisions consistently, including decisions that include dwangsoms and concrete recovery plans.

## 5. Conclusion

The problems of implementing *inkracht* rulings in environmental disputes in Indonesia are a reflection of multi-dimensional challenges that go beyond just juridical aspects. These barriers include institutional weaknesses, power imbalances between parties, and a culture of impunity. Empirical reality shows that even though court rulings have remained in force, environmental damage continues and public trust in the justice system is eroded.

Supreme Court Regulation Number 1 of 2023 is a revolutionary legal breakthrough. By shifting the execution paradigm from compensatory to restorative and providing innovative mechanisms such as mandatory recovery plans and direct recovery by plaintiffs, this PERMA provides new hope for environmental law enforcement. However, the success of PERMA will not be realized without the commitment and hard work of all stakeholders.

Ultimately, failure in environmental law enforcement directly hinders the achievement of Sustainable Development. Stagnant executions not only harm the country and ecosystems financially and ecologically, but also threaten the fundamental rights of future generations. Therefore, effective, consistent, and accountable law enforcement is not just a policy choice, but a fundamental prerequisite for realizing ecological justice and ensuring a sustainable future.

## References


Andin, I. W., Evantrino, M. D., & Pertiwi, R. P. (2024). The Existence of Environmental Law Enforcement in Realizing Economic Growth and Sustainable Development in Indonesia. *Journal of Law, Politics and Social Sciences*, *3*(3), 294-308.

Andini, R. (2022). *Integral Ecology-Based Environmental Conservation from the Perspective of the Qur'an* (Doctoral dissertation, PTIQ Institute Jakarta).

Didik Suhariyanto, S. H., Usman Tahir, S. T., RA, W., Zulkham Sadat Zuwanda, S. H., Dwi Nurahman, S. H., Herniati, S. H., ... & M.H., M. (2025). *Environmental Protection Law: Upholding Ecological Justice*. PT. Lost in education.

Dwiprigitaningtias, I. (2024). Kedudukan Hukum Instrumen Ekonomi Lingkungan Hidup (Ielh) Dalam Upaya Penanganan Lingkungan Hidup Akibat Dari Kegiatan Industri: The Legal Status of Environmental Economic Instruments (EEIs) in Addressing Environmental Issues Arising from Industrial Activities. *Res Nullius Law Journal*, *6*(2), 127-143.

Gaol, S. L. (2021). Environmental Dispute Resolution After the Enactment of Law Number 11 of 2020 concerning Job Creation. *Scientific Journal of Aerospace Law*, *11*(2).

Hanafiah, J. (2023, January 24). *Seven years of verdict, why has the court not been able to execute PT Kallista Alam?* Mongabay Indonesia. https://mongabay.co.id/2023/01/24/tujuh-tahun-vonis-mengapa-pengadilan-belum-bisa-eksekusi-pt-kallista-alam-1/

Hutajulu, H., Runtunuwu, P. C. H., Judijanto, L., Ilma, A. F. N., Ermanda, A. P., Fitriyana, F., ... & Wardhana, D. H. A. (2024). *Sustainable Economic Development: Theory and Foundations of Multi-Sector Sustainable Economic Development in Indonesia*. PT. Sonpedia Publishing Indonesia.

Maulidyna, S. A. (2022). The Politics of Environmental Law in Environmentally Sound Sustainable Development Policy in Indonesia. *Sci.* 265-292.

Moningka, C. I. (2024). Juridical Review of Corporate Criminal Liability in the Context of Environmental Violations. *Lex Crimen*, *12*(4).

Mukti, D. H. A. (2023). The binding power of a peace deed (Acte van Dading) made outside the court whose content is different from a judgment that has permanent legal force (in kracht van gewijsde). *Journal of Law & Development*, *53*(1), 49-84.

Mulyani, T., Muryati, M. D. T., & S. M. (2023). *The Politics of Environmental Licensing Law.*

Orlando, G. (2022). Legal effectiveness and legal functions in Indonesia. *Tarbiyah bil Qalam: Journal of Religious Education and Science*, *6*(1).

Ramadhan, M. R., & Salmi, S. (2024). The application of the polluter principle pays in environmental cases by using a restorative justice approach. *Journal of To Ciung: Journal of Legal Science*, *4*(2), 48-59.

Ruslan, A., Firdaus, P. A., & Hidayatullah, M. H. (2024). *Innovation and strategies in resource wealth management*. Uwais is inspired by Indonesia.

Saleh, I. N. S., Badilla, N. W. Y., Apriyanto, A., & Depari, D. P. (2024). *Reference Book of the Judicial System in Indonesia: Process, Rights, and Justice*. PT. Sonpedia Publishing Indonesia.

Suwasta, A. D., & Juhana, U. (2024). *Introduction to Law*. Breaking the Media.

Tumangger, N. E., Rahmi, E., & Hartati, H. (2024). Enforcement Of Strict Liability Principles In Cases Environmental Law In Indonesia: Penegakan Prinsip Strict Liability Pada Kasus Hukum Lingkungan Di Indonesia. *Journal of Administrative Law*, *5*(1), 69-91.

Wicaksana, I. G. W., & I. P., S. (2020). *Indonesian Foreign Policy, Domestic Politics and Regional Order*. Airlangga University Press.