
Vol. 28 Issue 1: December 2024 - May 2025

Published Online: December 19, 2024

Article Title

**Plantation Activities in Permanent Production Forests
without a Business Permit: An Analysis of Decision Number
604/Pid.B/LH/2023/PN Rhl**

Author(s)

Juli Handoko^a

Universitas Labuhanbatu || julihandoko@gmail.com

^aCorresponding Author

Sriono Sriono

Universitas Labuhanbatu || sriono.mkn@gmail.com

Nimrot Siahaan

Universitas Labuhanbatu || nimrotsiahaan4@gmail.com

How to cite:

Handoko, J., Sriono, S., & Siahaan, N. (2024). Plantation Activities in Permanent Production Forests without a Business Permit: An Analysis of Decision Number 604/Pid.B/LH/2023/PN Rhl. *Al-Ishlah: Jurnal Ilmiah Hukum*, 28(1), 1-14. <https://doi.org/10.56087/aijih.v28i1.528>



This work is licensed under a [CC BY-4.0 License](https://creativecommons.org/licenses/by/4.0/)

ABSTRACT

This research aims to analyze Decision Number 604/Pid.B/LH/2023/PN Rhl regarding environmental crimes due to negligence in plantation activities within permanent production forest areas without a business permit. This normative legal research employs a statute approach and a case study. Data analysis uses a qualitative content analysis to describe the issues and answer the research objectives. The research results indicate that the prosecution of Defendant Turiono with alternative indictments in Decision Number 604/Pid.B/LH/2023/PN Rhl highlights the legal complexities of illegal plantations in permanent production forests. The first and second indictments were deemed inappropriate because they did not correspond to the facts and context of the case, particularly regarding the Defendant's status as a wage labourer and the absence of mens rea. The Panel of Judges' decision to apply Article 99 section (1) of Law Number 32 of 2009, with the element of negligence (culpa) and the principle of strict liability, was considered more appropriate, strengthening the protection of public interests and the prevention of environmental damage. This decision sets an important precedent by emphasizing the importance of considering the context and role of the perpetrator in environmental law enforcement, as well as its implications for preventing environmental crimes through permit verification and more systematic risk assessment.

Keywords: Business Permit; Environmental Crime; Negligence; Permanent Production Forest; Plantation.

INTRODUCTION

Indonesia's economy heavily relies on utilising natural resources, with the plantation sector playing a crucial role (Dharmawan et al., 2020). Plantation businesses not only contribute to state revenue through foreign exchange but also provide employment opportunities and drive regional economies at both regional and national levels (Nasrullah, 2023). Pursuant to Law Number 39 of 2014, plantations are defined as the overall activity of managing natural resources and human resources, supported by production infrastructure such as facilities, tools, and machinery, encompassing cultivation, harvesting, processing, and marketing of plantation commodities. This definition provides a comprehensive legal framework for regulating and developing plantation businesses in Indonesia, covering upstream to downstream aspects within the plantation value chain.

A significant intersection exists between plantation activities and forest area utilization. Several strategic plantation commodities, including palm oil, are economically viable for cultivation within forest areas (Yenny & Simbolon, 2024). This phenomenon converges economic and conservation interests, necessitating careful legal arrangements to balance these concerns (Sudarwanto et al., 2022). This intersection is regulated explicitly in Article 36 of Government Regulation in Lieu of Law Number 2 of 2022 juncto Law Number 41 of 1999, which provides limitations and requirements to ensure the sustainability of forest functions amidst the demands of economic development.

The utilization of production forests, mainly Permanent Production Forests and Convertible Production Forests, as regulated in Article 31 section (1) point c of [Government Regulation Number 23 of 2021](#), requires a business permit from the Central Government. This provision is an implementation of Article 36 point 6 of [Government Regulation in Lieu of Law Number 2 of 2022](#) juncto Article 28 section (1) of [Law Number 41 of 1999](#), which explicitly emphasizes the importance of legality and compliance with applicable licensing procedures in utilizing forest resources for plantation activities. Permanent Production Forests are designated as forest areas whose primary function is producing forest products, where their existence must be maintained as permanent forests, and their utilization can be carried out through selective logging or clear-cutting systems while still considering soil structure conservation and ecosystem sustainability ([Nurda et al., 2020](#)).

Despite contributing to the economy, plantation activities operating without permits in forest areas have a significant potential to cause adverse environmental impacts ([Maharani et al., 2023](#)). Activities such as illegal land clearing and digging of drainage ditches, although aimed at artificially increasing plantation productivity, can disrupt the ecological balance, damage biodiversity, and significantly impair the hydrological functions of forests ([Fleming et al., 2024](#)). Acts that cause forest damage, even in forest areas that have been granted permits, are prohibited under Article 36 point 17 of [Government Regulation in Lieu of Law Number 2 of 2022](#) juncto Article 50 section (1) of [Law Number 41 of 1999](#). The problem of forest destruction is a multidimensional issue that impacts various aspects, including increased greenhouse gas emissions that contribute to climate change and the decline in global environmental quality ([Shigetomi et al., 2020](#)). Given the urgency and complexity of this issue, [Law Number 18 of 2013](#) and [Law Number 32 of 2009](#) have been enacted as a strong legal basis for law enforcement against environmental crimes ([Yuni, 2020](#)).

Forest destruction is no longer merely an administrative violation but has evolved into organized crime, with cross-border impacts (transnational crime) and increasingly sophisticated modus operandi. Therefore, law enforcement against perpetrators of forest destruction requires a comprehensive and multidisciplinary approach, involving various law enforcement agencies and the utilization of technology. This criminalization approach is based on the awareness that the impact of forest destruction is not only local but also has regional and global implications, threatening the sustainability of ecosystems and human life ([Bogheiry et al., 2023](#)).

As a concrete example of the problems described, [Decision Number 604/Pid.B/LH/2023/PN Rhl](#) presents a legal case related to unlicensed plantation activities in a Permanent Production Forest. This case, involving Defendant Turiono, highlights the issue of committing the act of digging ditches in a permanent production forest area without a permit to develop an oil palm plantation. In the judicial process, the

Public Prosecutor charged the Defendant with alternative indictments, which were subsequently decided by the Panel of Judges, declaring the Defendant legally and convincingly guilty of violating Article 99 section (1) of [Law Number 32 of 2009](#). This decision becomes a relevant object of analysis for understanding the application of law in law enforcement against environmental crimes related to illegal plantation activities.

Based on the background and problems presented, this research focuses on an in-depth analysis of [Decision Number 604/Pid.B/LH/2023/PN Rhl](#), particularly regarding applying criminal sanctions against unlicensed plantation activities in permanent production forest areas. This analysis aims to provide a more comprehensive understanding of the effectiveness of environmental law enforcement in the context of natural resource management and forest damage prevention efforts. Furthermore, this research is also expected to contribute to formulating more effective policies in the prevention and prosecution of environmental crimes in the plantation sector and provide recommendations for improving the legal system and its implementation in the field.

METHOD

This research employs a normative legal methodology utilizing a statute approach and a case study approach ([Qamar & Rezah, 2020](#)). This methodological framework is relevant to the research objective of analyzing the application of criminal sanctions against unlicensed plantation activities in permanent production forest areas. The statute approach will focus on several legislation related to environmental crimes. The case study is conducted through an in-depth examination of a court decision to provide a comprehensive insight into the practical application and interpretation of legal norms. In addition to primary legal sources in legislation and court decisions, this research utilizes secondary legal materials, including legal doctrines, scholarly journals, and other relevant literature obtained through library research. Data analysis employs a qualitative content analysis approach to systematically examine and interpret non-numerical data, such as legal texts and court decisions. This technique allows for identifying, classifying, and interpreting key themes, patterns, and arguments contained within the data. Through this rigorous methodological approach, this research endeavours to produce a comprehensive and systematic analysis to describe the problem and address the research objectives ([Sampara & Husen, 2016](#)).

RESULTS AND DISCUSSION

A. Legal Facts in Decision Number 604/Pid.B/LH/2023/PN Rhl Regarding Unlicensed Plantation Activities in Permanent Production Forest Areas

During the judicial process, the Defendant was brought to trial by the Public Prosecutor with alternative indictments, reflecting the complexity of the legal issues at hand. The Public Prosecutor's first indictment was based on Article 37 point 16 of [Government Regulation in Lieu of Law Number 2 of 2022](#) juncto Article 92 section (1) point a of [Law Number 18 of 2013](#). The second indictment referred to Article 98 section (1) of [Law Number 32 of 2009](#). Meanwhile, the third indictment was based on Article 99 section (1) of [Law Number 32 of 2009](#). These alternative indictments gave the Panel of Judges the latitude to consider various aspects of legal violations that may have occurred based on the facts revealed during the trial.

Based on the evidentiary process at trial, a series of events underlying the indictments was revealed. On Tuesday, September 19, 2023, at approximately 12:10 PM Western Indonesian Time, two personnel from the Rokan Hilir Police Resort arrived at a palm oil plantation owned by Tanggor Rumindo Rajagukguk, located on Jalan Lintas Kubu KM 28, Mekar Jaya Hamlet, Rokan Hilir Regency. At that location, the police officers found the Defendant conducting staking activities on the palm oil plantation using an excavator.

Following apprehension and interrogation by the police officers, Defendant admitted that he worked as a heavy equipment operator and performed staking work on land owned by Tanggor Rumindo Rajagukguk using an excavator owned by witness Jeperson Tumangger. The Defendant's crucial admission was that the work was carried out without a permit from the Central Government, which is the core of the legal violation in this case. This admission directly links the Defendant to illegal activities in the forest area.

Furthermore, expert testimony from Basuki Wasis provided a strong scientific basis regarding the environmental impact of the Defendant's actions. Based on soil analysis results from the ICBB PT Biodiversitas Bioteknologi Indonesia laboratory, Number 1683/LHP/PT.BBI.Mark/XI/2023, dated November 21, 2023, revealed significant soil damage due to plantation development in the forest area. The laboratory analysis revealed soil damage in the redox parameter, with measurements in Plot 1 at 11 mV, Plot 2 at 4 mV, and Plot 3 at -51 mV. These results were compared to the critical threshold criteria for the redox parameter of >-100 mV based on [Government Regulation Number 150 of 2000](#). Based on the quantitative data and comparison, the expert concluded that peaty mineral soil

and the environment had been damaged due to plantation development, precisely due to dredging or canal excavation on peaty mineral soil. This damage impacts the loss of soil, forest, and environmental functions and can cause further impacts such as floods, droughts, disruption of the microclimate, and damage to wildlife habitats. This expert testimony reinforces the argument that the Defendant's actions caused tangible and scientifically measurable environmental damage.

After hearing the testimony of witnesses, the expert, and the Defendant, and considering the evidence presented at trial, the Public Prosecutor filed criminal charges. These charges were based on the third indictment. In essence, the Public Prosecutor demanded that the Panel of Judges declare the Defendant guilty of committing a criminal act:

“Due to negligence, committing an act that results in exceeding ambient air quality standards, water quality standards, seawater quality standards, or standard criteria for environmental damage.”

The aforementioned criminal act is regulated and threatened with punishment in Article 99 section (1) of [Law Number 32 of 2009](#). Furthermore, the Public Prosecutor filed charges of imprisonment for one year and four months, reduced by the time already served in detention, with an order for the Defendant to remain in custody and to pay a fine of IDR 1,000,000,000 (one billion Rupiah) subsidiary to three months of confinement. Given that Article 99 section (1) of [Law Number 32 of 2009](#) stipulates minimum imprisonment of one year and a maximum of three years, and a minimum fine of IDR 1,000,000,000 (one billion Rupiah) and a maximum of IDR 3,000,000,000 (three billion Rupiah), the charges by the Public Prosecutor of imprisonment for one year and four months and a fine of IDR 1,000,000,000 (one billion Rupiah) can be categorized as relatively lenient charges.

B. Judicial Considerations in Selecting the Indictment Related to Environmental Crimes in Permanent Production Forest Areas

The selection of an indictment by a judge in a criminal case is a crucial stage that fundamentally determines the legal construction and substance of the verdict. In [Decision Number 604/Pid.B/LH/2023/PN Rhl](#), concerning environmental crimes related to unlicensed plantation activities in permanent production forest areas, Defendant faced alternative indictments. The primary focus of this analysis is to thoroughly explore the judge's rationale in selecting the third indictment. This analysis will elaborate on the correlation between the facts revealed at trial and the elements contained in each of the articles charged to understand the justification and precision of the legal application within the environmental protection framework.

The Public Prosecutor's first indictment was based on Article 37 point 16 of [Government Regulation in Lieu of Law Number 2 of 2022](#) juncto Article 92 section (1) point a of [Law Number 18 of 2013](#), which regulates the act of bringing heavy equipment that can reasonably be suspected of being used for plantation activities within forest areas without a business permit. This indictment emphasizes the aspects of licensing and business permit possession as the primary elements of the offence. At trial, the Defendant admitted his actions as an excavator operator conducting plantation activities in the forest area. Muhammad Fadhli, who provided expert testimony at trial, confirmed the status of the area based on the map attached to [Ministerial Decision Number SK.903/MENLHK/SETJEN/PLA.2/12/2016](#), which designates the location as a Permanent Production Forest Area.

However, the Defendant's crucial admission was his lack of knowledge regarding the land status and the absence of a permit. He worked under the orders and for wages from Sugianto, who rented the heavy equipment and brought it to the location. The fact that Defendant had only been working for two days and had not yet received wages further reinforces his position as a wage labourer with no control over the permitting. Criminal liability is closely related to *mens rea*, or the defendant's mental state in criminal law. The theories of *actus reus* and *mens rea* in criminal law require a physical act (*actus reus*) accompanied by intent or mental fault (*mens rea*) for criminal culpability ([Hardiansyah et al., 2024](#)). In this case, although the Defendant's *actus reus* was fulfilled, the *mens rea* in the context of business permit violations is questionable.

Furthermore, the vicarious liability doctrine, which governs one party's liability for the actions of another, is generally not applied in criminal law unless stipulated explicitly by law ([Chambers & Berger-Walliser, 2021](#)). In the context of business permits, the primary responsibility lies with the owner or manager of the activity, in this case, Tanggor Rumindo Rajagukguk. Therefore, the judge's consideration not to select the first indictment was appropriate, as the element of culpability in the permitting context could not be attributed to the Defendant.

The Public Prosecutor's second indictment was based on Article 98 section (1) of [Law Number 32 of 2009](#), which regulates intentional acts that exceed environmental quality standards. This article emphasizes the element of "intent" (*dolus*) as a condition for criminal liability ([Khoiri et al., 2024](#)). Although Defendant again reiterated his lack of knowledge regarding the land status and its potential environmental impact, the soil analysis results from the ICBB PT Biodiversitas Bioteknologi Indonesia laboratory, Number 1683/LHP/PT.BBI.Mark/XI/2023 scientifically proved the existence of environmental damage due to the activities. The Defendant's remorse for his actions was also revealed at trial.

However, in criminal law, intent must be proven concretely. The theory of *dolus* in criminal law distinguishes between *dolus directus* (intent as a purpose), *dolus indirectus* (intent as certainty), and *dolus eventualis* (intent as a possibility) (Kwik, 2024). In this case, no evidence indicated that the Defendant intentionally aimed to damage the environment or knew with certainty that his actions would cause damage. Although there was scientifically proven environmental damage, the element of intent in the criminal law sense was not fulfilled. The principles of *nullum crimen sine lege* (no crime without law) and *nulla poena sine lege* (no punishment without a penal provision in the law) underscore the importance of legal certainty and strict interpretation of the elements of an offence (Puspito & Masyhar, 2023). Therefore, the judge's decision not to select the second indictment was also appropriate.

In the same context, the Public Prosecutor's third indictment was based on Article 99 section (1) of Law Number 32 of 2009, which regulates acts due to negligence (*culpa*) that exceed environmental quality standards. After reviewing the considerations regarding the first and second indictments, the judge's rationale in selecting the third indictment becomes clear. The Defendant's lack of knowledge regarding the land status and intent to violate the law eliminates the element of intent. However, the fact of scientifically proven environmental damage demonstrates negligence on the part of the Defendant. Thus, the selection of the third indictment, which is based on the element of negligence, constitutes an appropriate and proportionate application of law, consistent with the facts of the trial and the principles of criminal and environmental law.

C. Juridical Analysis of Environmental Crimes Due to Negligence Based on Law Number 32 of 2009

In Decision Number 604/Pid.B/LH/2023/PN Rhl, the Panel of Judges thoroughly examined each element charged by the Public Prosecutor based on Article 99 section (1) of Law Number 32 of 2009. This article explicitly regulates criminal liability for environmental damage caused by negligence. This examination of elements is an implementation of the principle of legality in criminal law, which requires that an act can only be criminalized if it has been regulated by law.

The first element analyzed is the element of "Every Person." In the context of Law Number 32 of 2009, this phrase has a broad meaning, encompassing both individuals and business entities, regardless of their legal entity status. This interpretation aligns with the principle of strict liability in environmental law, emphasising broad accountability to prevent environmental damage (Pacheco et al., 2020). In Decision Number 604/Pid.B/LH/2023/PN Rhl, the Defendant named Turiono was accurately identified by the data in the indictment. It ensures no

error in persona occurs, a fundamental principle in criminal proceedings. Thus, the Panel of Judges correctly concluded that the element of “Every Person” was fulfilled by the Defendant.

Next, the Panel of Judges examined the second element, namely:

“Due to negligence, committing an act that results in exceeding ambient air quality standards, water quality standards, seawater quality standards, or standard criteria for environmental damage.”

The aforementioned element contains two closely related sub-elements. The sub-element “due to negligence” refers to the concept of *culpa* in criminal law, namely fault arising from a lack of caution or oversight by the perpetrator. The doctrine of *culpa* requires a violation of the standard of conduct that a reasonable person should carry out in the same situation. In addition, the perpetrator must also be able to foresee the potential consequences of their careless actions (Hidayatuzzakia et al., 2023).

It must be emphasized that Article 99 section (1) of [Law Number 32 of 2009](#) regulates a material offence, meaning that the determination of the fulfilment of the offence is based on the occurrence of a prohibited consequence, namely exceeding the quality standards or standard criteria for environmental damage. It differs from a formal offence, which emphasizes the act itself, regardless of whether or not a consequence occurs. In this context, proving the element of negligence is inseparable from proving the occurrence of environmental damage. The Panel of Judges correctly linked the sub-element “due to negligence” with the sub-element “exceeding the quality standards...or standard criteria for environmental damage.”

The sub-element “exceeding the quality standards...or standard criteria for environmental damage” is an alternative, as indicated by the word “or.” It means that fulfilling one of these criteria is sufficient to prove this element. In [Decision Number 604/Pid.B/LH/2023/PN Rhl](#), the focus is on the “standard criteria for environmental damage,” which is defined in Article 1 point 15 of [Law Number 32 of 2009](#) as the measurement of the limit of changes in the physical, chemical, and/or biological properties of the environment that the environment can tolerate to maintain its function.

The expert testimony presented at trial showed strong evidence that damage to peaty mineral soil and the environment occurred due to plantation development activities, specifically canal excavation. This damage impacted the loss of ecological functions of the soil and forest and could potentially cause further detrimental impacts, such as floods, droughts, microclimate disruption, and damage to wildlife habitats. This expert testimony, supported by scientific

data and analysis, reinforces the argument that the Defendant's actions resulted in tangible and measurable environmental damage. Thus, the Panel of Judges correctly concluded that the sub-element "exceeding the standard criteria for environmental damage" was fulfilled.

Based on the analysis of these two sub-elements, the Panel of Judges held that the second element, namely "due to negligence resulting in exceeding the standard criteria for environmental damage," was legally proven. The fulfilment of all elements in Article 99 section (1) of [Law Number 32 of 2009](#) has legal consequences, given that the Defendant is considered capable of being responsible for his actions (possesses the capacity for criminal responsibility). Therefore, the Panel of Judges in [Decision Number 604/Pid.B/LH/2023/PN Rhl](#) explicitly declared the Defendant legally and convincingly guilty of committing a criminal act due to negligence that resulted in exceeding the standard criteria for environmental damage by the Public Prosecutor's third indictment. This decision imposed a sentence of one year of imprisonment and a fine of IDR 1,000,000,000 (one billion Rupiah), with the provision that if the fine is not paid, it will be replaced with one month of confinement. The period of arrest and detention already served by the Defendant was deducted from the sentence imposed, and the Defendant was ordered to remain in custody. Regarding the evidence, one Hitachi 110 MF orange excavator unit was returned to its rightful owner, Jeperson Tumangger. The Defendant was also ordered to pay court fees of IDR 5,000 (five thousand Rupiah).

This verdict implicitly emphasizes the importance of caution in activities that can potentially damage the environment, especially in permanent production forest areas. The judge's consideration in selecting the third indictment, which is based on the element of negligence, demonstrates recognition that the Defendant, although lacking malicious intent (*mens rea*), was negligent in anticipating the impact of his actions on the environment. Furthermore, this decision sends an important message to the public, especially workers in the plantation and construction sectors. Before carrying out activities in areas that could potentially impact the environment, it is crucial to ensure the legality of these activities, including inquiring about and verifying the status of business permits with the employing party. It not only protects workers from legal entanglement but also prevents environmental damage that could cause harm to the broader community. In addition to permit verification, a very concrete and important preventive step is to conduct an environmental risk assessment (a simple environmental impact analysis) before starting activities. This assessment can identify potential negative impacts and formulate appropriate mitigation measures, thereby preventing future environmental crimes. Thus, this decision not only sanctions the perpetrator but also serves as a means of education and prevention for the public.

CONCLUSIONS AND SUGGESTIONS

Based on the results and discussion, it can be concluded that the prosecution of Defendant Turiono with alternative indictments highlights the legal complexities surrounding illegal plantations in permanent production forests. The inappropriateness of the first indictment lies in disregarding the Defendant's status as a wage labourer, while the responsibility for permitting rests with the landowner. It reaffirms the importance of accurate actor identification in environmental law enforcement. In this regard, the second indictment was also deemed inappropriate based on the element of intent in environmental damage. The fact that the Defendant worked to earn a living without adequate knowledge of the legal violations and their environmental impact negates the element of *mens rea*. In this context, enforcing criminal law related to the intent element requires the perpetrator's understanding and will to violate the law. Because the Defendant lacked such understanding, the intent element was not fulfilled.

Furthermore, the Panel of Judges' decision to select the third indictment, Article 99 section (1) of [Law Number 32 of 2009](#), reflects a proper understanding of the case context. The element of negligence (*culpa*) corresponds to the fact that the Defendant was insufficiently cautious in anticipating the impact of his actions, albeit without malicious intent. Applying the principle of strict liability in this decision strengthens the protection of public interests and prevents environmental damage. Moreover, this decision has important implications for the prevention of environmental crimes. In addition to permit verification, a systematic and comprehensive environmental risk assessment is essential to identify potential adverse impacts and formulate effective mitigation measures. Thus, this decision serves not only as a sanction but also as education and prevention. This decision establishes an important precedent in environmental law enforcement by emphasizing the importance of considering the perpetrator's context and role in general environmental law enforcement.

REFERENCES

- Bogheiry, A., Thaha, M., & Rahmah, L. (2023). Global Dependence Analysis on Indonesian Palm Oil Production and Its Effect on Environmental Security Using the Copenhagen School Approach. *Journal of World Science*, 2(3), 466-482. <https://doi.org/10.58344/jws.v2i3.243>
- Chambers, R., & Berger-Walliser, G. (2021). The Future of International Corporate Human Rights Litigation: A Transatlantic Comparison. *American Business Law Journal*, 58(3), 579-642. <https://doi.org/10.1111/ablj.12193>
- Decision of Minister of Environment and Forestry of the Republic of Indonesia Number SK.903/MENLHK/SETJEN/PLA.2/12/2016 on Forest Areas of Riau Province. <https://jikalahari.or.id/database/sk-903menlhksetjenpla-2122016>

- Decision of the District Court of Rokan Hilir Number 604/Pid.B/LH/2023/PN Rhl on Defendant: Turiono Alias Yono Bin Saiman. <https://putusan3.mahkamahagung.go.id/direktori/putusan/zaeefc8bce48b9ca9ec2303830333036.html>
- Dharmawan, A. H., Mardiyarningsih, D. I., Komarudin, H., Ghazoul, J., Pacheco, P., & Rahmadian, F. (2020). Dynamics of Rural Economy: A Socio-Economic Understanding of Oil Palm Expansion and Landscape Changes in East Kalimantan, Indonesia. *Land*, 9(7), 1-19. <https://doi.org/10.3390/land9070213>
- Fleming, A., Mendham, D. S., Sakuntaladewi, N., Grover, S., Jalilov, S.-M., Paul, B., Nasution, A. H., Lestari, S., Sinclair, A. L., Rachmanadi, D., Yuwati, T. W., & Winarno, B. (2024). Community Perceptions of Peat Rewetting in Tumbang Nusa Village, Indonesia. *Mires and Peat*, 30, 1-17. <https://doi.org/10.19189/MaP.2023.OMB.Sc.1983421>
- Government Regulation in Lieu of Law of the Republic of Indonesia Number 1 of 2004 on Amendment to Law Number 41 of 1999 on Forestry (State Gazette of the Republic of Indonesia of 2004 Number 29, Supplement to the State Gazette of the Republic of Indonesia Number 4374). <https://peraturan.go.id/id/perppu-no-1-tahun-2004>
- Government Regulation in Lieu of Law of the Republic of Indonesia Number 2 of 2022 on Job Creation (State Gazette of the Republic of Indonesia of 2022 Number 238, Supplement to the State Gazette of the Republic of Indonesia Number 6841). <https://peraturan.go.id/id/perppu-no-2-tahun-2022>
- Government Regulation of the Republic of Indonesia Number 150 of 2020 on Control of Soil Damage for Biomass Production (State Gazette of the Republic of Indonesia of 2020 Number 267, Supplement to the State Gazette of the Republic of Indonesia Number 4068). <https://peraturan.go.id/id/pp-no-150-tahun-2000>
- Government Regulation of the Republic of Indonesia Number 23 of 2021 on Forestry Management (State Gazette of the Republic of Indonesia of 2021 Number 33, Supplement to the State Gazette of the Republic of Indonesia Number 6635). <https://peraturan.go.id/id/pp-no-23-tahun-2021>
- Hardiansyah, R., Siregar, M. Y., & Tampubolon, W. S. (2024). Disparity in the Charges of Customs Crimes: A Study of Decision Number 42/Pid.B/2024/PN Rhl and Decision Number 43/Pid.B/2024/PN Rhl. *SIGn Jurnal Hukum*, 6(2), 144-156. <https://doi.org/10.37276/sjh.v6i2.373>
- Hidayatuzzakia, H., Masyhar, A., Wulandari, C., & Abu, R. (2023). Punishment of the Kanjuruhan Commotion due to Negligence from the Perspective of Causality Theory (Case of Decision 13/Pid.B/2023/PN Sby jo 922/K/Pid/2023). *The Digest: Journal of Jurisprudence and Legisprudence*, 4(2), 123-144. <https://doi.org/10.15294/digest.v4i2.76383>
- Khoiri, S. A., Pakpahan, Z. A., & Toni, T. (2024). Debt Bondage: An Analysis of Decision Number 612/Pid.B/2023/PN Rhl Concerning Crimes against Personal Freedom. *SIGn Jurnal Hukum*, 6(2), 157-169. <https://doi.org/10.37276/sjh.v6i2.374>

- Kwik, J. (2024). *Lawfully Using Autonomous Weapon Technologies*. TMC Asser Press. <https://doi.org/10.1007/978-94-6265-631-4>
- Law of the Republic of Indonesia Number 41 of 1999 on Forestry (State Gazette of the Republic of Indonesia of 1999 Number 167, Supplement to the State Gazette of the Republic of Indonesia Number 3888). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/442>
- Law of the Republic of Indonesia Number 19 of 2004 on Enactment of Government Regulation in Lieu of Law Number 1 of 2004 on Amendment to Law Number 41 of 1999 on Forestry Into Law (State Gazette of the Republic of Indonesia of 2004 Number 86, Supplement to the State Gazette of the Republic of Indonesia Number 4412). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/20>
- Law of the Republic of Indonesia Number 32 of 2009 on Environmental Protection and Management (State Gazette of the Republic of Indonesia of 2009 Number 140, Supplement to the State Gazette of the Republic of Indonesia Number 5059). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/561>
- Law of the Republic of Indonesia Number 18 of 2013 on Prevention and Eradication of Forest Destruction (State Gazette of the Republic of Indonesia of 2013 Number 130, Supplement to the State Gazette of the Republic of Indonesia Number 5432). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/364>
- Law of the Republic of Indonesia Number 39 of 2014 on Plantation (State Gazette of the Republic of Indonesia of 2014 Number 308, Supplement to the State Gazette of the Republic of Indonesia Number 5613). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/1621>
- Law of the Republic of Indonesia Number 6 of 2023 on Enactment of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation Into Law (State Gazette of the Republic of Indonesia of 2023 Number 41, Supplement to the State Gazette of the Republic of Indonesia Number 6856). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/1825>
- Maharani, M., Sabaruddin, A., & Maulid, M. (2023). The Role of Actors in Retribution Policy at the Kea-Kea Nature Tourism Park. *SIGn Journal of Social Science*, 4(1), 12-36. <https://doi.org/10.37276/sjss.v4i1.330>
- Nasrullah, N. (2023). The Role, Obstacles, and Challenges of the Forestry Police in the Pesapa FMR's Work Area. *SIGn Jurnal Hukum*, 5(2), 340-355. <https://doi.org/10.37276/sjh.v5i2.281>
- Nurda, N., Noguchi, R., & Ahamed, T. (2020). Change Detection and Land Suitability Analysis for Extension of Potential Forest Areas in Indonesia Using Satellite Remote Sensing and GIS. *Forests*, 11(4), 1-22. <https://doi.org/10.3390/f11040398>
- Pacheco, P., Schoneveld, G., Dermawan, A., Komarudin, H., & Djama, M. (2020). Governing Sustainable Palm Oil Supply: Disconnects, Complementarities, and Antagonisms between State Regulations and Private Standards. *Regulation & Governance*, 14(3), 568-598. <https://doi.org/10.1111/rego.12220>
-

- Puspito, B., & Masyhar, A. (2023). Dynamics of Legality Principles in Indonesian National Criminal Law Reform. *Journal of Law and Legal Reform*, 4(1), 109-122. <https://doi.org/10.15294/jllr.v4i1.64078>
- Qamar, N., & Rezah, F. S. (2020). *Metode Penelitian Hukum: Doktrinal dan Non-Doktrinal*. CV. Social Politic Genius (SIGn).
- Sampara, S., & Husen, L. O. (2016). *Metode Penelitian Hukum*. Kretakupa Print.
- Shigetomi, Y., Ishimura, Y., & Yamamoto, Y. (2020). Trends in Global Dependency on the Indonesian Palm Oil and Resultant Environmental Impacts. *Scientific Reports*, 10, 1-11. <https://doi.org/10.1038/s41598-020-77458-4>
- Sudarwanto, A. S., Karjoko, L., Handayani, I. G. A. K. R., Ma'aruf, A., & Glaser, H. (2022). The Policy on Illegal Oil Palm Plantation Reform in Forest Area during Jokowi's Presidency. *Hasanuddin Law Review*, 8(2), 171-185. <https://doi.org/10.20956/halrev.v8i2.3566>
- Yenny, O., & Simbolon, P. G. M. (2024). Palm Oil Smallholders in Peril: Indonesia Urgency in Aiding Smallholders to Compete Fairly in their Playing Field. *SIGn Jurnal Hukum*, 6(2), 124-143. <https://doi.org/10.37276/sjh.v6i2.372>
- Yuni, N. (2020). *Marine Pollution* Ditinjau dari Perbandingan Praktik Negara terhadap Instrumen Hukum Internasional. *SIGn Jurnal Hukum*, 2(1), 55-71. <https://doi.org/10.37276/sjh.v2i1.63>