

Legal Analysis of the Cihujung River Environmental Pollution Case by PT How Are You Indonesia (PT. HAYI) (Case study: Indonesia District Court Decision Number 735/PDT.G LH/2018/PN.Jkt.Utr)

Chandra Halim¹, Shecillia²

^{1,2} *Fakultas Hukum, Sun Yat Sen University China, ROC*

*Correspondence Author: Chanlimz2424@gmail.com

ARTICLE INFO

Article history:

Received 29 July 2024

Revised 14 August 2024

Accepted 30 August 2024

Available online

<https://talenta.usu.ac.id/Mahadi>

E-ISSN: 2964-7185

P-ISSN: 3025-3365

How to cite:

Halim, C., Shecillia (2024). Legal Analysis of the Cihujung River Environmental Pollution Case by PT How Are You Indonesia (PT. HAYI) (Case study: Indonesia District Court Decision Number 735/PDT.G LH/2018/PN.Jkt.Utr). *Mahadi: Indonesia Journal of Law*, 3(02), 146-152.

ABSTRACT

Environmental pollution, especially river water pollution, is a crucial issue that has far-reaching impacts on ecosystems and public health. This pollution is often caused by irresponsible industrial activities, as seen in the case between the Ministry of Environment and Forestry of the Republic of Indonesia and PT How Are You Indonesia. Through strict law enforcement and the application of the principle of absolute liability, it is hoped that a deterrent effect can be created for the perpetrators of pollution and encourage better protection of the environment. In a verdict that partially granted the lawsuit of the Ministry of Environment and Forestry of the Republic of Indonesia against PT How Are You Indonesia, the judge found the defendant guilty of water pollution based on the principle of absolute responsibility. The defendant is required to pay compensation of more than 12 billion rupiah and daily forced money of 10 million rupiah if it is late in implementing the decision. Corporate liability for environmental pollution is regulated in Law No. 32 of 2009, but several aspects of the verdict need further review, such as the relationship between strict liability and tort, the clarity of the purpose of compensation, and the importance of applying additional administrative sanctions. In addition, the Act is considered less effective in establishing a commitment to reduce and reverse environmental damage.

Keywords: Absolute Liability, Compensation and Administrative Sanctions

ABSTRAK

Pencemaran lingkungan hidup, khususnya pencemaran air sungai, merupakan isu krusial yang berdampak luas terhadap ekosistem dan kesehatan masyarakat. Pencemaran ini seringkali diakibatkan oleh aktivitas industri yang tidak bertanggung jawab, seperti yang terlihat dalam kasus antara Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia dan PT. How Are You Indonesia. Melalui penegakan hukum yang tegas dan penerapan prinsip tanggung jawab mutlak, diharapkan dapat tercipta efek jera bagi pelaku pencemaran dan mendorong perlindungan yang lebih baik terhadap lingkungan hidup. Dalam putusan yang sebagian mengabulkan gugatan Kementerian Lingkungan Hidup dan Kehutanan Republik Indonesia terhadap PT. How Are You Indonesia, hakim menilai tergugat bersalah atas pencemaran air berdasarkan prinsip tanggung jawab mutlak. Tergugat diwajibkan membayar ganti rugi sebesar lebih dari 12 miliar rupiah dan uang paksa harian sebesar 10 juta rupiah jika terlambat melaksanakan putusan. Tanggung jawab perusahaan terhadap pencemaran lingkungan diatur dalam Undang-Undang No. 32 Tahun 2009, namun beberapa aspek putusan perlu ditinjau lebih lanjut, seperti hubungan antara strict liability dan Perbuatan Melawan Hukum, kejelasan tujuan ganti rugi, serta pentingnya penerapan sanksi administratif tambahan. Selain itu, Undang-Undang tersebut dinilai kurang efektif dalam menetapkan komitmen untuk mengurangi dan membalikkan kerusakan lingkungan.

Kata kunci: Tanggung Jawab Mutlak, Ganti Rugi dan Sanksi Administratif



This work is licensed under a Creative Commons Attribution-ShareAlike 4.0 International.

<http://doi.org/10.26594/register.v6i1.idarticle>

1. Introduction

Humans are given the ability of reason and intelligence that is different from other living things by God in order to manage and utilize resources. Other living beings by God in order to manage and utilize natural resources (biological and non-biological) which aims to provide protection of natural resources (biological and non-biological) which aims to provide protection to the environment. Protection of the environment. Therefore, humans are obliged to maintain and therefore, humans are obliged to maintain and develop the environment so that it can always be the continuity and improvement of the quality of living things themselves.

Improve the quality of living things themselves. Human existence will always influence the balance of nature such as daily human activities in fulfilling their needs. Activities in fulfilling their daily needs. Human progress is often characterized by development of science and technology. Therefore, humans will be increasingly free in utilizing natural resources and the environment that exceeds the carrying capacity of the environment and will affect the balance of nature. Carrying capacity of the environment and will affect the balance of nature and the sustainability of the environmental function itself and the preservation of the function of the environment itself.¹

The existing environment is an inheritance that must be preserved. its integrity. However, it is not uncommon for problems to occur in the environment, Environmental problems often occur because of the irresponsible hands of humans for their needs irresponsible human hands for their needs so that the environment can no longer be preserved. maintained its integrity. In fact. in terms of protecting and maintaining, the environment, God has given trust by creating humans as living beings that are as a living being that is very different from other living things.²

Indonesia is currently experiencing serious problems regarding environmental pollution and damage, which is increasing day by day. Environmental problems are a big responsibility because they are related to the quality of life in the future. Exploitation of natural resources by humans has caused the quality of the environment to deteriorate. Environmental damage that often occurs such as indiscriminate logging, flooding, waste pollution, and many more.³ Therefore, in this case it is important to enforce a strong and binding law. The Indonesian state in the concept of a state of law, in this case, makes law a tool that aims to prevent and prevent rulers and humans from doing whatever they want to the environment. The existence of law enforcement is carried out so that activities to implement legal provisions, both in terms of preventing and enforcing, must cover all aspects of technical and administrative activities. This can be done by law enforcement officials and the government that is relevant to the current law. Law enforcement in environmental issues has been regulated in Law Number 32 of 2009. If in this case law enforcement can be carried out properly, then in the future the situation and conditions will be created as expected.⁴

Environmental problems in one of the most frequent cases is environmental pollution of rivers caused by factory waste. This often happens, so that it can cause the ecosystem in the river to be blocked and certainly the polluted river water can no longer be used, because when used it will have a negative impact on health. Strong law enforcement is essential to be implemented, enforced and strengthened.

In this paper, we examine a case of environmental pollution decision of Cihujung River by PT How Are You Indonesia (PT. HAYI) (Case study: Court Decision Number 735/PDT.G-LH/2018/PN.Jkt.Utr). In the verdict, the defendant (PT HOW ARE YOU) was proven to have discharged hazardous and toxic waste (B3) from its textile industry activities directly into the Cihujung River. This caused significant environmental pollution, especially by exceeding the Cihujung River class II water quality standards. This violation indicates that the Defendant has violated environmental regulations governing the disposal of industrial waste. Environmental pollution caused by the Defendant's industrial activities could have a serious impact on the local ecosystem, including the life of flora and fauna around the Cihujung River. The heavy metals, halogenated hydrocarbons, pigments, dyes, and tensioactive organic solvents contained in the industrial waste may cause long-term negative effects on human health as well as the surrounding environment. In the context of environmental law, the Defendants' actions constitute serious violations of established environmental regulations and standards.

In situations like this, strict and effective law enforcement efforts need to be carried out to ensure environmental recovery and protection. The parties involved, including the Ministry of Environment and

¹ Muhammad Sood, *Indonesian Environmental Law*, (East Jakarta: Sinar Grafika: 2019), p.10.

²Olivia Anggie Johar, *The Reality of Environmental Law Enforcement Issues in Indonesia*, *Journal of Environmental Science*, Vol. 15(1), (February, 2021), pp. 55

³ Anika Ni'matun Nisa & Suharno, *Law Enforcement on Environmental Issues to Realize Sustainable Development: Case Study of Forest Fires in Indonesia*, *Journal of Bina Mulia Hukum*, Vol. 4(2), (March, 2020), pp. 295

⁴ Muhammad Sadi, *Legal Certainty for Environmental Protection and Management in Indonesia*, *Judicial Journal*, Vol. 13(3), (December 2020), p. 312.

Forestry and relevant agencies, need to work together to establish appropriate sanctions and encourage the implementation of environmentally friendly industrial practices to prevent the recurrence of environmental pollution cases in the future. Given the serious implications of the Defendants' actions, urgent measures are needed to stop the illegal dumping of waste and adopt sustainable and environmentally-friendly industrial practices. Rehabilitation measures must also be taken to restore the condition of the Cihujung River and the surrounding environment. In the legal context, the application of appropriate sanctions should be made to prevent similar environmental violations in the future. Therefore, in this paper we will analyze the decision we have chosen by formulating problems and providing explanations through discussions that will be described in a paper entitled Legal Analysis of the Cihujung River Environmental Pollution Case by PT How Are You Indonesia (PT. HAYI) (Case study: Court Decision Number 735/PDT.G-LH/2018/PN.Jkt.Utr).

2. Method

The writing in this research uses a normative juridical method where this research has research restrictions in the realm of dogmatic law, theory, and legal philosophy. This writing is done with a statutory approach. The research is conducted using a literature study, through an objective description of primary legal materials in the form of laws and regulations, as well as reviewing secondary materials from journals, books, and literature relevant to the research topic in an effort to produce a credible research synthesis that can be accounted for academically, comprehensively, systematically, and integrated.

3. Analysis And Discussion

3.1. Basis for Judges' Consideration of the Imposition of Sanctions in District Court Decision Number: 735/PDT.G-LH/2018/PN.Jkt.Utr

A judge's decision is the culmination of a case that is being investigated and decided by a judge. Therefore, a decision must be accompanied by a judge's consideration. The case in District Court Decision Number: 735/PDT.G-LH/2018/PN.Jkt.Utr is a civil case, whose decision is influenced by several considerations of the judge relating to the following matters, namely: First, influenced by compliance with applicable law; Second, based on the facts in the trial; Third, based on the principle of justice.

Based on the decision in a civil case involving KLHK (Ministry of Environment and Forestry of the Republic of Indonesia) as the plaintiff and PT HOW ARE YOU INDONESIA as the defendant, the judge has decided to grant part of the lawsuit filed by KLHK, which is a central government agency. This decision is based on the following considerations:

1) The Defendant was found to have committed water pollution with strict liability.

Some of the basic considerations of the judge related to strict liability, among others:

a. Strict Liability:

Article 88 of Law No. 32 of 2009 regulates the principle of strict liability in cases of environmental pollution and damage. This means that business actors who use B3 and pollute the environment can be held liable without considering whether there is an element of fault or unlawful conduct.

b. Elements of Strict Liability

The judge explained the elements that must be present in strict liability, including the existence of acts (pollution and/or environmental damage), losses, and causality between acts and losses. for defense or rebuttal in the principle of strict liability, only the following are known:⁵

- Not using, producing hazardous waste and posing a serious threat is not proven not proven;
- Damage or pollution is not caused by its activities but is caused by a third party or force majeure;

c. Evidence in the Case.

There are a number of pieces of evidence used in this case, including physical evidence such as minutes of sampling, laboratory analysis, and minutes of environmental verification. And based on the evidence letter marked P4c environment test report PT Intertek Utama Service, dated January 23, 2014, proof through the results of samples and laboratory analysis, the defendant in its activities is proven to produce hazardous waste, and the Defendant does not deny it.

d. Precautionary Principle.

In this case, the judge was of the opinion that the precautionary principle may not be properly heeded by business actors or polluters. Therefore, if this principle is not followed, then the polluter

⁵Yudha Hadian Nur1 Dwi Wahyuniarti Prabowo, Application of the Principle of Strict Liability in the Framework of Consumer Protection, - *Scientific Bulletin of Trade Research and Development*, Vol. 5 No. 2, December 2011, p. 312. 178

must be held absolutely responsible for the impact of environmental pollution, including payment of compensation and restoration of environmental damage.⁶

- 2) The Defendant was ordered to pay compensation of Rp.12,013,501,184.00 (twelve billion thirteen million five hundred one thousand eight hundred four rupiah) in cash. The basic considerations used by the Panel of Judges include: The plaintiff has filed a lawsuit related to environmental pollution and claimed a loss of Rp. 12,198,942,574. In this consideration, the judge referred to the principles of strict liability and polluters pay, which indicate that the polluter must be responsible for all environmental losses that have been calculated by expert Eddy Soentjahyo based on the Regulation of the Minister of the Environment of the Republic of Indonesia Number 13 of 2011, concerning Compensation for Losses Due to Pollution and/or Environmental Damage and the Regulation of the Minister of the Environment of the Republic of Indonesia Number 7 of 2014 concerning Environmental Losses Due to Pollution and/or Environmental Damage; Furthermore, the Plaintiff also submitted a claim for the cost of verification of environmental dispute resolution in the amount of Rp. 117,420,000.00, but did not provide sufficient evidence for the amount of this cost. Therefore, the compensation costs amounted to Rp.12,013,501,184.00 (twelve billion thirteen million five hundred one thousand one hundred eightyfour rupiah), this value is lower than that claimed by the Plaintiff, because above it has been considered that the Plaintiff cannot prove the value of losses related to the cost of verification of environmental disputes.
- 3) The Defendant is ordered to pay forced money / *dwangsom* in the amount of Rp.10,000,000.00 (ten million rupiah) per day of delay in implementing the decision, calculated from the date this decision becomes legally binding. The basis for consideration of the determination of the amount, among others:
 - a. There is a provision for payment of forced money (*Dwangsom*) in the Environmental Law.

The judge acknowledged that in principle, forced money or *dwangsom* cannot be submitted in a lawsuit claiming payment of a sum of money. However, the Judge referred to Article 87 paragraph 3 of Law Number 32 Year 2009 which states that in relation to the payment of compensation for pollution or damage to the environment, payment of forced money or *dwangsom* may be requested.

- b. Amount of Forced Money.

In the opinion of the Panel of Judges, the amount of *dwangsom* of Rp. 50,000,000 per day determined by the plaintiff is considered too large if calculated per day of delay. By referring to considerations of propriety, the Panel of Judges considers an amount of Rp. 10,000,000 (ten million Rupiah) per day of delay to be a more appropriate amount.

3.2 Corporate liability for environmental pollution based on Law No. 32 of 2009 on environmental protection and management

Based on Law of the Republic of Indonesia No. 32 of 2009 concerning Environmental Protection and Management (UUPPLH), every industry and agency/business entity has an obligation to protect and preserve the environment and must be responsible for the negative impacts caused by their activities on the environment, including the management of waste generated from their activities.

Every person and/or company whose actions, business, and/or activities cause various impacts, both negative and positive impacts, must have responsibility for every activity they carry out. Specifically related to companies, in the event of environmental pollution by the company, the company must be able to take responsibility. Therefore, the principles of a company's responsibility for environmental pollution can be classified as follows:

1) Civil Liability

In civil law, there is a regulation regarding compensation due to unlawful acts. Based on Article 1365 BW, it is stated that Unlawful Acts are "any unlawful act, which brings harm to others, obliging those whose fault caused the harm, to compensate for the loss"⁷. A tort is an act that violates the law, decency, public interest, and propriety. Therefore, any person or business entity that commits an unlawful act (environmental pollution) must be responsible for the losses suffered by the community or government and other parties. In the concept of civil liability, it is done by providing compensation.

According to Article 1 point (5) of PERMEN No. 13 of 2011 concerning Compensation for Environmental Pollution and/or Damage, compensation is the cost that must be borne by the person in

⁶Yusuf Eko Nahuddin, Evidence in the Perspective of Environmental Law, *Journal of Legal Cakrawala*, Vol.7, No.2 December 2016, pp. 147-155-155

⁷Marhaeni Ria Siombo, Environmental Law and the Implementation of Sustainable Development in Indonesia, PT Gramedia Pustaka Utama, Jakarta 2012, page 118.

charge of activities and/or businesses due to environmental pollution and/or damage. In UUPPLH, civil liability is contained in Article 87 paragraph (1), which states that: "every person responsible for a business and/or activity that commits an unlawful act in the form of pollution and/or destruction of the environment that causes harm to other people or the environment is obliged to pay compensation and/or take certain actions."

In addition to the concept of tort in KUHP, namely in Article 87 of UUPPLH, there is also a *lex specialis* principle of liability for companies, namely Strict Liability. Article 88 states that "every person whose actions, business, and/or activities use hazardous waste, produce and/or manage hazardous waste, and/or pose a serious threat to the environment is absolutely responsible for the losses incurred without the need to prove the element of fault", so that in the concept of strict liability, the element of fault does not need to be proven by the plaintiff as a basis for payment of compensation. This is in contrast to the concept of fault-based liability in Article 87, where liability requires proof of the element of fault that caused the loss.⁸

2) Criminal Liability

Article 44 of the Criminal Code recognizes the principle of "no punishment without guilt" (*geen straf zonder schuld*) and "no criminal liability without criminal act" This principle is a theory of liability in criminal law. A person/business entity (corporation) that commits a criminal offense must be held accountable for its actions. In the UUPPLH,⁹ the regulation regarding criminal responsibility for companies that commit environmental damage or pollution is regulated in:

a. Article 116:

1) If an environmental criminal offense is committed by, for, or on behalf of a business entity, criminal charges and criminal sanctions shall be imposed on:

a) the business entity; and/or

b) the person who gave the order to commit the criminal offense or the person who acted as the leader of activities in the criminal offense.

2) If the environmental criminal offense as referred to in paragraph (1) is committed by a person, who by virtue of employment relationship or by virtue of other relationship acts within the scope of work of the business entity, the criminal sanction shall be imposed on the person giving the order or the leader in the criminal offense regardless of whether the criminal offense is committed individually or jointly.

b. Article 117: If criminal charges are filed against the person who gives the order or is the leader of the criminal offense as referred to in Article 116 paragraph (1) letter b, the punishment imposed in the form of imprisonment and fine shall be increased by one third.

c. Article 118: For criminal offenses as referred to in Article 116 paragraph (1) letter a, criminal sanctions shall be imposed on business entities represented by the management authorized to represent inside and outside the court in accordance with laws and regulations as functional actors.

d. Article 117: If criminal charges are brought against the person who orders or leads the criminal offense as referred to in Article 116 paragraph (1) letter b, the punishment imposed in the form of imprisonment and fine shall be increased by one third.

e. Article 118: For criminal offenses as referred to in Article 116 paragraph (1) letter a, criminal sanctions shall be imposed on business entities represented by management authorized to represent inside and outside the court in accordance with laws and regulations as functional actors.

f. Article 119: In addition to the penalties as referred to in this Law, additional penalties or disciplinary measures may be imposed on business entities in the form of:

1) forfeiture of profits obtained from criminal offense;

2) closure of all or part of the place of business and/or activities;

3) repair of the consequences of the criminal offense;

4) obligation to do what is neglected without right; and/or

5) placing the company under guardianship for a maximum of 3 (three) years.

g. Article 120:

a. In implementing the provisions as referred to in Article 119 letter a, letter b, letter c, and letter d, the prosecutor shall coordinate with the agency responsible for environmental protection and management to carry out the execution.

⁸Hadin Muhjad, *Environmental Law*, Cet. 1, Genta Publishing, Yogyakarta, 2015, pp. 87

⁹M. Yahya Harahap, *Discussion of Problems and Application of the Criminal Procedure Code; Examination in Court, Trial, Cassation, and Judicial Review*, Cet. 15, Edition 2, Sinar Grafika Publishers, Jakarta, 2014, pp. 76

- b. In implementing the provisions referred to in Article 119 letter e, the Government is authorized to manage business entities sanctioned with placement under guardianship to implement court decisions that have been legally binding.
- 3) Administrative Responsibilities
- The UUPPLH has regulated the administrative responsibility of a company, namely in articles:
- a. Article 76:
The minister, governor, or regent/mayor applies administrative sanctions to the person in charge of the business and/or activity if the supervision finds a violation of the environmental permit.
 - 1) Administrative sanctions consist of:
 - 2) written warning;
 - 3) government coercion;
 - 4) freezing of environmental license; or
 - 5) revocation of environmental license.
 - b. Article 77: The Minister may apply administrative sanctions against the person in charge of the business and/or activity if the Government considers that the local government intentionally does not apply administrative sanctions against serious violations in the field of environmental protection and management.
 - c. Article 78: Administrative sanctions as in Article 76 do not exempt the person in charge of the business and/or activity from recovery and criminal liability.
 - d. Article 79: The imposition of administrative sanctions in the form of freezing or revocation of environmental permits as referred to in Article 76 paragraph (2) letter c and letter d is carried out if the person responsible for the business and/or activity does not carry out government coercion. The responsibility can be imposed if there has been a decision that has permanent legal force by the court or other relevant officials/bodies and/or there has been an agreement for civil liability.

3.3 Conformity of Judges' Considerations in Decision No. 735/PDT.G-LH/2018/PN.Jkt.Utr with the Provisions of Law No. 32 of 2009 concerning Environmental Protection and Management

In Decision Number 735/PDT.G-LH/2018/PN.Jkt.Utr, there are several criticisms that can be raised: *First*, Legal Development. In the environmental pollution case, there are significant legal developments. The Panel of Judges no longer mixes the concept of strict liability stipulated in Article 87 UUPPLH and the tort of Article 1365 BW. However, there is a lack of clarity in this case, especially since the beginning of the lawsuit focused on environmental losses. It is unclear whether the loss is intended for recovery or not. Whereas in the context of environmental punishment, the term vicarious liability is known, which is oriented towards recovery. This has an impact on the decision of the Panel of Judges who only decided on compensation without a clear mechanism whether this is intended for environmental restoration or not.

Second; Imposition of Sanctions. It is important to remember that in environmental law, there are administrative sanctions that must be applied. In this decision, only administrative fines were imposed by the judge. This is problematic because only compensation claims or criminal sanctions can be decided against defendants who do not comply with environmental permits or EIAs.¹⁰ The waste that leaked and was discharged in the river showed serious procedural violations. Therefore, other administrative sanctions such as revocation of business license or suspension of business license should be considered by the Minister, governor, or regent/mayor (as stated in Article 76). In addition, environmental permits also need to be improved. Only by sanctioning administrative fines, companies can still repeat their violations. Therefore, it is necessary to consider the imposition of other administrative sanctions such as the company's operational license. This will put more pressure on companies to comply with environmental regulations. If only fines are imposed and waste disposal is not improved, this will be unsustainable and have a negative impact on the surrounding community.

4. Conclusion

The imposition of penalties is inconsistent from several aspects, namely related to legal development, imposition of sanctions, and there are weaknesses in legal products related to commitments in environmental protection, namely in Law Number 32 of 2009 which does not regulate the commitment of interested parties

¹⁰Deni Bram, *The Politics of Environmental Management Law*, Setara Press, Malang, 2014, p. 32. 32.

to slow down, stop, and reverse the direction of the rate of environmental destruction. So it can be said that the punishment imposed does not have a deterrent effect on companies and individuals who commit environmental violations. Environmental violations should be given sanctions in accordance with the ratio of their actions because they have polluted the environment which has an impact on the surrounding community so that the application of the law given to environmental polluters in the form of strict liability so as to create a deterrent effect for environmental polluters and can encourage better environmental protection of the environment

References

- Bram, Deni, *The Politics of Environmental Management Law*, Setara Press, Malang, 2014
- Harahap, M. Yahya, Discussion of Problems and Application of the Criminal Procedure Code; Examination in Court, Trial, Cassation, and Judicial Review, Cet. 15, Edition 2, Sinar Grafika Publishers, Jakarta, 2014
- Johar, Olivia Anggie, The Reality of Environmental Law Enforcement Issues in Indonesia, *Journal of Environmental Science*, Vol. 15(1), February, 2021
- Law of the Republic of Indonesia No. 32 of 2009 concerning Environmental Protection and Management Indonesia Burgerlijk Weetboek
- Muhjad, Hadin, *Environmental Law*, Cet. 1, Genta Publishing, Yogyakarta, 2015
- Nahuddin, Yusuf Eko, Evidence in the Perspective of Environmental Law, *Journal of Legal Cakrawala*, Vol.7, No.2 December 2016
- Nisa, Anika Ni'matun & Suharno, Law Enforcement on Environmental Issues to Realize Sustainable Development: Case Study of Forest Fires in Indonesia, *Journal of Bina Mulia Hukum*, Vol. 4(2), March, 2020
- Nur, Yudha Hadian, Dwi Wahyuniarti Prabowo, Application of the Principle of Strict Liability in the Framework of Consumer Protection, - *Scientific Bulletin of Trade Research and Development*, Vol. 5 No. 2, December 2011
- Sadi, Muhammad, Legal Certainty for Environmental Protection and Management in Indonesia, *Judicial Journal*, Vol. 13(3), December 2020
- Siombo, Marhaeni Ria Siombo, *Environmental Law and the Implementation of Sustainable Development in Indonesia*, PT. Gramedia Pustaka Utama, Jakarta, 2012
- Sood, Muhammad, *Indonesian Environmental Law*, East Jakarta: Sinar Grafika: 2019