



---

### A LEGAL POLITICAL REVIEW OF THE RECOGNITION STATUS AND RIGHTS OF INDIGENOUS PEOPLES IN ENVIRONMENTAL GOVERNANCE IN CIREBON

Aniq Aljuman<sup>1</sup>, Milenia Amanda Devanti<sup>2</sup>

<sup>1</sup> Master of Law Study Program, Faculty of Law, Universitas Swadaya Gunung Jati, Cirebon, Indonesia

<sup>2</sup> Master of Law Study Program, Faculty of Law, Universitas Swadaya Gunung Jati, Cirebon, Indonesia

**Corresponding Author:** Aniq Aljuman<sup>1</sup> Milenia Amanda Devanti<sup>2</sup>, **E-mail:** [Aniqalju@gmail.com](mailto:Aniqalju@gmail.com)<sup>1</sup>, [Mileniaamanda19@gmail.com](mailto:Mileniaamanda19@gmail.com)<sup>2</sup>

---

#### | ABSTRACT

The persistent shortcomings in the recognition of Indigenous Peoples across various regions of Indonesia, including Cirebon, reveal a significant discrepancy between the normative framework established in national legislation and its practical implementation at the local level. In Cirebon, the presence of local communities that continue to uphold traditional practices, social structures, and ecological knowledge has not been accompanied by legal acknowledgement through regional policy instruments. This absence of regulatory support leaves customary rights particularly communal land rights and traditional environmental management rights insufficiently protected, thereby limiting the role of indigenous communities in advancing sustainable environmental governance. This study aims to examine the legal politics underlying the recognition status of Indigenous Peoples in Cirebon and to analyze the extent to which their rights are protected within the framework of environmental governance. The analysis assesses the alignment between constitutional provisions and sectoral laws including the 1945 Constitution, the Forestry Law, the Environmental Protection and Management Law, and the Village Law and the regulatory arrangements at the regional level. It further evaluates the significance of local wisdom as an ecological foundation for community-based environmental stewardship. The research employs a normative juridical methodology, utilizing statutory, conceptual, and vertical synchronization approaches. Data were analyzed through an extensive review of literature and regulatory documents. The findings demonstrate that despite the existence of a robust national legal framework for indigenous recognition, the Cirebon regional government has yet to adopt regulations that explicitly regulate the identification, verification, and formal designation of Indigenous Peoples. Consequently, recognition remains declarative and non-institutionalized, failing to effectively enhance local community participation in environmental governance. The study concludes that regional legal reform particularly the enactment of a regional regulation recognizing Indigenous Peoples is essential to ensure legal certainty and to promote ecologically just environmental governance.

#### | KEYWORDS

Legal Politics, Indigenous Peoples Status and Rights, Environmental Governance.

---

#### I. INTRODUCTION

The recognition of Indigenous Peoples constitutes a strategic issue within Indonesia's legal politics, particularly following the growing demands for the restoration of collective rights over land, territories, and natural resources. The Indonesian Constitution, through Article 18B paragraph (2) of the 1945 Constitution, explicitly mandates that the state shall recognize and respect indigenous peoples and their traditional rights insofar as they continue to exist and are consistent with societal development. Nevertheless, the implementation of this constitutional mandate continues to face significant challenges, particularly at the regional government level. Various studies indicate that many regions have yet to establish legal instruments that ensure legal certainty for indigenous peoples in the management of natural resources [1].

This situation is also evident in Cirebon, a region with a long historical background and the presence of local communities that continue to practice traditions and ecological wisdom. However, to date, the local government has not enacted a Regional Regulation governing mechanisms for the identification, verification, and formal recognition of indigenous peoples. Unlike other regions such as Lebak and Bulukumba, which have formally recognized their indigenous communities, Cirebon remains at the level of social recognition without binding legal force [2].

From the perspective of legal politics, this condition reflects a gap between a progressive national legal framework and unresponsive regional policies. In fact, several laws such as the Forestry Law, the Environmental Protection and Management Law, and the Village Law provide significant space for strengthening the role of indigenous peoples in environmental governance [3]. This regulatory disharmony risks the erosion of local wisdom that has long served as a foundation for ecological sustainability.

Previous studies emphasize that legal recognition of indigenous peoples not only legitimizes collective identity but also enhances community access to decision making processes and environmental management [4]. However, scholarly analysis of the relationship between indigenous recognition and environmental governance in Cirebon remains limited.

This research has three main objectives:

1. To analyze the legal politics of recognizing Indigenous Peoples within the Indonesian legal system.
2. To examine the legal status of Indigenous Peoples recognition in Cirebon.
3. To assess the implications of Indigenous Peoples recognition for environmental governance in Cirebon

## **II. METHODOLOGY**

This study employs a normative juridical method, a legal research approach that focuses on the analysis of legal norms, principles, and rules contained in legislation, legal doctrines, and relevant court decisions. This method is selected because the research emphasizes the examination of the legal politics surrounding the recognition of indigenous peoples and its relevance to environmental governance, which requires an analysis of regulatory structures and the interrelationships among legal norms [5].

The approaches used include:

### **1. Statutory Approach**

This approach aims to examine the consistency and synchronization between constitutional provisions, sectoral laws, and regional regulations. The legal instruments analyzed include:

- a. Article 18B paragraph (2) of the 1945 Constitution concerning the recognition of indigenous peoples;
- b. Law No. 41 of 1999 on Forestry, particularly provisions related to customary forests;
- c. Law No. 32 of 2009 on Environmental Protection and Management (PPLH), which regulates public participation and local wisdom;
- d. Law No. 6 of 2014 on Villages, especially provisions regarding Customary Villages
- e. Various regional regulations in Cirebon, examined comparatively to assess the presence or absence of legal instruments for indigenous recognition.

Through this approach, the study evaluates the extent to which the national legal framework has been adopted, implemented, or neglected in regional policies[6].

### **2. Conceptual Approach**

This approach is used to understand the concepts of legal politics, indigenous peoples recognition, customary land rights (hak ulayat), and community based environmental governance. The study draws upon theories of legal politics that explain the relationship between policy, power, and normative structures, as well as theories of community based environmental governance [7].

This approach also examines the concept of local wisdom as an ecological foundation relevant to environmental management in Cirebon, considering the existence of local traditions and ecological knowledge.

### 3. Vertical Synchronization Approach

This approach analyzes the hierarchical relationships among legal norms by identifying alignment or inconsistencies between:

- a. Constitutional norms,
- b. Sectoral legislation,
- c. Regional policies,
- d. Their implementation in indigenous recognition practices.

This approach is essential, as delays in indigenous recognition at the regional level often stem from regulatory disharmony or the absence of local legal instruments [8].

#### Legal Materials Collection Techniques

The legal materials used consist of:

- a. Primary Legal Materials: legislation, Constitutional Court decisions, and government policies;
- b. Secondary Legal Materials: academic journals, books, and recent research findings on indigenous peoples and legal politics, particularly publications from 2020–2024;
- c. Tertiary Legal Materials: legal dictionaries, encyclopedias, and legal indexes.

#### Legal Materials Analysis Techniques

The analysis is conducted through literature review, normative interpretation, and comparative analysis. Literature review identifies foundational theories and indigenous recognition practices. Normative interpretation interprets relevant legal provisions, while comparative analysis assesses differences between the national legal framework and Cirebon's regional regulations, including their implications for environmental governance.

The analysis is carried out systematically to formulate conclusions regarding the ideal model of legal politics for indigenous recognition at the regional level and to propose legal reform recommendations for Cirebon.

### III. RESULTS AND DISCUSSION

#### 1. Legal Political Framework for the Recognition of Indigenous Peoples in Indonesia

The legal politics of recognizing Indigenous Peoples (MHA) in Indonesia reflects configurations of power relations among the state, law, and local communities. Such recognition does not emerge in a normative vacuum rather, it is shaped by the state's development orientation, paradigms of natural resource control, and the ideological choices of lawmakers. In this context, recognition of Indigenous Peoples constitutes a dynamic product of legal politics, yet from its inception it has contained a structural ambiguity between recognition and control [9].

Constitutionally, Article 18B paragraph (2) of the 1945 Constitution affirms state recognition and respect for Indigenous Peoples and their traditional rights. However, the formulation of this norm does not position Indigenous Peoples as inherently recognized legal subjects instead, their recognition depends on state assessment through conditional phrases such as *"insofar as they continue to exist," "in accordance with societal development,"* and *"regulated by law."* This formulation reflects a state centered recognition approach, whereby the state retains exclusive authority to determine the legal existence of customary law[10]. Consequently, constitutional recognition does not function as a direct guarantee of Indigenous Peoples' rights, but rather as an umbrella norm whose effectiveness depends heavily on legislative intent and executive policy.

In the development of sectoral legislation, the legal politics of Indigenous Peoples recognition exhibits a subordinative tendency. Laws in the fields of forestry, mining, and plantations have historically reproduced the *domein verklaring* paradigm in a modern form, namely through the concept of state control over land, water, and natural resources. Although Indigenous Peoples' customary land rights (*hak ulayat*) are normatively acknowledged, they are treated as exceptions that must first be proven. This pattern has systematically constructed customary territories as part of state controlled areas, thereby marginalizing customary law in the practice of natural resource control and utilization [11].

The role of the Constitutional Court, particularly through Decision No. 35/PUU-X/2012, marked a significant shift

in the legal politics of Indigenous Peoples recognition. The decision affirmed that customary forests are not state forests but constitute part of private forests (*hutan hak*). Theoretically, the Court carried out a constitutional correction of sectoral legislation that had negated customary land rights. Nevertheless, the Court maintained the paradigm of conditional recognition by requiring formal designation of Indigenous Peoples by regional governments. As a result, although the Court expanded the scope of recognition, such recognition remains confined within local administrative and political mechanisms, which in many cases are influenced by economic interests and power conflicts [12].

At the level of administrative policy, the legal politics of Indigenous Peoples recognition has transformed toward formalization through mechanisms of registration and designation. Minister of Home Affairs Regulation No. 52 of 2014 and Minister of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) Regulation No. 14 of 2024 demonstrate the state's efforts to integrate customary land rights into the national positive legal system, particularly through land registration. While this approach provides formal legal certainty, it carries the risk of reducing customary law to a mere administrative object. Customary rights, which are communal, dynamic, and grounded in social practice, risk being reduced to juridical data subject to the technocratic logic of the state [13].

From the perspective of legal pluralism theory, the legal politics of Indigenous Peoples recognition in Indonesia has not yet fully accommodated the equal coexistence of state law and customary law. The state continues to position customary law as applicable only insofar as it is recognized by the state, rather than as a living legal system with its own social legitimacy. This approach reflects a model of weak legal pluralism, in which legal plurality is formally acknowledged but remains subordinate to the dominance of state law [14]. Consequently, conflicts between Indigenous Peoples and the state or corporate actors are often resolved by prioritizing positive state law, while customary law is treated merely as sociological evidence.

Furthermore, the legal politics of Indigenous Peoples recognition reveals tension between legal certainty and substantive justice. Formalization efforts through designation and registration are often not accompanied by effective protection mechanisms for customary territories that have been traditionally occupied and managed for generations. In practice, many Indigenous Peoples communities that fail to obtain formal recognition instead lose access to their territories due to their inability to meet state administrative standards. This condition indicates that the politics of recognition has not yet been fully oriented toward rights protection, but remains trapped within a logic of control and administrative governance [15].

In conclusion, the legal politics of Indigenous Peoples recognition within the Indonesian legal system remains paradoxical. The state normatively recognizes Indigenous Peoples while simultaneously restricting such recognition through conditions, procedures, and control mechanisms. As long as Indigenous Peoples recognition remains situated within a framework of conditional and state centered recognition, legal protection for Indigenous Peoples will tend to be symbolic rather than transformative. A reorientation of legal politics is therefore required to shift recognition from mere normative legitimacy toward substantive protection that ensures the sustainability of Indigenous Peoples' collective rights within a pluralistic rule of law state.

## **2. Conditions of Indigenous Peoples Recognition in Cirebon**

The legal status of indigenous law communities within the Indonesian legal system is constitutionally recognized; however, it has not been fully protected in operational terms. The recognition of indigenous law communities as collective legal subjects is explicitly affirmed in Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, which states that the state recognizes and respects indigenous law communities along with their traditional rights. Nevertheless, such recognition is conditional and requires further regulation through statutory laws and government policies. Consequently, the legal status of indigenous law communities is not automatic but depends on formal determination and recognition by the state through applicable legal mechanisms. In line with Mahfud MD's theory of legal politics, this condition underscores that law is a product of political policy, meaning that the effectiveness of recognizing indigenous law communities is largely determined by the state's political choices in transforming constitutional norms into laws that are effectively implemented in practice [16].

The determination of a community in Cirebon as an Indigenous People cannot be based solely on cultural identity or local historical narratives rather, it must refer to legal criteria acknowledged within the national legal system. The use of the term Indigenous Peoples carries significant juridical consequences, particularly in relation to recognition as a collective legal subject and the protection of customary rights. Therefore, the classification of Indigenous Peoples must be grounded in normative and sociological parameters that are legally accountable.

The primary legal basis for determining Indigenous Peoples status derives from Article 18B paragraph (2) of the 1945 Constitution, which requires that indigenous communities continue to exist and that their traditional rights remain actively practiced. In the context of Cirebon, this requirement demands the continuity of customary practices within community life, rather than mere historical remnants or cultural symbols that no longer function as systems of social regulation.

Another essential requirement is the existence of customary institutional structures that are recognized and adhered to by community members. Such institutions may take the form of customary leaders, deliberative forums, or decision making mechanisms grounded in customary law [17]. The presence of these structures indicates that customary law functions as a normative system governing internal community relations. In the absence of living institutions, a community cannot easily be categorized as Indigenous Peoples in the juridical sense.

In addition to institutional structures, Indigenous Peoples must possess a customary territory or defined living space that has been collectively controlled and managed across generations. In Cirebon, such customary territories may include agricultural lands, coastal areas, or specific spaces that serve economic and social functions for the community. This collective territorial control forms the basis of customary land rights, even though such rights are not always formally recognized within the state land tenure system [18].

Another crucial requirement is the continued observance of customary legal norms by community members. These norms regulate various aspects of life, including resource management, dispute resolution, and social relations among community members. The existence of living norms demonstrates that customary law remains the primary reference for governing community life, rather than merely serving as cultural traditions without binding force.

Beyond these sociological criteria, recognition of Indigenous Peoples must also comply with the principles of the Unitary State of the Republic of Indonesia. Customary practices must not contradict national law, human rights, or the principle of equality among citizens. This requirement underscores that recognition of Indigenous Peoples is situated within the framework of national integration and is not intended to create a legal system separate from the state [19].

In positive legal practice, indigenous law communities must be identified and verified by local governments. This process includes an assessment of the community's history, customary institutions, customary territories, and prevailing norms. The fulfillment of these administrative requirements serves as the basis for local governments to formally designate a community as an indigenous law community through regional regulations or decisions of the head of the region, which subsequently determine the legal status and protection of customary rights in the Cirebon area. From the perspective of Mahfud MD's theory of legal politics, this mechanism demonstrates that the operation of law is strongly influenced by the will and policies of local authorities, such that the recognition of indigenous law communities is not solely determined by social realities, but rather by political-legal choices manifested through administrative decisions of the government [20].

Table 1. Comparison of National and Regional Legal Frameworks on Indigenous Recognition

<b>National Legal Instrument</b>	<b>Key Substance</b>	<b>Implementation Status in Cirebon</b>
1945 Constitution Article 18B(2)	State recognition of Indigenous Peoples	No elaboration in the form of a Regional Regulation (Perda) on indigenous recognition
Law No. 41 of 1999 on Forestry	Designation of customary forests	No mechanism for the designation of customary forests at the regional level
Law No. 32 of 2009 on Environmental Protection and Management (PPLH)	Community participation and local wisdom	Local wisdom is not accommodated in regional environmental policies
Law No. 6 of 2014 on Villages	Recognition of Customary Villages	No Customary Villages have been formally designated
Constitutional Court Decision No. 35/PUU-X/2012	Customary forests are not state forests	No implementation due to the absence of legal recognition of indigenous communities as legal subjects

The table demonstrates that vertical synchronization between national and regional regulations has not been effectively achieved. Cirebon lacks legal instruments to translate national norms into binding regional policies. This condition constitutes a major factor contributing to the absence of effective protection of customary land rights

(hak ulayat) and the failure to establish customary based environmental governance [20].

### **3. Implications of Indigenous Peoples Recognition for Environmental Governance in Cirebon**

The recognition of Indigenous Peoples in Cirebon would generate significant juridical, social, and ecological implications for environmental governance and the livelihoods of local communities. From a legal perspective, such recognition affirms indigenous communities as collective legal subjects possessing rights and authority to manage their customary territories and natural resources. Consequently, the people of Cirebon would no longer be positioned merely as objects of environmental policy, but rather as principal actors in environmental protection and management.

Environmental governance practices carried out by indigenous and local communities in Cirebon demonstrate that local norms have long functioned as mechanisms regulating the use of natural resources, even though they have not been formally recognized as indigenous legal practices. These governance systems have primarily developed in coastal areas, agricultural landscapes, and water resource management, which historically constitute the living spaces of Cirebon communities. The existence of these practices is important to examine, as they indicate the potential role of indigenous peoples in environmental protection if adequate legal recognition is granted [21].

In the coastal areas of Cirebon, traditional fishing communities have implemented marine resource management patterns based on local knowledge. These practices include restrictions on environmentally destructive fishing gear, seasonal regulation of fishing activities, and unwritten prohibitions on catching undersized fish. Such arrangements aim to ensure the sustainability of fish stocks and prevent damage to coastal ecosystems. Although these norms are not codified in written customary regulations, they are socially observed and function as effective instruments for controlling environmental exploitation [22].

In addition, coastal communities in Cirebon maintain practices to protect ecologically significant areas, such as mangrove forests and river estuaries. In practice, communities engage in voluntary mangrove replanting, limit logging activities, and preserve the protective function of mangroves against coastal abrasion. These activities reflect a form of community based ecological awareness that operates without direct state intervention, yet produces tangible impacts on coastal environmental protection [23].

In the agricultural sector, rural communities in Cirebon continue to uphold land management systems rooted in local wisdom. These practices include seasonal planting arrangements, the use of organic fertilizers, and the collective maintenance of traditional irrigation channels through mutual cooperation. Such irrigation management serves not only to distribute water but also to prevent conflicts among farmers and mitigate land degradation. Norms of mutual cooperation and deliberation function as social foundations for sustaining agricultural environments [24].

With regard to water resource management, local communities in Cirebon apply collective practices to protect shared springs and rivers. These practices include prohibitions against pollution, restrictions on certain activities near water sources, and social obligations to maintain river cleanliness. Although not institutionalized as formal customary law, these norms operate as binding rules of conduct and form an integral part of community based environmental governance [25].

From the perspective of environmental law, these practices are consistent with fundamental principles of environmental protection and management, such as sustainability, the precautionary principle, and public participation. However, due to the absence of formal recognition of these communities as Indigenous Peoples, existing environmental governance practices lack sufficient legal force when confronted with large scale development policies or economic interests. This condition places local communities in a vulnerable position in defending their living spaces.

The first implication of Indigenous Peoples recognition is the strengthening of the legitimacy of local wisdom based environmental governance practices that have long been implemented by Cirebon communities. Local norms governing coastal, agricultural, and water resource management would acquire clearer legal authority once recognized by the state. Such recognition enables customary law to function as a legitimate and acknowledged instrument of environmental regulation within the national legal system, preventing local practices from being easily overridden by top down development policies [26].

The second implication concerns enhanced community participation in environmental decision making. With the

recognition of Indigenous Peoples, indigenous communities in Cirebon would have a legal basis to actively engage in spatial planning processes, environmental licensing, and the supervision of business activities. This participation has the potential to strengthen the principle of environmental democracy, whereby decisions regarding land use and natural resource management are determined not only by the state and economic actors, but also by the communities directly affected [27].

Recognition of Indigenous Peoples also has implications for preventing environmental and agrarian conflicts in Cirebon. Legal certainty regarding customary territories and community managed spaces can reduce conflicts between communities, regional governments, and business actors. In the absence of such recognition, community based environmental management practices are often deemed to lack legal standing and are therefore vulnerable to displacement by investment interests. Indigenous recognition provides a stronger legal foundation for communities to defend their living spaces lawfully.

From an environmental protection perspective, Indigenous Peoples recognition promotes more sustainable, community based management approaches. Experience shows that communities with strong social and cultural ties to their environment tend to apply principles of caution and sustainability in natural resource use. In the context of Cirebon, such recognition can enhance the protection of coastal areas, mangroves, agricultural lands, and water sources from environmental degradation caused by excessive exploitation [28].

Nevertheless, these positive implications can only be realized if Indigenous Peoples recognition is accompanied by clear and operational regulatory frameworks. Recognition that is merely formalistic, without the delegation of meaningful authority, risks generating social dissatisfaction and new conflicts. Therefore, the recognition of Indigenous Peoples in Cirebon must be supported by regional policies that integrate customary law into the environmental governance system, including environmental planning, supervision, and law enforcement.

In conclusion, the recognition of Indigenous Peoples in Cirebon carries strategic implications for environmental protection and social justice. Such recognition not only strengthens the legal position of indigenous communities but also contributes to more participatory, sustainable, and locally responsive environmental governance. Within the framework of legal politics, Indigenous Peoples recognition in Cirebon should be understood as part of the state's effort to achieve ecological justice and sustainable regional development.

#### **IV. CONCLUSION**

The legal politics of recognizing Indigenous Peoples within the Indonesian legal system continues to position the state as the primary authority determining the existence of customary law through conditional recognition mechanisms. Although constitutionally acknowledged, such recognition has not yet fully ensured substantive protection of the collective rights of Indigenous Peoples.

At the regional level, particularly in Cirebon, the absence of regulatory frameworks for Indigenous Peoples recognition has resulted in the ineffective implementation of national legal norms. Consequently, local wisdom based environmental governance practices that have long been carried out by communities lack adequate legal force.

The recognition of Indigenous Peoples in Cirebon holds the potential to strengthen participatory and sustainable environmental governance. Therefore, a reorientation of the legal political approach to Indigenous Peoples recognition is necessary from an administrative focus toward substantive protection through the strengthening of regional regulations and the integration of customary law into environmental policy.

#### **REFERENCES**

- [1] R. Latuconsina, "Legal politics of indigenous rights recognition in Indonesia," *Jurnal Rechts Vinding*, vol. 10, no. 2, pp. 155-170, 2021.
- [2] S. Yuliasari, "Pengakuan masyarakat adat dalam kebijakan daerah," *Jurnal Hukum & Pembangunan*, vol. 52, no. 1, pp. 45-60, 2022.
- [3] A. H. Ramadhan, "Environmental governance and indigenous communities in Indonesia," *Journal of Environmental Law Review*, vol. 5, no. 1, pp. 33-49, 2021.
- [4] F. P. Sihombing, "Indigenous peoples and legal certainty in natural resource governance," *Brawijaya Law Journal*, vol. 7, no. 2, pp. 210-225, 2020.

- [5] P. Marzuki, *Legal Research: A Normative Approach*. Jakarta, Indonesia: Kencana, 2020.
- [6] R. Wibisana, "Environmental law and indigenous rights in Indonesia," *Indonesian Journal of Environmental Law*, vol. 3, no. 1, pp. 80–95, 2021.
- [7] T. Y. Simarmata, *Indigenous Peoples and Legal Politics*. Yogyakarta, Indonesia: UGM Press, 2022.
- [8] K. Cahyadi, "Vertical harmonization of indigenous regulations," *Journal of Legal Development*, vol. 14, no. 1, pp. 77–93, 2023.
- [9] M. D. Mahfud, *Legal Politics in Indonesia*. Jakarta, Indonesia: Rajawali Pers, 2017, pp. 13–15.
- [10] J. Asshiddiqie, *Introduction to Constitutional Law*. Jakarta, Indonesia: Rajawali Pers, 2016, p. 289.
- [11] M. S. W. Sumardjono, *Land in the Perspective of Economic, Social, and Cultural Rights*. Jakarta, Indonesia: Kompas, 2008, pp. 151–153.
- [12] Constitutional Court of the Republic of Indonesia, *Decision No. 35/PUU-X/2012*, Legal Reasoning para. 3.14.3.
- [13] Minister of Agrarian Affairs and Spatial Planning/National Land Agency Regulation No. 14 of 2024; see also Minister of Home Affairs Regulation No. 52 of 2014.
- [14] J. Griffiths, "What is legal pluralism?" *Journal of Legal Pluralism*, vol. 24, pp. 1–55, 1986, pp. 38–40.
- [15] R. Simarmata, *Customary Law and the Politics of State Recognition*. Jakarta, Indonesia: HuMa, 2019, pp. 102–105.
- [16] J. Asshiddiqie, *Introduction to Constitutional Law*. Jakarta, Indonesia: Rajawali Pers, 2016, p. 288.
- [17] Ter Haar, *Principles and Structure of Customary Law*. Jakarta, Indonesia: Pradnya Paramita, 2001, pp. 45–47.
- [18] M. S. W. Sumardjono, *Land in the Perspective of Economic, Social, and Cultural Rights*. Jakarta, Indonesia: Kompas, 2008, pp. 149–151.
- [19] Soepomo, *Chapters on Customary Law*. Jakarta, Indonesia: Pradnya Paramita, 2003, pp. 32–34.
- [20] F. Widodo, "Vertical synchronization of indigenous regulations," *Law and Society Journal*, vol. 8, no. 1, pp. 62–78, 2023.
- [21] M. D. Mahfud, *Legal Politics in Indonesia*. Jakarta, Indonesia: Rajawali Pers, 2017, pp. 18–19.
- [22] M. S. W. Sumardjono, *Land in the Perspective of Economic, Social, and Cultural Rights*. Jakarta, Indonesia: Kompas, 2008, p. 165.
- [23] Ministry of Marine Affairs and Fisheries, *Community-Based Coastal Management*. Jakarta, Indonesia, 2016, pp. 42–44.
- [24] Soepomo, *Chapters on Customary Law*. Jakarta, Indonesia: Pradnya Paramita, 2003, pp. 35–36.
- [25] R. Simarmata, *Customary Law and the Politics of State Recognition*. Jakarta, Indonesia: HuMa, 2019, pp. 123–125.
- [26] R. Simarmata, *Customary Law and the Politics of State Recognition*. Jakarta, Indonesia: HuMa, 2019, pp. 135–137.
- [27] T. Rahmadi, *Environmental Law in Indonesia*. Jakarta, Indonesia: Rajawali Pers, 2015, pp. 87–89.
- [28] A. Redi, "Local wisdom in environmental protection," *Jurnal Hukum Lingkungan Indonesia*, vol. 6, no. 1, pp. 45–47, 2019.