


Community Land Ownership in the Perum Perhutani KPH East Banyumas Forest Area: A Juridical-Empirical Review Based on Pancasila Justice Principles

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Article Info	ABSTRACT
<p>Keywords: Pancasila justice, tenurial conflict, Perum Perhutani, enclave land, legal certainty.</p>	<p>State forest management in Indonesia faces a complex problem due to the existence of community-owned land within the state forest area, which often triggers tenurial conflicts. This study is conducted to analyze the legal status of community land ownership within state forests and assess dispute resolution based on the principles of Pancasila Justice. The research method adopted is a juridical-empirical approach, which is normative in terms of forestry and agrarian laws and regulations, and empirical through field observations and limited interviews conducted in the KPH East Banyumas. Research findings indicate that there were 0.9 hectares of community-owned land in Plot 14 of RPH Kaliputih, Forest Management Unit Section of Jatilawang, which has been factually controlled and cultivated for years with clear physical boundaries. Administratively, it still falls under a state forest area, as per the BATB. The dualism of regulations between the Forestry Law and the Basic Agrarian Law resulted in a lack of synchronization of interpretation and weak legal certainty. Through the Pancasila Justice Perspective, it is necessary for the settlement of disputes not only to be formally lawful but also to balance the rights of the state and the community, environmental sustainability, and social justice. An integrative resolution model is recommended through regulatory harmonization, verification of enclave land status, strengthening deliberation-based mediation mechanisms, and protection of the community rights based on the principle of substantive justice.</p>
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INTRODUCTION

The control and management of state forest areas are strategic issues in the governance of natural resources in Indonesia, primarily because land within these areas is actually controlled, utilized, or owned by the people (Fuad et al., 2023; Widyawati & Istiqomah, 2023). This situation also touches on agrarian issues and involves the complex relationship between the state, the State-Owned Enterprise (Perum Perhutani), and local communities who have traditionally lived and depended on land designated as forest areas. Indeed, in the East Banyumas Forest Management Unit of Perum Perhutani itself, some residents occupy or own land within the state forest area, both for residential and agricultural purposes. This issue of

community land ownership within this state forest area has given rise to conflicts of interest, legal uncertainty, and a misalignment between empirical facts on the ground and the applicable legal framework (Nugroho et al., 2025).

In Indonesian forestry law, a distinction is made between "use" and "utilization" of state forest areas (Suparto et al., 2025). Perum Perhutani defines the use of state forest areas as being used by the government for public purposes (Aprilia et al., 2025), which may include the construction of airports, dams, toll roads, or the settlement of disaster victims. The use of state forest areas is generally carried out through mechanisms of borrowing, exchanging, or leasing, including land compensation (Suhadi, 2018). On the other hand, the use by forest village communities is usually informal and is conducted to fulfill daily needs, such as farming, seasonal plantations, rice paddies, or settlements. This use, often undertaken without permits or proper procedures, frequently gives rise to tenure conflicts.

Practices by both government and community also often occur without compensation or replacement of the forests, which further decreases the effective area managed by Perum Perhutani. In addition, lands within state forest areas owned by local communities, referred to in forestry terminology as enclaves, also limit the effectiveness of forest management. Land is often used for rice fields, plantations, and other agricultural uses that directly or indirectly affect the functional role of the forest area.

As the manager of state forests in Java, including East Banyumas, Perum Perhutani has the mandate to administer, manage, and protect forest areas. In practice, however, Perum Perhutani also interacts directly with communities that have traditionally used the land. Meanwhile, the government has issued various new regulations, including Presidential Regulation Number 88 of 2017 concerning the Settlement of Land Ownership in Forest Areas (PPTKH), as well as social forestry programs aimed at balancing community interests with forest sustainability. The implementation of this policy still faces numerous obstacles, primarily those related to data validation issues, lengthy administrative procedures, and differing perceptions of authority among the central government, regional governments, and Perum Perhutani.

From a justice perspective, this issue cannot be viewed solely from a legal-formal standpoint. Pancasila justice, as a fundamental value in the national legal system, requires harmony among the principles of legal certainty, utility, and substantive justice (Rivai et al., 2025). The principle of Social Justice for All Indonesians emphasizes protection for groups that have been historically vulnerable and dependent on natural resources for their livelihood (Jesica & Nadia, 2019). The Pancasila justice approach, in the case of community land within state forest areas, requires a settlement that is not based solely on administrative legality but is responsive to the historical fact of land ownership, the economic needs of the community, and ecological balance. This approach is still rarely implemented consistently in resolving forestry disputes.

It was against this background and in light of these gaps that this study attempts to analyze the legal framework governing community lands within the state forest area managed by Perum Perhutani KPH East Banyumas. Additionally, it seeks to identify and describe the empirical conditions of land ownership, as well as the various forms of interaction

and conflict between the people and Perum Perhutani. It also evaluates the implementation of various regulations for resolving land ownership within forest areas in the region. It then formulates a just settlement model based on the Pancasila justice perspective. Thus, this research is expected to make a theoretical contribution to the development of agrarian and forestry law, while also offering practical recommendations for the government, Perum Perhutani, and the community in finding a sustainable solution to resolve land ownership conflicts in accordance with the country's fundamental values.

METHOD

This research is a juridical-empirical study that examines the existence of community-owned land within state forest areas in East Banyumas, managed by the East Banyumas Forest Management Unit (KPH) of Perum Perhutani, using a Pancasila justice perspective. The approach used consists of a structural analysis to examine how law operates within society to create national order and stability based on the values of Pancasila justice, and a conflict analysis to examine various cases that arise in the community. In the context of this research, the conflict approach focuses on tenurial cases, namely by examining the control of community-owned land within state forest areas, including the basis of ownership according to laws and regulations, and its compliance with the principles of Pancasila justice.

The data sources in this study include both primary and secondary data. Primary data were collected through field observations and interviews with relevant parties. Secondary data refer to primary legal materials, consisting of laws and regulations, whereas secondary legal materials include journals, research findings, and other scholarly works (Noor, 2023). Tertiary legal materials, such as legal dictionaries and internet references, supported this. All the data collected were then analyzed descriptively and logically presented consistently and systematically to account for the focus of this research study.

RESULTS AND DISCUSSION

Legal Framework for Community Land Ownership in State Forest Areas in the East Banyumas Forest Management Unit

State forest management is a strategic function legally mandated to Perum Perhutani, the State-Owned Enterprise with authority in forest management (Christmas et al., 2021). This assignment is affirmed in Article 3, paragraph 1 of the Government Regulation Number 72 of 2010 concerning Perum Perhutani, last amended by the Government Regulation Number 23 of 2021 concerning Implementation of Forestry. The government mandates Perum Perhutani to manage state forests in the provinces of East Java, Central Java, West Java, and Banten, excluding conservation forests, in accordance with the principles of sustainable forest management and good forest governance. The emphasis of this provision is that Perum Perhutani is not positioned solely as a business entity seeking profits, but also as an extension of the state to execute its public functions, including the protection of forest areas and their sustainable use.

In carrying out its operations, the head office of Perum Perhutani is in Jakarta. At the same time, the working areas on the islands of Java and Madura are divided into three regional

divisions: the East Java Regional Division, the Central Java Regional Division, and the West Java Regional Division. This division of regions enables better coordination and supervision, while also adapting to the geographical, social, and complex nature of forestry problems, which vary from one region to another. For example, the Central Java Regional Division controls 20 KPH, one of which is the KPH East Banyumas. The KPH's East Banyumas working area comprises four districts with a total area of 46,453 hectares, which is divided into several forest area functions: Production Forest (HP), Limited Production Forest (HPT), and Protected Forest (HL). Each function has different management principles and utilization restrictions; therefore, it requires more specific monitoring.

From a legal perspective, Perum Perhutani is based on a hierarchy of laws and regulations that govern Indonesian forestry governance. The most fundamental is the 1945 Constitution, which stipulates the state's right to control natural resources. The principle was then operationalized through Law Number 41 of 1999 concerning Forestry, which serves as the basis for the administration, management, and utilization of state forests. Law Number 18 of 2013 concerning the Prevention and Eradication of Forest Destruction enhances law enforcement and mechanisms for eradicating illegal logging. Furthermore, Law Number 6 of 2023 concerning the Stipulation of Government Regulation, instead of Law Number 2 of 2022 concerning Job Creation, has been enacted, which modifies the structure of several forestry stipulations, particularly in business licensing and the resolution of tenurial conflicts. A relevant derivative stipulation is Government Regulation Number 23 of 2021 concerning Forestry Implementation, which stipulates explicitly forest area boundaries, forestry licensing, and mechanisms for forest area utilization.

In addition to these general regulations, Perum Perhutani has internal legal products that guide its technical operations. For example, the Decree of the Directors of Perum Perhutani No. 549/Kpts/Dir/2012, which outlines guidelines for Handling Tenurial Conflicts, has served as a guide for resolving disputes between forest village communities and Perum Perhutani. The Forest Sustainability Management Plan (RPKH), also known as the Forest Sustainability Management Plan 2020–2030, is a strategic planning document that encompasses long-term management, covering production, protection, social, and environmental perspectives.

Field research in the KPH East Banyumas reveals that the legal basis for land rights in state forest areas is established within a dual legal framework. For state land within the forest, the Forestry Law takes precedence, supported by the Minutes of Boundary Arrangement (BATB) document, forest area maps, and decisions made by the Ministry of Forestry and the Ministry of Environment/Environmental Control Agency (KLKH) regarding the designation of the area as a state forest. These instruments are final and binding in determining the land status of the area as part of the state forest.

On the other hand, community-owned land located within or immediately adjacent to forest areas, referred to in forestry terminology as enclaves, is subject to the national agrarian legal regime, as governed by Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA). Further regulations are contained in Government Regulation Number 24 of 1997 on Land Registration, which legally acknowledges community civil rights, including ownership

rights, cultivation rights, building rights, and use rights. Thus, within a single geographic area, two legal regimes that are equally valid coexist: forestry law, which governs state forest areas, and agrarian law, which governs community-owned land.

This often creates tenure problems because the physical boundaries of forest areas are not in alignment with, and often contradict, long-established community land ownership and use. Many cases show that forest village communities have occupied, cultivated, or inherited lands that are now part of forest area boundaries as defined by the state (Junarto et al., 2024). The consequence of this is overlapping claims by the community, Perum Perhutani, and other government agencies. Unresolved tenure problems could trigger horizontal and vertical conflicts (Novianti, 2024), decreasing the effectiveness of forest management and increasing the likelihood of forest encroachment and illegal use of forest areas.

Additionally, studies in KPH East Banyumas demonstrate that the mechanisms for designating and verifying forest areas often do not fully involve the communities or are not supported by comprehensive historical data related to land ownership. The result is that community-owned lands are declared as part of forest areas without sufficient social verification. In the case of communities, the lack of formal proof of ownership, such as certificates, makes them vulnerable to disputes. The relationship between Perum Perhutani, as the manager of state forest areas, and forest village communities should therefore be managed in accordance with the principles of social justice, as mandated by Pancasila. The resolution of tenure should not be based merely on legal and formal aspects, but also on historical, sociological, and environmental sustainability aspects (Kjeldsen & Stender, 2022). For that reason, one alternative that could constitute a more humane and fair resolution model may be based on restorative justice, social forestry cooperation, and recognition of indigenous peoples' rights.

Empirical Conditions of Land Control, Interaction, and Tenurial Conflicts between Communities and Perum Perhutani

Within the working area of the East Banyumas Forest Management Unit, community-owned land is physically located within a state forest area. This phenomenon represents a concrete example of the tenurial issues arising from the misalignment between the administrative boundaries of state forest areas and community land control (Hendra & Firmanda, 2025). According to the 2020–2030 Forest Sustainability Management Plan, within the Jatilawang Forest Management Unit, specifically at Kaliputih Forest Management Resort, in Plot 14, a total area of 174.74 hectares was identified, with 0.9 hectares of community-owned land. Administratively, this is in Kaliputih Village, Purwojati District, Banyumas Regency, Central Java Province.

According to the RPKH, these 0.9 hectares are registered as rice fields; however, field research reveals something entirely different. Upon direct inspection, the area consists of mixed vegetation, comprising banana, *petai*, jengkol, and predominantly teak. Such vegetation indicates the characteristics of a mixed garden, rather than rice fields, as noted in these planning documents. Moreover, the land has clear physical boundaries, marked by stakes, and exhibits a long-standing pattern of intensive cultivation. From the presence of

stakes and continued occupation, it appears that the local community considers the land private property, even though it is administratively located within a state forest area.

This dualism reflects the overlapping claims from the community, as landowners based on certificates or proof of ownership, and Perum Perhutani, as the manager of the state forest area. Agrarian law would consider the land to fall under the provisions of the Basic Agrarian Law, UUPA, and Government Regulation No. 24 of 1997 regarding land registration. Still, from a forestry law perspective, it falls under the area of a State Forest, based on the BATB and the government's own determination. Synchronization between these two legal regimes, agrarian and forestry, is lacking, thus becoming the root of tenurial conflicts that often arise in various Perum Perhutani work areas, including the KPH East Banyumas.

The tenurial conflicts in this region reflect the suboptimal implementation of dispute resolution guidelines, as regulated in Perum Perhutani Directors' Decree No. 549/Kpts/Dir/2012 concerning Guidelines for Handling Tenurial Conflicts. The normative guidelines stipulate stages of identification, verification, and clarification of area status, participatory mapping, and recommendations for resolution through deliberation, partnership programs, or formal legal channels. However, implementation in the field still faces numerous obstacles, resulting in a slow and inconsistent resolution process.

Administrative constraints are primarily related to the incompleteness of historical and legal data regarding boundaries and the history of community land. Sometimes, forest area boundaries have not been updated or are not reflective of changing community land use. Besides, evidence of community land administration is sometimes incompletely documented or not integrated with forestry data (Noor & Navarro, 2025). The second is the gap in perception of authority between institutions, where Perum Perhutani often places dispute issues within the forestry domain. At the same time, communities refer to land provisions stemming from the agrarian regime. This disparity in perception leads to disharmony and prolongs the dispute resolution process. A third challenge is suboptimal participatory boundary mapping. For instance, many such remappings do not involve stakeholders, particularly communities that own or control the land. Consequently, a gap exists between forestry administration maps and actual on-the-ground conditions, as seen in the case of Plot 14 of the Forest Management Resort (RPH) Kaliputih.

In addition to these technical and administrative factors, socio-cultural ones also play their part. Forest village communities, who have cultivated the land for generations, attach historical and sentimental value to the land. Upon being declared a state forest area, the community often feels disadvantaged or loses the rights it has enjoyed for a long time. Conversely, Perum Perhutani is obligated to secure state forest areas to prevent encroachment, damage, and reduction of forest areas that impact the target of a minimum 30% national forest cover area mandated under the Forestry Law. Concretely, a 0.9-hectare enclave in Plot 14 of the RPH Kaliputih shows the complexity of tenure issues in state forest areas. This case exemplifies the need for policy harmonization between forestry and agrarian law, improvement in spatial data quality, collaborative mapping, and resolution of conflicts with justice and legal certainty. The resolution of this problem is crucial not only to preserve community rights but also to ensure the effectiveness of state forest management by Perum

Perhutani, thereby ensuring sustainability and the certainty of forest boundaries in the long run. To clarify the research findings, the following is a summary of the tenure case, specifically Plot 14 of the RPH Kaliputih, KPH East Banyumas.

Table 1. Summary of Research Findings on the Tenure Case of Plot 14 of the RPH Kaliputih, KPH East Banyumas

Aspects	Research Findings	Explanation
Land Area and Location	The total area of Plot 14 is 174.74 hectares, with 0.9 hectares of community-owned land within the administrative boundaries of the state forest area.	Data derived from the 2020–2030 RPH and field observations indicate the presence of private land enclaves within areas claimed as state forest.
Administrative Status vs. Field Conditions	The RPKH records the land as rice fields, but observations indicate mixed plantations (banana, <i>petai</i> , <i>jengkol</i> , and teak).	The inconsistency between the planning documents and the actual biophysical conditions indicates weaknesses in the validity of the spatial and administrative data.
Evidence of Community Control	The land has demarcated boundaries, is intensively cultivated, and has been managed for generations as private property.	Physical and historical evidence support the community's claim, despite its legal location within a state forest area.
Regulatory Dualism	Agrarian law recognizes community rights (UUPA, PP 24/1997), while forestry law declares land as a state forest based on the BATB.	The difference in legal regime paradigms gives rise to overlapping claims and is the root of tenure conflicts.
Socio-Cultural Factors	Communities have a historical and emotional connection to the land they have cultivated for generations.	Conflicts are not only formal and legal but also affect the community's identity, economic sustainability, and sense of substantive justice.
Implications for Forest Management	Tenurial conflicts hinder Perum Perhutani's ability to maintain state forest areas and achieve the 30% national forest cover target.	Land disputes disrupt management effectiveness and threaten the sustainability of conservation.
Strategic Needs	Harmonization of agrarian and forestry regulations has increased spatial data accuracy, facilitated collaborative mapping, and promoted deliberation-based conflict resolution.	This is a key recommendation for equitable tenure resolution, legal certainty, and maintaining forest sustainability.

Source: processed data, 2025

The above table enables clear comparisons between administrative data, field findings, and the root of the legal conflict, presenting a strong causal link between data discrepancies, regulatory dualism, and the failure to apply dispute resolution guidelines. That fact would imply that the issue in Plot 14 is not particular but indicative of broader system concerns in tenure governance in Perum Perhutani areas.

Evaluation of Policy Implementation and Formulation of a Just Settlement Model Based on Pancasila Justice

Community-owned land management in the state forest area demonstrates that resolving tenurial conflicts cannot be limited to formal legality but must be grounded in the values of Pancasila justice, which forms the basis of the state and its ideology, serving as the *grundnorm* of the Indonesian legal system (Sajid, 2018). It is essential to understand the interaction between forest and agrarian regulations, as well as the values of Pancasila, in the context of the 0.9-hectare land dispute in Plot 14 of RPH Kaliputih, BKPH Jatilawang, and KPH East Banyumas, in order to carry out substantive justice.

In this context, Pancasila justice requires that each principle serve as an ethical guideline when determining the resolution of issues. First Principle, Belief in the one and only God, is a moral basis that demands honesty and trustworthiness, as well as respect for the life rights of the community. The Second Principle, Just and Civilized Humanity, demands that community landowners be treated humanely, not disadvantaged, by administrative claims, and receive recognition of their fundamental rights. The Third Principle, "Unity of Indonesia," states that resolutions must be directed at maintaining harmony among state and forest village communities, particularly Perum Perhutani, in order to prevent conflict from eroding social unity. The Fourth Principle, "Democracy Guided by the Wisdom of Deliberation/Representation," requires that resolutions be carried out through dialogue and deliberation, which is a unique mechanism for the Indonesian nation. The Fifth Principle, "Social Justice for All Indonesian People," requires that resolutions strike a balance between the interests of the state, the people, and environmental sustainability.

These values of justice provide the foundation for resolving the case of the 0.9-hectare land, which is located within a state forest area and is currently in the possession of the people but has a sound legal basis. According to Article 19, paragraph (2), letter c of Law Number 5 of 1960 concerning Basic Agrarian Regulations, in conjunction with Government Regulation Number 24 of 1997 concerning Land Registration, a certificate becomes authentic proof of land ownership. That is, even though the land is included within a state forest area map, ownership evidence in the form of a certificate provides solid legal legitimation for the community.

Field data from KPH East Banyumas indicate that the land is being managed by the community, with clearly defined boundaries, and the area is planted with a mixed crop of bananas, petai, jengkol, and teak. In contrast, Perum Perhutani relies on the BATB as a basis for determining state forest areas. The difference in the legal basis used has caused conflict over land tenure. However, with the physical and administrative boundaries already clear, the rights and obligations of the landowners and forest managers could also be clarified. This

situation reflects that the existence of regulations and clear boundaries is one form of justice for all stakeholders in question.

Satjipto Rahardjo's progressive legal theory perspective strengthens the argument that resolving this land dispute cannot be dependent solely on textual legality (Ramadani et al., 2023). Progressive law holds that "law is for humans, not humans for law," so in settling land tenure disputes, the welfare of the community, as the main subject of the law, must be held paramount. Hence, resolving the 0.9-hectare land conflict required prioritizing community rights while also considering the forest area's function.

However, the review of the existing regulatory framework reveals a dual legal regime between forestry and agrarian affairs. Space in the Forestry Law is defined based on administrative designation, while the Basic Agrarian Law covers citizens' civil rights. The lack of synchronization leads to land tenure disputes that are difficult to resolve. What is needed, therefore, is an integrative resolution model based on Pancasila justice that comprises:

1. Harmonization of forestry and agrarian regulations by synchronizing the land maps and recognition of enclaves.
2. Full verification of land status based on agrarian-forestry audits, certificate inspection, ownership history, and participatory mapping.
3. Community-based mediation through deliberation involving villages, village governments, Perum Perhutani, National Land Agency, and local governments to ensure that solutions reflect shared aspirations.
4. Welfare through empowering forest village communities, social forestry schemes, or land release when legal requirements are met.

It is a model of dispute resolution that provides not only legal and administrative settlement but also substantive justice in the spirit of Pancasila. This way, conflicts over tenure are not sources of social tension but rather become a momentum to achieve more inclusive, humane, and sustainable forest governance.

CONCLUSION

Community land ownership in state forest areas managed by Perum Perhutani KPH Banyumas Timur is not only a matter of formal legality. However, it is also a substantive justice issue mandated by the principle of Pancasila Justice. Research findings indicate that in Plot 14 of the RPH Kaliputih, BKPH Jatilawang, 0.9 hectares of community-owned land is administratively overlapping with claims to state forest areas, as per the BATB. Such dualism of regulation between forestry and agrarian law gave birth to tenurial conflicts due to inconsistencies in regulations and the less-than-ideal implementation of dispute resolution mechanisms by Perum Perhutani. In this regard, the Pancasila Justice should logically demand an integrative resolution that merges legal certainty, social benefits, and substantive justice, based on the recognition of community rights grounded in the UUPA and PP 24/1997, achieved through deliberation, and the protection of the dignity and welfare of forest village communities. Therefore, an integrative resolution model is needed—one that harmonizes agrarian and forestry regulations, strengthens deliberation-based mediation, and builds equality between communities and Perum Perhutani. Its implementation will embody the

values of Pancasila in achieving social justice for all Indonesians while preserving the forests as a national asset. According to the results of such a study, further research could be conducted to map similar cases in other Perum Perhutani areas and to explore socio-legal studies of power relations between forest village communities and Perum Perhutani or forest management institutions. Research is also needed to review the feasibility of regulatory reformulation to ensure harmony between agrarian and forestry regulations. These will contribute to the development of dispute resolution models that are more equitable, efficient, and sustainable for both forests and the welfare of the people.

REFERENCE

- Aprilia, D., Jaelani, A. K., & Dwi, I. (2025). Regulatory Model for Tourism Villages in Forest Areas Based on Sustainable Tourism. *Legality: Jurnal Ilmiah Hukum*, 33(1), 286–306.
- Christmas, S. K., Hardiyanti, M., & Prawira, S. A. (2021). Role in the Forest Village Community-Based Forest Management Sustainable Development. *Journal of Judicial Review*, 23(June), 115–128.
- Fuad, Fokky; Tardjono, Heriyono; Machmud, Aris; Rohayah, Nizla; Maguchu, P. (2023). Ownership of Land: Legal Philosophy and Culture Analysis of Land Property Rights. *Jurnal Media Hukum*, 30(2), 98–116.
- Hendra, R., & Firmanda, H. (2025). The Importance of Tenure and Access Rights for Indigenous Peoples. *Cepalo*, 2(1), 81–94. <https://doi.org/10.25041/cepalo.v9no1.3616>
- Jesica, N., & Nadia, M. (2019). The Realization of Social Justice for the Poor Citizens According to Legal Philosophy. *Fiat Justisia*, 12(4), 284–297.
- Junarto, R., Pinuji, S., Mahasari, J., & Mujiburohman, D. A. (2024). Land Rights and Agrarian Reform in Forest Areas : A Basis for Sustainable Development. *International Journal of Sustainable Development and Planning*, 19(1), 237–245.
- Kjeldsen, L., & Stender, M. (2022). Bringing social sustainability into the mix : framing planning dilemmas in mixed-tenure regeneration. *Building Research & Information ISSN*., 3218. <https://doi.org/10.1080/09613218.2022.2081120>
- Noor, A. (2023). Socio-Legal Research: Integration of Normative and Empirical Juridical Research in Legal Research. *Jurnal Ilmiah Dunia Hukum*, 7(2), 61–65. <https://doi.org/10.56444/jidh.v7i2.3154>
- Noor, A., & Navarro, C. M. (2025). Legal Status of Land Rights Certificates due to Neglect by Rights Holders and Decades of Occupation : A Normative Legal Study. *Pena Justisia: Media Komunikasi Dan Kajian Hukum*, 24(2), 8314–8331.
- Novianti, L. (2024). The Dynamics of Land Tenure And Utilization: A Case Study of Agrarian Disputes In Aceh Besar District. *Teunuleh Scientific Journal*, 5(1), 47–59.
- Nugroho, A. P., Sunito, M. A., & Kinseng, R. A. (2025). *Land Tenure Conflicts in Forest Areas of Muara Gembong , Bekasi Regency*. 448–459.
- Ramadani, J. M., Swadaya, U., & Jati, G. (2023). *Progressive legal perspective on legal certainty over land ownership in Genteng Village*.
- Rivai, A., Harahap, A., Farros, S. Al, & Hosnah, A. U. (2025). Implementation of Pancasila Values in the Formation of Law No . 1 of 2023 (New Criminal Code). *Formosa Journal*

- of Science and Technology (FJST)*, 4(1), 27–38.
- Sajid, D. A. (2018). Pancasila as the Basis for Legal Development in Indonesia. *Jurnal Scientia Indonesia*, 4(ii).
- Suhadi. (2018). The Use of Forest Areas for Infrastructure Development under Leasehold Forest Area License : A Sustainable Development Perspective. *ICoL GaS*, 03013, 10–13.
- Suparto, S., Admiral, A., Ardiansyah, A., & Namazovna, S. D. (2025). The Concept of State Control over Forests and Forest Areas in Indonesia. *Journal of Law, Environmental and Justice*, 3(2), 201–228. <https://doi.org/10.62264/jlej.v3i1.118.1>
- Widyawati, L. F., & Istiqomah, A. (2023). *Implementation Of Good Forest Governance In Forest Management In Indonesia*. 2(02), 77–88.