

Liability For Corporate Crimes In Environmental Crimes In Indonesia (Case Study Of Pt. Wijaya Inti Nusantara)

Muhammad Taufiq
taufiq_advocate007@yahoo.co.id
Sultan Agung Islamic University, Indonesia

Article Info

Received: 2022-08-12

Revised: 2023-02-21

Accepted: 2023-03-31

Keywords:

Corporation;

Criminal;

Environment;

Crime;

Islam;

Abstract

Corporate Crime is a serious crime that harms the people of Indonesia, especially in the long term. For a long time, corporate crime has often been in the public spotlight, especially with cases such as corruption, money laundering, and tax evasion. Not only that, in the environmental aspect there are also corporate crimes, for example in the abuse of power that causes environmental pollution which has a very wide impact on various parties. Therefore, this study aims to examine how the criminal liability of corporations that commit environmental crimes in Indonesia is carried out. The research methodology used here is normative juridical research. The results of the research obtained are criminal liability for environmental crimes committed by corporations, accountability not only for individuals, but also corporations such as for example a business entity as emphasized in Articles 116-118 of Law No. 32 of 2009. As well as providing a perspective on how Islamic law responds to the phenomenon of corporate criminal liability. In this case, Islamic Law has views from various sources, namely the Qur'an and As-Sunnah as the main reference in managing the environment and behaving. In Surah Ar-Rum verse 40 Allah Subhanahu Wa Ta'ala said: It has been seen that the destruction on the land and in the sea is caused by the deeds of human hands (Through it) Allah makes them feel a part of their deeds so that they can return (to the right path). The MUI in its Fatwa once stated that in the utilization of environmental wealth, managers must prioritize ethics that avoid environmental damage not only for the sake of profit. In Islamic law, corporate liability in the environment is to compensate for losses due to unlawful acts.

I. Introduction

Corporate crimes often occur so that they become in the public spotlight. In addition to occurring in cases, such as cases of corruption, money laundering, tax evasion, which are allegedly carried out by corporate administrators as well as benefiting the corporate entities concerned, now what is very concerning are corporations in cases of forest fires and environmental pollution that are detrimental to the surrounding community.

Environmental pollution that occurs both directly and indirectly, can reduce the quality of the environment, so that it can result in the destruction of biotic and abiotic communities. Humans are one of the biotic components that can also be affected by environmental pollution both directly and indirectly. Environmental pollution not only causes environmental damage, decreases environmental carrying capacity, threatens human health, but also threatens the preservation of the environment itself. In fact, the survival of human life is highly dependent on available resources. Therefore, it is necessary to think about how to manage resources that can preserve the environment.

The perspective of Islamic studies there is the study of Islamic law, in the modern era there is a scientific study in the Islamic perspective regarding the science of contemporary fiqh, namely fiqh bia'ah, in this study it is very relevant and needed to study the impact of environmental damage in accordance with the study of Islamic science. It is hoped that with the study of environmental fiqh, humans will adhere to this knowledge so that they are responsible and understand the safety of the environment that has been given from Allah the Creator to always be maintained and protected (Arif and K. M, 2020). The general public and industrial management related to the environment should know that from the perspective of Islamic science there are correct procedures and rules for environmental management.

The potential for environmental problems that can affect the preservation of nature and human health raises awareness of the need to regulate environmental problems with legal instruments. The regulation of environmental problems in Indonesia began with the existence of the Environmental Law, namely No. 4 of 1982 concerning the Main Provisions of Environmental Management (Statute Book No. 12 of 1982, supplement to Statute Book No. 3215) which in its development was perfected and replaced by Law No. 23 of 1997 concerning Environmental Management and finally by Law No. 32 of 2009 concerning Environmental Protection and Management. In essence, the regulation provides all components of living things, including humans or society, to avoid pollution caused by human activities themselves. These legal protections are given, among

others, by providing criminal sanctions to perpetrators of environmental crimes.

In the Qur'an also regulating the destruction of the environment caused by humans, Allah Subhanahu wa Ta'ala said in Ar-Rūm [30]:41:

Corruption appeared on land and sea because of what the hands of men have wrought, so that some of them may taste what they have done, that they may return.

It has been seen that damage on land and in the sea is caused by human hands. (Through that) Allah made them feel a part of their deeds so that they would return (to the right path).

The Islamic religion in responding to a phenomenon of natural destruction is very clear, so that it is not only in the Qur'an and Al-Hadith but in the provisions issued by the MUI which is a consensual institution in the state policy order, in this case referring to the Islamic religion.

Allah said in QS As-Shuaro verse 183 which means Allah Subhanahu wa Ta'ala said:

And do not despise the things of men, and do not roam in the land making mischief.

Do not harm man by diminishing his rights and do not cause damage on the earth. The universe that has been created by Allah SWT should be able to be used well by humans with the sole interest of seeking the pleasure of Allah SWT. Considering that humans are Caliph fil ardi which means that humans are leaders in this world who must be role models, take care of, prosper and provide help for other humans and other creatures (M. Hasan Ubaidilah, 2010). Using this concept so that people who are Muslims will always pay attention to behavior and always remember the rules regulated in Islam so that they will reconsider when planning the exploitation of natural resources and the management of the earth. The Quran, Al-Hadith and Ijtima Ulama have always been guidelines for him to do this.

Graham Parkers' theory states that the religious views of a community group are very influential in responding to and behaving towards nature and the environment (Mohammad Mufid, 2016).

The relationship between corporations and the environment is also very close. Based on data from the Indonesian Environment Forum (Walhi) and Auriga in August 2022, 94.8% of land in Indonesia is managed by corporations. On the island of Kalimantan, Walhi and Auriga noted that the land managed by corporations reached 24.73 million hectares, while the people only managed 1.07 million hectares. Similar inequality also occurs on other islands (Walhi, 2024).

This indicates that corporations have an extraordinary impact on the environment compared to the people themselves. Seeing the great role of corporations in the environment, corporations must be able to account for their actions if they cause environmental problems in the future. In addition, in the running of corporations, they must also continue to get good concentration and control by the government.

Based on these facts, the existence of corporations as the subject of criminal law can cause problems in various fields, one of which is environmental sustainability. As the accountability that should be carried out by PT Wijaya Inti Nusantara in South Konawe Regency which is engaged in the mining sector but results in the pollution of spring water sources for the residents of Torobulu Village so that it is dangerous for the surrounding community and threatens environmental sustainability, especially PT uses criminalization measures for residents who refuse to operate nickel mines by PT Wijaya Inti Nusantara.

2. Research Method

The research method used in this study is normative juridical research. Normative juridical research is legal research conducted by examining research objects based on juridical aspects and explaining the provisions of applicable laws or laws (Soejono and Mamudji, 2001). The technique of collecting legal materials carried out by the researcher is by literature study and the legal materials used are primary and secondary legal materials. The legal materials are systematically arranged, studied, and drawn a conclusion in relation to the problem being studied (Marzuki and Peter, 2017). The data analysis required in this study is a qualitative method. The data analysis techniques used in qualitative research include data reduction, analysis, data interpretation and triangulation. From the results of the data analysis, conclusions can then be draw

3. Results and Discussion

Corporate Criminal Liability for Environmental Crimes (Case Study of PT Wijaya Inti Nusantara South Konawe)

According to *Black's Law Dictionary* Corporate crime is any criminal act committed by a corporation and therefore can be charged to a corporation because of the activities carried out by its employees and employees (Pricing, waste disposal), often known as a white collar crime (Hat-trick and Hamzah, 1996).

According to B. Clinard & Peter C. Yeager Corporate crime is part of white-collar crime, but more specifically. It is the crime of institutionalization in the complex and deep relationship between an executive leader and a manager in a hand. It can also be in the form of a family company, but still in white-collar crime. Any ordinary corporate action, which is punishable by the state, whether under state administrative law, civil law, or criminal law (Started, 1992).

Etymologically, the word corporate (Dutch: *corporatie*, British: *corporation*, German: *corporation*) comes from the Latin word *corporatio*. *Corporare* itself comes from the word "*corpus*" (Indonesian: *badan*), which means to give a body or to incorporate. Thus, corporation means the result of the work of incorporating, in other words, the body that is made into a person, the body obtained by human actions as opposed to the human body, which occurs according to nature (Muladi and Dwidja Priyanto, 2010).

Corporate crime is a form of crime in the business world that arises due to increasingly sophisticated technological developments and the intellectual level of the perpetrators. Encouraged by neoliberalism in the economic field so that the main goal is to raise as much capital as possible through profits from corporations (*capital*), this will be very vulnerable to causing corporate crimes (Muhammad Taufiq, 2018).

Formal legal provisions related to corporate crimes are guided by each law and regulation that defines corporations as legal subjects, namely Perma No. 13 of 2016 concerning Procedures for Handling Criminal Cases by Corporations, Perja No. 28 of 2014 concerning Guidelines for Handling Criminal Cases with Corporate Legal Subjects, and the Criminal Procedure Code.

Regarding the criminalization of corporations, there are provisions in Law Number 7 of 1955 concerning the Investigation, Prosecution and Trial of Economic Crimes (UUTPE) where in Article 15 paragraph (1) it is stated: "If an economic crime is committed by or on behalf of a legal entity, a company, a union of other persons or a foundation, then criminal prosecution is carried out and criminal penalties and disciplinary actions are imposed, either against the legal entity, the company, the association or the foundation, either against those who give the order to commit the economic crime or who acts as a leader in the act or omission, or against both."

In its explanation, Article 15 states that punishment or action can also be imposed

against legal entities, companies, associations and foundations. In economic criminal law, the rule is very necessary, because many economic crimes are committed by these agencies. Modern criminal law has recognized the teaching, that punishment can be pronounced against a legal entity. So in the special criminal law, namely the economic criminal law, it is possible to impose a criminal penalty on a corporation as specified in the UUTPE. This has also been applied in criminal provisions in the banking sector, capital market and so on.

Categorically, environmental crimes regulated in the Environmental Law consist of acts of environmental pollution; acts of environmental destruction and other acts that violate the provisions of the applicable laws (Siregar, J. and Zul, M, 2015). There is often a confusion between pollution and environmental destruction, even though there are differences between the two. The Environmental Protection and Management Act also distinguishes between the two:

Article 1 number 14: "Environmental pollution is the entry or introduction of living things, substances, energy, and/or other components into the environment by human activities so that they exceed the environmental quality standards that have been set.

Article 1 number 16: "Environmental destruction is the action of a person who causes direct or indirect changes to the physical, chemical, and/or biological properties of the environment so that it exceeds the standard criteria for environmental damage.

The difference between the two things is not too principled because everyone who destroys the environment automatically also pollutes and vice versa. The difference only lies in the intensity of the act done to the environment and the degree of consequences suffered by the environment due to the act (Abdurrahman, 1983).

Mining is one of the activities that has real relevance to environmental changes and has an impact on aquatic resources and the environment caused by these mining activities. Generally, mining activities give rise to two very opposite sides, namely it can be profitable when mining generates income and economic growth but can also be very detrimental if mining endangers health, safety and causes damage to the environment (Nasution, L., Suratman, & Sudrajat, 2021).

Another thing that can arise from mining activities is environmental problems. Environmental problems are caused by their inability to develop social systems, lifestyles that are not able to make our lives in harmony with the environment (Agung Suprihatin, D, 2013). It can be interpreted that mining activities are profitable from an economic aspect, namely as a livelihood for residents living in the area around the mine and corporations that control the land, but the consequences of mining activities are inseparable from the potential for harm both in terms of health and environmental problems. Environmental problems are conditions in the biophysical environment that prevent the satisfaction or fulfillment of human needs for health and happiness.

One of the mining activities actually carried out by PT Wijaya Inti Nusantara is a

company established in 2017 engaged in nickel mining. This nickel mining company is located in Torobulu Village, Laeya District, South Konawe Regency, Southeast Sulawesi Province. Initially, this Nickel Mine succeeded in providing income for the South Konawe Regency Government as well as the Southeast Sulawesi Provincial Government with an average income of 300 billion to 500 billion through the Nickel import program to China. But unfortunately, the pride of the local government has changed to a mining company that is troubling the community. The reason is that PT Wijaya Inti Nusantara's nickel mining has caused various impacts on the surrounding community, especially the absence of AMDAL and RKAB.

Now various problems in PT Wijaya Inti Nusantara have emerged, namely: the loss of clean water sources in Torobulu Village, resulting in villagers having to buy clean water and making many villagers suffer from itching due to the pollution of clean water sources. The PT made it difficult for the source of clean water in Torobulu Village so they had to buy clean water for an average of 60k per day. The PT also criminalized villagers who refused Nickel mining activities.

PT. Wijaya Inti Nusantara was reported by the KNPI DPP to the National Police Headquarters which in its report PT. Wijaya Inti Nusantara is suspected of carrying out mining activities without a clear EIA and violating legal regulations. As a result of its activities, it causes very serious environmental damage, namely damaging mangrove forest areas, including water and air pollution. Moreover, PT Wijaya Inti Nusantara's nickel mining activities are directly adjacent to the children's learning place at SDN Laeya 12, the mine is right behind the school. So that heavy equipment activities and other mining activities greatly disrupt the learning process at SDN Laeya 12 school.

PT Wijaya Inti Nusantara is suspected of violating the Minister of Energy and Mineral Resources of the Republic of Indonesia No. 33 of 2015 Procedures for Installing Mining Business License Limit Signs and Special Mining Business Permit Areas for Minerals and Coal as regulated in Article 19. The article stipulates that the boundary of the IUP Area or IUPK Area for production operations must be at least 500 meters away, but in fact the mining operation area that is still available has the potential to be explored for nickel products or former mining puddles has a distance of less than 500 meters from residential areas, which is exacerbated by direct borders with SDN 12 Laeya so as to interfere with the teaching and learning process of the nation's children.

The government should be responsive to nickel mining activities that threaten the future of Indonesian children when carrying out teaching and learning activities. Unfortunately, the local and provincial governments are only responsive to the profits obtained from nickel mining products without caring about the impact on the people of Torobulu Village. The implementation of mining businesses should consider various factors, not only juridical issues such as licensing and compliance aspects, but also social analyses such as social impacts that must occur in every extractive mining process that consumes a large area of land.

In the investigation process, Walhi Sulawesi found that nickel mining activities in Torobulu Village penetrated into residential areas, the traces of the excavation were also still neatly arranged behind the walls of SDN 12 Laeya. In the investigation process, it was found that there was an impact on PT Wijaya Inti Nusantara's mining activities, namely:

1. Social conflicts. There is often intimidation by the village government considered to be on the side of the company so that it is selective when distributing clean water due to the damage to the spring water source, but even the clean water is only given to people who are pro-PT WIN.
2. Health. The community's source of clean water depends on clean water shipments which are only distributed once a week.
3. Milieu. Nickel mining activities are carried out near residents' spring water sources which causes residents to have difficulty getting clean water and the river in Torobulu Village is experiencing drought
4. Economic impact of fishermen. Fishermen's catches have decreased drastically and they have to look for fish hundreds of kilometers away first to get fish, especially seaweed production where the livelihood of the coastal people of Torobulu cannot produce.

Article 71 of Law No. 39 of 1999 concerning Human Rights, the Government is obliged to respect, protect, enforce and promote human rights for the benefit of the community, especially in this case PT Wijaya Inti Nusantara often violates human rights by criminalizing environmental activists in Torobulu Village, operating mining equipment adjacent to residents' settlements, damaging the spring water source of villagers and various other human rights violations. In this article, the government should be obliged to control companies not to commit human rights violations.

In compensating the communities around the affected mines, PT Wijaya Inti Nusantara has discriminated in providing compensation by providing compensation to certain communities who support the mining activity process so that other communities who criticize and reject the mining process do not get compensation. Article 65 of the Law of the Minister of Energy and Mineral Resources of the Republic of Indonesia No. 7 of 2020 concerning Procedures for Granting Regions, Licensing and Reporting on Mineral and Coal Mining Business Activities.

The form of responsibility carried out by PT Wijaya Inti Nusantara, can be associated with the explanation according to Daud Silalahi of the types of activities that can be applied the principle of absolute responsibility, namely activities that cause great danger as a result of which cannot be overcome with the usual efforts (*abnormally dangerous activities*)

Islamic Law Perspective in Corporate Liability for Environmental Damage in Indonesia

The environment of the principles is an interrelated relationship because the elements of the environment are something that includes all of God's creations on earth. Human behavior in caring for nature is very influential for the resilience of nature on the earth.

It is unimaginable that the environment is always considered worthless, humans only make the environment an object of exploitation to be taken advantage of without paying attention to negative impacts. Humans are minimal in placing the existence of the environment by ignoring its care so that it is not considered a subject but an object (M. Abdurrahman, 2012). Regarding the case of environmental destruction carried out by PT Wijaya Inti Nusantara, namely leaving the lake that was excavated from the mine, not paying attention to the clean water contained in the community around the mining because it has been polluted by mining waste and criminalizing environmental activists of the Torobulu community. This act does not reflect the Islamic values that have been regulated in the Quran, Al-Hadith and Islamic rules compiled by jurists.

People in general often face problems caused by natural and chemical environmental pollution. According to the WHO (*World Health Organization*) has formulated problems that threaten environmental health, the environmental problems are as follows:

1. Lack of availability of clean drinking water.
2. Problems of wastewater management and prevention of environmental pollution.
3. The problem of soil environmental pollution due to the disposal of liquid waste in rivers and solid waste in the earth's plains and other wastes (Alwani, Ambarik, 2017).

Islamic law regulates the prohibition of environmental damage. As Allah says in QS Al-Araf verse 56 And do not corrupt the land after it has been reformed, and call upon him out of fear and greed if God's mercy is close to the benefactor *Do not do any harm to the earth after it has been well organized. Pray to Him with fear and hope. Indeed, Allah's mercy is very close to those who do good.*

In the word of Allah, it is strictly forbidden for humans to make damage on this earth, as has been done by PT Wijaya Inti Nusantara, which is to leave an excavation hole like a lake which is a former mine, destroying the ecosystem and the purity of the spring water sources around the mine so as to reduce access to clean water owned by the community around the mine.

The rules for prohibiting mining activities that damage the environment are also contained in the MUI Fatwa on Environmentally Friendly Mining number 22 of 2011 in the provisions of the law paragraph 4 which reads:

"Mining activities that are not in accordance with the requirements in terms of damaging the environment, and do not bring welfare to the surrounding community, are haram by law"

In the MUI fatwa verse above, it emphasizes the use of mining which must be focused on environmental ethics. So that in the paragraph prohibits mining actions that cause damage to the community around the mining environment which has been fatwa haram, especially for PT Wijaya Inti Nusantara which has caused a very detrimental environmental impact to the surrounding community and the environment. So that the existence of the mine from PT Wijaya Inti Nusantara does not produce a positive impact on the community and the surrounding environment, it is appropriate that from the

perspective of Islamic law studied from the MUI Fatwa, it is mandatory to prohibit PT Wijaya Inti Nusantara's mining activities.

PBNU in the 33rd Congress of NU in Jombang issued a Decision on the prohibition of excessive exploitation

1. The act of excessive exploitation of natural resources so that it causes greater damage is haram.
2. The granting of exploitation permits by the government has an impact that cannot be repaired as before, then the law is haram if it is intentional.
3. The attitude that must be possessed by the community is *amar ma'ruf nahi munkar* according to their abilities (Muhammad Nasaruddin, 2024).

In the PBNU Decree, it is explained that entrepreneurs must prioritize the interests of the environment, starting from the safety of workers, the impact of the surrounding environment, the surrounding flora and fauna ecosystem and of course the surrounding community, not just prioritizing the interests of economic benefits. So it is very contrary to the activities of PT Wijaya Inti Nusantara which have had a negative impact on the community and the natural ecosystem around mining. The mine did not notice that after the mining was completed there would be no more humans, flora and fauna that would occupy the mining site.

4. Conclusion

Based on the results of the research and presentation above, the author concludes that the criminal liability for environmental crimes committed by corporations, the parties that can be held accountable are not only individuals, but also corporations such as a business entity. This is emphasized in Articles 116-118 of Law No. 32 of 2009. If the person responsible for the criminal act is the administrator or order-giver in the corporate activity, then the administrator or order-giver who in this case is an individual person can be sentenced to imprisonment and a fine as a form of legal liability. Business entities can be subject to additional penalties in the form of deprivation of profits obtained from criminal acts, closure of all or part of the place of business, repairs due to criminal acts, obligations to do what is neglected without rights, and placement of the company under supervision. In the view of Islamic law, Allah SWT has explained in the Qur'an that the destruction of nature and the environment is caused by human actions themselves. Islam has banned efforts that cause environmental damage and harm others. PT Wijaya Inti Nusantara has violated the rules that have existed in the Quran, especially in Indonesia has an MUI institution that has prohibited the exploitation of natural resources that have an environmental impact and is not responsible in repairing damage. PBNU also argued in the decision of its 33rd congress in Jombang that it is illegal to exploit nature that only prioritizes economic benefits and ignores the impact of environmental damage. It is appropriate for the government to take a stance in punishing PT Wijaya Inti Nusantara which has become one of the corporate

bodies that does not have environmental ethics in caring for the surrounding environment and protecting the lives of the surrounding community.

References

- Abdurrahman. (1983). Introduction to Indonesian Environmental Law. Bandung: Alumni.
- Agung Suprihatin and Daryanto. Introduction to Environmental Education. Yogyakarta: Gava Media, 2013.
- Ahmad Munawar. Forest Environment Law Enforcement in South Kalimantan. Al 'Adl Law Journal Vol. V No.10. 2013.
- Ambarik Alwani. Al-Mas'uliyah Al-Dauliyah An Himayat Al-Biah. Rights Study Program. Faculty of Rights and Political Science. Muhammad Kkidor University. 2017. P. 240.
- Arif, K. M. (2020). Islamic moderation (Wasathiyah Islam) from the perspective of the Qur'an, as-sunnah and the views of scholars and jurists. Al-Risalah: Journal of Religious Studies and Islamic Thought, 11(1), 22-43.
- ARTICLE
- Butt, Simon and Tim Linsdsey. Indonesian Law. Oxford: Oxford University Press, 2018.
- CRITICAL! Overlapping Permits to Build Houses in Banjarbaru Above the Danger Zone, Disperkim: No Comment! Asked the Regional Secretary
<https://www.teras7.com/gawat-tumpang-tindih-izin-ratusan-rumah-di-banjarbaru-di-atas-zona-bahaya-disperkim-no-komen-tanya-sekda/>
- Fariaman Laia. Criminal Liability for Environmental Pollution Crimes. Indonesian Journal of Social Sciences, Vol.2 No.4. 2021.
- Fuady, Munir. Dirty Business (Anatomy of a White-Collar Crime). Bandung: PT Citra Aditya Bakti. 2004.
- Gunakaya, A. Widiada. Introduction to Indonesian Law. Bandung: STHB Press, 2015.
- Hat-trick, Hamzah. (1996). The Principle of Corporate Liability in Indonesian Criminal Law. Grapindo, Jakarta.
- Heryandi. (2019). State Policy in the Marine & Fisheries Sector in the Era of Regional Autonomy. Lampung: Aura Publishing.
- Kongkalikong Congregation at PT Wijaya Inti Nusantara Mine.
<https://www.amanahsultra.id/kongkalikong-berjamaah-di-tambang-pt-wijaya-inti-nusantara/>
- M. Abdurrahman. (2012). Maintaining the environment in Islamic teachings. Bandung: Coordinating Minister for Economic Affairs of the Republic of Indonesia. Thing. 65.
- M. Hasan Ubaidilah. "Fiqh Al Biah (Formulation of the Concept of Al-Maqasid Al-Shariah in Environmental Conservation and Restoration)" Al-Qanun Journal 13. 2010. vol 1 p. 26.
- Mohammad Mufid. "Eco-Literacy of Fiqh Al-Bi'ah in National Law" Al-Jinayah: Journal of Islamic Criminal Law 2. June 2016 Vol. 1 Page. 235.
- Muladi and Dwidja Priyanto. 2010. Corporate Criminal Liability, Jakarta: Kencana.
- Noor Hafidah, et al. Implementation of Protection of Victims of Corporate Crime in the Environmental Sector (Case Study in South Kalimantan). Journal of Legal Horizons Vol. 2 No. 2. 2013.
- PT Galuh Cempaka's Land Conspiracy, Want to Mine Diamonds or Take the Land?
<https://koranbanjar.net/konspirasi-lahan-pt-galuh-cempaka-mau-tambang-intan-atau-ngambil-lahannya/>
- Sahetapy, J.E. Corporate Crime. Bandung: PT Refiana Aditama. 2002.

- Saleh, M. Ridha. Ecoside: The politics of environmental crime and human rights violations. Jakarta: Walhi. 2005
- Started. (1992). Flower Potpourri of Criminal Law. Bandung.
- Sulasi Rongiyati. Alleged Criminalization in the Prevention and Eradication of Forest Destruction. Legal Brief, Vol. VIII, No.06/II/P2DI. 2015.
- Taufiq, Muhammad. Corporate Crime. Yogyakarta: Student Library. (2018)
- Torobulu Village Selamat or Destroy, Investigation of PT WIN Activities by Walhi Sulawesi. <https://www.instagram.com/p/C2d9ZWQpvSn/?igsh=MXkyYjBhMmI0dmc4Yg==>
- Walhi: 94.8% of Indonesia's Land is Controlled by Corporations, <https://databoks.katadata.co.id/datapublish/2022/08/16/walhi-948-lahan-indonesia-dikuasai-korporasi>