

## **Implementation of Fulfilling The Constitutional Rights of Citizens in Religion: Case Study of Batur Village, Indonesia**

**Cholida Hanum**

cholidahanum@uinsalatiga.ac.id

Universitas Islam Negeri Salatiga

---

### **Article Info**

Received: 2025-01-20

Revised: 2025-03-25

Accepted: 2025-05-20

### **Keywords:**

Implementation;  
Constitutional Rights;  
Religious Freedom

---

### **Abstract**

*In recent years, various events showing the existence of religious freedom have become a phenomenon. Violation of respect for the individual's freedom to embrace and practice religious freedom has an impact on all aspects of life, including education, health, employment, and access to public services. As the national organizer, the government plays an important role in creating a favorable, safe and peaceful atmosphere for the people. The slogan of Bhinneka Tunggal Ika seems to be only utopian, which is reflected in the civil relations in the village of Batur, where occupations are multi-religious. But it is important to note that the term "villages of tolerance" is not only symbolic. Studies have shown that the rights stipulated by the constitution are mentioned as village tolerance rights, and the extent to which these rights are realized in the future should be fully supported by the local government and the village government. The research is qualitative, collecting primary data through interviews and secondary data through documents related to the problem. The result of this research is that the realization of the religious rights of Semarang Regent in Batur Village is not top-down (from the state to the citizens), it is precisely that the realization of religious rights in Batur Village is collectively discussed. The community's own awareness and mutual encouragement to create a harmonious and coordinated shared life between one religion and another.*

## **I. Introduction**

Enforcement, respect and fulfillment of human rights should occur in all national and state living settings, the same should happen in all levels of society including in villages that are experiencing rapid development and leading to villages that prosper, human rights issues are also always raised. Human rights issues in the village usually occur as a result of village development that leads to an advanced village where it requires the construction of facilities and infrastructure that in the end if not handled seriously will cause crucial human rights issue. The order of implementation of government policies is still much untargeted and tends to be discriminatory and sometimes associated with political elements. Nationally in order to realize this is considered mandatory to make human rights as part of the Indonesian constitution.

Batur village as one of the villages that experienced rapid development in recent years as a miniature multi-religious village must also be constitutionally and obliged to protect and respect human rights in every implementation of development carried out stipulated in local regulations and village regulations. Batur village has an area of 1081,750 ha. Located on the slopes of mount merbabu precisely in the District Getasan Semarang. The number of villagers as many as 7353 people with a population of 3719 men and 3634 women. Batur village is an example of the application of religious tolerance. How not, because the citizens come from several religions that maintain each other's relationships. There are at least 4 religions embraced by batur villagers, namely Islam as the majority religion, Buddhism, Christianity and Catholicism. Based on the percentage of the population of Muslims as many as 5,698 people (77%), then Christianity as many as 1335 people (18%), Catholicism as many as 4 people (0.05%), Buddhism as many as 313 people (4.95%). Regarding the community form of Batur Village is related to the realization of religious rights, it is interesting that the village later developed an understanding that Uncle Village is a tolerant village.

Based on this problem, this paper uses an empirical juridical approach that is the approach used to see social symptoms related to the law in the practice of fulfilling religious rights in Batur Village, Semarang Regency. The empirical juridical approach examines how normative provisions are manifested as real in society. This study also uses normative juridical approach because it uses secondary data as additional material, in the form of various laws and regulations and references to other documents related to the assessment, research and process of legislation. While judging by its nature, this research includes research that is descriptively analytical that will describe the overall object to be systematically examined by analyzing the data obtained.

## **2. Research Method**

This research is a non-doctrinal legal research. Non-doctrinal legal research is a legal research that is based on behavior that appears in social interactions that describe law as a manifestation of symbolic meaning in existing social behavior (Shidarta, 2013). This research used an empirical legal approach, with the object of study being the conception of meaning in behavior as a result of the manifestation of the constitutional rights implementation which is subjective and constructed as a result of a law. This research will focus more on explaining the real situation related to the implementation of fulfilling the constitutional rights of citizens in religion: case study in Batur Village, Indonesia.

### **Types and Sources of Data**

The types of data used in this research consist of primary data and secondary data. Primary data is data obtained directly from the field. While secondary data is data obtained from library sources such as documents, books, printed media, laws and regulations related to the topic of discussion studied by the researcher (Ibrahim, 2017). The data source is the place where the researcher gets the data (Martin, 2023). Meanwhile, the data originating from this research was obtained from 2 (two) sources, namely, first, primary data sources, while those that will be used as primary data sources in this research are the Head of Batur Village, Religious Figures of Batur Village, Batur Village Community. Furthermore, secondary data sources include:

#### **a. Primary Legal Materials**

Namely rules, norms or basics, laws and regulations including Law ICCPR, Law Number 39 of 1999 on Human Rights.

#### **b. Secondary Legal Materials**

Namely the work of legal academics, research results, scientific works, mass media or other products that are related to the issue of constitutional rights and Religious Freedom

## **3. Results and Discussion**

### **Guarantee Of Religious Rights As A Basic Right In The Constitution**

Prof. Muladi said that various countries have studied human rights issues through various ideas related to the establishment of state or non-governmental organizations (NGOs).

There are basically at least four arguments related to human rights, as shown below:

1. The absolute universal view views human rights set forth in the International Bill of Rights as universal values. This view has absolutely no respect for the social and cultural characteristics inherent in each country. Proponents of this view are developed countries, and for developing countries, developed countries are usually considered exploitative because they use human rights as a means of oppression and judgment.
2. The universal view is relative, i.e. looking at human rights issues as universal issues, but there are exceptions based on the principles of international law. An example can be seen in Article 29, paragraph 2, of the Universal Declaration of Human Rights, which states:  
  
"In exercising their rights and freedoms, everyone should only be limited by law. The goal is simply to ensure that the rights and freedoms of others are properly recognized and respected, and to meet the requirements of fair moral justice. Order and universal welfare of a democratic society."
3. A very special (absolute particularistic) view that human rights are the affairs of each country without giving sufficient reason, especially in the refusal to implement international documents. This view is selfish, defensive, passive and chauvinistic towards human rights.
4. A relatively specific (relatively particular) point of view, involving human rights issues and common and ethnic issues in each country. The validity of international documents must be aligned, solid and balanced, and supported, and rooted in the country's culture. This view is not only defensive, but also actively formulates and proves the human rights characteristics it asserts. (Sofyan, 2015)

The attitude of the Indonesian people based on a relatively particular point of view tries to find a meeting point between the four points of view based on Pancasila and the constitution without ignoring international documents. The protection of human rights law is a national guarantee: it is included in the rule of law and law enforcement officials who apply the standard values of human rights. The state has several obligations in human rights, including:

1. Respect, meaning that the state does not interfere with the fulfillment of individual rights;
2. Protection, meaning that the state makes laws that contain mechanisms to prevent human rights violations committed by state institutions themselves or non-state actors. This protection is everyone's guarantee.
3. Realization means that the state is taking active steps to integrate it into

institutions and procedures, including allocating resources so that the public can enjoy its rights. This rights-based approach develops a task manager to fulfill his obligations and enhances the rightful owner's right to claim his rights. (Sofyan, 2015)

Through article 1 paragraph 3 of the 1945 Constitution stated that the State of Indonesia is a state of law, meaning the law as the commander in chief who controls the government in running the wheel of government based on the truth of justice. The concept of state law used is the state law of Pancasila, where the basis of the state law Pancasila using the principle of state prismatic law, which chooses a certain part of another legal state then compared in one legal system, for example the concept of *rechtstaat* and the concept of rule of law. In principle the state of law makes the law as the basis for running the state. Respect for individual rights must be upheld by the government, and also a free and impartial justice system must be put forward. (Panjaitan, 2018)

The implementation of a state that relies on fair laws then produces good governance. One of the principles of good governance is the establishment of legal supremacy that realizes the existence of fair law enforcement for all parties without exception by paying attention and respecting the values that live in society. The administration of the state government is already regulated in the constitution, including how the government guarantees the human rights of citizens. The rights contained in the constitution are called constitutional rights. Constitutional rights are more clearly defined as rights guaranteed by the constitution or the constitution, whether those warranties are expressly or implied. Because the right is included in the constitution, it becomes part of the constitution so that all branches of power are obliged to respect it. In addition, because constitutional rights are part of the constitution, they must be protected. (View of RELIGIOUS CONSTITUTIONAL RIGHTS AND CONSTITUTIONAL COURT, n.d.)

One of the many rights guaranteed in the constitution is the right to embrace a religion. To guarantee and protect the right of religion, the state in Article 29 paragraph 2 of the 1945 Constitution promises equality of the position of every citizen to freely embrace religion according to his beliefs. (Panjaitan, 2018)

The principle of the state of Indonesian law in the 1945 Constitution relates to the right of religion and believes in placing the principle of The One True God as the main principle, as well as religious values that underlie the movement of national and state life, not a country that separates the relationship between religion and state (separation of state and religion), and not solely adhere to the principle of individualism or the principle of communalism. The Constitution of the Unitary State of the Republic of Indonesia does not provide the possibility of a campaign of freedom not to religion, freedom for anti-religious promotion and does not allow to insult or derogatory religious teachings or books that become

the source of religious beliefs or soil the name of God. The state also provides a basic obligation which is a set of obligations that if not implemented, do not allow the implementation and establishment of human rights. Integrally, the 1945 Constitution stipulates that in upholding human rights, every element, whether state, government, or society also has a basic obligation that supports respect for human rights itself. (Sumadi, 2012)

Based on ICCPR and General CommentAry No. 22, Religious Freedom and Belief contain the following points:

- a. Freedom to own or adhere to a religion or belief of its own choice (forum internum), including converting or abandoning a religion or belief.
- b. Freedom to tomanifest his religion or beliefs (forum externum), which in the Declaration on the Elimination of All Forms of Intolerance and Discrimination based on Religion and Belief (1981) (General Comment No.15 ICCPR, n.d.)

Similarly, Sumadi asserted that the right and freedom of religion has 2 (two) dimensions. The first dimension, is forum internum, namely the right and personal freedom to believe in a religion. The second dimension is forum externum, namely the right to act, including communicating to and defending it in public. The state cannot intervene in the first dimension, let alone impose. However, against the second dimension, namely the practice in the dimension of religious rights and freedoms that have been related to social relations, the state can impose restrictions by using legal instruments, with the sole purpose of ensuring recognition and respect for the rights and freedoms of others and to meet the demands of justice. [vide Article 28] paragraph (2) constitution 1945]. In article 18 (3) ICCPR emphasized that freedom to manifest religion or belief may be subject only to such limitations as are prescribed by law and are necessary to protect public safety, order, health, or morals or the fundamental rights and freedoms of others. (ICCPR article 18 (3).

Forum externum, as contained on ICCPR and general commentary No. 22 has several aspects, including:

1. Carrying out their religion and beliefs in worship activities
2. Have a place of worship
3. Using religious symbols
4. Commemorating religious holidays
5. Appoint or elect a religious leader
6. Teaching and disseminating religious materials (including doing religious broadcasts)
7. The right of parents to ensure religious and moral education for their

children

8. Communicate with individuals and communities about religious affairs at the national and international level
9. Establish and run humanitarian institutions / collect and receive funding.
10. Submit an objection based on conscientious objection. (International Covenant on Civil and Political Rights (ICCPR), n.d.)

Article 8 of Law No. 39 (1999) on human rights, protection, promotion, enforcement, and embodiment of human rights is the responsibility of the government and society. The government has passed various laws and regulations and ratified various conventions, such as the Convention on the Rights of the Child, the Convention on the Elimination of All Forms of Discrimination against Women and other conventions, but has not been supported by a strong joint commitment to apply them. Based on these conditions, an effective law enforcement mechanism is needed to protect the rights of citizens, especially the right to freedom of religion and belief. (President of the Republic of Indonesia, 1999)

The activity of interpretation of the scriptures of a religion in order to obtain an understanding as a provision of practice is the domain of the forum internum, but mritakan, advocate or seek general support is the domain of the externum forum because it has been related to the human rights of others, public life, public interests and the interests of the state. Therefore, while the interpretation activities or activities are distorted, it will cause unrest among the religious people concerned, disturb their peace, and disturb public order. That's when the state is obliged to intervene by imposing such restrictions by using legal instruments. To allow it, is the state's negligence in carrying out its obligations. (Sumadi, 2012).

### **Implementation Of The Fulfillment Of Basic Constitutional Rights In Religion In Batur Village, Semarang Regency**

Batur village is located on the slopes of Mount Merbabu, Central Java, which is ±1600 meters above sea level. Batur village is the last stopover of merbabu mountaineering from the northwest side. The existence of batur village as a place to live in and learn local wisdom for the guests. Batur village becomes a strategic location as a choice of places to learn to live in the countryside with cool air and surrounded by farmland and trees just below Mount Merbabu. (Ariadi, n.d.)

Batur village which is a district of Semarang consists of 19 hamlets namely Thekelan, Seloduwur, Nglelo, Tawang, Batur Kidul, Batur Wetan, Gondang, Dukuh, Selongisor, Kaliduren, Madu, Ngringin, Kalitengah, Sanggar, Diwak, Senden, Rejosari, Wonosari and Krangkeng. In addition to being famous for the natural beauty of the mountains

it has, Batur village is also known as a multi-religious village. There are 4 kinds of religions embraced by batur villagers, namely Buddhism, Islam, Catholicism and Christianity. Each of the religions performs its worship in their respective houses of worship, namely Mosques, Churches and Viharas. As a multi-religious village, the tolerance built in batur village is very strong. It is evident that every year, during the Religious Holidays, batur villagers congratulate the religious people who are celebrating. And this congratulatory activity is carried out continuously until 2019, the year 2020 is not carried out because of the pandemic so that religious celebrations are also conducted on a limited basis. (Supriyo, n.d.)

Diversity often makes many problems more complicated, be it human rights violations, religious intolerance and riots triggered by differences, but this does not apply in Batur Village. In life in a compound society that has religious differences, people live harmoniously, peacefully and tolerance is maintained. Batur people consider that religion is a belief in God that is personal, so that whatever religion is embraced by each member of the village community batur does not make the fading harmony between each other. (Kristanto, n.d.)

Batur village has many families that each family member has different beliefs, especially in Thekelan Hamlet. There are more than 30 families whose members have different religious beliefs. For example, his mother's father is a Protestant and his son is Muslim. Or his mother's father is Buddhist and his son is a Protestant/Muslim Christian. Although they have different family members in terms of beliefs, they appreciate the differences and encourage different religious family members to persevere and practice their own religion. Because people believe that religion is a person's business with his God, it is the result of a man's contemplation of his belief in The One True God. Religion is used as clothing, everyone has their own clothes that are appropriate and suitable to be worn on their body, suitable pakian is not necessarily appropriate if worn on the body of others. (Ariadi, n.d.)

The relationship created in Batur Village is very interesting, because the fulfillment of the right in religion both in the realm of *internum* and *externum* is actually emerging from the community itself, not the country that insists or provides. Savigny said that the law at its earliest stage of development was expressed spontaneously from customary customs and traditions. That the only true source of all laws coming directly from custom, according to Savigny, is evidence of its existence. Savigny also said that the diversity of legal forms did not evolve based on deliberate natural reflection or reasoned utility considerations, but rather emerged from the common beliefs of the people, a feeling that was the same as an inner need. (Aulia, 2020)

In the practice of fulfilling religious rights, especially the provision of means of worship, there is no prohibition to establish houses of worship in Batur Village. But it becomes a mutual agreement that in each hamlet where there are different religions, the house of worship is quite one. This became a consensus held firmly by

the residents of Batur Village. In addition, in the construction of houses of worship, namely churches, mosques or vihara communities shoulder to shoulder in realizing it. (Citro, n.d.) There is a mutual awareness that is closely held by the people of Batur. This awareness does not distinguish between religions and groups which later became one of the reasons why Batur Village is known as a village of tolerance as well as a peaceful multicultural. Based on what Savigny claimed that the existing law was not established, it is very appropriate to the phenomenon that occurred in Batur village. It is the spirit of those who live and work together that gives birth to the law. In the general consciousness of a society that applies and is found the law, and therefore it must be called the law of the people. The law thus develops through internal silently-operating powers, not by the arbitrary will of the legislator. (View of Friedrich Carl von Savigny On the Hukum\_ of Law as a Manifestation of the Soul of the Nation, n.d.)

In Batur village there are no rules that discuss the fulfillment of religious life. Even at the district level, there are no rules or regulations that govern religious life. However, in the Semarang District Documentation and Legal Information Network page, there is an interesting vision that is the realization of freedom of religious life as one of the benchmarks for community welfare. (JDIH Semarang Regency, n.d.) . This practice is precisely in line with what Savigny said, that the law exists regardless of the state. It is a creation, not of nature or of God, but of the national consciousness. Thus, the supremacy of the law is mysteriously born from the spirit of the people (spirit of the people, or *volksgeist*) that already existed before. Because it comes from the unique spirit of the people, the law is not made, and the *volksgeist* becomes the basis for studying all its manifestations. (Rai, 2012)

Because the law was not made, the legislation in Savigny's view became insignificant, unless it had a declarative nature. Savigny's view asserts that the law "does not exist in itself", for its essence is "human life" seen from certain aspects. The law is not a product that is formed for some reason and then stipulated in the law. The law is not even something that exists but a living and changing consciousness that is forever in the process of becoming. In an important sense, the law, as Roger Berkowitz put it, therefore can be said to be non-existent. (Rai, 2012)

The people of Batur Village define religion and diversity as a gift as well as a deep belief in every human being, no religion that teaches bad, all religions teach to do good to other human beings even to different beliefs. This mindset is what makes Batur Village very attached to the efforts to maintain harmony between religious people who then realize a religious atmosphere that upholds the values of tolerance, respects differences and strives to make Batur Village as a peaceful, harmonious, comfortable and harmonious village. In the religion of the people of Batur Village is very free to others to live their respective religions without any problem and look at a difference in religion, instead they encourage each other to obey and persevere in carrying out their respective religions.

However, although demikian can not be denied that in batur village there has been a conflict. The conflict came from a new resident who entered and settled there because of the marital factor with one of the batur villagers. So in order to care for and perpetuate the values that live in the batur community, so that in the future it is not affected by the flow of dynamic community development, the living law must be institutionalized in the form of rules. Roscoe Pound suggests the concept of "law as tool of social engineering" means that the law can serve as a tool of social engineering. In Indonesia, this concept was developed by Mochtar Kusumaatmaja with the idea of "law as a means of community renewal". (Gochhayat, 2012)

The concept of "law as a tool of social engineering or community renewal" here rests on the values that exist in society. Because the use of law as a means of social engineering can only be done if it gives place on customary law, customary law and customs in society to grow in the national legal system. The legal way that should be practiced in Indonesia as a pluralist country is to facilitate the growth and development of The Living Law in society and synergize it with the national interest through efforts known as harmonization of the law. With the institutionalization of the values of batur villagers in village regulations and drawn further, namely in the Semarang District Regulation, these values will continue to be sustainable in line with the changes and dynamics of the community that occur. (Lathif, 2017)

So as the mandate in the implementation of the fulfillment of Religious Freedom and Belief, there are two actors who have an essential role in it, namely the State and Society. In this case, the state's obligation is to accommodate the values that have been practiced by the community into written rules so that those values will be maintained and increasingly deeply entrenched in society.

#### **4. Conclusion**

That in the fulfillment of religious rights in Indonesia there are two substantial dimensions, namely the first dimension, is an forum internum, namely the right and personal freedom to believe in a religion(freedom of religion). The second dimension is the right to act, including communicating to and defending it in public.

The realization of religious rights in the Semarang Regency of Batur Village is not top-down (from the state to citizens). But It is precisely the realization of religious rights in Batur Village is a collective joint Bottom Up, which is the result of the community's own consciousness and achievements. Encourage each other to create a harmonious and coordinated common life between one religion and another. This approach is completely consistent with what Savigny said, that the law has nothing to do with the country. It is not a creation of nature or God, but a creation of public consciousness. However, in order to prevent these values from disappearing with the development of society, the state must institutionalize them in the form of formal rules at the rural and regional levels, while still

formulating them in accordance with the continuous development and development of the life rules of the Batur village community

## References

- Aulia, M. Z. (2020). Friedrich Carl von Savigny tentang Hukum: Hukum sebagai Manifestasi Jiwa Bangsa. *Undang: Jurnal Hukum*, 3(1), 201–236. <https://doi.org/10.22437/ujh.3.1.201-236>
- Cito Sukarmin. 2021. Personal Interview of “Buddhist Leader” in his home, Batur Village, Semarang Regency
- Gochhayat, S. A. (2012). “Social Engineering by Roscoe Pound”: Issues in Legal and Political Philosophy. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.1742165>
- International Covenant on Civil and Political Rights (ICCPR).
- Indaha. 2021. Personal Interview in his home, Batur Village, Semarang Regency
- JDIH Kabupaten Semarang. (n.d.).
- Komentar Umum No.15 ICCPR.
- Lathif, N. (2017). Teori Hukum Sebagai Sarana Alat Untuk Memperbaharui Atau Merekayasa Masyarakat. *Palar | Pakuan Law Review*, 3(1), 73–94. <https://doi.org/10.33751/palar.v3i1.402>
- Lamino. 2021. Personal Interview of “ Chatolic Religious Leader” in his home, Batur Village, Semarang Regency
- Kristian Yulianto. 2021. Personal Interview of “ Christian Religious Leader” in his home, Batur Village, Semarang Regency
- Panjaitan, A. K. (2018). Implikasi Pengosongan Kolom Agama dalam Kartu Tanda Penduduk Terhadap Pemenuhan Hak Konstitusional Umat Baha’i. In *Indonesian State Law Review* (Vol. 1, Issue 1, pp. 1–16).
- Paul Martin, 2023, Introduction: Non-doctrinal Research Methods in Environmental Law, [www.elgaronline.com](http://www.elgaronline.com).
- Presiden Republik Indonesia. (1999). Undang-Undang No . 39 Tahun 1999 Tentang : Hak Asasi Manusia. Undang-Undang Republik Indonesia Nomor 39 Thn 1999 Tentang Hak Asasi Manusia, 39, 43.
- Rai, N. (2012). Volksgeist: In View of Friedrich Carl Von Savigny. *SSRN Electronic Journal*. <https://doi.org/10.2139/ssrn.1695389>
- Radix Wahyu DA. 2021. Personal Interview in his home, Batur Village, Semarang Regency
- Satiman. 2021. Personal Interview of “Islamic Religious Leader” in his home, Batur Village, Semarang Regency.
- Sa’adah. 2021. Personal Interview in her home, Batur Village, Semarang Regency
- Salim Ibrahim Ali, dkk, L2017, *egal Research of Doctrina and Non-Doctrinal*, International Journal of Trend in Research and Development, Vol. 4(1).
- Shidarta, *Hukum Penalaran dan Penalaran Hukum*, Genta Publishing, Yogyakarta, 2013.
- Sofyan, A. (2015). Perlindungan Hak-Hak Kelompok Minoritas Menurut Hukum Internasional Dan Implementasinya Di Indonesia.
- Sumadi, A. F. (2012). Hak Konstitusional Beragama dan Mahkamah Konstitusi. 11(2).
- Suwarno. 2021. Personal Interview in his home, Batur Village, Semarang Regency
- Supriyo. 2021. Personal Interview in his home, Batur Village, Semarang Regency
- View of Friedrich Carl von Savigny tentang Hukum\_ Hukum sebagai Manifestasi Jiwa Bangsa. (n.d.).
- View of HAK KONSTITUSIONAL BERAGAMA DAN MAHKAMAH KONSTITUSI. (n.d.).

- Temanggung Provinsi Jawa Tengah. *Diponegoro Law Journal*. Vol.6, No.2. p.2.  
<https://ejournal3.undip.ac.id/index.php/dlr/article/view/19575>
- Indra Rahmatullah. Desember 2014. Perlindungan Indikasi Geografis dalam Hak Kekayaan Intelektual Melalui Ratifikasi Perjanjian Lisabon. *Jurnal Cita Hukum*. Vol. II No.2. ISSN : 2356-1440. Fakultas Syariah dan Hukum UIN Syarif Hidayatullah Jakarta.
- Siti Asfiah. Oktober 2015. Perlindungan Hukum Potensi Indikasi Geografis Di Kabupaten Brebes Guna Pengembangan Ekonomi Masyarakat Lokal. *Jurnal Idea Hukum*, Vol.1 No.2. Magister Hukum Fakultas Hukum Universitas Jenderal Soedirman.
- Tatty Ramli dan Yetti Sumiati. 2008. Impplikasi Pendaftaran Indikasi Geografis Terhadap Potensi Peningkatan Pertumbuhan Ekonomi Masyarakat. *Jurnal Hukum Bisnis*. Bo.27 No.4.
- Winda Risna Yessiningrum. 2015. Perlindungan Hukum Indikasi Geografis Sebagai Bagian Dari Hak Kekayaan Intelektual. *Jurnal Kajian Hukum dan Keadilan IUS*, Vol. III, No.7. p.45
- Yuni Zanesty Hutapea. 2020. Analysis of Factors Affecting Demand For Gayo Robusta Coffee (Coffee Camephora). Universitas Medan Area.  
<http://repository.uma.ac.id/handle/123456789/12125>
- 1945 Constitution of the Republic of Indonesia  
Law Number 19 of 2013 concerning Protection and Empowerment of Farmers  
Law of the Republic of Indonesia Number 20 of 2016 concerning Marks and Geographical Indications  
Government Regulation No. 51 of 2007 concerning Geographical Indications  
<http://www.aekiaice.org/>  
<https://www.talkaboutcoffee.com/coffee-beans.html> Coffe Beans – The Many Varieties of The Coffe Plant.  
<https://ig.dgip.go.id/detail-ig/26#batas-wilayah>