Palm Oil Liquid Waste Pollution: The Limits of Corporate Strict Liability and State Obligations in Indonesia

Theresia Saurmaida Elisabet Siburian[(1)]
Fakultas Hukum, Universitas Jenderal Soedirman, Indonesia
Sri Wahyu Handayani[(2)]
Fakultas Hukum, Universitas Jenderal Soedirman, Indonesia
Abdul Aziz Nasihuddin [(3)]
Fakultas Hukum, Universitas Jenderal Soedirman, Indonesia
Ruslina Irianty[(4)]
Penelitian Dan Evaluasi Pendidikan, Universitas Negeri Jakarta, Indonesia
Email: theresia.siburian@mhs.unsoed.ac.id

Article Info
Received: 11-08-2026
Revised: 22-10-2026
Accepted: 16-11-2026

Keywords: *Environmental Pollution; Palm Oil Mill Effluent; Strict Liability; State Responsibility; Environmental Supervision*

Abstract

This article analyses the legal liability of a palm oil mill and of the state for alleged river pollution from liquid waste, using an alleged case in Pasangkayu, West Sulawesi, as an illustration. It is normative legal research with statutory, conceptual and case approaches, supported by official statements and news reports. The analysis finds that pollution in law means exceeding environmental quality standards, yet none of the sources reviewed publishes laboratory results showing such exceedance. Strict liability under Article 88 of Law No. 32 of 2009, as amended, covers only hazardous substances, hazardous waste or serious threats, so claims over ordinary effluent may depend on proving unlawful acts and fault. The state's duty to license and supervise remains central, but public follow-up after sampling is limited. The article recommends publishing laboratory results, clarifying the serious-threat standard, and strengthening provincial supervision..

1. Introduction

Coconut industry palm oil play a role important in economy area. but factory processing produce waste liquid in amount big. Management waste That become exam for two obligations law at the same time. Corporation must prevent and restore pollution. while the state is obliged ensure right inhabitant on environment good and healthy life as guaranteed by Article 28H paragraph (1) of the 1945 Constitution and Article 65 paragraph (1) of Law Number 32 of 2009 concerning Protection and Management Environment (UUPPLH) (Cristtian, 2022; Hamdi et al., 2025; Maksum et al., 2026).

Allegations pollution by PT Palma Sumber Lestari in the Regency Pasangkayu. West Sulawesi, became example problem that. After There is complaint citizens. team integrated Government West Sulawesi Province which

consists of on Satpol PP and Damkar (Daulay, 2023; Murdiana et al., 2026; Wibowo, 2025). Environmental Services. and Forestry Services inspected factory on August 5, 2025. Officials state company allegedly throw away waste to river so that influence activity agriculture residents and team take river water samples For tested in the laboratory. On April 2, 2026, the West Sulawesi DPRD recommended closing all over activity companies. among other things because company called Not yet own permission industry processing oil palm oil and because three worker die in accident Work. In sources reviewed No found published laboratory test results. so that case This Still status suspicion (Fadli et al., 2025).

Between the desired norm (*das Sollen*) and the reality (*das Sein*) there is distance. UUPPLH provides three track enforcement. namely administrative. civil. and criminal. but implementation slow. In PT Kallista Alam case. decision court level First dated January 8, 2014 sentenced company pay Rp. 366 billion. but until June 2022 recovery land Tripa Swamp peatland has not yet realized and executed Still prepared. Study about plantation palm oil in Paser Regency found that service environment life generally stop at warning written and termination activities and accountability company often limited to replacement loss and revocation permission (Fajar, 2025).

Previous studies divided into several direction. Some discuss criminal corporations on pollution waste palm oil and conclude that enforcement Not yet effective. part discuss changes to Article 88 of the UUPPLH by the Job Creation Law which are considered shift not quite enough answer from absolute to based error. part discuss Reliable documents as tool proof in strict liability lawsuits. and some discuss supervision licensing environment. Not many unifying study three matter in One analysis (Kehutanan, 2022): elements that must be proven so that the suspicion pollution waste palm oil can asked liability. validity period not quite enough answer absolute. and internal state obligations supervision as well as licensing. This article fill in gap the with case Pasangkayu as illustration (Hulu, 2026). The purpose is explain elements and limits of responsibility corporation. assess obligations and implementation the role of the state, and formulate necessary reinforcement. (Febriyantia & Siregar, 2025).

2. Methods

Study This various juridical normative. namely research that examines legal norms positive. Principle (Azkiya et al., 2026; Latekay et al., 2023; Putra et al., 2026a, 2026b). and doctrine for answer issue law. The approach used is approach legislation. approach conceptual. and approach case. Approach legislation reviewing the 1945 Constitution, UUPPLH, and its amendments through Law Number 6 of 2023. Approach conceptual examine draft pollution. responsibility answer absolute. principle polluter pay. and the principle caution. Approach case use case of PT Kallista Alam as comparator decisions and cases Pasangkayu as illustration (Kurnia et al., 2023).

primary legal material is the 1945 Constitution, Law Number 32 of 2009 in script original. and the provisions of Article 88 as amended Law Number 6 of 2023 which is quoted in literature. Legal materials secondary is article journals. government press releases. and media reports. Data on case Pasangkayu taken from news and statements official. Statement officials who use the word" suspected " are treated as allegations and statements One citizens who do not confirmed officials treated as claim. One article that is categorized as an advertorial by the media No used (Manurung, 2025).

Analysis done in a way descriptive-analytical and qualitative with stages : (1) identifying accountability norms corporations and state obligations ; (2) describe elements that must be proven in every track enforcement ; (3) mapping fact case along with its certainty status ; (4) compare with decisions and research previous ; and (5) formulate recommendation (Phuk et al., 2025).

Study This own limitations. Research This No involving informant so that No requires ethical clearance, however Because that's also research No test implementation in a way directly (Rajasa & Muhadi, 2023). Laboratory test results. team minutes integrated. and documents permission No available for author. This study evaluate framework law and burden proof. not conclude that pollution has happen (KabarMakassar, 2025).

3. Result And Discussion

A. Chronology and Status of Certainty of Case Facts

Table 1 summarizes reported events and distinguish facts presented officials from unsubstantiated allegations and claims confirmed.

Table 1. Chronology suspicion pollution and certainty status fact

Time	Reported events	Status
August 1, 2025	Meeting coordination team integrated at the West Sulawesi DLH Office to follow up complaint inhabitant .	Media reported
August 5, 2025	Integrated team review factory in Baras District , checking nine point pool waste and drainage disposal , and taking river water samples for laboratory tests .	Statement officials
August 5, 2025	The Environmental Agency notes the application area reported land covering an area of 132 hectares , while the area verified in the field was 95.1 hectares .	Statement officials
August 5, 2025	Official mention company allegedly throw away waste to rivers and impact on activities agriculture inhabitant .	Allegations
March 18, 2026	Department of Manpower stop activity company until condition safety Work filled after three worker die .	Delivered in DPRD meeting
April 2, 2026	The West Sulawesi DPRD recommends closing all over activity company . It is also said that company Not yet own permission industry processing oil palm oil from government province .	Recommendation , not decision closing
June 2026	A inhabitant declare waste water colored concentrated streamed to	Claim One citizens , not yet

	the Balanti River , smells stinging, and well inhabitant contaminated. The company does not give response .	verified

A number of matter need noted. First. no any source load results laboratory. determination sanctions administrative consequence pollution. or report criminal. (Barat, 2026). Second. the location called different : the August 2025 news report mentions Baras Village, whereas 2026 news reports mention Kasano Village, Baras District. Third. the difference between 132 hectares reported and 95.1 hectares verified show that land data application waste Not yet orderly. The company stated open and ready repair when found violation. All over discussion following therefore speak about What should proven. not about evidence that has been There is. (Qurniawan et al., 2026; Rosari et al., 2026; Zahra et al., 2026)

B. Elements Contamination and the Burden of Proof

UUPPLH defines pollution environment life as entry or inclusion creature life. matter. energy. and/ or other components to in environment by activities man so that beyond standard quality environment life that has been determined (Article 1 number 14). Element the main thing is is exceeding standard quality. Change water color. odor. or the death of fish is indications that become base examination. but in a way law Not yet prove pollution. Articles 98 and 99 of the UUPPLH also formulate the crime with consequence surpassed standard water quality. not just consequence in the form of visible damage (Angelina et al., 2026; Anggraini et al., 2026; Jundana et al., 2026; sulbarupdate, 2026; Zusmelia et al., 2026).

Consequently. the results of laboratory tests on water samples taken team integrated become proof key. Without results that is all track enforcement. both administrative. civil. and criminal. no own runway strong factual. Prohibition throw away waste to environmental media life in Article 69 paragraph (1) letter e of the UUPPLH also only can implemented If disposal That can proven. Reliable documents and reports monitoring company can complete proof Because load forecast impact and plans management that becomes gauge

measuring compliance. Therefore transparency of monitoring data become part from burden proof that must be filled with countries and companies (Irwan et al., 2026).

Article 69 paragraph (1) letter e is also necessary read together practice application land. namely utilization of wastewater on land plantation. Official mention existence letter agreement between companies and communities about utilization waste. and some land Already flowing waste. Condition law application land No described in reviewed and necessary sources reviewed in study continued (Hajam et al., 2023). because legitimate use and disposal to river own consequence different laws. (Yudhistira, 2025)

Limits of Liability Absolute and Path of Accountability Corporation

Article 88 of the UUPPLH as changed through Law Number 6 of 2023 which states : every person whose actions. efforts. and/ or his activities using B3, producing and/ or manage B3 waste. and/ or that which causes threat Serious to environment life responsible answer absolute on losses incurred from business and/ or its activities. Formulation This limit its validity not quite enough answer absolute on three situation. Threat Serious defined as threats that have an impact wide to environment live and give rise to anxiety society (Article 1 number 34) (Yang et al., 2023). The phrase " without need proof element error " no There is in formulation results quoted changes that. and some writer evaluate change the shift not quite enough answer company from absolute to based error so that not quite enough answer corporation tend limited to aspects administrative (Nurlaily & Supriyo, 2022).

Its application to waste liquid factory coconut palm oil No automatic. Sources reviewed No state that waste That classified as B3 waste. Officials Satpol PP indeed referring to Article 14 paragraph (1) letter f of West Sulawesi Regional Regulation Number 2 of 2024 which prohibits disposal waste material dangerous and poisonous to river. but classification waste palm oil No explained in source said (Undang-Undang Nomor 6 Tahun 2023 Tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 Tentang Cipta Kerja Menjadi Undang-Undang, 2023). If the waste No classified as B3, responsible answer absolute only can used when plaintiff prove existence threat serious (Undang-Undang Dasar Negara Republik Indonesia

Tahun 1945, 1945). that is impact breadth and anxiety society. If not proven. lawsuit must built through Article 87 paragraph (1), which requires guarantor answer business pay change loss and/ or do action certain on actions violate law in the form of pollution (Shams et al., 2021). with burden more proof heavy for plaintiffs. Table 2 compares paths the (Undang-Undang Nomor 32 Tahun 2009 Tentang Perlindungan Dan Pengelolaan Lingkungan Hidup, 2009).

Table 2. Lines of accountability corporation and burden the proof

Track	Base	That should proven	Notes For case waste palm oil
Administrative	Article 76 of the UUPPLH (script) original): warning written , coercion government , freezing , and revocation permission environment	Violation provision permissions found in supervision	No need proof error , but need findings documented supervision
Civil : actions violate law	Article 87 paragraph (1)	Deeds violate law in the form of pollution , loss , and relationships cause and effect	Burden of proof heavy for citizens ; results laboratory required
Civil : liability answer absolute	Article 88 (as amended by Law 6/2023)	Activity using B3, managing B3 waste , or cause threat serious , and loss	Valid If B3 waste or threat Serious proven ; classification waste palm oil Not yet clear
Criminal : deliberate	Article 98 paragraph (1): 3 to 10 years imprisonment	Beyond standard water quality and intentionality	Need results laboratory and evidence intentional
Criminal :	Article 99	Beyond standard water	Threat Far more light

negligence	paragraph (1): 1 to 3 years imprisonment	quality and negligence	than Article 98
Criminal corporation	Article 116 etc.	Deeds administrator or giver command that acts For corporation	Proof assessed difficult and based error

criminal path also has apparent weakness in decision. In coal waste dumping case by corporation. judge more emphasize actions than intention. no implementing strict liability firm. dropping a fine of Rp. 2 billion. and not order recovery. Civil path can produce a large value. such as Rp. 366 billion in PT Kallista Alam's case consists of on change make a loss material Rp114,333,419,000 and costs recovery of IDR 251,765,250,000,{{mong15}} but implementation the verdict need time for years. Two principles recognized by the UUPPLH support track civil law. The principle of pollution pay used to pollute bear cost recovery. and Article 87 requires funds to be recovery environment (Prihatiningsih et al., 2019). whereas principle caution allows the judge to act before certainty scientific full and has implemented in a number of decision Supreme Court.

Discussion

State Obligations in Licensing. Supervision. and Enforcement

State obligations stem from from constitution. Article 28H paragraph (1) of the 1945 Constitution guarantees right on environment good and healthy life. and interpretation This often called as constitution green which demands that the state protect and fulfill right the. Court The Constitution also links Article 33 paragraph (4) with development sustainability and justice intergenerational. At the level of law. UUPPLH divides duties and authorities government central. provincial. and district / city in Article 63 paragraphs (1), (2), and (3), incl coaching and supervision obedience guarantor answer business and publishing permission environment in accordance respective authorities. Article 76 provides government authority apply sanctions administrative when supervision find violation (Muhashiby et al., 2021).

In case Pasangkayu. response relative state beginnings fast. Meeting

coordination conducted on August 1, 2025 and review field on August 5, 2025, with taking water samples and examination pool waste. However three matter show weaknesses. First. the results laboratory No found in source public. even though results That determine enforcement law. Second. the difference between 132 and 95.1 hectares land application shows licensing and monitoring data that has not been accurate. Third. with information that company Not yet own permission industry processing oil palm oil from government province. appear question about function state licensing and supervision. namely How factory can operate when permission That of course Not yet any question This subject to confirmation document unlicensed permits available for the author. so that only can submitted as notes.

Recommendation closure by the DPRD is necessary read with be careful. Research about enforcement law administration environment show that revocation permission can free company from obligation recovery so that coercion government. preceded reprimand written. more in accordance For force recovery. By the same logic. closure activity need accompanied by obligation recovery and replacement make a loss to citizens. Effectiveness supervision also depends on coordination inter-agency. utilization technology. and participation society. with obstacle in the form of limitations personnel and resources Power technical and a long legal process. Article 70 of the UUPPLH opens room role community. and meaningful participation demand information environment that can accessed (Edi Minarno et al., 2022).

Barriers and Reinforcements

From the description above. the obstacles main enforcement law on suspicion pollution waste palm oil can formulated in four thing. First. the evidence scientific. namely results laboratory that is not available or No published. Second. the unclear boundaries of accountability absolute Because classification waste and standards threat Serious Not yet emphasized. Third. the weakness effect deterrent. which is visible from small fines and executions decision slow civil law. Fourth. data and permits that are not orderly. which makes supervision difficult measured. Obstacles access inhabitant to help the law also makes it difficult use right sue representative group in Article 91 and the right sue organization environment in Article 92 of the UUPPLH, but matter

This No can proven from sources reviewed and needed study empirical (Nurhasanah et al., 2021).

4. Conclusion

First. accountability corporation on suspicion pollution waste liquid palm oil depends on the proof that standard quality exceeded. and laboratory test results case Pasangkayu No available in sources reviewed. Responsibility answer absolute according to Article 88 only valid when activity using B3, managing B3 waste. or cause threat serious. so lawsuit on waste normal can move to Article 87 which requires proof actions violate law. Second. the state is obliged do licensing. supervision and enforcement based on Article 28H paragraph (1) of the 1945 Constitution and Article 63 of the UUPPLH. In case Pasangkayu. response beginning fast but results testing. land data order application. and permission status Still become question. Third. obstacles in the form of proof scientific. limits of responsibility answer absolute blur. effect deters the weak. and data does not orderly can overcome with openness results testing. clarity standard law. and greater oversight strong. Limitations study This is lack of primary data so study field and analysis document permission required as continuation. Based on findings that. it is recommended: Government West Sulawesi Province publishes laboratory test results on river water samples and team minutes integrated. as well as state in a way open permit status industry company. The Ministry of Environment emphasized classification waste liquid factory coconut palm oil and guidelines interpretation of "threat" serious" in Article 88 so that the limits of liability answer absolute clear. Government area strengthen supervision with matching land data application waste. strengthening laboratories and personnel supervisor. and implement coercion government accompanied by obligation recovery before consider revocation permission. The company opens report monitoring and reliable documents or document environment to community and allocate recovery funds. Researchers furthermore do study field through interview with service environment life. citizens. and companies as well as examine document permits and results laboratory.

References

Angelina, A. E., Azni, U. S., Jayanthi, R., Malim, D. D. L. O., & Thinn, P. P. (2026). Spatial Accessibility and Socio-Spatial Inequality in Regional Development: A Critical Review. *Jurnal Ilmu Sosial Mamangan*, *15*(2), 30–47.

Anggraini, N., Putra, I., Maihasni, M., Fachrina, F., & Haug, M. (2026). Handling Children with Legal Problems: Case at LPKS Kasih Padang Capital City. *Jurnal Ilmu Sosial Mamangan*, *15*(2), 1–15.

Azkiya, F. N., Putri, Z. U., Nurhalisyah, E., Athallah, S. H., & Damopolii, S. A. M. (2026). Fulfillment of the Rights of Victims of Sexual Violence under Law Number 12 of 2022 on Sexual Violence Crimes. *Media Hukum Indonesia (MHI)*, *4*(3).

Barat, R. T. (2026). PT Palma Sumber Lestari di Pasangkayu: Praktik Bisnis Sawit yang Merusak Lingkungan dan Merenggut Hak Warga. In *teropongbarat.com*.

Cristtian, I. (2022). Pertanggungjawaban Tindak Pidana oleh Korporasi Perkebunan Kelapa Sawit atas Pencemaran Limbah yang Berdampak pada Lingkungan Hidup di Kabupaten Paser. *Jurnal Magister Hukum ARGUMENTUM*, *8*(2), 85–105. https://doi.org/10.24123/argu.v8i2.5193

Daulay, M. M. (2023). Kebijakan Hukum terkait Korporasi yang Terlibat Pencemaran Lingkungan. *Jurnal Notarius*, *2*(1).

Edi Minarno, P., Suprapto, A., & Harsono. (2022). Pollution load capacity of the Larangan/Premulung River Sukoharjo Regency, Central Java Province, Indonesia in 2020. *IOP Conference Series: Earth and Environmental Science*, *1016*(1), 012029. https://doi.org/10.1088/1755-1315/1016/1/012029

Fadli, M., Yumni, A., Afriza, Marto, P., & Sukma, W. M. (2025). Konstitusi Hijau: Hak atas Lingkungan Sehat sebagai Bagian dari Hak Asasi dalam UUD 1945. *Rewang Rencang: Jurnal Hukum Lex Generalis*, *6*(12).

Fajar. (2025). PT Palma Sumber Lestari Diduga Buang Limbah Sawit ke Sungai, Kawasan Pertanian Dilaporkan Tercemar. In *fajar.co.id*.

Febriyantia, F., & Siregar, Mhd. A. (2025). Analisis Penerapan Aturan Hukum Pidana Dumping Limbah Batu Bara oleh Korporasi sebagai Pelaku Tindak Pidana (Studi Putusan Nomor: 526/Pid.Sus-LH/2017/PN Trg). *LITRA: Jurnal Hukum Lingkungan Tata Ruang Dan Agraria*, *5*(1), 106. https://doi.org/10.24198/litra.v5i1.2331

Hajam, Y. A., Kumar, R., & Kumar, A. (2023). Environmental waste management strategies and vermi transformation for sustainable development. *Environmental Challenges*, *13*(April), 100747. https://doi.org/10.1016/j.envc.2023.100747

Hamdi, S., Dewa, G. K. S., & Primasari, L. (2025). Reconception of Justice in the Intersection of Legal Protection and Victims' Rights in the Contemporary Criminal Justice System. *Kosmik Hukum*, *25*(3), 554–557.

Hulu, S. Y. P. (2026). Apa itu Green Constitution? In *Hukumonline*.

Irwan, I., Zusmelia, Z., Ansofino, A., Saadoon, A. R., & Siahaan, K. W. A. (2026). Pentahelix Collaboration in Enhancing Creative Economic Competitiveness Based on MDI Culture in West Sumatra Tourism Destinations. *Journal Public Policy*, *12*(3), 375–382.

Jundana, Q., As' ari, A. ari, Irwan, I., Zusmelia, Z., & Siska, F. (2026). Digital-Based Innovations in Nagari Administrative Services to Improve the Quality of Public Services in Pasaman Regency. *Marsiurupan: Journal of Community Development and Empowerment*, *1*(2), 130–142.

KabarMakassar, R. (2025). Tim Terpadu Pemprov Sulbar Tinjau Dugaan Pencemaran Lingkungan di Pasangkayu. In *KabarMakassar.com*.

Kehutanan, K. L. H. dan. (2022). KLHK Apresiasi Putusan Mahkamah Agung Tolak PK Derden Verzet PT Kallista Alam dalam Perkara 1000 Hektar Lahan Gambut Rawa Tripa. In *Siaran Pers*.

Kurnia, K., Fawwaz, I. R., & Herlina, L. (2023). Penerapan Polluter Pays Principle dalam Perkara Tumpahan Minyak di Teluk Kota Balikpapan. *Jurnal Hukum IUS QUIA IUSTUM*, *30*(3), 561–582. https://doi.org/10.20885/iustum.vol30.iss3.art5

Latekay, M., Pietersz, J. J., & Sedubun, V. J. (2023). Penegakan Hukum Administrasi terhadap Penerbitan Izin Lingkungan Kegiatan Budidaya Tanaman Perkebunan Pala Intercroop Kakao di Kabupaten Seram Bagian Barat. *TATOHI: Jurnal Ilmu Hukum*, *3*(9), 924–935. https://doi.org/10.47268/tatohi.v3i9.1954

Maksum, H., Halik, H., Azkia, F., Daud, N. M., & Anwar, A. (2026). Reconstructing the Right to an Effective Remedy for Victims of Sexual Violence in Indonesia's Criminal Justice System. *Journal of Mujaddid Nusantara*, *3*(3), 222–241.

Manurung, F. B. G. (2025). Partisipasi Hijau Bermakna (Meaningful Green Participation) sebagai Perwujudan Pemerintahan yang Ekokratis. *Jurnal Pro Natura*, *2*(1), 37–60.

Muhashiby, M. I. N., Hasibuan, H. S., & Wahyono, S. (2021). Waste Management in Jakarta Recycle Centre: Case Study of Pesanggrahan, Jakarta. *IOP Conference Series: Earth and Environmental Science*, *940*(1), 012034. https://doi.org/10.1088/1755-1315/940/1/012034

Murdiana, E., Rodliyah, N., Natamiharja, R., Fathoni, M. N., & Jha, G. K. (2026). The Victim's Best Interest Principle in Islamic Law: An Examination of the Substance of Sexual Violence in Muslim Majority Countries in the Contemporary Era. *MILRev: Metro Islamic Law Review*, *5*(1), 33–60.

Nurhasanah, Cordova, M. R., & Riani, E. (2021). Micro- and mesoplastics release from the Indonesian municipal solid waste landfill leachate to the aquatic environment: Case study in Galuga Landfill Area, Indonesia. *Marine Pollution Bulletin*, *163*, 111986. https://doi.org/10.1016/j.marpolbul.2021.111986

Nurlaily, N. Y., & Supriyo, A. (2022). Pertanggungjawaban Korporasi dalam Kasus Pencemaran Lingkungan Hidup. *Media of Law and Sharia*, *3*(3), 255–269. https://doi.org/10.18196/mls.v3i3.14384

Phuk, A. C., Rini, W. S. D., & Krustiyati, J. M. A. (2025). Dokumen Analisis Dampak Lingkungan (Andal) sebagai Dasar Pembuktian Penyelesaian Sengketa Lingkungan Hidup Berdasarkan Standar Strict Liability. *Jurnal Pro Natura*, *2*(2), 102–119.

Prihatiningsih, B., Kusuma, Z., Suharyanto, A., & Leksono, A. S. (2019). Prediction Spatial Model of Domestic Liquid Waste Distribution in Sawojajar Village, Malang City of Indonesia. *International Journal of Multicultural and Multireligious Understanding*, *6*(5), 186. https://doi.org/10.18415/ijmmu.v6i5.1063

Putra, A. F., Kurnia, D. A., & Gea, F. A. (2026a). Victimological Analysis Of The Fulfillment Of Rights For Victims Of Assault within the Resolution Of Cases Through Restorative Justice. *Legal Frontier*, *2*(4), 104–111.

Putra, A. F., Kurnia, D. A., & Gea, F. A. (2026b). Victimological Analysis Of The Fulfillment Of Rights For Victims Of Assault within the Resolution Of Cases Through Restorative Justice. *Legal Frontier*, *2*(4), 104–111.

Qurniawan, A., Nuswantari, N., & Mansyur, M. A. (2026). Legal Review of the Fulfillment of Victims' Rights in Human Trafficking Cases under Supreme Court Regulation (PERMA) No. 1 of 2022. *Contrarius Series: Law & Social Justice*, *1*(3), 404–412.

Rajasa, M. R. F., & Muhadi. (2023). Analisis Aspek Hukum dan Kebijakan dalam Perizinan Lingkungan di Indonesia. *Rewang Rencang: Jurnal Hukum Lex Generalis*, *4*(11).

Rosari, D., Ngatemin, N., Yanti, D., & Mulyadi, B. (2026). Optimized Regional Development Planning for Samosir Tourism: Integrating Seasonal Accommodation Occupancy and Sustainable MSME Empowerment. *Jurnal Ilmu Sosial Mamangan*, *15*(1), 194–207.

Shams, M., Alam, I., & Mahbub, M. S. (2021). Plastic pollution during COVID-19: Plastic waste directives and its long-term impact on the environment. *Environmental Advances*, *5*, 100119. https://doi.org/https://doi.org/10.1016/j.envadv.2021.100119

sulbarupdate. (2026). DPRD Sulbar Rekomendasikan Penutupan PT Palma Sumber Lestari. In *sulbarupdate.id*.

Undang-Undang Dasar Negara Republik Indonesia Tahun 1945 (1945).

Undang-Undang Nomor 6 Tahun 2023 Tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 Tentang Cipta Kerja Menjadi Undang-Undang (2023).

Undang-Undang Nomor 32 Tahun 2009 Tentang Perlindungan Dan Pengelolaan Lingkungan Hidup (2009).

Wibowo, A. (2025). A Portrait of the Level of Legal Awareness of Crime Victims Regarding the Right to Restitution (Study in Talun District, Blitar Regency, 2024). *Proceedings of International Conference of Graduate School on Sustainability*, *10*, 114–119.

Yang, J., Sun, J., Wang, R., & Qu, Y. (2023). Treatment of drilling fluid waste during oil and gas drilling: a review. *Environmental Science and Pollution Research*, *30*(8), 19662–19682. https://doi.org/10.1007/s11356-022-25114-x

Yudhistira, Y. P. (2025). Penerapan Prinsip Kehati-Hatian (Precautionary Principles) dalam Perkara Lingkungan Hidup. In *Dandapala*.

Zahra, N. A., Alamsjah, A., & Syah, F. (2026). The Effect of Implementing an Auction Item System and Social Factors on Profit and Loss Reports at PT. Pegadaian UPC Sukaria. *Journal Social Society*, *6*(2), 817–827.

Zusmelia, Z., Irwan, I., Ansofino, A., Ayubovna, I. S., & Siahaan, K. W. A. (2026). The Role of Millennial Entrepreneurs and Women Entrepreneurs in the Creative Economy Strengthening Strategy For Increasing Economic Competitiveness in the Destination Area Tour Creative West Sumatra. *Jurnal Ilmu Sosial Mamangan*, *15*(2), 16–29.