Enforcing Anti-SLAPP Mechanisms: Legal Protection for Environmental Defenders Against Criminalization

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Abstract

The numerous occurrences of environmental damage and other ecological crimes have led to legal problems and caused losses for affected communities. The objective of this study is to identify and analyze the legislative regulations concerning legal protection for environmental activists, the implementation of legal protection for environmental activists, and the challenges faced in its implementation. Based on the prevailing regulations, environmental activists who fight for the right to a healthy environment cannot be criminally prosecuted or civilly sued. However, in its implementation in Indonesia, there are cases where actions taken to advocate for a good and healthy environment intersect with criminal law provisions and are deemed as unlawful acts. This constitutes a SLAPP (Strategic Lawsuit Against Public Participation) intended to weaken their efforts. The research method used is empirical juridical, with data collection techniques involving interviews with a predetermined sample relevant to the theme, namely an environmental NGO, WALHI (The Indonesian Forum for Environment), specifically WALHI Jambi. The results of the research will provide an overview that actions protecting the environment from damage and/or pollution are protected under the prevailing laws and regulations in Indonesia. The assessment of environmental activists' actions as environmental defenders is made through the principles of proportionality and subsidiarity, which serve as considerations for law enforcement. The targeted outputs from this research are a certificate as a presenter at a national seminar and an article in a Sinta 2 accredited journal. The findings of this research are expected to contribute to future criminal law policy related to the legal protection of environmental activists, one that is more oriented towards justice and the rights of victims affected by environmental damage, as well as ensuring that environmental activists receive protection when carrying out their activities related to environmental preservation without obstacles or intimidation from certain parties attempting to hinder their work.

1. Introduction

The widespread environmental damage in Indonesia has caused significant losses to society. According to data released by the Directorate General of Environmental and Forestry Law Enforcement, already succeed handle 187 case file case environment life throughout year 2024. These cases include illegal waste dumping, illegal wildlife trade, waste disposal, and even the distribution of illegal timber (Jundana et al., 2026; Rosari et al., 2026; I. M. Simanjuntak et al., 2026; Yusuf & Wahyuningati, 2022). Law enforcement aims not only to provide a deterrent effect by targeting the primary beneficiaries (*beneficial ownership*), but also to redress the losses suffered by victims, including losses to the environment, communities, and the state (Anggraini et al., 2026; Kansil & Susilawati, 2020; Siahaan et al., 2026). The success of environmental law enforcement cannot be separated from the efforts and the environmental activist Which fight for help for victim from existence case environment life Which in The community experiences environmental damage, particularly from businesses and individuals who often focus solely on financial gain without considering the environmental impacts (M. Simanjuntak, Widiarty, et al., 2022). Environmental activists play a crucial role in protecting the environment and promoting sustainable development, but they often face challenges and threats, including violence, intimidation, and criminalization (M. Simanjuntak, Tumanggor, et al., 2022). Effective legal protection is essential. important to ensure safety and security activist internal environment carry out their activities (Widyawati et al., 2022).

Regulations on Environmental Management, namely Law Number 32 of 2009 concerning Environmental Protection and Management, abbreviated as UUPPLH, as an effort to prevent human actions that will have an impact on environmental damage and pollution (Putra et al., 2024). environment, through enforcement law (Marsela et al., 2024). Related with regulation about environment life, based on Article 65 of Law No. 32 of 2009 concerning Environmental Protection and Management, it explains the environmental rights granted to every person, namely (Feliks, 2022):

1. Every person entitled on environment life Which Good And Healthy as part from human rights;

2. Every person entitled get education environment life access information, access to participation, and access justice in fulfilling rights on the living environment good and healthy;
3. Everyone has the right to submit proposals and/or objections to business plans and/or activity Which estimated can cause impact to environment ;
4. Everyone has the right to play a role in environmental protection and management in accordance with laws and regulations.

Furthermore, in Article 66 of Law no. 32 of 2009 explains "Everyone who fights for right on environment life Which Good And Healthy No can sued in a way criminal or sued civilly." However, the provision of protection Not yet implemented with good, because there are restrictions room movement to the difficulty interpreting elements "fight for environment good and healthy life" (Duwira Hadi Santosa, 2021). Legal protection for environmental activists is crucial as they are often the target of attacks, including unfair lawsuits (SLAPPs) and physical threats (Angelina et al., 2026; Anggraini et al., 2026; News, 2019; Zusmelia et al., 2026). Ministerial Regulation No. 10 of 2024 provides this legal protection, ensuring that environmental activists cannot be prosecuted criminally or civilly for their actions in advocating for the right to a healthy and good environment (Wijaya et al., 2021). However, in practice, both criminal and civil charges have been filed against environmental activists (Roland & Poni, 2021). Several key points, according to Ministerial Regulation No. 10 of 2024, relate to legal protection, the forms of protection, and loopholes in regulations that could criminalize environmental activists (Irwan et al., 2026; Purba et al., 2026; Riyanti, 2023; Tomi et al., 2026).

2. Method

Data from activist environment from period time 2014 until 2023, There is 133 case threat to environmental activists, with a significant increase in 2021 when the Job Creation Law was enacted. Therefore, stronger and more comprehensive legal protection is needed to protect environmental activists. The (Arskarn & Bunmee, 2023).

Published rule law This give wind fresh for activist environment in fighting for victims of environmental damage, but This regulation has not been able to

bind law enforcement with differing perspectives on case handling and has not been oriented towards protecting environmental activists. Prior to the issuance of Regulation of the Minister of Environment and Forestry (Permen LHK) Number 10 In 2024, other regulations were issued to address these issues, namely the Prosecutor's Guidelines No. 8 of 2022 concerning the Handling of Criminal Cases of Environmental Protection and Management, and the Regulation Court Supreme Court Decree (PERMA) No. 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases, which revokes the Decree of the Chief Justice of the Supreme Court Number 36/KMA/SK/II/2013 concerning the Implementation of Guidelines for Handling Environmental Cases, however Not yet effective Still happen case *SLAPP* to activist environment. Hope activist Environmental protection, the existence of Ministerial Regulation No. 10 of 2024 provides a strong basis for protecting environmental activists without fear of legal action. Discussing environmental activism is inseparable from the definition of the environment. in the narrow sense, namely, everything that exists around man. Whereas environment in meaning wide is unity room with All objects, forces, conditions, and living creatures, including humans and their behavior, affect nature and the continuity of life (Daeng & Daeng Yusuf, 2021). Meanwhile, the definition of environmental activists is that they are people who are members of organizations that actively fight for the environment. In this case, the activists referred to are those who are involved in something organization Which care to problem environment (Notanubun, 2021). Normal called Non-Governmental Organizations (NGOs) or Non-Governmental Organizations (NGOs) which have their own interests in management and maintenance environment life. Wrong One NGO Which focus regarding environmental issues in Indonesia, is the Indonesian Forum for the Environment (Walhi) which was founded in year 1980 (Harefa et al., 2026; Nurlaily & Supriyo, 2022; Reden et al., 2026; Sidabutar et al., 2026). Lots activity Which done Walhi including advocacy policy, education and training, direct action, and conducting research and documentation. Walhi's achievements include stopping projects that damage the environment (Irayadi, 2024). choose Walhi as a place to research this problem, because it is indeed the focus Walhi fits the theme be examined (Zakaria et al., 2025). Based on the description, the research focuses on the problem, namely, how arrangement and form form

protection law to activist environment? also about How implementation from protection law to activist environment live? and How obstacles in implementation from protection law to activist environment live?. While the type of research uses an empirical juridical method, it is a study conducted to observe the workings of law in society. This research approach is descriptive, namely research through concrete data in the field which is then presented, analyzed and interpreted. Analytical descriptive research is conducted in order to show symptoms, empirical facts in the field through normative review (Ritonga et al., 2024).

3. Result And Discussion

1. Legal Protection Regulations and Forms of Legal Protection for Environmental Activists

Legal protection for environmental activists has been regulated in Article 66 of Law No. 32 of 2009 concerning Environmental Protection and Management, Supreme Court Regulation No. 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases, and Ministerial Regulation of the Environment and Forestry No. 10 of 2024 concerning Legal Protection for People Fighting for the Right to a Good and Healthy Environment, as well as Prosecutor's Guidelines No. 8 of 2022, concerning Handling of Criminal Cases in the Field of Environmental Protection and Management (Ramadhani et al., 2021).

This protection is not only given to environmental activists, but to everyone who defends and fights for a good and healthy environment, as their rights are stipulated in Article 28H of the 1945 Constitution. However, in its implementation, there are environmental activists whose actions are considered unlawful, especially in the field of criminal law. In this case, an explanation of the protection regulations for environmental activists as environmental fighters will be explained as follows (Thani, 2017):

1. Law No. 32 of 2009 concerning Environmental Protection and Management Life

The Law on Environmental Protection and Management not only regulates environmental protection but also prioritizes the protection of human rights to

a good and healthy environment. This right is stated in Article 66, which states, "Anyone who fights for a good and healthy environment cannot be prosecuted criminally or sued civilly." Based on the contents of the article, it is explained that actions to fight for the environment cannot be considered unlawful. The state has an obligation to protect their rights, as regulated in the Law as an effort to provide protection for them as environmental defenders (Heriyanto et al., 2022).

2. Regulations Supreme Court Regulation (PERMA) Number 1 of 2023 Concerning Guidelines for Judging Case Environment

Before issued PERMA No. 1 of 2023, has issued moreover Previously, the Decree of the Chief Justice of the Supreme Court No. 36/KMA/SK/II/2013 (SK KMA 36/2013) which adheres to system Anti- *SLAPP* law, with do defense the most important thing formerly must decided through interim decision, however in implementation defender environment must still undergo trial and prove that He has become a victim *of SLAPP*. Therefore his weaknesses to protection they fighter environment, then PERMA No. 1 of 2023 was issued, the contents of which are has explain from elements of Article 66 of Law no. 32 of 2009 Concerning Protection and Management Environment.

Protection law to those who fight for right on environment life, has been explained in Article 48 paragraph (1), "Protection the law given to everyone who fights for it right on environment " A good and healthy life. " In this article, it emphasizes the contents of Article 66 of Law No. 32 of 2009, that environmental activists and the community are guaranteed freedom of opinion and action in fighting for the environment (Wicaksono & Kusriyah, 2018).

Furthermore, in Article 48 paragraph (2), it contains an assessment of the struggle for the right to a good environment and as explained in Article 48 paragraph (1), the Judge Examining the Case will consider the factors of his actions, while Article 48 paragraph (3) identifies the contents of Article 48 paragraph (1) explaining the right to submit proposals or objections, both verbally and in writing, regarding environmental protection and management. This right reflects active participation in the decision-making process that has the potential to affect environmental quality, through the right to submit complaints, complaints, or reports of alleged environmental crimes, including filing administrative, civil lawsuits, or other legal processes. This right provides

a guarantee to be able to take legal action in upholding justice for environmental rights. The scope of rights granted to environmental activists has been described, previously in Article 66 regarding rights was not clarified which gave rise to multiple interpretations (Johar et al., 2022). So that environmental activists have an existence in environmental protection, through open space in expressing opinions in writing and orally which are voiced through demonstrations, internet websites, and also through social media that utilize technology. The broader scope and clarity of interpretation of Article 66 has become a guideline for judges in making decisions regarding their actions as environmental defenders (Romualdo, 2023).

Furthermore, in Article 48 paragraph (4), it is stated that realizing the right to a good and healthy environment, which has previously been explained in Article 48 paragraph (1), paragraph (2), and paragraph (3), is carried out in accordance with applicable law. Furthermore, in proving environmental criminal cases, it is explained in Article 76 paragraphs 1 to 7 which regulate the public prosecutor's charges against the actions of environmental activists as actions that violate criminal law will be adjusted to the contents of Article 66, so that charges containing violations in Article 66 will clearly be rejected by the Judge. Even in the following article, namely Article 77, it is stated that when after examining the main case, the judge assesses that the actions accused by the public prosecutor have fulfilled the elements and are proven, but are also proven as activists for the right to a good and healthy environment, in accordance with the contents of Article 66 of Law No. 32 of 2009 concerning Environmental Protection and Management, the judge will issue a verdict of acquittal from all legal charges (Ahmad Shoifi et al., 2024).

In this regard, environmental activists who carry out actions in terms of protecting the environment, but are in conflict with the elements of the relevant articles in the realm of criminal acts, will still be protected because they are proven to be environmental activists. The judge's decision is certainly through the fulfillment of the elements of Article 66, and based on Article 78 paragraph (1), explaining the judge's assessment of the objections and/or defense of the defendant and/or his legal counsel as contained in Article 76 and Article 77, by considering the contents of Article 48 paragraph (2), Article 48 paragraph (3), and Article 48 paragraph (4), which have been explained previously. In this

case, based on the contents of the articles in this Perma, it becomes a resolution related to the problem of ambiguity in the scope of the struggle for the right to a good and healthy environment (Adrianto, 2024).

3. Regulation of the Minister of Environment and Forestry (Permen LHK) No. 10 of 2024 Concerning Legal Protection for People Who Fight for the Right to a Good and Healthy Environment.

The issuance of the Ministerial Regulation of the Environment and Forestry is an effort to realize protection for environmental defenders, including environmental activists. Article 2 paragraph (1) states, "People who fight for the environment cannot be prosecuted criminally and sued civilly." This article is an affirmation of the contents of Article 66 of Law No. 32 of 2009 concerning Environmental Protection and Management. Furthermore, Article 2 states that what is meant by "people who fight for the environment" are individuals, groups of people, environmental organizations, academics/experts, customary law communities, and business entities (Annida & Firmansyah, 2022)." Furthermore, Article 3 regulates actions in protecting the environment (Sands, 2023). Through the Minister of Environment and Forestry Regulation, there is an explanation regarding *SLAPP actions* which are stated as retaliatory actions against people who fight for the environment. In Article 5 paragraph (1) it is stated that these actions consist of weakening the struggle and public participation, summons, criminal proceedings and civil lawsuits. Specifically, the weakening of the struggle and public participation is stated to consist of written threats, verbal threats of criminalization, and physical violence that endangers safety. Meanwhile, specifically in the criminal law section, it is also stated in Article 5 paragraph (2) that the forms of actions are reporting suspected criminal acts and criminal prosecution (Windari & Effendi, 2021).

The legal protection provided to environmental activists in this ministerial regulation consists of preventing retaliatory actions through capacity building for law enforcement officers through synergy between the government and law enforcement officers, in addition there are handling measures to protect environmental activists by determining cases as retaliatory actions and providing legal assistance (Suryaningsi; Warman; Komariyah Widyatmike Gede; Hudiyono, Yusak; Thaba, Aziz, 2021).mBased on the laws and

regulations regarding the protection of environmental workers, in this case environmental activists, efforts have been clearly regulated to protect their actions to protect environmental rights which are considered illegal acts, or referred to as *SLAPP actions.*

4. Prosecutor's Guidelines No. 8 of 2022 Concerning Handling of Criminal Cases in Environmental Protection and Management Sector

In the guidelines of the Prosecutor's Office, it has the objective of enforcing the law on environmental protection due to acts of environmental damage and pollution, and protection of environmental fighters and defenders, in this case directly related to Article 66 of Law No. 32 of 2009 concerning Environmental Protection and Management, regarding environmental activists as one of the environmental fighters in fighting for a good and healthy environment which is given protection with the concept of Anti -*SLAPP,* by stopping *SLAPP cases* as early as possible through the role of the prosecutor as a case controller (*dominus litis).* In this case, in accordance with the role of the Prosecutor's Office in upholding the supremacy of law for the protection of public interests, as well as in upholding human rights.. Protection arrangements should be implemented in accordance with applicable regulations, so that there is a match between the law and its implementation. In this case, a more comprehensive arrangement and understanding of the meaning of "fighting for the right to a good and healthy environment" are needed. Protection arrangements should be implemented in accordance with applicable regulations, so that there is a match between the law and its implementation. In this case, a more comprehensive arrangement and understanding of the meaning of "fighting for the right to a good and healthy environment" are needed (Ilyasa, 2021).

2. Implementation of Legal Protection for Environmental Activists

Legal protection for environmental activists who fight for the right to a good and healthy environment as a form of action against environmental damage and pollution should be protected according to laws and regulations in Indonesia. However, the implementation of legal protection for environmental activists has not been effective. There are cases involving environmental activists and also communities as environmental defenders who fall into the

legal realm, especially in the field of criminal law (Spamann, 2022). In addition, activists often encounter resistance and intimidation from related parties who feel that environmental activists who are carrying out their duties accompanying communities in conflict are a threat and harm them, so that sometimes they encounter obstacles and even experience physical violence. Some example cases that occurred to activists environment including (Toyib et al., 2023);

1. The case of Budi Pego, a activist environment that does rejection mine in Tumpang Pitu Banyuwangi, in 2018 was sentenced by the Supreme Court with punishment 4 years in prison, Budi Pego as defendant as stated in Article 12 paragraph (1) of Law no. 9 of 1998 concerning Independence Expressing Opinions in Public.
2. Daniel Frits, is a activist environment in speak out opinion through social media Facebook to pollution pond Karimunjaya shrimp, however He become defendant in case defamation, so disconnected guilty and punished for 7 (seven) months by the District Court with fulfillment elements of Article 45A paragraph (2) in conjunction with Article 28 paragraph (2) of Law no. 19 of 2016 Concerning Change on Constitution Number 11 of 2008 concerning Electronic Information and Transactions (ITE).
3. Criminalization to farmer named M. Kasim, a farmer from Pandan Sejahtera Village, District Geragai East Tanjung Jabung Regency, still Keep going continued, thing this is proven until This Mr. Kasim Still undergo legal process consequence fight for land the transmigration provided government. Mediation process between community and PT Indonusa Agromulia No achieved agreement between two sides parties, including continuous effort done through Restorative Justice is not successful, so the process continues continues. The case of M. Kasim show one of the from many the case that occurred which ended occurrence criminalization for farmers who fight for right on land they.
4. Incident criminal persecution and assault that almost frown life occurred in the jurisdiction Maro Sebo Ulu police station, the victim named Dedi Irawan and his parents Sungkoyo inhabitant village Mekar Sari, Maro Sebo District, Batanghari Regency. Accompanied by an Advisor The law

> from team Advocacy Walhi Jambi them report events experienced, events This happening in the background behind garden the victim's palm oil is controlled by certain individuals known J toke as a land mafia. When the victim takes results his garden Alone rather they get action violence from child fruit the J token, even though clear boss J and son fruit occupy land of victims without legal basis in a way law.

A number of example cases that occur said, according to Eko Mulio, Advocacy Manager Walhi Jambi is of the opinion that, "The case that ensnared activist environment life to law criminal, is method in silence action defender environment.".

At the same time, Ginda Bahari, Research and Campaign Division of Walhi Jambi, said,

The Daniel Frits case is one of many instances of criminalization of environmental activists. Law enforcement is considered to be neither objective nor proportional in the legal process against Daniel. In this case, law enforcement tends to view cases solely from the perspective of the perpetrator, ignoring the underlying perspective. Furthermore, Indonesia already has regulations regarding *Anti-Strategic Lawsuits Against Public Participation* (Anti-*SLAPP*), which should be taken into consideration when making a decision (Amnesti et al., 2025).

Ginda Bahari stated, assessing the lack of understanding in interpreting the meaning of fighting for a good and healthy environment, namely: The many criminalization actions carried out against environmental activists, are simple evidence that shows the lack of understanding of law enforcement officers in interpreting and implementing the Law, this still often occurs because they do not have the same understanding regarding legal protection for environmental activists which has been regulated in the applicable laws and regulations.

Furthermore, Muhammad Aditya Prakoso of the Jambi Walhi Division responded that, "In Indonesia, the regulations are good, but in terms of implementation, there are some things that do not comply with the applicable regulations." In relation to this opinion, it is in line with Ginda Bahari's opinion regarding the regulations that are quite good, but in their implementation they are not appropriate (Taduri, 2021).

In terms of regulations, there are already laws that are considered

progressive in protecting environmental activists in fighting for a good and healthy environment. These regulations began with the enactment of Law No. 32 of 2009, one of whose articles states that anyone who fights for the right to a good and healthy environment cannot be prosecuted criminally or civilly. Then, protection for activists was also strengthened with the enactment of Ministerial Regulation (Permen) LHK Number 10 of 2024, where environmental activists who have often been criminalized under criminal articles in the Criminal Code, or the ITE Law, finally have a legal umbrella, no longer can be prosecuted criminally or sued civilly (Bashir & Santhi, 2022). However, this regulation is often refuted by law enforcement officials in taking action against cases accused of environmental activists (Balik et al., 2023).

Based on the results of interviews with environmental activists from Walhi Jambi, researchers concluded that the regulation of protection for environmental activists as fighters and defenders of the environment has not provided the legal protection that it should in its implementation (Maturbongs et al., 2017). Based on the theory of legal protection, the meaning of legal protection itself is to provide protection and protection for human rights, through legal instruments, namely laws and regulations in Indonesia regarding legal protection given to environmental defenders with the aim of improving human welfare. However, in its implementation there are still inconsistencies in protecting rights, as evidenced by the implementation that has not been running well. Several cases have ensnared environmental activists in the realm of criminal law, criminal law should not be a means to stop actions in fighting for the environment, and ensnare environmental activists but rather as a means to provide protection for human rights. Environmental damage and environmental pollution caused by either individuals or legal entities (corporations) should be given firm action, through the last means of criminal law enforcement as *the ultimum remedium,* not turning into law enforcement against environmental defenders (Herdiansah, 2021).

3. Obstacles in the Implementation of Legal Protection for Environmental Activists

In implementing legal protection for environmental activists, there are still several obstacles faced, namely (Zhang et al., 2019):

1. Law No. 32 of 2009 concerning Environmental Protection and Management

In this law, especially Article 66, there are still multiple interpretations, namely (Permana et al., 2025):

provisions for protection for environmental activists, in particular Article 66 of Law No. 32 of 2009 concerning PPLH is considered ineffective because it is of a multiple interpretations And not implementable (Liu et al., 2024). In addition, the absence of clear implementing regulations regarding Anti-SLAPP procedures and mechanisms makes its implementation difficult (Wijayanti et al., 2023).

2. Weak Understanding and Commitment of Law Enforcement

Law enforcement officers (Police, Prosecutors, and Judges) often don't really understand or ignore the main objective of Article 66 of the Environmental Management Law, so that in processing cases, they focus more on civil or criminal lawsuits alleged by the company/business actor (such as defamation) rather than the main issue of environmental pollution reported by activists (Tristy & Aminah, 2020).

This is in accordance with the opinion of Eko Mulio, Manager of Advocacy and Legal Defense of Walhi Jambi, who stated that there are often differences in perception or understanding from law enforcers when handling cases related to environmental conflicts, whether land disputes or other cases, this is one of the obstacles when Walhi carries out its duties to accompany communities in conflict (Sihotang et al., 2024).

3. High Cases of Criminalization (SLAPP) and Intimidation

Despite Article 66 of Law No. 32 of 2009 concerning Environmental Protection and Management, cases of criminalization, intimidation, violence, and threats against environmental activists remain widespread and tend to increase year after year (Javandira & Gama, 2018). This demonstrates that the existing legal framework fails to provide real protection on the ground (Cahyani & Puspitasari, 2023).

4. Narrow Scope of Protection

Some protection regulations tend to limit protection only to activists who choose the official legal route (litigation), thus ignoring or excluding those who choose other advocacy routes, such as peaceful actions, public campaigns, or

field investigations, even though these routes are often the main targets of intimidation for environmental activists (Riyanto, 2018).

Some of the obstacles outlined previously explain that legal protection for environmental activists is running well, where legal provisions exist, but are not effective as a shield or have the impact of providing appropriate legal protection, so that environmental activists remain vulnerable to massive criminalization And counter-attack from parties whose interests are disturbed by environmental conservation efforts and still need to be thought about together to find the right solution so that what has been regulated in Law No. 32 of 2009 concerning Environmental Protection and Management, especially Article 66 can be implemented properly and activists truly receive legal protection in accordance with legal regulations (Warsiman et al., 2023).

Conclusion

In the regulation of protection for environmental activists contained in Article 66 of Law No. 32 of 2009, especially in Article 66 concerning Environmental Protection and Management, as an effort to prevent actions that violate the law and disrupt public interests and several other articles, Supreme Court Regulation (PERMA) Number 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases, Regulation of the Minister of Environment and Forestry (Permen LHK) No. 10 of 2024 concerning Legal Protection for People Fighting for the Right to a Good and Healthy Environment and Prosecutor's Guidelines No. 8 of 2022 concerning Handling of Criminal Cases in the Field of Environmental Protection and Management. Meanwhile, regarding the implementation of protection for environmental activists, from various environmental conflicts that occur, it is necessary to understand the interpretation of the meaning of Article 66 of Law No. 32 of 2009 by law enforcement officials so that there is no difference in interpreting the Environmental Law. In addition, they must prioritize the objectives of actions in fighting for a good and healthy environment, and consider that they have carried out greater legal interests, so as not to discourage their actions in protecting the environment. In the implementation of legal protection for environmental activists, there are several obstacles related to legal protection

for environmental activists that need to be addressed together with both the parties in conflict and the local government and law enforcement so that they have the same understanding in finding solutions that do not harm all parties in conflict and also overcome the existing obstacles

References

Adrianto, I. (2024). Legal Protection for Hospitals Against Delay in Payment of Claims by BPJS. *Proceedings: International Forum Research on Education, Social Sciences Technology and Humanities*, *1*(2), 151–155.

Ahmad Shoifi, Djumikasih, D., & Laila, F. (2024). Legal Protection for Creditors Who Recipient of Motor Vehicle Fiduciaries After Constitutional Court Decision Number 18/PUU-XVII/2019 & Number 2/PUU-XIX/2021 (Study at BRI Finance Malang Branch). *International Journal Of Humanities Education and Social Sciences (IJHESS)*, *4*(2). https://doi.org/10.55227/ijhess.v4i2.1375

Amnesti, S. K. W., Zulaichah, S., & Istiqomah, N. (2025). Legal protection of personal data security in Indonesian Local Government apps: Al Farabi's perspective. *Legality: Jurnal Ilmiah Hukum*, *33*(1), 1–19.

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.

Annida, L., & Firmansyah, A. (2022). Environmental Uncertainty, Debt Policy, Tax Avoidance: Does Managerial Ability Matter? *Riset*, *4*(2), 054–071. https://doi.org/10.37641/riset.v4i2.162

Arskarn, K., & Bunmee, R. (2023). *Legal issues pertaining to personal data protection and mule account liability in emergency decree on measures for the prevention and suppression of technological crimes BE 2566*. Thammasat University.

Balik, A., Hetharie, Y., Uktolseja, N., Anggia, P., & Tulaseket, R. (2023). Registration of Copyright as Guarantee of Batik Motif Legal Protection (Comparation Study of Indonesia, Malaysia and Thailand). *JILS*, *8*, 1.

Bashir, F., & Santhi, V. (2022). Impact Of Employee Training On The Environmental Performance: An Empirical Evidence From Micro, Small And Medium Enterprises. *Journal of Environmental Protection and Ecology*, *23*(4), 1588–1596.

Cahyani, R. S. A., & Puspitasari, W. (2023). Pengaruh Kinerja Lingkungan, Biaya Lingkungan, Kepemilikan Saham Publik, Green Accounting, Dan Struktur Modal Terhadap Kinerja Keuangan. *Jurnal Akuntansi Trisakti*, *10*(2), 189–208. https://doi.org/10.25105/jat.v10i2.17846

Daeng, M. Y., & Daeng Yusuf, M. F. (2021). Legal Protection for Children Victims of Narcotics Abuse in Riau Province. *International Journal of Law and Public Policy*, *3*(2), 100–106. https://doi.org/10.36079/lamintang.ijlapp-0302.265

Duwira Hadi Santosa, A. A. G. (2021). Pertanggungjawaban Pidana Korporasi Terhadap Pencemaran Lingkungan (Suatu Perbandingan UU PPLH Dengan Omnibus Law Kluster Lingkungan Hidup). *Jurnal Komunikasi Hukum (JKH)*, *7*(1), 336. https://doi.org/10.23887/jkh.v7i1.31738

Feliks, D. (2022). Legal Protection of Policyholders Due to Bankruptcy of Bumi Asih Jaya Insurance. *Khazanah Hukum*, *4*(2), 80–91. https://doi.org/10.15575/kh.v4i2.18100

Harefa, J. S., Anwar, K., Nailatulliza, N., Lubis, Z. Z., & Phonna, M. (2026). Analysis of the Influence of Price Changes on The Demand of Stop Materials in the Community. *Journal of Social and Society*, *1*(2), 140–150.

Herdiansah, A. G. (2021). Mengatasi permasalahan sampah di lokasi wisata alam gunung di Jawa Barat. *Dharmakarya: Jurnaal Aplikasi Ipteks Untuk Masyarakat*, *10*(4), 357. https://doi.org/10.24198/dharmakarya.v10i4.35767

Heriyanto, A., Hermansyah, E. O., & Atmoko, D. (2022). LEGAL PROTECTION FOR CHILDREN IN THE CRIME OF THEFT. *International Journal of Law Reconstruction*, *6*(1), 137. https://doi.org/10.26532/ijlr.v6i1.21546

Ilyasa, R. M. A. (2021). Legal and Victimological Perspective on Sexual Violence against Children Cases in Indonesia. *The Indonesian Journal of International Clinical Legal Education*, *3*(3), 281–300. https://doi.org/10.15294/ijicle.v3i3.48269

Irayadi, M. (2024). Legal Protection For Social Security Administering Body Health Participants. *Awang Long Law Review*, *6*(2).

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.

Javandira, C., & Gama, A. W. S. (2018). Analisis Faktor Lingkungan Eksternal Dan Internal Usaha Sayur Organik (Studi Kasus Pada UD. Eka Setia Lestari Di Baturiti). *JUIMA: JURNAL ILMU MANAJEMEN*, *8*(2). https://doi.org/https://doi.org/10.36733/juima.v8i2.286

Johar, O. A., Daeng, M. Y., & Manihuruk, T. N. (2022). Pertanggungjawaban Pidana

Pencemaran Dan Perusakan Lingkungan Hidup Akibat Pembakaran Hutan Dan Lahan Di Provinsi Riau. *Jurnal Hukum Respublica*, *21*(2), 131–154.

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.

Kansil, C., & Susilawati, D. (2020). Legal Protection for Insured Companies in the Insurance Company Experience Fail to Pay in Claim Process (Example of The Case of Bumiputera Insurance Certificate Policy Number: 209101549390). *Proceedings of the 2nd Tarumanagara International Conference on the Applications of Social Sciences and Humanities (TICASH 2020)*, 1003–1007. https://doi.org/10.2991/assehr.k.201209.159

Liu, S., Liu, H., & Chen, X. (2024). Does environmental regulation promote corporate green investment? Evidence from China's new environmental protection law. *Environment, Development and Sustainability*, *26*(5), 12589–12618. https://doi.org/https://doi.org/10.1007/s10668-023-03933-3

Marsela, D., Yudhistira, Y., & Fawaid, B. (2024). Legal Protection of Consumers in Online Business: A Criminal Law Perspective in Handling Fraud and Identity Theft. *Research Horizon*, *4*(3), 99–106. https://doi.org/https://lifescifi.com/journal/index.php/RH/article/view/263

Maturbongs, E. E., Cahyanti, T. W. A., & Fitriani. (2017). Management and Environmental Conservation Based on Local Wisdom. *Advanced Science Letters*, *23*(3), 2512–2514. https://doi.org/10.1166/asl.2017.8661

News, I. T. (2019). *Bank DBS Indonesia Ajak Masyarakat Peduli Lingkungan Lewat Gerakan Recycle more, Waste less*.

Notanubun, W. B. (2021). Analisis Hukum Penindakan Bagi Pelanggaran Dan Penyalahgunaan Lingkungan Hidup Ditinjau Dari Undang-Undang Nomor 32 Tahun 2009 Tentang Perlindungan Dan Pengelolaan Lingkungan Hidup. *Lex Administratum*, *9*(4).

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

Permana, D. Y., Imamulhadi, I., Idris, I., & Mariana, M. (2025). Integrating Indigenous Wisdom in Environmental Protection: Exploring Village Authority within the Framework of State Responsibility in Indonesia. *Jambura Law Review*, *7*(2), 359–389. https://doi.org/10.33756/jlr.v7i2.29582

Purba, P., Siahaan, E. M., Hulu, C. W., & Januardani, F. D. (2026). Utilization Of Artificial Intelligence In Demand Forecasting: A Qualitative Study Of Business Actors. *Journal of Social and Society*, *1*(2), 84–97.

Putra, R. E. P., Wijaya, A. U., Gandryani, F., & Indriastuti, D. E. (2024). Pertanggungjawaban Hukum bagi Perusahaan yang Membuang Limbah B3 dalam Tinjauan Undang-Undang Nomor 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup. *Jurnal Ilmu Hukum Wijaya Putra*, *2*(2), 62–74. https://doi.org/https://doi.org/10.38156/jihwp.v2i2.137

Ramadhani, A. N. A., Aspan, Z., & Hasrul, M. (2021). Legal Protection for unregistered citizen at Healthcare and Social Security Agency (BPJS). *Jurnal Hukum Volkgeist*, *6*(1), 69–78. https://doi.org/10.35326/volkgeist.v6i1.1548

Reden, S., Simamora, Y. T., Banjarnahor, D. N., & Thomas, R. A. (2026). The Urgency and Strategic Role of Students as Agents of National Identity Transformation in the Society 5.0 Era: The Concept of Patriotic Digital Collaboration. *Journal of Social and Society*, *1*(2), 98–105.

Ritonga, A. M., Manurung, S. S., Marito, E., & Manurung, J. S. (2024). Legal Protection Of The Rights Of BPJS Kesehatan Patients In Orchid Rooms In Imelda Pekerja Indonesia General Hospital In 2023. *Jurnal Media Informatika*, *5*(2), 238–241.

Riyanti, R. (2023). *Legal status of artificial intelligence-based health insurance services: Challenges, opportunities for customer protection*.

Riyanto, S. . (2018). Analisis Pengaruh Lingkungan Internal Dan Eksternal Terhadap Keunggulan Bersaing Dan Kinerja Usaha Kecil Menengah (Ukm) Di Madiun. *JMBI UNSRAT (Jurnal Ilmiah Manajemen Bisnis Dan Inovasi Universitas Sam Ratulangi).*, *5*(3), 159–168. https://doi.org/10.35794/jmbi.v5i3.21707

Roland, C., & Poni, S. K. (2021). Strategi Dinas Perhubungan Mengatasi Pelanggaran Parkir Di Alun-Alun Kota Bandung (Studi Kasus Strategi dari Faktor Lingkungan). *Jurnal Riset Bisnis Dan Manajemen*, *11*(1), 64–77.

Romualdo, R. Y. (2023). *Pertanggung Jawaban Perusahaan Angkutan Terhadap Pencemaran Laut yang Disebabkan oleh Tumpahan Minyak Ditinjau dari Perspektif Undang-Undang Nomor 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup*. Universitas Kristen Indonesia.

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.

Sands, P. (2023). Environmental protection in the twenty-first century: sustainable development and international law. In *The global environment* (pp. 116–137). Routledge.

Siahaan, K. W. A., Simanjuntak, H., Yanti, F., Custilas, A., & Zouhair, E. (2026). Enhancing Student Competence Through SETS-Based Chemistry Instruction on the Colligative Properties of Solutions. *Marlajar: Journal of Science, Technology, and Innovation*, *1*(2), 151–167.

Sidabutar, L. S., Simatupang, T. L., & Panggabean, S. (2026). Analysis of Syntactic Functions in the Text of the Indonesian Proclamation of Independence. *Journal of Social and Society*, *1*(2), 151–158.

Sihotang, Y., Mokorimban, M. A. T., & Mamangkey, R. M. K. (2024). Penegakan Hukum Lingkungan Dalam Pengendalian Pencemaran Udara Pada Pabrik Industri Berdasarkan Undang-Undang Nomor 32 Tahun 2009. *Lex Privatum*, *14*(1).

Simanjuntak, I. M., Telaumbanua, E. H., & Marbun, R. C. (2026). Management of Non-Academic Formative Assessment in Enhancing Self-Confidence and Collaboration in the Sunday School English Club. *Journal of Social and Society*, *1*(2), 123–139.

Simanjuntak, M., Tumanggor, T., Nainggolan, B., & Widiarty, W. S. (2022). Legal Protection of Consumers in Insurance Agreements Generally and Especially Marine Hull Insurance as One of Indonesia's Economic Development. *International Journal Of Artificial Intelegence Research*, *8*(1), 1–11.

Simanjuntak, M., Widiarty, W. S., & Damian, E. (2022). Legal Protection Consumers Associated with Insurance Regulations Especially Claims Settlement in Indonesia's Economic Development (Case Study of Marine Hull Insurance). *Journal of Positive Psychology and Wellbeing*, *6*(1), 1220–1235.

Spamann, H. (2022). Indirect investor protection: the investment ecosystem and its legal underpinnings. *Journal of Legal Analysis*, *14*(1), 17–79. https://doi.org/https://doi.org/10.1093/jla/laac003

Suryaningsi; Warman; Komariyah Widyatmike Gede; Hudiyono, Yusak; Thaba, Aziz, L. N. M. (2021). Legal Protection And Rehabilitation Of Victims Of Child Trafficking With The Purpose Of Prostitution In Indonesia. *Pt. 2 J. Legal Ethical & Regul. Isses*, *24*, 1.

Taduri, J. N. A. (2021). The Legal Certainty and Protection of Foreign Investment Againsts Investment Practices in Indonesia. *Lex Scientia Law Review*, *5*(1), 119–138. https://doi.org/https://doi.org/10.15294/lesrev.v5i1.46286

Thani, S. (2017). Peranan Hukum dalam Perlindungan dan Pengelolaan Lingkungan

Hidup. In *Jurnal Warta* (Vol. 51, pp. 1829–7463).

Tomi, Y., Kristiono, E., Ratković, N., & Sharlach, T. (2026). Innovation in computer science learning through artificial intelligence and machine learning technologies. *Marlajar: Journal of Science, Technology, and Innovation*, *1*(2), 10–66784.

Toyib, M., Yustianti, S., Kurnia, S., & Herachwati, N. (2023). Legal Protection for BPJS Kesehatan Patients in Healthcare Services at the Dr. Soetomo General Academic Hospital Surabaya. *YURISDIKSI: Jurnal Wacana Hukum Dan Sains*, *19*(3), 370–383.

Tristy, M. T., & Aminah, A. (2020). *Efektivitas Kebijakan Pengurangan Sampah Plastik Bagi Kelestarian Lingkungan Hidup Di Era Globalisasi* (pp. 43–55).

Warsiman, W., Maswita, M., Sipahutar, A., & Tanjung, J. H. S. (2023). Analisis yuridis tindak pidana pencemaran laut menurut Undang-Undang Nomor 32 TAHUN 2009 tentang perlindungan dan pengelolaan lingkungan hidup. *Jurnal Normatif*, *3*(1), 212–223.

Wicaksono, R. A., & Kusriyah, S. K. (2018). Implementation Of Restorative Justice Approach In Legal Protection Against Lightweight Crime By The Children. *Jurnal Daulat Hukum*, *1*(4), 943. https://doi.org/10.30659/jdh.v1i4.4136

Widyawati, A., Pujiyono, P., Rochaeti, N., Ompoy, G., & Zaki, N. N. B. M. (2022). Urgency of the Legal Structure Reformation for Law in Execution of Criminal Sanctions. *Lex Scientia Law Review*, *6*(2), 327–358. https://doi.org/10.15294/lesrev.v6i2.58131

Wijaya, H., Santoso, B., & Azhar, M. (2021). Pertanggungjawaban Pidana Korporasi Atas Pencemaran Lingkungan Hidup. *Notarius*, *14*(1), 206–220. https://doi.org/10.14710/nts.v14i1.38863

Wijayanti, T. I., Fadlan, F., Washliaty, L., & Parohha, L. S. (2023). Juridical Analysis Of The Effectiveness Of Online Single Submission (Oss) Implementation Related To License For Environmental Protection And Management In Batam City (Research Study In Batam City Investment Service Integrated Services (PTSP). *International Journal of Educational Review, Law And Social Sciences (IJERLAS)*, *3*(1), 11–22. https://doi.org/https://doi.org/10.54443/ijerlas.v3i1.480

Windari, R., & Effendi, T. (2021). Child Rights and Human Security: Promoting Child Protection At The Tourist Attractions On Madura. *International Journal of Business, Economics, and Social Development*, *2*(4), 162–170. https://doi.org/10.46336/ijbesd.v2i4.171

Yusuf, C. F. P., & Wahyuningati, E. (2022). Legal Protection of Mis-Selling Cases Victims on Unit Linked Insurance Products: The Basis of Law No. 40/2014 Regarding Insurance Policy. *Srawung (Journal Of Social Sciences And Humanites)*, 91–103.

Zakaria, I. A., Suroso, I., & Supriyantoko, B. (2025). Pertanggungjawaban Korporasi Dalam Pencemaran Lingkungan Hidup Berdasarkan Perspektif Hukum Perdata. *Quantum Juris: Jurnal Hukum Modern*, *7*(2).

Zhang, Q., Yu, Z., & Kong, D. (2019). The real effect of legal institutions: Environmental courts and firm environmental protection expenditure. *Journal of Environmental Economics and Management*, *98*, 102254. https://doi.org/https://doi.org/10.1016/j.jeem.2019.102254

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.