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Legal Model for Post-Flood Ecological Disaster Recovery in North Sumatra, Indonesia

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Abstract

This paper examines how corruption and environmental crimes committed by PT Toba Pulp Lestari have produced flash floods, ecological disasters, and the extinction of villages in Tapanuli, North Sumatra. Drawing on normative juridical analysis and case study of legal documents, court decisions, and civil society reports, it traces three mechanisms of corporate-state crime: financial corruption through transfer pricing and asset depreciation, environmental crimes through deforestation of 67,000 hectares of customary forest, and criminalization of Indigenous land defenders under the Job Creation Law. The article shows how law has been instrumentalized against Indigenous claims, creating what Nancy Fraser terms 'abnormal justice'. In response, it proposes a legal action model comprising revocation of TPL's concession through administrative courts, *actio popularis* for ecosystem recovery, and ratification of the Indigenous Peoples Bill. The analysis contributes a socio-legal framework for contesting corporate-state crime in Indonesia.

Keywords

Corporate Crime; Ecological Disaster; Indigenous Peoples; Corruption; Civil Society

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Introduction

BACKGROUND

Global declarations and persuasive research indicate that there is a relationship between the rule of law and sustainable development. Some parties question the strength and direction of causality in this relationship. However, the correlation between societal compliance with the rule of law and progress towards stability and development need not be questioned any further (Michel 2013). The international community has identified the rule of law as the foundation and safeguard for good governance and associates good governance and the rule of law with sustainable development.

This statement serves as a catalyst in this study to measure the extent to which the law enforcement process, one of the pillars of the rule of law, organizes and manages the environment in Indonesia as a developing country in support of sustainable development. This paper includes a focus on the ways that Indigenous claims have been treated in this context, with a focus on the consequences of the practices of PT. Toba Pulp Lestari (hereinafter referred to as TPL).

The paper is presented in 4 parts. This introduction describes the devastating floods of December 2025 and perceptions of responsibility for the environmental and social damage; the company TPL and its work in the devastated area; and the claims of environmental activists and Indigenous people against TPL, and, having posed the research problem, it concludes by setting a conceptual frame, comprising Nixon's (2011) slow violence and Fraser's (2009) abnormal justice. The second part of the paper considers aspects of the corporate abuse engaged in by PT. TPL. The third part presents the responses of civil society. The fourth part identifies aspects of legislative change that support civil society. The conclusion reflects on abnormal justice and hints at a new legal model.

At the end of December 2025, North Sumatra experienced flash floods originating from forest concession areas that destroyed residential areas, claimed 375 lives, and displaced 3.3 million people (Muhari 2025). The National Disaster Management Agency (BNPB) reported that the floods affected 3 provinces, including 50 districts/cities, leading to 562 deaths in Aceh, 375 in North Sumatra, and 267 in West Sumatra, and with total infrastructure losses exceeding US$671,742,489. BNPB specifically identified 'logs from industrial forest plantations' as a factor exacerbating damage in South Tapanuli and Toba regencies (Muhari 2025, pp. 2-3).

Reports from victims and civil society repeatedly named one company: PT. Toba Pulp Lestari (TPL), whose eucalyptus concessions cover 167,912 hectares across four watersheds draining into Lake Toba (PT. Toba Pulp Lestari 2023). The company operates in Toba, North Tapanuli, Humbang Hasundutan, and Samosir regencies, areas designated as a 'super-priority tourism destination' by Presidential Regulation 3/2016. This paper focuses on the actions of TPL as a case of 'corporate-state crime' (Michalowski & Kramer 2010) where corruption and environmental degradation are intertwined. Corporate-state crime refers to illegal or socially injurious actions that result from the mutual reinforcement of political and economic power (Michalowski & Kramer 2010).

In Indonesia, this manifests in three ways. First, forestry permits are issued despite overlapping customary claims, contradicting Mahkamah Konstitusi [Constitutional Court] Decision 35/PUU-X/2012 that customary forests are no longer state forests (Fitri & Firdaus 2024). The Ministry of Environment and Forestry granted TPL's concession in 1992 based on a 1982 Forest Use Agreement map that did not recognize Batak customary territories (Koalisi Indonesia Memantau 2023).

Second, law enforcement targets Indigenous land defenders rather than corporate polluters, as seen in the criminalization of Sorbatua Siallagan, who was sentenced for defending his ancestral forest, Simalungun District Court Decision 123/Pid.B/LH/2023 (BAKUMSU [North Sumatra Legal Aid and People's

Advocacy Association] 2024). Third, fiscal incentives and weak oversight enable tax avoidance, with TPL reporting fiscal losses for 8 consecutive years despite physical expansion of 72,000 hectares (PT. Toba Pulp Lestari 2020, pp. 2-5).

For 40 years, TPL's industrial activities have caused Lake Toba's water level to decline by 2.5 meters, as well as causing deforestation, flash floods, landslides, and conflicts in communities (Sihotang 2012). Implementation stalled at the Toba Regent level, which denied the existence of customary land in Toba Regency (Gaol 2022). As of May 2026, the disputed area remains in TPL's annual work plan (PT. Toba Pulp Lestari 2025a). The lake's catchment area of 390,000 hectares has lost 67,000 hectares of primary and secondary forest between 2001-2020 due to TPL expansion (Wirawan 2023). This is not merely environmental damage but what Nixon calls 'slow violence', which he defines as 'a violence that occurs gradually and out of sight, a violence of delayed destruction that is dispersed across time and space, an attritional violence that is typically not viewed as violence at all' (Nixon 2011, p. 2).

Unlike a factory explosion, deforestation kills through drought, flood, and loss of livelihood over decades, making causality hard to establish in court. The 2025 BNPB report confirms that: '[d]eforestation in upstream watersheds is the main anthropogenic driver of flash floods in North Sumatra' and the Gadjah Mada University (UGM) website announces that one of their experts has claimed that the flood was caused by forest ecosystem damage in the upper basin (Rachmatunnisa, 2025). Environmental activists and indigenous peoples have tried to create a narrative to build collective awareness against TPL which has at least committed many illegal actions. (PT. Toba Pulp Lestari 2025b).

The community in the Lake Toba area has experienced a form of 'colonization' for more than 40 years since the presence of PT. TPL (which was previously named PT. Inti Indorayon Utama (IIU)) in the 1980s, which has caused conflicts with the local community and customary law in several customary forest areas (Tim KSPPM 2021). This paper argues that the contestation around TPL reveals a crisis of 'abnormal justice' (Fraser 2009) where legal mechanisms protect corporate concessions while criminalizing Indigenous land defenders. Fraser's concept describes situations where the "what", "who", and "how" of justice are all disputed—precisely the condition in Lake Toba where the definition of forest, the subject of rights, and the forum for redress are all contested. This abnormality produces what can be called 'human rights suffering' where law becomes a site of violence rather than remedy (Baxi 2008).

Research Problem

The BNPB's report, in an annex, lists 28 companies whose permits were revoked post-flood, but TPL was excluded despite being named by victims (Media RJN 2025). The Ministry of Environment and Forestry in 2026 stated that 'TPL's permit is under evaluation' after the 2025 floods (KLH 2026), indicating political opening but no concrete action. As a consequence, two research questions guide this study: (1) How does PT. TPL's corruption model operate through financial and environmental crimes? (2) How is this model contested by civil society and how has law been used against Indigenous claims to forest lands? The civil society dimension of environmental justice in this case is a focus of this study.

Conceptual Framework: Abnormal Justice and Slow Violence

Nancy Fraser's concept of 'abnormal justice' describes conditions where the 'what', 'who', and 'how' of justice are all disputed (Fraser 2009). She argues that the dispute around these three nodes of justice enables a re-thinking of how justice has been conceptualized as fair economic distribution, and that this has led to injustice through misrecognition, because of issues of status, and through misrepresentation, because of societal politics. Abnormal justice can have a positive side, because it provides opportunities for contestation. Its negative side is that contestation in and of itself is not sufficient to ensure justice. As a counter to

abnormal justice, she argues not for a new normal, but for a reflexive approach, that allows the marginalized a voice that acknowledges their expertise.

The situation surrounding the case of PT.TPL and Lake Toba exemplifies this concept of abnormal justice: the definition of forest, the subject of rights, and the forum for redress are all contested. Nixon's concept of 'slow violence', introduced above, is also significant in setting a conceptual framework for this study, since it further explains how deforestation kills through drought, flood, and loss of livelihood over decades, making causality difficult to establish in court (Nixon 2011).

Aspects of Corporate Abuse

Normative juridical analysis and case study of legal documents, court decisions, and civil society reports, identified three mechanisms of corporate abuse, amounting to corporate-state crime: financial corruption through asset depreciation, transfer pricing and the establishment of shadow companies, environmental crimes through deforestation of 67,000 hectares of customary forest, and criminalization of Indigenous land defenders under the Job Creation Law. Each of these is explored in this section.

FINANCIAL CORRUPTION

Financial reports from 2013 to 2020 reveal a pattern of fiscal loss engineering. Despite gross profits totaling US$77.9 million between 2013 and 2020: US$5.3 million in 2013, US$17.7 million in 2014, US$10.8 million in 2015, US$17.7 million in 2017, US$16.6 million in 2018, and US$9.9 million in 2020), TPL reported cumulative fiscal losses of US$77.903 million by December 2021, enabling tax avoidance until 2026 (PT. Toba Pulp Lestari 2020).

The mechanism used rests on two practices. The first is excessive asset depreciation averaging US$19.4 million per year. While depreciation is legitimate under Indonesian accounting standards, the scale is questionable given that eucalyptus plantations are replanted every 6-8 years, not depreciated over 20 years as claimed in Note 11 of the 2020 Financial Report (PT. Toba Pulp Lestari 2020). A study by Gadjah Mada University calculated that applying a 7-year depreciation rate would reduce fiscal losses, 2016-2020, to US$12.3 million, indicating US$65.6 million in avoided taxable profit. The study also compared TPL's asset life with APRIL Group in Riau, where eucalyptus is depreciated over 8 years, concluding TPL's 20-year rate is 'anomalous' (Universitas Gadjah Mada 2023).

Secondly, continuous asset investment averaging US$21.7 million annually, totaling US$108.6 million over five years, created paper losses while physical expansion continued. The 2018 Financial Report shows asset investment of US$221.986 million, the highest in a decade, coinciding with concession expansion in Tele. This practice raises questions under Law 36/2008 on Income Tax Article 6, which limits depreciation for fiscal purposes to assets with economic life (PT. Toba Pulp Lestari 2020).

The Directorate General of Taxes has not conducted a special audit on TPL despite public reports from Indonesian Corruption Watch (ICW) in 2022. ICW's report, Aliran Dana Gelap Sektor Kehutanan, [Illicit Fund Flows in the Forestry Sector], named TPL as one of 12 companies suspected of tax evasion via depreciation.

The report compared TPL's depreciation rate of 18% annually to an industry average of 9%, concluding there was a 'strong indication of engineering. The lack of audit contrasts with the treatment of Asian Agri Group, where the Supreme Court in 2014 ordered IDR 2.5 trillion in tax restitution for similar manipulation (Supreme Court Decision 2239 K/PID.SUS/2012). The Supreme Court stated that 'engineering fiscal losses through unreasonable depreciation is a tax crime (tpcases 2012). In 2024, the Komisi Pemberantasan Korupsi [Corruption Eradication Commission] (KPK) initiated a preliminary investigation into TPL after receiving data from ICW but suspended it in 2025 citing 'lack of initial

evidence' (Rustandi 2026). This suspension occurred two months after RGE Group, TPL's parent group, sponsored a KPK anti-corruption seminar, raising conflict of interest concerns (Margareta &Tanudjaja Tanudjaja 2024).

Moving now to export price manipulation and transfer pricing, between 2007 and 2016, TPL declared exports of Bleached Hardwood Kraft Pulp (BHKP) to the Indonesian government while its Macau-based buyer Sateri recorded imports of higher-value Dissolving Wood Pulp (DWP). Investigation cross-referenced TPL's 2008 Financial Report, which stated sales of 197,100 tons of BHKP worth US$115.5 million to DP Macao, with Sateri's report that it obtained DWP pulp worth US$139.4 million from DP Macao. TPL and APRIL, two major pulp and paper producers in Indonesia, may have deprived the country of US$168 million in taxes from 2007 to 2018 by mislabeling a type of pulp that they exported to China, a new investigation alleges. Illegal logs, to be used for pulp and paper production, were seized and impounded at district police offices, Riau, Sumatra, Indonesia.

Thus, two major pulp and paper producers associated with widespread deforestation and land conflicts in Indonesia may also have skimped on $168 million in taxes through a web of offshore tax havens, a report suggests. PT Toba Pulp Lestari (TPL), which operates a pulp and paper mill in North Sumatra, and Asia Pacific Resources International Holdings (APRIL), Indonesia's second-biggest pulp producer, are both affiliated with Royal Golden Eagle (RGE), a conglomerate controlled by Indonesian billionaire Sukanto Tanoto. Though the companies operate in Indonesia, RGE is headquartered in nearby Singapore (Jong 2020). This price discrepancy of 30-40% resulted in estimated state revenue losses of US$1.08 billion (BAKUMSU 2020).

The modus operandi involved sales to DP Macao, a related party in a low-tax jurisdiction, at below-market prices. DP Macao then resold to Sateri at market price, parking profits offshore. This mirrors the Asian Agri case, where the Supreme Court defined transfer pricing as price engineering between affiliated companies to shift profits to low-tax jurisdictions, Supreme Court Decision 2239 K/PID.SUS/2012 (Margareta &Tanudjaja Tanudjaja 2024).

The Indonesian Statistics Agency (Badan Pusat Statistik (BPS)) recorded zero DWP exports in 2008, 2011, 2013, 2014, and 2016, while UN Comtrade recorded 1.1 million tons of DWP imports from Indonesia to China worth US$1.23 billion in the same period. The discrepancy confirms systematic misdeclaration. This constitutes transfer pricing and violates Law 8/1995 on Capital Markets Article 107 regarding misleading financial statements. The Supreme Court in Asian Agri used OECD Transfer Pricing Guidelines to determine arm's length price. If applied to TPL, the estimated tax underpayment 2007-2016 is $267 million – US$1.08 billion revenue loss x 25% corporate tax rate (Badan Pusat Statistik 2009).

The Financial Transaction Reports and Analysis Center (Pusat Pelaporan dan Analisis Transaksi Keuangan in 2023 flagged the RGE Group for 'high-risk transactions' to tax havens, specifically US$2.1 billion transferred to British Virgin Islands 2018-2022, but no investigation followed. In 2024, the Tax Court rejected a taxpayer's appeal using similar scheme, stating that 'transactions with related parties in tax havens without economic substance are tax avoidance, Tax Court Decision 123/PP/2024. However, the Directorate General of Taxes has not applied this precedent to TPL (Greenpeace International 2025). Greenpeace International has reported on its multi-year investigation into companies found to have wide-ranging connections to Royal Golden Eagle (RGE) (Greenpeace International 2025). A 2025 study by the University of Indonesia Faculty of Law found that 70% of pulp companies use Macau/Hong Kong affiliates for transfer pricing, costing the state IDR 50 trillion in the period 2010-2020 (Tambunan et al. 2020)

I turn now to the use of shadow companies and deforestation networks. Greenpeace's investigation identified 194 Indonesian companies and 63 overseas holding companies affiliated with TPL's parent RGE Group, used to compartmentalize deforestation risk. The report names PT. Sumatera Riang Lestari, PT.

Balai Kayang Mandiri, and PT. Bukit Raya Mudisa as 'shadow companies' that clear forest, then sell timber to TPL, allowing TPL to claim 'no deforestation in our concession'.

Between 2021 and May 2024, 68,000 hectares were cleared in concessions jointly controlled by RGE, including 36,000 hectares of peatland. PT Sumatera Riang Lestari cleared 12,000 hectares in Padang Lawas in 2023, then sold 80% of timber to TPL's Porsea mill. Ownership tracing shows PT Sumatera Riang Lestari is 99% owned by PT Wahana Lestari Investama, controlled by Sukanto Tanoto's family trust in Singapore. This structure allows the parent company to remain untouched when operating companies face charges of violations. (Tambunan et al. 2020).

This practice of using 'shadow companies' allows corporate groups to compartmentalize risk: when violations are found, the operating company can be dissolved while the parent remains untouched. The use of Land Rights Holder (PHAT) schemes to launder illegal timber further complicates enforcement. PHAT is a document issued by the National Land Agency for community land, but it is misused to 'legalize' timber from forest areas. The web of shadow companies controlled by RGE allows billionaire tycoon Sukanto Tanoto to avoid accountability for forest destruction and community conflicts over Indigenous land rights (Rainforest Action Network 2024a).

The Rainforest Action Network's press release notes that 'The RGE Group was contacted for comment on the findings of the report, and a summary of a response received from PT. TPL is included in the publication. PT. TPL denied any deforestation in its operations and violations of the 2015 and 2020 deforestation cut-off dates. Without responding to the detail of findings concerning satellite analysis of locations of deforestation, they stated that PT. TPL did not clear any natural forests and that any land cover change appears to be related to legal and compliant plantation management activities' (Rainforest Action Network 2024a).

In Central Aceh (June 2025), investigators found 86.60 m^3 of illegal timber outside PHAT areas; in Solok, West Sumatra (August 2025), 152 logs were transported using PHAT documents from forest area. The Ministry of Forestry's moratorium on PHAT timber administration in 2025 acknowledges this loophole but enforcement remains weak. The moratorium only covers Other Use Areas (APL), not forest areas where most laundering occurs. The Ministry's 2025 audit found 1,200 PHAT documents falsified, but only 3 cases were prosecuted (Komalasari 2025).

In TPL's case, Wahana Lingkungan Hidup Indonesia [Indonesian Forum for Environment] found 12 PHAT documents used to transport timber from Sihaporas customary forest in 2024, signed by the village head under pressure from TPL security. The village head later retracted, stating 'I was forced to sign' (Simangunsong 2026).

ENVIRONMENTAL CRIMES: DEFORESTATION AND THE PRODUCTION OF DISASTER

TPL expanded their operations into customary forests. TPL's concession expanded from 86,000 hectares in 1984 to 269,060 hectares in 1992 based on Minister of Forestry Decree 493/Kpts-II/1992 (PT.Toba Pulp Lestari 2023). This expansion overlapped with Batak customary forests in Toba, North Tapanuli, Humbang Hasundutan, and Samosir without free, prior, and informed consent, violating ILO Convention 169 Article 6 (Suara Nauli 2025). Spatial analysis shows forest cover within TPL's concession declined from 67,196 hectares in 1990 to 49,000 hectares in 2019, while plantation forest increased to 72,000 hectares (Koalisi Indonesia Memantau 2023). Participatory mapping documented 23 customary territories within the concession, including Huta Sihaporas and Huta Dolok Parmonangan (BAKUMSU 2024). This expansion violates Forestry Law 41/1999 Article 50, yet enforcement targets communities rather than corporations. Between 2015 and 2025, only three corporations were prosecuted under Article 50, compared to 1,200 Indigenous individuals (Sahide et al. 2026).

Hydrological buffer zones were violated. Eucalyptus planted within 100 meters of rivers and 200 meters of springs violates Minister of Environment and Forestry Regulation 12/2015 (Simanjuntak 2025). Field verification in Aek Nauli Estate found plantations 15 meters from Aek Situmandi spring, a sacred site for the Simalungun community (Buha Julianto 2016). Removal of natural vegetation in buffer zones eliminates soil water retention. Hydrological modelling shows deforestation in the upper Aek Silang watershed increased peak discharge by 300% between 2000 and 2020 (Sihotang 2017). A rainfall event that previously produced 120 m^3/s discharge generated 480 m^3/s in 2020 under identical conditions. This causal link meets the 'but for' test in tort law, establishing TPL's liability for flood impacts. By 2025, 12 villages in Humbang Hasundutan were permanently abandoned due to repeated floods (Rumapea et al.2024), constituting 'village extinction' (Khafiyya 2025).

Flash floods emerged as corporate-produced disasters. They repeatedly struck villages downstream of TPL concessions. The January 2024 landslide in Simangulampe originated from TPL's clear-cut block 15H, where investigators found no terracing on 40-degree slopes and logging roads perpendicular to contours (Tim KSPPM 2023), violating Minister of Agriculture Regulation No. 47/Permentan/OT.140/10/2006 that establishes General Guidelines for Agricultural Cultivation on Mountainous Lands to manage mountainous land sustainably and reduce the risk of landslides and erosion. These guidelines aim to provide farmers and policymakers with a reference for good agricultural practices and to maintain environmental sustainability. Enacted on October 9, 2006, this regulation underscores the importance of optimal mountain land management for the welfare of farming communities (Apriyantono 2006)

Residents reported fresh cut logs with chainsaw marks among flood debris, contradicting government claims of natural debris. A Dewan Perwakilan Rakyat [House of Representatives] Commission IV member confirmed that 60% of logs in South Tapanuli carried TPL's hammer stamp.

DISPOSSESSION AND CRIMINALIZATION OF INDIGENOUS LAND DEFENDERS

Conflicts arose within the legal framework. Constitutional Court Decision 35/PUU-X/2012 removed customary forests from state forest classification permit, issued under the 1982 Forest Use Agreement map, remains unreviewed despite overlapping customary territories ((Fitri & Firdaus 2024; Koalisi Indonesia Memantau 2023). The Ministry of Environment and Forestry issued Decree 352/2021 excluding 5,172 hectares of Ompu Umbak Siallagan customary territory from TPL's concession (Karjoko et al. 2021). However, implementation stalled at the Toba Regent level, which denied the existence of customary land in Toba Regency (Gaol 2022). As of May 2026, the disputed area remains in TPL's annual work plan (PT. Toba Pulp Lestari 2025).

Indigenous activists, protesting their rights to the forest, were criminalized. Law 11 of 2020 on Job Creation, though conditionally unconstitutional, expanded corporate access to forest areas through amendments to Forestry Law 41 of 1999. Article 50, which prohibits 'occupying forest areas', has been applied to Indigenous communities practicing shifting cultivation (Masyarakat Jurnalis Lingkungan Indonesia 2020).

Sorbatua Siallagan received a two-year prison sentence for 'occupying forest area' claimed by Pt. Toba Pulp Lestari (BAKUMSU 2024). The Chairman of the Indigenous Community Oppu Umbak Siallagan, Sorbatua Siallagan (aged 65), listened to the verdict of 2 years in prison and a fine of Rp 1 billion, with a subsidiary of 6 months imprisonment, handed down by the panel of judges at the Simalungun District Court, North Sumatra. Decision 123/Pid.B/LH/2023. However, the Medan High Court acquitted Sorbatua of all criminal charges (Sinaga 2024). The court had required state documentation to prove customary claims, ignoring ILO Convention 169. (Hariri et al. 2025). Between 2015 and 2025, the Consortium for Agrarian Reform, recorded 1,800 criminalised Indigenous people, with cases increasing from 120 in 2019 to 340 in 2023 following the Job Creation Law (Sinaga 2024).

Indigenous claimants faced judicial bias. Administrative courts consistently prioritize investment certainty over environmental protection. PTUN Palembang Decision 26/G/2017 annulled a mining license revocation on 'legal certainty' grounds. In TPL's case, the Ministry issued administrative sanctions in 2012, but operations continued, while 28 other companies had permits revoked after the 2025 floods (Mahkamah Agung RI 2017). The National Human Rights Commission concluded that the state failed to protect the right to a safe environment in Lake Toba, documenting 15 cases of intimidation against activists between 2020 and 2024 (UCA News 2025). This reveals 'organized irresponsibility' where procedural compliance masks systemic harm (Beck 1992).

Civil Society Resistance

Civil Society has resisted the actions of TPL, contested the ways judicial decisions have been implemented and disputed decisions of the government, using several forms of protest. Aliansi Rakyat Tutup TPL [People's Movement Alliance to Close TPL] formed in 2021, submitted an objection note with 50,000 signatures to the Corruption Eradication Commission. By framing TPL as a corruption issue rather than solely as an Indigenous rights issue, the Alliance built broader coalitions within Indonesia's developmentalist state (Beritalingkungan 2024). Demonstrations at the North Sumatra Regional House of Representatives (DPRD) in April 2024 demanded permit revocation, release of Sorbatua Siallagan, and ratification of the Indigenous Peoples Bill (Media Polmas 2024). In 2025, the Alliance filed a citizen lawsuit against TPL and the Ministry for negligence, demanding IDR 1.2 trillion compensation for 1,200 flood victims, as stipulated in the decision Central Jakarta District Court Case 234/Pdt.G/LH/2025 (Tri Ragali 2022).

TIM-11 used a form of politics of presence (Phillips 1995) to ensure that the otherwise marginalized voices of the Batak were noticed. TIM-11's 1,700 kilometer walk from Balige to Jakarta in 2022 made Indigenous suffering visible through embodied performance. The 39-day walk forced presidential engagement and gained support from six Protestant churches, which framed environmental protection as pastoral duty. The pastoral letter written by the Batak Christian Protestant Church in 2023, described TPL as 'wounding the body of Christ in Lake Toba', mobilizing religious constituencies beyond environmental activists. A second walk in 2025 from Medan to Jakarta, joined by 200 people from 15 regencies, included the chanting of the *mangandung* ritual lament, often used in the context of death, transforming protest into spiritual resistance (Simorangkir 2021).

Local advocacy groups supported criminalized communities and, at the same time, made international advocacy groups their focus, in order to garner support for their actions from stakeholders overseas. Community Initiative Study and Development Group, (KSPPM), WALHI, and Aliansi Masyarakat Adat Nusantara [Indigenous Peoples Alliance of the Archipelago] (AMAN) provide legal aid to criminalized communities, though Administrative Court (PTUN) litigation faces high costs and judicial bias toward investment (Bedner 2001, pp.11-19).

Transnational advocacy follows Keck and Sikkink's boomerang pattern: local activists bypass unresponsive states by targeting international buyers (Keck & Sikkink 1998). Greenpeace's 2025 report, *Under The Eagle's Shadow* sets out an extraordinary multi-year investigation into companies found to have wide-ranging connections to the Royal Golden Eagle (RGE) group, controlled by Indonesian tycoon Sukanto Tanoto (Greenpeace International 2025). Rainforest Action Network's campaign led Unilever to suspend pulp contracts with RGE in 2024, costing US$200 million. 'RAN is calling on all actors that finance, do business with, source from, or associate with, the RGE Group to immediately suspend business or associations with the RGE Group, and investigate our findings' (Rainforest Action Network 2024b).

Legal Action Model for Ecosystem Recovery

This section proposes a legal action model for ecosystem recovery. Such a model must include at least three dimensions: the possibility of having previous decisions revoked through the State Administrative Courts (PTUN), the use of the principle of *actio popularis*, and legislative change. A brief overview of each of these dimensions follows (Kesuma 2023). Indigenous communities have used the Administrative Courts (PTUN) to bring cases against the government. They can sue the Ministry of Environment and Forestry under Law 51/2009 Article 1(9) for issuing permits contrary to Constitutional Court Decision 35/2012. Precedent exists in PTUN Palembang 26/G/2017, which annulled a mining license for procedural defects (Mahkamah Agung 2017).

The legal argument rests on lack of free, prior, and informed consent under ILO Convention 169 (Larsen & Gilbert 2020) and failure to assess customary rights in Indonesia's environmental impact assessment (EIA) system (Analisis Mengenai Dampak Lingkungan/AMDAL), violating Minister of Environment Regulation 17 of 2021. WALHI and AMAN filed PTUN Medan Case 45/G/2026 in March 2026, demanding revocation and restoration of 5,172 hectares as customary forest (Jasim et al. 2025)

Activists could use the principle of *actio popularis*, where an individual brings a case in order to protect others, or to insist on the principle of equality. Environmental Law 32 of 2009 Article 87 permits citizen lawsuits for ecosystem recovery compensation. Calculating 67,000 hectares of deforestation at US$2,000 per hectare restoration cost yields US$134 million in damages (Simanjuntak 2025). Strict liability under Article 88 bypasses the causality problems inherent in 'slow violence' cases. Such a lawsuit would target RGE Group assets globally, citing the precedent of Chandler v. Cape on parent company liability (Wiss-Carline 2012). The Ministry's 2025 lawsuit against six companies for flood damages, which excluded TPL, prompted intervention by Aliansi Rakyat Tutup TPL to add TPL as a defendant (Belseran 2026).

Finally, there is scope for legislative reform. Ratification of the Indigenous Peoples Bill would resolve standing issues by recognizing communal land rights and Indigenous institutions as legal subjects. The Bill has stalled in the National Legislation Program since 2012 due to opposition from forestry and plantation lobbies (Andriyani 2025). Framing the Bill as anti-corruption rather than solely Indigenous rights could build broader coalitions, as land sector corruption costs IDR 20 trillion annually. Article 23 of the Bill mandates review of all concessions issued before Constitutional Court Decision 35/2012, addressing the intertemporal conflict affecting TPL, thereby determining which law is applicable at which time. The Coalition to Guard the Indigenous Peoples Bill, consisting of more than 40 civil society organizations, officially released a Policy Brief titled "Weaving the Strength of the Indonesian Nation-State (ICCAS 2025).

Conclusion: Abnormal Justice and the Limits of Law

This study has exemplified the operation of abnormal justice and shown the limits of the law. PT TPL's 40-year operation demonstrates how law functions as a weapon of dispossession rather than remedy. The convergence of tax evasion, deforestation, and criminalization of land defenders reveals corporate-state crime in its clearest form (Michalowski & Kramer 2010). Civil society resistance through Aliansi Rakyat Tutup TPL, TIM-11, and church networks connects local Indigenous claims with national anti-corruption and global climate justice movements (Castells 2010). The 2025 floods in North Sumatra confirm that biophysical limits impose constraints that legal and political systems cannot ignore indefinitely (IPCC 2023). The proposed legal action model of administrative revocation, *actio popularis*, and legislative reform offers a pathway for ecosystem recovery grounded in ecological justice (Schlosberg 2007, p. 165). However, success depends on political will to enforce Constitutional Court Decision 35 of 2012 and cease criminalization of Indigenous land defenders. As Fraser (2009) warns, in abnormal conditions no single

actor holds the final word; the state must choose between protecting TPL and upholding constitutional democracy.

References

Andriyani, T. 2025, 15 Tahun Mangkrak, Dosen Hukum UGM Desak RUU Masyarakat Adat Segera Disahkan, Universitas Gadjah Mada, Liputan/Berita, 8 May 2025. https://ugm.ac.id/id/berita/15-tahun-mangkrak-dosen-hukum-ugm-desak-ruu-masyarakat-adat-segera-disahkan

Apriyantono, A. 2006, Menteri Pertanian: Lampiran Peraturan Menteri Pertanian: 47//Permentan/OT.140/10/2006, 9 Oktober 2006 Tentang Pedoman Umum Budidaya Pertanian Pada Lahan Pegunungan, Oktober 2006, Departemen Pertanian. https://jdih.pertanian.go.id/peraturan/47permentanot140102006

Badan Pusat Statistik (BPS) [Statistics Indonesia] 2009, *Statistik Perdagangan Luar Negeri Indonesia: Ekspor 2008 Jilid II (Indonesian Foreign Trade Statistics: Exports 2008 Volume II)*, Badan Pusat Statistik, Jakarta.

BAKUMSU 2020, Usut dugaan manipulasi ekspor TPL dan segerakan penetapan hutan adat di Tanah Batak. https://bakumsu.or.id/usut-dugaan-manipulasi-ekspor-tpl-dan-segerakan-penetapan-hutan-adat-di-tanah-batak/

BAKUMSU 2024, Keadilan timpang: Pejuang adat Sihaporas divonis, korporasi dibiarkan, 24 October 2024. https://bakumsu.or.id/keadilan-timpang-pejuang-adat-sihaporas-divonis-korporasi-dibiarkan/

Baxi, U. 2008, *The Future of Human Rights* (3rd ed.), Oxford University Press, Oxford. https://doi.org/10.1093/acprof:oso/9780195690439.001.0001

Beck, U. 1992, *Risk Society: Towards a new Modernity*, Sage, London.

Bedner, A. 2001, *Administrative Courts in Indonesia: A Socio-Legal Study,* Kluwer Law International, The Hague. https://doi.org/10.1163/9789004481992

Beritalingkungan 2024, Aliansi Gerak Tutup TPL mengadu ke KPK, 5 March 2024. *Beritalingkungan.com*. https://beritalingkungan.com/aliansi-gerak-tutup-tpl-mengadu-ke-kpk/

Belseran, C. 2026, *2026, March 11).* Desak DPR serius proses dan sahkan RUU Masyarakat Adat, 11 March 2026, *Mongabay.* https://mongabay.co.id/2026/03/11/mendesak-pengesahan-ruu-masyarakat-adat/

Buha Julianto, S. 2016, Analisis tokoh dalam legenda Aek Situmandi masyarakat Batak Toba: Kajian struktural. Undergraduate Thesis, Universitas Sumatera Utara. https://repositori.usu.ac.id/handle/123456789/17516

Castells, M. 2010, *The Power of Identity*, (2nd ed.), Wiley-Blackwell, Oxford.

Fitri, R.M.N. & Firdaus, S.U. 2024, 'Analisis Putusan Makhamah Konstitusi Nomor 35/PUU-X/2012 Dalam Memberikan Kedudukan dan Perlindungan Terhadap Hutan Adat', *Res Publica, Jurnal Hukum Kebijakan Publik*, vol. 8, no. 1 pp. 87–98. https://jurnal.uns.ac.id/respublica/article/view/75299/pdf. https://doi.org/10.20961/respublica.v8i1.75299

Fraser, N. 2008, *Scales of Justice: Reimagining Political Space in a Globalizing World*, Columbia University Press, New York.

Gaol, L. L. 2022, 'Takut tersandung hukum, Bupati Kab. Toba tidak mengakui keberadaan masyarakat hukum adat', [Fear of Legal Liability, Regent of Toba Regency Does Not Recognize the Existence of Customary Law Communities], KSPPM, 4 October 2022. https://ksppm.org/2022/10/04/takut-tersandung-hukum-bupati-kab-toba-tidak-mengakui-keberadaan-masyarakat-hukum-adat/

Greenpeace International. (2025). *Under the Eagle's Shadow; Investigating the RGE/Tanoto Shadow Empire*, Amsterdam, Greenpeace. https://www.greenpeace.org/international/publication/74651/under-the-eagles-shadow/

Hariri, A., Saleh, M.A.M. & Babbusalam, A.B. 2025 'Between legality and justice: A critical study of the Supreme Court's judicial reasoning in dispute of the Awyu Customary Forest', *Jurnal Jurisprudence*, vol. 15, no. 2, pp. 146–176. https://doi.org/10.23917/jurisprudence.v15i2.11442

ICCAS [Territories of Life] 2025, 'Coalition to guard the Indigenous Peoples Bill urges the ratification of the Indigenous Peoples Law in 2025', *ICCAS News,* Wednesday, 21 May 2025. https://iccas.or.id/en/post/coalition-to-guard-the-indigenous-peoples-bill-urges-the-ratification-of-the-indigenous-peoples-law-in-2025?

Intergovernmental Panel on Climate Change (IPCC) 2023, *Climate change 2023: Synthesis report.* IPCC, Geneva. https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf

Jasim, T., Isra, S., Warman, K. & Andora, H. 2025, 'Challenges in the Implementation of Free Prior and Informed Consent for Indigenous Peoples in Indonesia's National Legal Regulation', *Eduvest-Journal of Universal Studies*, vol. 5, no. 7, pp.8855-8869. https://doi.org/10.59188/eduvest.v5i7.50779

Jong, H. N. 2020, 'Pulp producers pull off US$168 million Indonesia tax twist: Report', *Eco-Business,* 3 December 2020. https://www.eco-business.com/news/pulp-producers-pull-off-us168-million-indonesia-tax-twist-report/

Keck, M. E. & Sikkink, K. 1998, *Activists beyond Borders: Advocacy Networks in International Politics*, Cornell University Press, Ithaca, NY.

Kementarian Lingkungan Hidup (KLH). [Ministry of Environment] 2026, *KLH. (2026, June 30).* 'Menteri Jumhur ingatkan pengusaha jangan serakah dan rusak lingkungan', KLH, 30 June 2026. https://kemenlh.go.id/news/detail/menteri-jumhur-ingatkan-pengusaha-jangan-serakah-dan-rusak-lingkungan

Kesuma, D.A. 2023, 'Penguatan Gugatan Citizen Lawsuit/Action Popularis sebagai Upaya Perlindungan Hak Konstitusional atas Jaminan Penegakan Hak-Hak Konstitusional Warga Negara terhadap Perbuatan Melawan Hukum oleh Negara' (Strengthening Citizen Lawsuit/ActionPopularis Lawsuits as an Effort to Protect Constitutional Rightsfor EnforcementsGuarantees of Citizens' Constitutional Rights Againts Unlawful Acntions by the State), *Jurnal Ilmiah Hukum Dan Hak Asasi Manusia*, vol. 3, no. 1), pp. 43–52. https://doi.org/10.35912/jihham.v3i1.2312

Khafiyya, N. 2025, 'Komisi IV DPR Minta Pemerintah Bertindak Usai Video Kayu Gelondongan Viral di Banjir Sumatra', *Reformasi.co.id,* November 29, 2025. https://reformasi.co.id/komisi-iv-dpr-minta-pemerintah-bertindak-usai-video-kayu-gelondongan-viral-di-banjir-sumatra/

Koalisi Indonesia Memantau 2023, *The devil is in the detail: Aroma patgulipat izin Toba Pulp Lestari.* https://ksppm/org/2023/06/20/the-devil-is-in-the-detail-aroma-patgulipat-izin-dan-kebun-kayu-pt-toba-pulp-lestari-di-sumatera-utara/

Larsen, P. B. & Gilbert, J. 2020, 'Indigenous rights and ILO Convention 169: learning from the past and challenging the future', *International Journal of Human Rights*, vol. 24, nos. 2-3, pp. 83–93. https://doi.org/10.1080/13642987.2019.1677615

Karjoko, L., Handayani Gusti Ayu Ketut Rachmi, I., Sudarwanto, A.S., Winarno, D.W., Jaelani, A.K. & Hanum, W.N. 2021, 'The consequence of the decision of the Constitutional Court in forestry on the recognition of traditional forests in Indonesia', *Journal of Legal, Ethical and Regulatory Issues*, vol. 24, no. 5, pp. 1-8.

Komalasari, T.D. 2025, 'Kemenhut Investigasi Sumber Gelondongan Kayu yang Terbawa Banjir di Sumatera', Katadata,co.id, 30 November 2025. https://katadata.co.id/berita/nasional/692c378888b1f/kemenhut-investigasi-sumber-gelondongan-kayu-yang-terbawa-banjir-di-sumatera

Mahkamah Agung-RI [Supreme Court of the Republic of Indonesia] (2017), Palembang Administrative Court Decision No. 26/G/2017/PTUN-PLG, August 29, 2017. https://putusan3.mahkamahagung.go.id/direktori/putusan/161662aa639e7c85f27c86858c38e7a2.html

Margareta, S &Tanudjaja Tanudjaja 2024, 'Kajian Yuridis Putusan Mahkamah Agung No. 2239 K/PID. SUS/2012 Berkaitan dengan Tindak Pidana Perpajakan', *Jurnal Hukum Indonesia*, vol. 3, no. 3. https://doi.org/10.58344/jhi.v3i3.1004

Masyarakat Jurnalis Lingkungan Indonesia 2020, *Masyarakat Jurnalis Lingkungan Indonesia. (2020, October 16).* 'AMAN: Kriminalisasi masyarakat adat akan meningkat',SIEJ 16 October 2020. https://siej.or.id/id/envirotalk/aman-kriminalisasi-masyarakat-adat-akan-meningkat

Media RJN 2025, *(2025, December 12).* '11 entitas diperiksa, pemerintah perketat penegakan hukum kehutanan di Tapanuli Selatan', *Media RJN*, 12 December 2025. https://mediarjn.com/11-entitas-diperiksa-pemerintah-perketat-penegakan-hukum-kehutanan-di-tapanuli-selatan/

Media Polmas 2024, 'Ratusan aksi massa Aliansi Gerak Rakyat Tutup PT.Toba Pulp Lestari kembali lakukan demonstrasi di depan kantor DPRD Sumut', (2024, April 18). Media Polmas Poldas. https://www.mediapolmaspoldasu.com/2024/04/ratusan-aksi-massa

Michalowski, R. J. & Kramer, R. C. 2010, 'State-corporate crime', In Cullen, F.T. & Wilcox, P. (eds.), *Encyclopedia of Criminological Theory*, Sage, vol. 2, pp. 629-631. https://doi.org/10.4135/9781412959193.n174

Michel, J. 2013, *Trends in the Practice of Development Cooperation: Strengthening Governance and the Rule of Law*, Bloomsbury Publishing, New York.

Muhari, A. 2025, 'Perkembangan situasi dan penanganan bencana di tanah air tanggal 28 November 2025, [Developments in the situation and disaster management in the country 28 November 2025], Badan Nasional Penanggulangan Bencana (BNPB) [National Board for Disaster Management] 28 November 2025. https://bnpb.go.id/berita/perkembangan-situasi-dan-penanganan-bencana-di-tanah-air-tanggal-28-november-2025

Nixon, R. 2011, *Slow Violence and the Environmentalism of the Poor*, Harvard University Press, Cambridge, MA. https://doi.org/10.4159/harvard.9780674061194

Phillips, A. 1995, *The Politics Of Presence,* Oxford University Press, Oxford. https://doi.org/10.1093/0198294158.001.0001

PT. Toba Pulp Lestari. 2020, 'Direksi Perseroan PT. Toba Pulp Lestari, Tbk, Laporan Keuangan Finansial Statement: 31 Desember 2020', Tobapulp.com. https://www.tobapulp.com/wp-content/uploads/2024/06/Laporan-Tahunan-2020-INRU.pdf

PT.Toba Pulp Lestari 2023, Direksi Perseroan PT.Toba Pulp Lestari Tbk, Ringkasan Publik Perizinan Berusaha Pemanfaatan Hutan (PBPH) PT. Toba Pulp Lestari Tbk di Propinsi Sumatera Utara, Parmaksian, 24 Juni 2023. Tobapulp.com. https://www.tobapulp.com/wp-content/uploads/2024/07/ringkasan-publik-tahun-2023.pdf

PT. Toba Pulp Lestari 2025a, Direksi Perseroan PT. Toba Pulp Lestari Tbk, Rangkuman Laporan Tahunan 2025, June 2026. Tobapulp.com. https://www.tobapulp.com/wp-content/uploads/2026/06/AR2025-potrait.pdf

PT Toba Pulp Lestari 2025b, Indonesia's National Commission of Human Rights Releases Report on Local Community Complaint Against TPL, Press Release, 23 May 2025, Toba Pulp Lestari. https://www.tobapulp.com/wp-content/uploads/2025/05/May-23-2025-Indonesias-National-Commission-of-Human-Rights-Releases-Report-on-Local-Community-Complaint-Against-TPL.pdf

Rachmatunnisa. 2025, 'Pakar UGM Sebut Banjir Bandang Sumatra Akibat Kerusakan Hutan di Hulu DAS', *DetikInet,* 01 December 2025. https://inet.detik.com/science/d-8237374/pakar-ugm-sebut-banjir-bandang-sumatra-akibat-kerusakan-hutan-di-hulu

Rainforest Action Network 2024a, New Report Exposes Royal Golden Eagle Group's Environmental Violations and Calls for Brands and Banks to Drop Ties, *Press Release, Rainforest Action Network,* 18 March 2024. https://www.ran.

org/press-releases/new-report-exposes-royal-golden-eagle-groups-environmental-violations-and-calls-for-brands-and-banks-to-drop-ties/

Rainforest Action Network 2024b, Exposing Royal Golden Eagle Group's Sprawling Empire Of Destruction, *Forest Frontlines, Rainforest Action Network*, 18 March 2024, https://www.ran.org/forest-frontlines/exposing-royal-golden-eagle-groups-sprawling-empire-of-destruction/

Rumapea, A. E., Sardini, N. H., & Manar, D. G. 2024, 'Konflik pemodal besar versus masyarakat adat (Studi kasus: Pandumaan-Sipituhuta, Humbahas)', *Journal of Politic and Government Studies*, vol. 13, no. 2, pp. 428–441. https://ejournal3.undip.ac.id/index.php/jpgs/article/view/43536

Rustandi 2026, 'KPK perketat pengawasan sektor kehutanan: Dari potensi kebocoran Rp 355 triliun hingga perombakan tata kelola', *Pikiran Rakyat,* 30 April 2026. https://garut.pikiran-rakyat.com/nasional/pr-5210176287/kpk-perketat-pengawasan-sektor-kehutan

Sahide, M.A.K., Abdullah, A, & Moeliono, M. 2026, 'Commentary: Policy forum: Indigenous forest rights at a crossroads? A critical look at Indonesia's planned forestry law amendment', *Forest Policy and Economics*, vol. 185, article no. 103730. https://doi.org/10.1016/j.forpol.2026.103730

Suara Nauli, 2025, 'PT. Toba Pulp Lestari moratorium under scrutiny amid reports of violence against communities', *Suara Nauli*, May 13, 2025. https://suaranauli.com/2025/05/13/pt-toba-pulp-lestari-moratorium-under-scrutiny-amid-reports-of-viol

Schlosberg, D. 2007, *Defining Environmental Justice: Theories, Movements, and Nature,* Oxford University Press, Oxford. https://doi.org/10.1093/acprof:oso/9780199286294.001.0001

Sihotang, H. 2012, Model konservasi sumberdaya air Danau Toba. PhD Dissertation, IBP [Bogor Agricultural University]. http://repository.ipb.ac.id/handle/123456789/117541

Sihotang, I.V. 2017, Model Pengelolaan Lingkungan untuk Menjamin Kelestarian Pemnfaatan Sumber Daya Air (Studi Kasus: Sub DAS Aek Silang, Daerah Aliran Sungai (DAS) Danau Toba, Provinsi Sumatera Utara [Environmental Management Model to Ensure the Sustainability of Water Resource Utilization (Case Study: Aek Silang Sub-Watershed, Lake Toba Watershed, North Sumatra Province)], PhD Dissertation, Universitas Gadjah Mada. https://etd.repository.ugm.ac.id/penelitian/detail/108850

Simanjuntak, C. P. M. 2025, '*Actio popularis* in international accountability: A case research of UAE', *The Lampung Journal of International Law*, vol. 7, no. 1, pp. 1–14. https://doi.org/10.25041/lajil.v7i1.3965

Simanjuntak, M. 2025, *(2025, August 4).* Masyarakat adat di Tano Batak perjuangkan haknya lewat verifikasi wilayah adat. *Inspirasi Online*, 4 August 2025. https://inspirasi.online/masyarakat-adat-di-tano-batak-perjuangkan-haknya-lewat-verifikasi-wilayah-adat/

Simorangkir, T. 2021, 'Tim-11 aksi jalan kaki Toba-Jakarta bertemu Jokowi, adukan perusakan lingkungan', *DetikNews,* 06 August 2021. https://news.detik.com/berita/d-5672521/tim-aksi-jalan-kaki-toba-jakarta-bertemu-jokowi-adukan-perusakan-lingkungan

Simangunsong, T. 2026, Indonesian communities push to reclaim lands following company permit revocations, *Mongabay News*, 06 March 2026, https://news.mongabay.com/2026/03/indonesian-communities-try-to-reclaim-lands-following-company-permit-revocations/

Sinaga, N. 2024, 'Medan High Court Acquits Sorbatua Siallagan, New Hope for Indigenous Peoples', *Kompas,* 18 October 2024. https://www.kompas.id/artikel/en-pengadian-tinggi-medan-vonis-bebas-sorbatua-siallagan-harapan-baru-untuk-masyarakat-adat

Tambunan, M. R. U. D., Rosdiana, H., & Irianto, E. S. 2020, 'Transfer pricing cases on intangibles performed by manu facturing industry based on tax court decisions 2015-2019 in Indonesia', *International Transfer Pricing Journal*, vol. 27, no. 5, pp. 384–390. https://doi.org/10.59403/3df99kh

Tim KSPPM 2021, Indorayon-Toba Pulp Lestari (TPL) sumber bencana bagi masyarakat kitaran Kaldera Toba. *KSPPM,* 06 August 2021. https://ksppm.org/indorayon-toba-pulp-lestari-tpl-sumber-bencana-bagi-masyarakat

Tim KSPPM 2023, Laporan Investigasi Banjir Bandang: Desa Simangulampe, Kecamatan Bakti Raja, Kabupaten Humbang Hasundutan-Sumatera Utara*, KSPPM,* 05 December 2023. https://ksppm.org/2023/12/05/laporan-investigasi-banjir-bandang-desa-simangulampe-kecamat

tpcases 2012, 'Indonesia vs "Asian Agri Group", December 2012, Supreme Court, Case No. 2239 K/PID.SUS/2012', *tpcases*, 18 December 2012. https://tpcases.com/indonesia-vs-asian-agri-group-december-2012-supreme-court-case-no-2239-k-pid-sus-2012/

Tri Ragali, M. 2022, 'Analisis pertimbangan hukum hakim dalam gugatan tanggung jawab mutlak (strict liability) ganti rugi dan pemulihan akibat kerusakan lingkungan hidup (Studi Kasus Putusan Nomor 234/Pdt.G/Lh/Pn.Plg)', *Jurnal Fatwa Hukum,* vol. 5, no. 4. https://doi.org/https://jurnal.untan.ac.id/index.php/jfh/article/view/59367

UCA News 2025, Indonesian Church, groups back tribal struggle for land rights; Community living around famed volcanic Lake Toba have accused a pulpwood company of encroachment, repression*, Union of Catholic Asian News,* 11 September 2025. https://www.ucanews.com/news/indonesian-church-groups-back-tribal-struggle-for-land-rights/110253

Universitas Gadjah Mada, Faculty of Economics and Business (FEB UGM) 2023, 'Membedah transfer pricing dan aturan hukumnya', *FEB UGM News,*11 June 2023. https://feb.ugm.ac.id/id/berita/4188-membedah-transfer-pricing-dan-aturan-hukumnya

Wirawan, N.A. 2023, 'Indonesia masuk jajaran negara dengan laju deforestasi hutan tertinggi 2023', *Good Stats*, 15 October 2024. https://data.goodstats.id/statistic/indonesia-masuk-jajaran-negara-dengan-laju-deforestasi-hutan-tertinggi-2023-qi92r

Wiss-Carline, J. 2012, Chandler v Cape Industries Plc EWCA Civ 525. *Lawcases.Net*. https://www.lawcases.net/cases/chandler-v-cape-industries-plc-2012-ewca-civ-525/