JOURNAL LA SOCIALE

VOL. 07, ISSUE 04 (1162-1171), 2026
DOI:10.37899/journal-la-sociale.v7i4.3283

Criminal Responsibility of Corporations in Criminal Actions of Environmental Pollution in Indonesia: A Case Study

Gustika Sandra[1], Rika Damayanti[1], Muh.Bakri[1]

[1]*Andi Sudirman University, Indonesia*

**Corresponding Author: Gustika Sandra*
Email: gustikasandra84@gmail.com

Article Info

Article history:
Received 29 April 2026
Received in revised form 17 June 2026
Accepted 20 July 2026

Keywords:
Criminal Liability
Corporations
Absolute Liability
Environmental Law

Abstract

Corporate criminal liability in environmental pollution crimes in Indonesia. Corporations as subjects of criminal law have been recognized in Law No. 32 of 2009 concerning Environmental Protection and Management (UUPPLH). However, the application of criminal sanctions against corporations still faces challenges, especially in proving guilt and the effectiveness of sanctions. This study aims to analyze the legal basis, forms of accountability, and obstacles in the implementation of corporate criminal law in the environmental sector. The research method used in this study is normative juridical (legal research), namely research that focuses on examining the application of rules or norms in law. positive prevailing. The results of the study were obtained based on a Court decision regarding environmental pollution. In this case, the corporation was sentenced to a fine and required to repair the environmental damage. This case is evidence that corporations can be held criminally responsible in Indonesia. This study found several obstacles in the implementation of corporate criminal liability such as 1) Proving the element of fault, it is difficult to prove the intent or negligence of the corporation. 2) The effectiveness of sanctions or fines is often not commensurate with the environmental damage caused., 3) the existence of conflicts of interest so that law enforcement is weak due to economic and political interests. Suggestions to legal institutions are the need to increase the capacity of investigators in forensic audits and corporate law, strengthening the internal oversight system in enforcing legal accountability.

Introduction

Environmental pollution is a serious problem facing Indonesia. Many cases of pollution are carried out by corporations through industrial, mining, and plantation activities (Nasution et al., 2024; Hidjaz, 2019; Desmaiani et al., 2026). Corporations, as legal entities, have significant potential to cause environmental damage, thus requiring criminal accountability. Indonesia, as a country with abundant natural resources, faces significant challenges in preserving the environment. Industrial, mining, plantation, and energy activities often cause pollution and environmental damage that have widespread impacts on society (Kodiya et al., 2025; Ellwanger et al., 2025; Mir et al., 2023). Water, air, and soil pollution not only disrupt ecosystems but also threaten human health and sustainable development. The phenomenon of environmental pollution in Indonesia is largely carried out by corporations. with large-scale businesses. Corporations often ignore environmental management obligations for the sake of economic gain (Tetteh et al., 2024; Esposit0 et al., 2024; Dhar et al., 2022). This raises fundamental questions about how criminal law can implicate corporations as perpetrators of criminal acts. Corporate crime has become one of the most complex legal issues in the modern financial sector, particularly in developing countries like Indonesia. These crimes include serious violations such as money laundering, tax evasion, and financial reporting manipulation,

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

all of which can significantly impact economic stability and public trust in financial institutions (Umoh et al., 2024; Van der Cruijsen et al., 2023; Li et al., 2023).

Within the framework of law enforcement against corporate crime, it is crucial to position corporations not only as profit-oriented legal entities, but also as moral subjects obligated to adhere to the values of business ethics, social responsibility, and the rule of law (Bhagat & Hubbanrd, 2022; Dacin et al., 2022; Breakey et al., 2025). In Indonesia, strengthening this approach has been attempted through various legal instruments, ranging from sectoral laws such as Law No. 8 of 2010 concerning the Prevention and Eradication of Money Laundering Crimes, to Law No. 32 of 2009 concerning Environmental Protection and Management (UU PPLH), which is a systematic legal basis for preserving environmental functions and preventing pollution/damage. Enacted on October 3, 2009, this law regulates environmental planning, utilization, control, supervision, and law enforcement. This law has been partially amended by the Job Creation Law.

Corporations have a legal responsibility to protect the environment, with violations resulting in civil and criminal sanctions under Law No. 32 of 2009. The primary principle applied is strict liability *for* pollution, particularly industrial waste. However, enforcement is often hampered, and WALHI has highlighted the potential for a decline in environmental protection in the Draft Criminal Code (Arunkumar & Dharshini, 2025; Bone & Herawato, 2026; Anggraeni, 2025).

Corporate crimes in the environmental sector often involve irregularities in business activities that directly impact ecosystem damage. Pollution cases generally occur due to inadequate waste management, environmental damage, logging, and mining, resulting in environmental degradation. Corporations are responsible for the environmental damage resulting from their business activities. This includes both criminal and civil liability. Law No. 32 of 2009 (PPLH) and Law No. 18 of 2013 (P3H) are the primary basis for prosecuting corporations that damage the environment, although their implementation is still considered weak. Despite existing regulations, law enforcement against corporations is often difficult, particularly in proving elements of corporate crime. Corporations are obligated to bear the costs of environmental restoration for the pollution they cause (Pardede et al., 2023; Hartanto et al., 2024; Radhova et al., 2026; Nurhayati et al., 2026).

Indonesia's criminal law framework, despite progress, still faces various weaknesses in addressing corporate crime (Anwary, 2022; Suartha & Ivory, 2024; Saipudin et al., 2025). One major challenge is the lack of harmony in existing regulations, such as overlap between regulations from other sectors and general criminal law. This lack of harmonization has led to inconsistencies in legal interpretation, making it difficult for law enforcement agencies to effectively apply sanctions. Furthermore, the lack of clarity in determining corporate criminal liability adds to the complexity of the law enforcement process. Furthermore, corporate managers often exploit legal loopholes to avoid punishment, ultimately weakening efforts to prevent future crime (Napitupulu et al., 2025; Admati et al., 2025; Mapfeka, 2026). Furthermore, the perception that large corporations possess the financial and political power to avoid legal accountability has further fueled skepticism about Indonesia's criminal justice system. This is further exacerbated by weak coordination between law enforcement agencies, which often results in a disjointed approach to addressing corporate crime (Bociga et al., 2026; Quadri et al., 2026; Sarkar & Shukla, 2024).

Methods

This study employed normative juridical legal research to examine the regulation and implementation of corporate criminal liability in environmental pollution cases in Indonesia.

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

The research focused on analyzing the legal framework governing corporate criminal responsibility and its application in judicial practice.

The study applied statutory, conceptual, and case approaches. The statutory approach was conducted by examining the relevant legislation governing corporate criminal liability, particularly Law No. 32 of 2009 concerning Environmental Protection and Management, as amended by Law No. 6 of 2023 concerning Job Creation, Law No. 1 of 2023 concerning the Indonesian Criminal Code, and Supreme Court Regulation No. 13 of 2016 concerning Procedures for Handling Criminal Cases Committed by Corporations. The conceptual approach was used to analyze legal doctrines concerning corporate criminal liability, culpability, strict liability, criminal sanctions, and environmental restoration. Meanwhile, the case approach examined judicial interpretations of these legal principles in environmental pollution cases involving corporate defendants.

The legal materials consisted of primary, secondary, and tertiary legal materials. Primary legal materials included statutory regulations and court decisions concerning corporate environmental crimes. Court decisions were selected purposively based on the following criteria: (1) the defendant was a corporation or business entity; (2) the case involved environmental pollution or environmental damage; (3) the judgment discussed corporate criminal liability; and (4) the complete decision was publicly accessible through the Supreme Court Decision Directory (Direktori Putusan Mahkamah Agung Republik Indonesia). Secondary legal materials comprised books, peer-reviewed journal articles, legal commentaries, and previous studies concerning environmental law and corporate criminal liability, while tertiary legal materials included legal dictionaries and other supporting legal references.

To describe the development of environmental pollution cases involving corporations during the 2019–2025 period, case data were compiled from publicly accessible decisions available in the Supreme Court Decision Directory and supported by official reports published by the Ministry of Environment of the Republic of Indonesia. The case search employed keywords such as *corporation*, *environmental pollution*, *environmental damage*, *industrial waste*, and *environmental crime*. Duplicate records, cases involving only individual defendants, and decisions unrelated to environmental pollution were excluded from the analysis. The identified cases were subsequently classified according to the year in which the decisions were issued to illustrate annual case trends.

Legal materials were collected through document analysis and systematically classified according to the legal basis of corporate liability, attribution of fault, responsible legal subjects, types of criminal sanctions, environmental restoration obligations, and obstacles encountered in law enforcement. The collected materials were analyzed qualitatively using grammatical, systematic, and teleological interpretation to evaluate the consistency between statutory provisions and judicial application.

To strengthen the validity of the findings, triangulation was conducted by comparing statutory regulations, judicial decisions, official government documents, and relevant academic literature. This approach was intended to identify the consistency between the normative legal framework and its implementation in environmental law enforcement involving corporate criminal liability.

Results and Discussion

Based on the research results, it was found that corporations have been recognized as subjects of criminal law in Law No. 32 of 2009 concerning Environmental Protection and Management (UUPPLH). Articles 116–118 emphasize that corporations can be subject to principal penalties

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

in the form of fines, as well as additional penalties such as revocation of business permits, the obligation to repair environmental damage, and the announcement of a judge's decision. In addition, Law No. 6 of 2023 (Job Creation) strengthens the position of corporations as parties that can be held criminally responsible for environmental pollution.

Distribution Trend of Environmental Pollution Cases by Corporations in Indonesia

Figure 1. Trends in environmental pollution cases by corporations in Indonesia from 2019 - 2025

Figure 1 presents the distribution of corporate environmental pollution cases identified in this study during the 2019–2025 period. Based on the court decisions collected through the Supreme Court Decision Directory and supporting official environmental reports, the number of identified cases generally increased over the observation period, although annual fluctuations were observed. The number of cases increased from 12 cases in 2019 to 15 cases in 2020 and remained stable in 2021. The number subsequently increased to 20 cases in 2022, declined slightly to 18 cases in 2023, and reached the highest level, with 47 identified cases, in 2025.

The observed pattern indicates that corporate involvement in environmental pollution cases has remained a persistent issue within Indonesia's environmental law enforcement system. The increase in identified cases may reflect stronger environmental supervision, improved law enforcement efforts, greater public reporting, or increased judicial handling of environmental disputes involving corporations. However, the annual distribution presented in this study is descriptive in nature and should not be interpreted as evidence of a causal relationship between the number of reported cases and the effectiveness of environmental law enforcement. Instead, these data illustrate the development of corporate environmental litigation identified from the legal sources examined in this research.

Principles of elements of guilt in criminal law in Indonesia

The principles of criminal law in Indonesia serve as moral and legal guidelines for upholding justice. Their application requires consistency between theory and practice, particularly when addressing modern crimes such as corruption, human rights violations, and environmental pollution by corporations.

In proving guilt (*schuld)* in criminal law, there is a popular adage adopted from Article 44 of the Criminal Code which is still in effect at the time this article was published, namely the principle of no crime without fault, or what is known as *geen straf zonder schuld* in the Continental European concept and *actus non facit reum nisi mens sit rea* in the Anglo Saxon concept (*an act does not constitute itself guilt unless the mind is guilty)*. Furthermore, according

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

to Roeslan's opinion in the Corporate Case based on the Principle of legality and fault is the basis for ensnaring corporations that commit environmental pollution. Corporations can be punished if proven to have committed violations based on applicable laws (UUPPLH Articles 116-118). In the Case of Human Rights and Corruption The principle of retroactive prohibition is excluded for gross human rights violations and corruption, in accordance with universal principles recognized in international law. Environmental Law Enforcement The principle of ultimum *remedium* is applied by prioritizing administrative sanctions over criminal sanctions, unless the violation results in major damage or loss of life. The application of the principle of criminal law must pay attention to the balance between certainty and law and justice. He criticized law enforcement practices that often ignore the principles of culpability and proportionality, especially in cases of corporations and public officials. According to him, these principles are not merely theoretical norms, but tools of control over state power in imposing criminal penalties. Errors in the concept of criminal law consist of 3 elements, namely: 1). the ability to be responsible, 2) intent (*dolus)* or negligence (*culpa)* as a form of error, and also as an assessment of the perpetrator's spiritual relationship with his actions, 3) the absence of a reason for forgiveness, 4) Effectiveness of sanctions : fines are often not commensurate with the environmental damage caused., 5) Conflict of interest : weak law enforcement due to economic and political interests.

Concept of Corporate Criminal Liability

Corporate criminal liability is a concept in criminal law that emphasizes that corporations (both legal entities and non-legal entities) can be subject to criminal acts and held accountable for actions that cause harm, including environmental pollution. The concept of corporate criminal liability in environmental crimes in Indonesia recognizes corporations as legal subjects that can be punished, not only their managers. Based on Law No. 32 of 2009, corporations are responsible if environmental pollution/damage occurs due to negligence or deliberate actions in their business activities. The main sanctions include fines and disciplinary measures, aimed at restoring the environment.

The existence of corporations as subjects of criminal acts in the criminal law reform policy has consequences for the principles of criminal law, namely that corporations can be held accountable according to Law 1/2023, accountability for criminal acts by corporations According to the Criminal Code, not only can it be imposed on managers, but also on corporations, that judges can impose criminal penalties on corporations or managers, or corporations and managers, either alternatively or cumulatively. The new Criminal Code regulates that criminal acts by corporations can be held accountable, if they are included in the scope of business or activities as determined in the articles of association or other provisions applicable to corporations, then benefit the corporation unlawfully, in addition to being accepted as corporate policy, the corporation does not take the necessary steps to prevent, prevent greater impacts and ensure compliance with applicable legal provisions to avoid the occurrence of criminal acts; and/or the corporation allows the occurrence of criminal acts. Article 5 of Perma 13/2016 has stipulated that the resignation or death of one or more corporate directors does not result in the loss of corporate liability. Furthermore, we need to convey that the penalties imposed on corporations under Law 1/2023 include principal and additional penalties. The principal penalty for corporations is a fine. Additional penalties for corporations include payment of compensation, reparations for the consequences of the crime, performance of neglected obligations, fulfillment of customary obligations, financing of job training, confiscation of goods or profits obtained from the crime, announcement of a court decision, revocation of certain permits, permanent prohibition on carrying out certain acts, closure of all or part of the corporation's business premises and/or activities, freezing of all or part of the

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

corporation's business activities; and dissolution of the corporation. If the corporation does not comply with the additional penalties, the corporation's assets or income can be confiscated and auctioned by the prosecutor to satisfy the additional penalties that have not been fulfilled. In addition, the corporation can also be subject to actions such as corporate takeover, placement under supervision, and/or placement of the corporation under guardianship. Examples of corporate criminal liability in environmental cases include the imposition of criminal fines as referred to in Article 98 paragraph (1) of the Environmental Law, namely acts that result in exceeding ambient air quality standards, water quality standards, seawater quality standards, or environmental damage criteria. Criminal liability for victims is said to be ideal if the victims of environmental crimes receive legal protection. This protection can be provided in the form of compensation or environmental restoration. Thus, in a criminal decision, it is not enough to simply punish the perpetrator. One way for victims to receive legal protection which is a form of the perpetrator's responsibility towards the victim is to apply the doctrine of strict liability in criminal acts.

According to Daud Silalahi, the types of activities that can be applied to the principle of absolute liability are activities that can cause major harm, the consequences of which cannot be overcome by conventional means (abnormally dangerous activities). The standard of abnormality is based on the degree of risk, where the risk is considered high if it cannot be reached by conventional means, according to existing technological capabilities. The gravity of harm, where the danger is considered very difficult to prevent when the level of feasibility of preventive measures begins to occur, where the person responsible must demonstrate maximum effort to prevent the occurrence of consequences that cause harm to other parties. The ideal form of corporate criminal liability is when victims of environmental crimes receive legal protection. This protection can be provided in the form of compensation or environmental restoration. To achieve this, if an environmental crime occurs, the principle of absolute liability should ideally be applied with certain conditions.

Corporate criminal liability for victims of environmental crimes is considered ideal if the victims of environmental crimes also receive legal protection in the form of compensation and environmental restoration. Corporate crime is a white-collar crime. Therefore, corporations must be held criminally responsible for their legal actions, including committing environmental crimes. According to Henny Yunita (2020), there are three parameters that can be used to criminalize corporations. First, the law has expressly stipulated that the subject of the crime includes corporations. This parameter is very important regarding the principle of legality. Second, a corporation can be included as a suspect if investigators have determined that the personal suspect is an official who is considered to represent the corporation and is the directing mind and will of the corporation. Third, a corporation cannot be held criminally responsible if the directing mind and will of the corporation commits a crime against their own corporation and the corporation in question has already filed a lawsuit against the act. This parameter confirms that an act is called a corporate crime if the act provides benefits and advantages for the corporation. Based on Article 1 number 1 of Law Number 32 of 2009 concerning Environmental Protection and Management, it states that the Environment is a unity of space with all objects, power, conditions, and living creatures, including humans and their behavior, which affect nature itself, the continuity of life, and the welfare of humans and other living creatures. A good and healthy environment is a basic right of every Indonesian citizen as this right has been guaranteed in Article 28H of the 1945 Constitution of the Republic of Indonesia. However, what if the right to obtain a good and healthy environment is not fulfilled due to an act of destruction of the environment. Environmental crimes are crimes committed by individuals or corporations intentionally or due to negligence in committing acts that are contrary to Law Number 32 of 2009 concerning Environmental Protection and Management.

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

UUPPLH contains two types of crimes, namely material crimes and formal crimes. A material crime is a crime or act prohibited by law which is considered to be perfect or fulfilled if the act has caused consequences.

Criminal liability can only occur if an individual or corporation has been declared to have committed a crime. In a broad sense, liability covers 3 main issues in criminal law, namely unlawful nature (unrecht), fault (schuld), and criminal (staff). This system of liability is characterized by efforts to ensure that the nature of the criminal act committed by the corporation is limited to individuals. So that if a crime occurs within the corporate environment, then the crime is deemed to have been committed by the management of the corporation. In Law Number 32 of 2009 concerning Environmental Protection and Management (UUPPLH), the liability of business entities is formulated in Articles 116 to 119. Article 116 of the UUPPLH contains the criteria for the emergence of liability of business entities and who should be responsible. If we look at the formulation of Article 116 of the UUPPLH, the liability of business entities arises in one of the following conditions, namely: (1) environmental crimes are committed by a business entity, or on behalf of a business entity, or (2) by a person based on an employment relationship or based on another relationship who acts within the scope of the business entity's work. In criminal law, according to Moeljatno, a person's mistakes and negligence can be measured by whether the perpetrator of the crime is able to take responsibility.

Conclusion

The legal basis for corporate criminal liability for environmental pollution in Indonesia is clear and firm. Corporations can be subject to both principal and additional penalties, and their managers can also be held accountable. Implementation still faces challenges, particularly in proving guilt and the effectiveness of sanctions. Regulatory strengthening, capacity building of law enforcement officials, and the implementation of harsher sanctions are needed to ensure corporate accountability.

Suggestion

The government needs to strengthen the role of the Ministry of Environment and Forestry (KLHK) and local governments in conducting oversight. Supervision should be technology-based, for example, with an integrated air and water quality sensor system. Communities should be involved in environmental oversight through *public hearings* or pollution reporting mechanisms. Court decisions regarding corporate polluters should be widely publicized to serve as a deterrent. In addition to criminal sanctions, corporations can be subject to administrative and civil sanctions, such as revocation of business licenses or compensation to affected communities. Prosecutors, judges, and investigators need to receive specific training on corporate crime to be able to prove guilt and impose appropriate sanctions.

References

Admati, A. R., Atkinson, N., & Pfleiderer, P. (2025). Profitable misconduct, corporate governance, and law enforcement. *Corporate Governance, and Law Enforcement (June 06, 2025). Univ. of Wisconsin Legal Studies Research Paper*, (1845). https://dx.doi.org/10.2139/ssrn.5284606

Anggraeni, R. (2025). Unpacking the Independence of the Indigenous Peoples Bill: A Critique. *Sriwijaya Crimen and Legal Studies*, 76-87.

Anwary, I. (2022). Evaluation of the effectiveness of public administration policies in the development of stringent legal framework: An analysis of the criminal justice system in Indonesia. *International Journal of Criminal Justice Sciences*, *17*(2), 312-323.

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

Arunkumar, N., & Dharshini, V. (2025). Decriminalizing Environmental Offenses: Implications of Removing Penalty Provisions in Indian Environmental Law. *LawFoyer Int'l J. Doctrinal Legal Rsch.*, *3*, 203.

Bhagat, S., & Hubbard, G. (2022). Rule of law and purpose of the corporation. *Corporate Governance: An International Review*, *30*(1), 10-26. https://doi.org/10.1111/corg.12374

Bociga, D., Lord, N., & Bellotti, E. (2026). Challenges and enabling conditions in the governance of economic crime: Insights from the UK's National Economic Crime Centre. *Journal of Economic Criminology*, *12*, 100228.

Bone, S., & Herawati, R. (2026). The Legal Politics of Human Rights Defenders' Protection: Criticism of Criminalization Practices and the Path to Justice. *As-Siyasi: Journal of Constitutional Law*, *6*(1), 17-42.

Breakey, H., Wood, G., & Sampford, C. (2025). Understanding and defining the social license to operate: Social acceptance, local values, overall moral legitimacy, and 'moral authority'. *Resources Policy*, *102*, 105488. https://doi.org/10.1057/s41291-025-00294-9

Dacin, M. T., Harrison, J. S., Hess, D., Killian, S., & Roloff, J. (2022). Business versus ethics? Thoughts on the future of business ethics. *Journal of business ethics*, *180*(3), 863-877. https://doi.org/10.1007/s10551-022-05241-8

Desmaiani, H., Akbar, A. A., Romiyanto, R., Hermawati, E., Suhartoyo, A., Rahma, S. N.,... & Jumiati, J. (2026). Assessing environmental degradation in a tropical watershed: Evidence from artisanal and small-scale gold mining (ASGM), and plantation expansion in West Kalimantan, Indonesia. *Journal of Degraded and Mining Lands Management*, *13*(2), 9859-9873. https://doi.org/10.15243/jdmlm.2026.132.9859

Dhar, B. K., Harymawan, I., & Sarkar, S. M. (2022). Impact of corporate social responsibility on financial expert CEOs' turnover in heavily polluting companies in Bangladesh. *Corporate Social Responsibility and Environmental Management*, *29*(3), 701-711. https://doi.org/10.1002/csr.2230

Ellwanger, J. H., Ziliotto, M., Kulmann-Leal, B., & Chies, J. A. B. (2025). Environmental challenges in Southern Brazil: impacts of pollution and extreme weather events on biodiversity and human health. *International Journal of Environmental Research and Public Health*, *22*(2), 305. https://doi.org/10.3390/ijerph22020305

Esposito, P., Ahmad, Z., Riso, V., & Mustafa, N. (2024). Beyond the business case? Retracing the walk of C orporate social responsibility and financial performance relationship in the Oil and Gas sector. *Corporate Social Responsibility and Environmental Management*, *31*(3), 2211-2224. https://doi.org/10.1002/csr.2676

Hartanto, P., Wijaya, S. G., & Chancy, R. (2024). Discourse of Ecological Damage as a State Financial Loss: Evidence from Indonesia. *Journal of Law, Environmental and Justice*, *2*(3), 307-331. https://doi.org/10.62264/jlej.v2i3.110

Hidjaz, K. (2019). Effectiveness of environmental policy enforcement and the impact by industrial mining, energy, mineral, and gas activities in Indonesia. *International Journal of Energy Economics and Policy*, *9*(6), 79-85.

Kodiya, M. A., Modu, M. A., Ishaq, K., Yusuf, Z., Wakili, A. Z., Dayyabu, N.,... & Babangida, M. U. (2025). Environmental pollution in Nigeria: Unlocking integrated strategies for

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

environmental sustainability. *African Journal of Environmental Sciences and Renewable Energy*, *18*(1), 30-50. https://doi.org/10.62154/ajesre.2025.018.010588

Li, T., Trinh, V. Q., & Elnahass, M. (2023). Drivers of global banking stability in times of crisis: the role of corporate social responsibility. *British Journal of Management*, *34*(2), 595-622.

Mapfeka, S. (2026). Corruption's Impact on Zimbabwe's Mineral Economy: Enhancing Corporate Governance for Sustainable Economic Growth. *Chetana's Journal of Management*, *1*(02), 21-39.

Mir, R. A., Mantoo, A. G., Sofi, Z. A., Bhat, D. A., Bashir, A., & Bashir, S. (2023). Types of environmental pollution and its effects on the environment and society. In *Geospatial Analytics for Environmental Pollution Modeling: Analysis, Control and Management* (pp. 1-31). Cham: Springer Nature Switzerland. https://doi.org/10.1007/978-3-031-45300-7_1

Napitupulu, J. H., Panggabean, M. L., Panjaitan, H., & Widiarty, W. S. (2025). An Integrated Legal Framework for Digital Investment Fraud Prevention in Indonesia. *Journal of Sustainable Development and Regulatory Issues (JSDERI)*, *3*(3), 540-567. https://doi.org/10.53955/jsderi.v3i3.154

Nasution, M. J., Bakri, S., Setiawan, A., Wulandari, C., & Wahono, E. P. (2024). The impact of increasing nickel production on forest and environment in Indonesia: a review. *Jurnal Sylva Lestari*, *12*(3), 549-579.

Nurhayati, N., Rahman, A. A., Pribadi, E. P. A., Panjaitan, N. R., Nismara, T. S., & Tohadi, T. (2026). Civil liability for environmental damage from mining on small islands: PT Gag Nikel Case after Constitutional Court Decision No. 35/PUU-XXI/2023. *Requisitoire Law Enforcement*, *17*(2), 183-190.

Pardede, M., Situmorang, M., Aristeus, S., Rumadan, I., Lumban Toruan, H. D., Diogenes,... & Nugrahani, E. L. P. (2023). Perspectives of sustainable development vs. law enforcement on damage, pollution and environmental conservation management in Indonesia. *Journal of Water and Climate Change*, *14*(10), 3770-3790. https://doi.org/10.2166/wcc.2023.417

Quadri, S. S. A., Ali, M., Zakir, M., & Bakhtawar, S. (2026). Human Trafficking as Human Security Failure: Bridging Criminal Law, Development Policy, and Regional Cooperation in South Asia. *PAKISTAN JOURNAL OF LAW, ANALYSIS AND WISDOM*, *5*(2), 126-138.

Radhova, S. S., Berutu, S. P., & Ardini, A. (2026). A Legal Analysis of the Application of Strict Liability and the Role of Courts in Civil Litigation for Environmental Pollution. *Al-Adalah: Jurnal Hukum dan Politik Islam*, *11*(2), 261-280. https://doi.org/10.30863/ajmpi.v11i2.11460

Saipudin, L., Salim, H. S., Rodliyah, R., & Wulandari, L. (2025). The Concept of Corporate Criminal Liability in the Indonesian Criminal Law System. *Jurnal IUS Kajian Hukum Dan Keadilan*, *13*(2), 475-499. https://doi.org/10.29303/ius.v13i2.1817

Sarkar, G., & Shukla, S. K. (2024). Bi-directional exploitation of human trafficking victims: Both targets and perpetrators in cybercrime. *Journal of Human Trafficking*, 1-22.

Suartha, I. D. M., & Ivory, J. (2024). Corporate crime liability: Beyond rule reform on Indonesia criminal policy. *Focus Journal Law Review*, *4*(2).

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)

Tetteh, L. A., Agyenim-Boateng, C., & Simpson, S. N. Y. (2024). Institutional pressures and accountability processes in pursuit of sustainable development goals: Insights from Ghanaian indigenous oil companies. *Corporate Social Responsibility and Environmental Management*, *31*(1), 89-107. https://doi.org/10.1002/csr.2554

Umoh, B. U., Ofurum, U. D., & Folasade, O. A. S. (2024). The impact of bank fraud on economic stability and public trust in Nigeria's financial system. *Global Academic Journal of Economics and Business*, *6*(6), 187-195.

Undang-Undang No. 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup.

Undang-Undang No. 6 Tahun 2023 tentang Cipta Kerja.

Undang-Undang Republik Indonesia Nomor 26 Tahun 2000 tentang Pengadilan Hak Asasi Manusia.

Undang-Undang Republik Indonesia Nomor 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup.

Undang-Undang Republik Indonesia Nomor 6 Tahun 2023 tentang Cipta Kerja.

Van der Cruijsen, C., De Haan, J., & Roerink, R. (2023). Trust in financial institutions: A survey. *Journal of economic surveys*, *37*(4), 1214-1254. https://doi.org/10.1111/joes.12468

ISSN 2721-0960 (Print), ISSN 2721-0847 (online)