

Regulation of Communal Property Rights in International and Indonesian Law: Challenges and Solutions

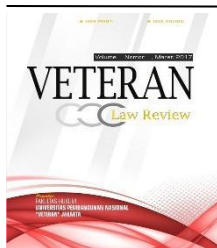
Mariam Alifa Azzahra¹

¹Faculty of Law, University of Lampung, E-mail: mariamalifaazzahra@gmail.com

| ARTICLE INFO | ABSTRACT |
|--|--|
| <p>Keywords: Communal Property Rights, Hak Ulayat, International Law.</p> <p>How to cite: Azzahra, Mariam Alifa. (2025). Regulation of Communal Property Rights in International and Indonesian Law: Challenges and Solutions. <i>Veteran Law Review</i>. 8(1). 13-27.</p> <p>Received:2024-12-21 Revised:2025-08-14 Accepted:2025-08-16</p> | <p>Communal property rights are a cornerstone of sustainable resource management and the preservation of indigenous cultures and traditions. These rights guarantee fair access and long-term sustainability by enabling communities to cooperatively own, use, and manage resources. A framework for ensuring the protection and advancement of these rights is offered by international agreements like the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). In Indonesia, the Constitution and important laws, such as Law No. 5/1960 on Basic Agrarian Principles, promote the recognition of communal property rights under hak ulayat. However, there are still major obstacles in the way of putting these rights into practice. These include disputes between corporate interests and communal land claims, the absence of official recognition for many indigenous communities, and the difficulties between sustainable resource governance and national development ambitions. The legal frameworks governing community property rights at the national and international levels are examined in this article, along with important issues and potential fixes. In order to guarantee the fair and sustainable management of shared resources, it makes the case for greater legal recognition, participatory governance, and improved cooperation between domestic and foreign parties.</p> |

1 Introduction

Community property rights are more than merely legal precepts in many indigenous and local communities; they constitute the cornerstone of social cohesiveness, cultural identity, and economic survival. These rights stand for the shared ownership and control of essential resources like genetic materials, land, forests, and traditional knowledge. The survival of these communities and the conservation of their distinctive cultural legacy would be in grave danger in the absence of these rights. In the international legal system, where

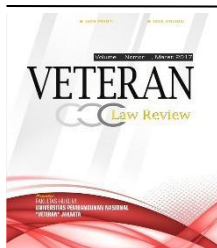


individual property rights are prioritized, common property rights frequently receive little protection despite their significance. Significant difficulties are brought about by this imbalance, especially in emerging countries like Indonesia, which is well-known for its remarkable natural riches and cultural variety.

Numerous legal systems around the world have made an effort to address this problem and provide protection for the rights of communities. The historic 2007 United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) expressly acknowledges the collective rights of indigenous peoples to possess, utilize, and control their lands. In a similar vein, the 2010 Nagoya Protocol places a strong emphasis on just and equitable benefit-sharing for the utilization of traditional knowledge and genetic resources. These frameworks emphasize the significance of protecting community rights and making sure that indigenous communities profit from the sustainable use of their resources. (UNDRIP, Articles 26 and 31; Nagoya Protocol, Articles 7 and 12).

These multinational arrangements do have certain drawbacks, though. Their application differs greatly between nations and is frequently eclipsed by accords such as the Trade-Related Aspects of Intellectual Property Rights (TRIPS). TRIPS underrepresents group ownership systems in favor of private ownership as a means of fostering economic growth and innovation. Because of this, indigenous groups often find it difficult to reap the benefits of the resources they have managed for many generations. This disparity is especially noticeable when businesses take advantage of genetic resources or traditional knowledge without fairly compensating the communities from which they come. (TRIPS, Part II, Article 27).

The Constitution of Indonesia formally recognizes the idea of hak ulayat, or customary communal land rights, and other legislation uphold it. The 1945 Constitution, for example, recognizes indigenous peoples' existence and their right to manage natural resources in Article 18B. This recognition is further supported by other legislative frameworks, such as the Forestry Law and the Basic Agrarian Law. There are still major barriers in place in spite of these legal safeguards. The practical implementation of these rights is frequently hampered by weak governance institutions, tensions between government development aims and customary land rights, and a lack of systematic documentation of traditional knowledge (Putri et al., 2024). Because of this,



Veteran Law Review

Volume : 8

Issue: 1

P-ISSN : 2655-1594

E-ISSN: 2655-1608

indigenous populations are unable to fully benefit from their natural and cultural assets and are at risk of land conflicts and economic marginalization. The theoretical underpinnings of community property rights and their role in international law have been examined in earlier research. The promise of Third World Approaches to International Law (TWAIL) as a means of resolving the systemic injustices present in international legal systems has been emphasized by some. TWAIL challenges the prevalence of Western-centric frameworks and promotes more inclusive models that give developing nations' perspectives more weight (Putri et al., 2022). However, a large portion of the material now in publication is still theoretical in nature, paying little attention to real-world tactics for enforcing protections for communal rights under national legal frameworks such as Indonesia's.

This study aims to close that gap by offering a thorough examination of the ways in which both Indonesian and international legal frameworks regulate community property rights. It seeks to pinpoint the obstacles preventing their acknowledgement and defense, offer workable answers, and highlight how crucial it is to adapt international norms to local conditions. This study adds to the larger conversation on communal property rights by tackling these problems and provides practical advice for defending the rights of Indonesia's indigenous and local communities.

The significance of this research rests in its capacity to connect theoretical debates with useful suggestions. This research emphasizes the critical necessity for policies that respect and maintain indigenous peoples' collective legacy in a world where economic development frequently comes at the expense of environmental and cultural sustainability. This paper's conclusions are intended to open the door to a more just legal system that strikes a balance between the rights of people who have long protected the world's natural and cultural assets and the demands of growth.

2 Legal Framework

The laws on communal property rights offer the basis of declaring and protecting these rights at domestic and global levels. This has demonstrated continuing attempts to address those native and local people's concerns while promoting general development. Although there are international conventions that govern some of the fundamental principles of protection of

communal rights, it is, however, realized that their enforcement largely depends on the extent, to which the national legal frameworks give effect to such principles. These practices present the case of how international conventions and Indonesian laws enhance and/ or hinder the attainment of sustainable and fair uses of resources in Indonesia

2.1 International Law

Custodianship of the communal property rights is indeed one of the vital roles of the international legal systems for local community and Indigenous people who rely for the sustenance of their cultural integrity and proper use of the resources through those rights. Some of these rights are described in several global pacts, but the success of most often depends with how well the nations declare and adhere to them.

a. United Nations Declaration on the Rights of Indigenous People (UNDRIP)

The approval of the UNDRIP was a giant step for indigenous people around the world with the adoption of the resolution in 2007. It asserts their indigenous people's right of ownership, use, and disposition over the lands they have occupied for generations, in the Declaration (UNDRIP Articles 26 and 31). It enunciates how vital common belongings are to their sustenance and their ethnic reminiscence as a people. Although not a legally binding document the UNDRIP is a powerful advocacy tool that affords indigenous people the political/moral weight to insist that the law acknowledge them.

b. Convention on Biological Diversity (CBD)

CBD was founded in 1992 to conserve biological diversity and to use that resource sustainably. The fact that Article 8(j) recognises the importance of traditional knowledge, the latter should be protected as well as appropriately utilised in the course of its 'use'. The 2010 CBD extension called Nagoya Protocol strengthens this framework by ensuring that access to and use of genetic resources and traditional knowledge is founded on fair and equitable access sharing. Also, as a condition of using the resources in areas inhabited by indigenous people, this policy requires that free, prior, and informed consent

(FPIC) of such people must be obtained (CBD, Article 8(j); Nagoya Protocol, Articles 7 and 12).

c. ILO Convention No. 169

While the ILO Convention No. 169 was adopted in 1989 to protect the rights of tribal and indigenous people. These agreements require governments to recognize indigenous peoples land rights and ensure their participation in matters affecting their territories. The main of the agreement is called FPIC, by which indigenous peoples have the right to approve or reject activities that impact their resources (ILO Convention No. 169 Articles 13–16).

d. TRIPS agreement

Aimed at regulating intellectual property rights in international business the TRIPS agreement was agreed to in 1995. TRIPS is often accused for putting individual proprietorship above common one although it grants the countries the right to legislate on the protection of the genetic resources and traditional knowledge. The former is especially important for noting that indigenous peoples' rights to communal property remain largely unspoken in this approach. Thus to ensure that economic growth does not compromise their wisdom formerly held it is suggested that there is desire to propose changes to TRIPS or develop completely different frameworks that respect communal IPs anonymously recognized in the TRIPS (TRIPS, Part II, Articles 27–29).

2.2 Indonesian Law

a. 1945 Constitution (Article 18B Paragraph 2)

The provisions that are contained in the 1945 Constitution and conferred legal recognition of the indigenous people are found in Article 18B Paragraph 2. This article provides powerful legal arguments for the protection of land, and also customary land, and customary forests, which has played an important role in indigenous peoples' existence for centuries. However, in practice, this kind of recognition is nowhere translated into specific government policies and actions. In a clash between the indigenous individuals' claim to a piece of land and the developmental projects that include constructing infrastructure or

industrializing the country, the indigenous people eventually lose to such developments for the benefit of the economy of the nation (1945 Constitution Article 18B Paragraph 2).

b. Law No. 5/1960 concerning Basic Agrarian.

The Basic Agrarian Law is part of the main regulations that govern recognition of indigenous peoples' rights to customary land. It also reassures that customary land under the control of the indigenous people have legal categorization despite being owned by the people. However, the formulation of this law is always followed by conflict in terms of ownership of land. Most firms seeking to undertake commercial production projects, for example, plantations or mining, encroach on customary land. This condition leads to conflict and unfairness since indigenous people often lack the capacity organs or resources to protect their rights (Law No. 5 of 1960)

c. Decision of the Constitutionality of the House of Representatives No. MK35/PUU-X/2012

A brief ray of hope for indigenous peoples' rights came out from the decision of the Constitutional Court of the Republic of the Philippines in the case of MARLOWE KID P easing case no. MK35/PUU-X/2012. This decision leaves no doubt that customary forests are no longer state forests, but indigenous people's rights that should be recognized. This was a milestone in the struggle for the indigenes to regain their so called lost territories. However, similar to many other countries, the problem arises that legal recognition of these rights is not complemented by strong law enforcement or awareness from local governments, as well as the absence of mechanisms that could guarantee the real enforcement of such rights in practice (Decision MK35/PUU-X/2012).

d. Law no 41 year 1999 concerning The Laws and Regulation towards Forestry.

Even more, the recognition of the indigenous people's right to their customary forests is provided by the Forestry Law no. 41 of 1999. Here also with this law set in place it sets it clear that indigenous people have the right to exercise control over customary forests and utilize as they deem fit. However, in practice, this law is actually an obstacle to large-scale development initiatives including mining or logging, land

clearance for oil palm plantations or other large-scale development projects. As in many other circumstances indigenous peoples' rights are sidelined by economic claims viewed as more pressing. This demonstrates the great challenge faced by the Indonesian legal regime in establishing a common ground to allow economic development while respecting the rights of indigenous peoples into account in the Law No.41 199 (Law No. 41 of 1999).

3 Challenges in Implementation

The journey toward realizing the right to communal property for indigenous communities, including those in Indonesia, is fraught with intricate challenges that extend beyond mere legal frameworks. These challenges manifest at various levels – policy, governance, and social dynamics – impacting the lives and cultures of these communities in profound ways. Here are four key challenges they face:

a. Lack of Official Recognition

The majority of indigenous people remain officially invisible despite customary land rights are recognized on the international and national levels. This has forced them to lack recognition due to poor survey and registration of their ancestral land. In most of these communities, there is no recognition of their status and that make it hard for them to exercise their legal rights in legal frameworks thus there is a gap between cultural norms and new legal realities. The problem is especially apparent in Indonesia where the state-level and national government are currently swathed in bureaucracy and complex layers of legislation. For this reason, many indigenous communities are excluded in regional spatial planning, thus exposure to displacement and marginalization.

This tends to be quite demoralizing especially when it erases culture-interest associations that people had with the land. To many indigenous people their territory is not simply a piece of geography, but it is part of their existence, culture, and heritage. This fight is not just a fight to be acknowledged in the courtroom, but one for existence, culture, and legacy for the next generations of these communities.

b. Land Conflict

Another major obstacle to indigenous people is the conflict in the use of the land that is mainly as a result of the overlapping bounds between these groups and private sector companies. This is most felt in the oil palm, mining, and logging industries through which business ventures invade customary land. In Indonesia, for example law enforcement is poor and government policies that support the grant of corporate permits to use community and indigenous peoples' lands are rampant.

Information from organizations like AMAN (Indigenous Communities Alliance of the Archipelago) disturbs showing that 70% of the trials around the lands in the country are with large firms. These conflicts can create serious combat between the indigenous people and the large company that seeks to carry out the operation. In many case of self-determination, people fight for their land not just for the soil, but for their existence, means of living and culture.

c. The achievement of National Development Priorities

These industries and infrastructural progress happen at the detriment of the indigenous people, as governments continue to favor economic growth against he rights of indigenous people. This is demonstrated in Indonesia through the National Strategic Project (PSN), in which large section of customary land is cleared for roads, airport as well as industrial development. Worryingly, many of these projects commence without acquiring the FPIC of indigenous peoples.

Open questions emerge concerning this type of scenario and who is perceived as a worthy subject by the plugin and the decision-making machinery. In many indigenous cases it has been seen that the struggle for development is actually the mere stripping off their rights and existence. They are alive to brace themselves with a situation where their fore fathers territorial territories are converted into business entities for profit making exercise and in the process their culture is erased, and they are locked out of the commercial activities meant for them by their own fore fathers.

d. Globalization and Privatization

Both globalization and privatization clearly relate to an economy, with globalization as an economic concept that is in some ways outgrowths of and interconnected with privatization. The forces of globalization have only made things worse, and tend to increment the marginalization of indigenous peoples. Changing market conditions exposes the commons of the people to the encroachment by capital, thus eroding the principle communal management of resources that seek to preserve and enhance the viability of the community in the present and future. The activities of land grabs by TNCs not only expel indigenous people from their ancestral lands, but also turn them into employees or even refugees in their own country.

This trend turns indigenous people into a welfare state whose struggling economic prospects also means they are unable to support themselves. The cultural loss is also equally severe, because the indigenous proverbs, practices and beliefs by which these communities' survival and cohesion have been maintained for generations, are in grave danger of being wiped out by an increasingly assertive, takeover-oriented economic imperative.

4 Discussion

Hence, it is imperative to analyse and bring together numerous issues related to the recognition and protection of the rights to communal property starting with the incorporation of the customary law into the Indonesian legal system. These indigenous people have been protecting the nature for ages mostly in order to sustainably meet the basic needs of society. These communities therefore hold sustainable practices that modern world development is often unable to achieve. Nevertheless, thanks to their contribution, these groups are discriminated by denying them their rights in order to embrace policies that embrace economic development at the expense of cultural and environment.

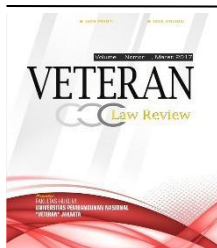
This particular finding is one of the important milestones of indigenous peoples in Indonesia starting with the constitutional court MK35/PUU-X/2012 which declared customary forests as owned by indigenous peoples and not the state forests anymore. This particular ruling was a great victory, though it is by no means enough. Despite the existence of

indigenous rights regimes, indigenous peoples' territories remain largely unacknowledged while indigenous resources continue to be grabbed by different interest groups. That this has happened at the legal level doesn't make it easy to translate into practical and workable policies.

On the same note, it is the government must come up with a participatory strategy to counter this gap. The first process is the participation of people from indigenous organizations in the drawing of geographical boundaries. Thus, apart from providing legal understanding, it develops working and cordial cooperation relations between the communities, the government, and even other private entities. In performing the participatory mapping, distorted manner is avoided in a way that the indigenous peoples' history and memories are incorporated. It also enable reduce cases where there are conflicting claims that would cause a disagreement. As such, the government should come up with parameters and these forms the basis of the equitable management of land, which equivalent to the dignity and the dreams of the indigenous people (Arizona & Cahyadi, 2013).

Another important factor is how to properly balance commitments to the international community with the needs and desires of the nation. Even though Indigenous peoples are among the most active in protecting biodiversity, they are still among the most endangered populations. These global frameworks include; The United Nations Declaration on the Rights of the Indigenous Peoples (UNDRIP) and Convention on Biological Diversity (CBD). For example, the FPIC principle guarantees indigenous people to be fairly and clearly asked for consent before development activities occur on their territories. However, in Indonesia, FPIC is not even given a true social consultation and approval process, and is instead used as a rubber stamp (Fay & Sirait, 2005; Nicholson, 2016).

This also applies to the necessity for reforming national laws. Hitherto, Indonesian law remains largely individualistic, and collective rights such as those under customary laws remain ill-provided for. The task of amending Law No. 5/1960 on Agrarian Principles, which constitutes the UUPA, appears to be an obvious first measure for acquiring better legal protection of communal land and resources. Furthermore, there is a belief about bringing a digital system of land registration which could faster the



Veteran Law Review

Volume : 8

Issue: 1

P-ISSN : 2655-1594

E-ISSN: 2655-1608

recognition, could reduce conflict, and increase transparency of the system. The same system would help to better document customary territories, and to prevent clashes with other entities over ownership.

They also require improved Instruments, Capacity Building and Support Systems for handling of disputes over Customary Land like the National Land Agency (BPN). In many cases, indigenous people are helpless in such matters because the justice system is not enough on hand. Enabling agencies with the capability to fairly settle disputes is not only making legal guarantees but also addressing equity and accountability felt in the agencies. Strong legal framework for CPRs is the key precondition to ensure the SSD that is favorable for all the subject of this right (Gritten et al., 2015; AMAN Report, 2022).

Last but not least, participatory governance has to become the foundation of the effective management of the common property. First Nations peoples require more than acknowledgement from Canada's legal system – they require a voice in determining the destiny of their territory and its riches. One excellent example can be looked at at Musyawarah Adat (Traditional Deliberation) in Papua, where methods are employed where indigenous communities can engage in discussions over how their territory is utilized and governed. With this model, it is possible to control current and future problems using culturally appropriate and locally supported governance systems that still honor cultural norms.

Bringing these changes to other regions with similar models adapted for local culture and ecosystems could greatly enhance communal property use. High-level dialogue would also be effective if consultative forums through which government officials, indigenous leaders, and civil society organizations could come together would be created. These kinds of platforms should not be mere rigid formalisms; rather they should be relationships that foster trust and shared risk responsibilities. By providing indigenous peoples the platform of being equal partners in the development process Indonesia can envision a better tomorrow – one that is sustainable, inclusive, indigenous and humane. (Larson & Pulhin, 2012; Colchester, 2011).

5 Conclusion

Realisation, affirmation and defence of collective property rights are crucial to make way for the integral development of the original peoples and local communities, as well as the safeguard of the cultural and natural diverse legacy. Such rights based on the common traditions and ownership provide an exceptionally rich value as opposed to an ordinary legal protection—they reflect the ethnical commitment of generations for their land and environment. Nonetheless, efforts are still have to be made to make the advancement made in Indonesia, the like of the recent decision of the Constitutional Court in the case of MK35/PUU-X/2012, meaning that communal rights in the country, while are recognized on papers, are also protected and enforced in practice without barriers.

The nature of the problem is that the most important goal is to incorporate customary law into the legal system of Indonesia. In lieu of modern technology, Indigenous communities world over have over time been known to practice sustainable utilization and management of resources to meet the human needs without compromising on the environment. It is a knowledge that is hugely beneficial when dealing with current crises like climate change and destruction of habitat. However, such contributions are so little acknowledged by legal system and policies as they tend to give a green light to the developments in economies without respecting cultures. Consequently the government needs to set up affirmative structures that will enable indigenous people to make decisions on their land. Energy theatre and more issuance of what can be classified as participatory mapping and consultative forums that will ensure that those under customary legal system are aware of their counterparts under the national legal system would go a long way in enhancing the trust between the two distinct camps of stakeholders.

As relevant is the enhancement of correspondence between Indonesia's national interests and international obligations. Legal instruments such as UNDRIP and CBD being based on equitable access and sharing of benefits and obtaining FPIC. Nevertheless, in most development projects especially those in Indonesia FPIC becomes more or less a procedural requirement rather than being implemented in its true sense. To enhance FPIC as a meaningful and enforceable legal principle, more cooperation

with the international bodies including, UNDP, FAO should be achieved. These organizations can offer technical assistance and funding besides helping to emulate great policies from all over the world because Indonesia's policies do not violate the rights of indigenous people, but it is still a sovereign nation.

Another key act towards beginning to protect communal property rights is the amendment of existing laws. The Indonesian system of laws primarily promotes the ownership of certain rights by individuals, while disregarding collective interest in those same rights. Law reform initiatives include amending the JJCLs that underpin the U.K.-based UUPA (Law No. 5/1960) and making new legal instruments in the Pacific that better protect indigenous customary land rights. It therefore means that trying to establish new technology through e-systems of registration of land and aer, provision of better facilities to institutions that has to deal with the issues of land such as the BPN could definitely reduce the cases of land disputes and increase the level of transparency. The sort of reforms would not only enhance legal security, but it would also lay down the principles of balanced and sustainable development.

Finally, this article is insisting that participatory governance needs to become the foundation for the practice of communal property management. Very importantly Indigenous communities must be privy to decisions that affect their territories and resources. For instance, the Musyawarah Adat in Papua gives lessons that culture can inform contemporary systems of government. Such models can be extended across the country with accommodating modifications to the underlying cultural and ecological settings, so promising to fill the divide between indigenous and modern knowledge and requirements.

In conclusion one can say that is not only a matter of law and economy to protect the interests of the nominaphoric owners of the already collectively formed property, it is a matter of morality and culture as well. Indigenous people of Indonesia have been the protectors of Indonesia's lands, its material and immaterial heritage. In recognizing and honoring their rights along with their stewardship of their heritage they gain a future that is sustainable and more equitable. Through the adoption of customary law, harmonizing between Indonesian commitments and local contexts, the

transformation of the national legal systems, and the engagement with participatory governance system, Indonesia has the path to conducive favorable environment that respects the cultural and historical roots and at the same time paves the way for more prosperous and liberal future for its people.

References

- Aguilar, M. (2001). *Traditional knowledge and intellectual property: Issues and challenges*. International Development Research Centre (IDRC).
- Arizona, Y., & Cahyadi, A. (2013). *The recognition of indigenous peoples' rights in Indonesia: Constitutional Court decision MK35 and its implications*. Jakarta: AMAN.
- Colchester, M. (2011). *Free, prior and informed consent: Making FPIC work for forests and peoples*. Forest Peoples Programme.
- Convention on Biological Diversity. (1992). *Text of the Convention on Biological Diversity*. Retrieved from <https://www.cbd.int/convention/>
- Decision MK35/PUU-X/2012. (2012). *Indonesian Constitutional Court decision on customary forests*.
- Fay, C., & Sirait, M. (2005). Getting the boundaries right: Indonesia's recognition of customary land rights. *World Agroforestry Centre (ICRAF)*.
- Gritten, D., Saastamoinen, O., & Sajama, H. (2015). Ethics in forestry: An examination of ethics of forest exploitation in Indonesia. *International Forestry Review*, 17(4), 388–399. <https://doi.org/10.1505/146554815817582570>
- International Labour Organization. (1989). *ILO Convention No. 169 on Indigenous and Tribal Peoples*. Retrieved from <https://www.ilo.org/indigenous/>
- Larson, A. M., & Pulhin, J. M. (2012). Enhancing forest tenure reforms through participatory governance: Lessons from the field. *CIFOR*.
- Law No. 5 of 1960. (1960). *Basic Agrarian Law (Undang-Undang Pokok Agraria)*.
- Law No. 41 of 1999. (1999). *Forestry Law of Indonesia*.
- Nagoya Protocol. (2010). *Nagoya Protocol on access to genetic resources and the fair and equitable sharing of benefits arising from their utilization*. Retrieved from <https://www.cbd.int/abs/>



Veteran Law Review

Volume : 8

Issue: 1

P-ISSN : 2655-1594

E-ISSN: 2655-1608

- Nicholson, D. (2016). Environmental governance in Indonesia: Sustainable development and democracy. *Environmental Policy and Governance*, 26(3), 203–215. <https://doi.org/10.1002/eet.1724>
- Putri, R. W., & Sirait, M. Y. (2024). Communal rights and customary law: A TWAİL perspective in Indonesia. *Indonesian Journal of International Law*, 21(2), 165–192. <https://doi.org/10.17304/ijil.vol21.2>
- Putri, Y. M., & Putri, R. W. (2022). Communal rights as hegemony in the Third World regime: An Indonesian perspective. *Indonesian Journal of International Law*, 19(2), 289–315. <https://doi.org/10.17304/ijil.vol19.2>
- Putri, Y. M., & Putri, R. W. (2021). Recognizing the protection of communal intellectual property rights. *De'rechtsstaat*, 7(2), 173–189. <https://doi.org/10.20473/der.v7i2.2021>
- Trade-Related Aspects of Intellectual Property Rights. (1995). *WTO Agreement on TRIPS*. Retrieved from https://www.wto.org/english/docs_e/legal_e/27-trips.pdf
- United Nations Declaration on the Rights of Indigenous Peoples. (2007). *Text of the declaration*. Retrieved from <https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html>
- AMAN Report. (2022). *State of Indonesia's indigenous peoples: Challenges and opportunities*. Jakarta: AMAN.