



# Protection of Indigenous Peoples' Rights in Forest Areas: A Normative Legal Analysis of the Seizure of Indigenous Territories

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**Abstract:** The takeover of indigenous peoples' land rights by the state or corporations remains a legal issue that requires special attention. Indigenous communities, who manage forest areas such as customary land rights for generations, often face challenges from the state, which acts as the primary authority over forest areas. This study aims to analyze the forms of protection for indigenous peoples' rights using a normative approach. The method used in this study is normative juridical, utilizing literature study techniques by examining laws and legal doctrines related to the recognition of indigenous peoples' rights and rights to traditional territories. This study found that the recognition of indigenous peoples' rights has been normatively accommodated in the constitution and related regulations, but its implementation faces challenges in the form of overlapping sectoral policies and low administrative recognition of indigenous community territories. Therefore, reconstructive efforts are needed in the form of regulatory harmonization and legal recognition of indigenous peoples' territories so that the protection of indigenous peoples' rights in forest areas can be implemented effectively and fairly.

**Keywords:** Forest Areas; Forestry Law; Indigenous Peoples' Rights; Indigenous Territories;

## 1. Introduction

The existence of indigenous legal communities and their traditional rights in Indonesia is strongly protected by the country's constitution (Dian & Arrizal, 2025; Nasoha et al., 2024). Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia affirms that the state recognizes and respects the rights of indigenous legal communities. The cultural identity and rights of traditional communities are protected and respected in line with current developments (Astomo, 2019; Perangin-Angin et al., 2020). This constitutional guarantee contrasts sharply with the reality faced by communities living in forest areas. Those who reside in and manage forest areas are instead threatened with repeated and systematic land grabbing, facilitated by legal instruments that should protect their interests.

The Indigenous Peoples' Alliance of the Archipelago (AMAN) points to the fact that throughout 2023, at least 2,578,073 hectares of indigenous land were taken over by the state and corporations (Aman, 2024). In 2025, customary land grabbing intensified, with AMAN recording the seizure of 3.8 hectares of customary land from 109 indigenous communities (Aman, 2025). These land takeovers are often accompanied by violence and have resulted in injuries and even deaths. These incidents not only demonstrate weak law enforcement but are also suspected to reflect an inconsistency between constitutional norms and technical legal norms governing the relationship between state forest areas and the rights of indigenous peoples.

This issue is evidenced by Article 3 of the Basic Agrarian Law, which affirms the recognition of customary rights of indigenous peoples, but this recognition is accompanied by the phrases "as long as they actually exist" and "must not conflict with other laws and regulations of a higher order." This demonstrates ambivalence and undermines the rights of indigenous peoples, becoming a legal instrument for the state

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to negate their historical rights in the public interest. Law No. 41 of 1999 concerning Forestry, most recently amended by Law No. 6 of 2023, as a specific regulation, only regulates customary forests and indigenous peoples, defining customary forests as state forests located within community territories. The lack of collective land ownership is one of the causes of the unclear recognition of collective rights of indigenous peoples (Cahyono et al., 2025).

Along with the issuance of the Constitutional Court Decision Number 35/PUU-X/2012, it brings good benefits by shifting the paradigm of customary forest governance. The Constitutional Court decision places customary forests as the territory of customary law communities. This Constitutional Court statement positions the state no longer as the full owner of customary forests but instead as the party obliged to recognize, respect, and protect the rights of indigenous communities and their forest areas. Thus, the issuance of this decision encourages changes in forestry governance from a centralized approach to an approach based on participation and protection of indigenous peoples' rights. Forest management is based on local wisdom and the sustainability of forest areas.

Several previous studies have addressed this issue, but significant gaps remain. Drawi et al., conducted a study on the existence of customary rights of indigenous communities over forests in North Lombok following the issuance of Regional Regulations. Their study concluded that although regional regulations provided formal protection, their implementation failed to address fundamental legal challenges (Drawi, 2024). Rahmadi conducted a study on the urgency of establishing customary rights for indigenous Papuan communities and asserted in his findings that the absence of regional regulations at the district/city level is the primary cause of land law uncertainty (Rahmadi, 2022). The lack of integration between customary law and the national agrarian legal system, which lacks clear verification and registration mechanisms, hampers the protection of customary rights, creates legal uncertainty, and triggers agrarian conflicts, as seen in the case on Rempang Island (Lubis et al., 2025).

From the research, there is an unfilled gap related to the interaction between regulations which then gives rise to normative conflicts and normative studies of regulations governing the forestry sector starting from the Forestry Law to the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency (ATR/BPN) of the Republic of Indonesia Number 14 of 2024 concerning the Implementation of Land Administration and Land Registration of Customary Rights of Indigenous Peoples. The study was conducted with the aim of analyzing the conflict of forestry legal norms and attempting to formulate normative reconstruction in accordance with the mandate of Article 18B paragraph (2) and Article 28I paragraph (3) of the 1945 Constitution, which can be the basis for systematic regulatory improvements. The findings of this study are expected to contribute to the recognition of customary rights of indigenous peoples. Although Article 18B paragraph (2) of the 1945 Constitution and the Basic Agrarian Law recognize customary rights, the absence of technical regulations often gives rise to legal uncertainty and triggers agrarian conflicts between indigenous peoples, the government, and the private sector.

## 2. Materials and Methods

This research is classified as normative juridical research, namely research that examines law as a system of norms consistently and coherently in a positive legal system (Noor, 2023). Peter Mahmud Marzuki stated that normative legal research is research conducted to find the truth of coherence by examining the conformity between applicable legal norms and higher legal norms, in accordance with applicable legal principles (Marzuki, 2011). In accordance with this research category, the approach used is a statute approach that examines the issue of customary rights in positive legal

regulations starting from the 1945 Constitution of the Republic of Indonesia, especially Article 18B paragraph (2) and Article 28I paragraph (3); Law No. 5 of 1960 concerning Basic Agrarian Principles; Law No. 41 of 1999 concerning Forestry including Regulation of the Minister of ATR/BPN No. 14 of 2024 concerning the Implementation of Land Administration and Registration of Customary Land Rights of Customary Law Communities which is technical in nature. In addition to these approaches, this study also employed a case study approach, particularly in relation to Constitutional Court Decision No. 35/PUU-X/2012, which separates customary forests from the state forest regime.

The data sources used were secondary data, consisting of primary, secondary, and tertiary legal materials. Primary legal materials were sourced from laws and regulations and court decisions, while secondary legal materials were sourced from books, articles, and other scholarly works relevant to the study's focus. In addition to these two legal materials, this research was also supported by tertiary legal materials, including legal dictionaries, legal encyclopedias, and glossaries of laws and regulations. The collected data were analyzed qualitatively using a deductive approach, starting from constitutional norms and moving down to statutory norms in the forestry sector. Discrepancies between the two served as the basis for reconstructing the relevant norms.

### 3. Results and Discussion

#### 3.1 *Conflicting Norms and Legal Voids in the Recognition of Customary Rights of Indigenous Communities in Forest Areas*

Customary rights are hereditary rights held by indigenous communities over specific areas, including land, forests, water, and the natural resources within them (Patittingi, 2020; Sufriadi et al., 2024). These customary rights are collectively owned, passed down from generation to generation, and their use is regulated by local customary law (Hasjad, 2023). Recognition of these customary rights is expressly enshrined in the 1945 Constitution of the Republic of Indonesia, followed by the recognition of customary rights in Law No. 5 of 1960 concerning Basic Agrarian Regulations (UUPA). However, the provisions regarding customary rights in Article 3 of the UUPA create ambivalence because they require that customary rights be recognized "as long as they actually exist" and "must not conflict with other laws and regulations of a higher order."

The inclusion of this clause actually becomes a legal instrument that weakens customary rights because the phrase "as long as they still exist" shifts the burden of proving customary rights to indigenous communities, the state awaits proof from indigenous communities of the existence of customary rights whose existence has been passed down from generation to generation, even though the mechanism for proving the existence of customary rights is not clearly regulated. Furthermore, the phrase "not in conflict with other higher regulations" in Article 3 of the UUPA appears to be a gateway to sectoral regulations that disregard the existence of customary rights. These clauses have provided ample scope for regulatory interpretation, the interpretation of which undermines the position of indigenous communities in owning and utilizing customary rights. The recognition of customary rights in the UUPA is merely declaratory and devoid of constitutive value.

The ambiguity surrounding customary rights in the UUPA continues with the regulation of customary rights in Law No. 41 of 1999 concerning Forestry. Before being "corrected" by the Constitutional Court, the Forestry Law defined customary forests as state forests located within the territories of indigenous communities. This normative definition clearly states that customary forests are under state claim, reducing communities as customary forest owners to customary forest managers, provided the state permits them. The Forestry Law grants the state full authority to own all land (Suparto et al., 2025). The Forestry Law, which is the *lex Specialis* in the customary

rights provisions in the UUPA predominantly place customary rights within state forests.

This situation is evident in the emergence of cases of customary rights acquisition from indigenous communities, which appear to be structured and widespread. Some cases are accompanied by intimidation, violence, or even criminalization of indigenous communities (Praiseda A, 2022). In the last four years, from 2022 to 2025, cases of customary land acquisition have tended to increase. In 2022, there were 13 land acquisition cases covering a total area of 251,000 hectares, involving palm oil plantation companies, mining companies, conservation projects, and state officials as the main actors (Aman, 2022). This situation increased drastically in 2023, with 230 cases involving 2,578,073 hectares of land taken, dominated by corporations in the plantation and mining sectors, infrastructure companies, and government agencies (Aman, 2024).

In 2024, the number of cases decreased to 121, but land acquisition reached 2.8 million hectares, designated for mining, plantations, forestry, energy, and national strategic projects (Aman, 2024). Customary land acquisition continued in 2025, with 135 cases involving 3.8 million hectares of land taken. The majority of the land was allocated for the mining sector, reaching 69 cases, followed by plantations (34 cases), and the remainder allocated for forestry, energy, and tourism infrastructure projects (Aman, 2025). This fact indicates a continued increase in land acquisitions each year. The acquisition of customary land rights is shown in the following table:

**Table 1.** Acquisition of Customary Lands/Ulayat Rights 2022–2025

Year	Number of Cases	Amount of Area Taken Over	Main Actor
2022	13 cases	±251.000 hectares	Palm oil plantation companies, mining, conservation projects, and state officials
2023	230 cases	2.578.073 hectares	Plantation corporations, mining, infrastructure projects, and government
2024	121 cases	±2,8 million hectares	Mining, plantations, forestry, energy projects, and national strategic projects
2025	135 cases	±3,8 million hectares	Mining (69 cases), plantations (34 cases), infrastructure, forestry, energy, and tourism

Source: Aman 2022 – 2025, Processed data, 2026

The data shows a significant increase in both the frequency of cases and the extent of the affected area. In 2022, the area of customary forest taken over reached 251 million hectares, which then increased sharply in 2023 to 2.57 million hectares. Two years later, the land taken over had reached 3.8 million hectares. This data indicates that pressure on customary or customary land rights is intensifying amidst the expansion of investment and development based on natural resources. From a legal perspective, this trend indicates that constitutional recognition of customary law has not been effective in curbing the expansion of customary forest rights permits. Forests that were in fact under the management of indigenous communities for generations have been transferred to the state, while their constitutional rights are guaranteed in Article 18B paragraph (2) and Article 28I paragraph (3) of the 1945 Constitution of the Republic of Indonesia.

From the perspective of the hierarchy of norms theory proposed by Hans Kelsen, the differences between constitutional norms and technical regulations as mentioned above demonstrate an inconsistency, as laws and regulations must derive validity from constitutional norms (Kelsen, 1949). If the constitution recognizes the rights of indigenous communities, then all sectoral regulations in forestry, agriculture, and other sectors must comply with these provisions. The fact that corporations can still obtain rights to manage customary areas demonstrates vertical disharmony.

Therefore, the Constitutional Court Decision No. 35/PUU-X/2012, which seeks to mitigate normative conflict by declaring customary forests not state forests but rather forests located within indigenous communities' territories, is an appropriate choice for this study. This Constitutional Court decision marked a significant milestone in forestry policy reform in Indonesia. It fundamentally shifted the management of customary forests from state forests to forests located within the territories of indigenous communities, thus having significant implications for natural resource governance, the protection of indigenous peoples' constitutional rights, and the direction of national forestry policy based on justice, participation, and the sustainability of forest areas.

The Constitutional Court's boldness in striking down the term "state" from the definition of customary forests in the Forestry Law shifted the status of indigenous communities from merely managers to owners of customary forests. However, in terms of implementation, the Constitutional Court decision has not been fully implemented due to the lack of operational norms that implement this constitutional mandate into a more concrete mechanism. The absence of clear technical regulations creates legal uncertainty and often gives rise to conflicts between indigenous communities, the government, and the private sector.

### ***3.2 Normative Reconstruction of Customary Rights Protection: Towards a Consistent and Constitutional Legal Framework***

The protection of customary rights of indigenous communities is a matter requiring special attention, given the increasing expropriation of indigenous rights amidst national legal development efforts (Cyrilus Bomas Bolok Werang et al., 2025). As previously stated, the national constitution provides explicit and clear protection for the existence of indigenous communities and their inherent rights. However, normative inconsistencies remain, often serving as a tool for the expropriation of indigenous rights, leading to conflict (Pransisto, 2025). This situation demonstrates a gap between constitutional recognition and technical regulations. This situation requires legal reconstruction that aligns the regulation of indigenous rights in legislation with the constitution.

In the normative legal tradition, a good legal system must fulfill three legal ideals, as proposed by Gustav Radbruch. Radbruch argues that good law fulfills the elements of certainty, utility, and justice (Radbruch, 2006). The absence of any of these legal ideals indicates the need for improvement through reconstruction. Normative reconstruction in this context begins with the need to reread the mandates of Article 18B paragraph (2) and Article 28I paragraph (3) of the 1945 Constitution, which have been read separately for their respective sectors: forestry, agrarian affairs, and mining. Normatively, the provisions of Article 18B paragraph (2) and Article 28I paragraph (3) of the 1945 Constitution must be read as a unified legal entity that affirms the position of indigenous peoples as holders of constitutional rights, not as objects of policy whose recognition depends on the good faith of state administrators.

This constitutional recognition must give rise to a legal obligation for the state to respect, protect, and fulfill the rights of the communities concerned. The existence of indigenous forest areas is often annulled for investment purposes by excessively interpreting the state's control rights as stipulated in Article 33 paragraph (3) of the 1945 Constitution. In essence, Article 33 paragraph (3) must be interpreted as meaning that the state has the right to regulate and manage, not to own and exclusively possess. The state's control over the land, waters and all its contents as stated in Article 33 of the 1945 Constitution must not override the constitutional rights of indigenous peoples over areas which they have traditionally controlled.

Normative reconstruction to protect the existence of indigenous communities can also be achieved through harmonization of laws and regulations with the planned drafting of the Indigenous Peoples Bill. Legislative intervention is necessary to ensure that indigenous communities receive recognition, protection, and empowerment,

particularly regarding their rights, such as customary rights and environmental rights, and are protected from criminalization (Karso, 2025; Permadi et al., 2025). To date, there has been no regulation that explicitly prioritizes customary rights in determining the status of forest areas. The Indigenous Peoples Bill, which has been under discussion for the past sixteen years, has yet to yield any clear results amidst the emergence of various sectoral regulations that fail to guarantee legal certainty for the rights of indigenous communities.

The ratification of the Draft Law on Indigenous Peoples as a *lex specialis* is urgently needed to fill the legal vacuum that positions customary rights as exclusive to indigenous communities. The Indigenous Peoples Law must be responsive and no longer rely on regional regulations for the recognition of customary rights. Recognition, which awaits the issuance of regional regulations, cannot be forced, as it depends on the political will of local governments. Recognition is no longer based on an administrative declarative model but rather on a factual-juridical model. Communities that meet the factual criteria as customary legal entities must be legally recognized without having to wait for regional legal products.

Furthermore, recognizing the rights of customary communities requires a simpler registration mechanism that guarantees legal certainty. Although the government has issued Ministerial Regulation No. 14 of 2024 on the registration of customary land, this regulation has not been able to resolve forestry tenure conflicts. The customary territory registration mechanism must have defensive legal implications that automatically protect customary rights areas, thus providing interim protection. Furthermore, tenure conflicts must be resolved cross-sectorally through a special forum that addresses overlapping areas between state forest areas and customary territories (Sukirno, 2026). Without this forum, tenure conflict resolution often involves criminal proceedings, which structurally always harms indigenous communities.

#### 4. Conclusions

The rights of indigenous communities have been firmly established in the state constitution and various sectoral regulations. However, in practice, this normative recognition has not been effectively implemented, as evidenced by the seizure of customary land rights of indigenous communities. Furthermore, the normative recognition of indigenous rights in the constitution has not been accompanied by harmonization of subordinate laws and regulations, which has instead led to the dominance of state control policies over indigenous lands. Normatively, realizing the protection of indigenous rights requires synchronization of regulations across sectors and strengthening mechanisms for recognizing indigenous territories that are simpler and provide legal certainty. National forestry law policy must prioritize the recognition and protection of indigenous peoples' rights through clear, comprehensive, and socially just regulations. This can be achieved by, among other things, accelerating the recognition of customary law territories, strengthening legal certainty over customary rights, harmonizing sectoral regulations, and limiting the issuance of investment permits in customary law territories. Equally important is strengthening mechanisms for monitoring and resolving agrarian conflicts, as well as implementing the state's obligation to involve indigenous peoples in every policy-making process related to natural resource management to respect their constitutional rights.

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