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# Dispute Resolution and Strengthening the Maritime Security System (Indonesia and Malaysia)

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## Abstract

Indonesia and Malaysia, as two close neighbors, often face a number of problems, one of which is related to maritime boundaries. The clear determination of maritime boundaries is crucial, especially referring to the United Nations Convention on the Law of the Sea (UNCLOS) of 1982, as it provides a definite understanding of the rights and obligations of each country. Although the determination of maritime boundaries does not automatically guarantee security, the clarity of the boundary is much more advantageous than the uncertainty that can actually complicate conflicts. That ambiguity often triggers problems and various other detrimental activities. This research is included in normative legal research by emphasizing the approach of legislation, international rules. Strengthening the maritime security system is urgent, including strengthening institutions, legal regulations, and publication obligations after the sea boundary is agreed, as stipulated in UNCLOS of 1982. The lack of public understanding of maritime boundaries can also be an obstacle in maintaining maritime security. In this case, Indonesia needs to be more assertive in maintaining its maritime sovereignty by taking legal action against every violation that occurs. The government is also required to be consistent in enforcing the law against actions that clearly violate Indonesia's maritime territory.

**Keywords:** Sea boundary conflicts, Maritime security, and Law enforcement.

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## Introduction

Indonesia's natural resources, especially those found in a very large marine area, have great potential to be utilized in supporting national development, as explained in the provisions of Article 25 of the 1945 Constitution of the Republic of Indonesia. The use of natural resources, both by the government and the community, is one of the important efforts to encourage progress and realize people's welfare, especially through marine potential. The Indonesian Sea, which covers most of the country's territory and has a strategic position, is widely recognized as a key resource in the national development process.

In the past, countries were free to use the sea without certain restrictions. However, this freedom has been limited since the enactment of the maritime legal system through UNCLOS of 1982. UNCLOS stands for United Nations Convention on the Law of the Sea (Maria et al., 2022). The convention sets various restrictions aimed at preventing the free exploitation of the sea, which can damage marine natural resources. In addition, UNCLOS also provides a mechanism for resolving maritime law disputes. In the context of relations between Indonesia and Malaysia, history records that there are quite complex dynamics due to various disputes, one of which is related to the issue of territorial boundaries that have not been resolved until now (Budidarsono et al., 2024). In response to the disagreement, the two countries opted for a settlement approach through diplomatic negotiations.

The process of resolving the maritime boundary between Indonesia and Malaysia takes a long time because the two countries use different bases. Indonesia refers to the UNCLOS of 1982, while Malaysia sticks to the national map published in 1979, so it is often a source of disagreement in negotiations, even though Malaysia has ratified the UNCLOS of 1982. In international law, the issue of the territorial boundaries of countries is not only seen from a legal perspective, but also from a historical perspective. Malaysia emphasizes more on the historical approach in determining its territory (Zulfikar, 2023).

The UNCLOS of 1982 is an international agreement resulting from the UNCLOS III Conference organized by the United Nations from 1973 to 1982. This convention provides legal certainty regarding the rights and obligations of States in the use of the sea, including in economic activities and management of marine resources (Yovitasari et al., 2024). UNCLOS is also the basis for international law in regulating state sovereignty over maritime areas such as territorial seas, inland waters, and archipelagic seas, especially for archipelagic countries.

One of the important provisions in UNCLOS is Article 279, which affirms that countries in dispute are obliged to settle their differences peacefully. This means that all members of this convention must take the peaceful path of resolving international conflicts (Haerun et al., 2024). Various issues such as state jurisdiction, management and utilization of marine natural resources, as well as exploration and exploitation rights are part of the dispute that must be negotiated. Thus, Indonesia and Malaysia actually have various settlement options that can be pursued together. Currently, the dispute over the maritime boundary between the two has reached the stage of negotiations towards an agreement, although it has been going on for years.

The research entitled "Dispute Resolution and Strengthening the Maritime Security System in the Maritime Boundary Conflict between Indonesia and Malaysia" has a novelty in its integrative approach between aspects of international law and the national security system. So far, studies on maritime boundary conflicts tend to discuss dispute resolution and territorial security separately. This research offers a new perspective by directly linking dispute resolution efforts based on international maritime law, especially UNCLOS of 1982, with the strengthening of maritime security systems involving institutions, regulations, and public participation. Another novelty lies in the focus on the challenges of post-determination of sea boundaries which are still minimally discussed in the previous literature. This approach provides a more comprehensive view of efforts to maintain sovereignty and stability in maritime border areas.

Theoretically, this research contributes to the development of international maritime law studies, especially in the context of archipelagic countries facing territorial boundary conflicts. This research also enriches the discourse on the integration between international legal norms and national security policies, and offers a new conceptual model in handling maritime disputes based on diplomatic and defense synergies. Meanwhile, practically, this study provides policy recommendations that are applicable to the Indonesian government in strengthening supervision and law enforcement in potentially disputed marine areas. In addition, the results of this research can be the basis for formulating a more firm and consistent

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national strategy in maintaining maritime sovereignty, as well as strengthening the capacity of relevant institutions in carrying out their strategic roles.

**Literature Review**

This research relies on a number of theoretical foundations and relevant references. First, UNCLOS of 1982 (United Nations Convention on the Law of the Sea) is the main reference in determining the boundaries of maritime boundaries and the mechanism for resolving disputes between countries. The Convention establishes the principles regarding the sovereignty of coastal states, maritime zones, and the peaceful resolution of conflicts, whether through direct negotiations, mediation, arbitration, or international judicial institutions. Second, theories about state sovereignty and maritime security are used to understand the urgency of protecting maritime areas, especially for archipelagic countries such as Indonesia. Barry Buzan's approach to securitization underscores that security issues are not limited to military aspects, but also involve political, economic, and social dimensions, including the protection of potential marine resources.

Thus, this study tries to fill the gap in studies that are still limited in directly linking the process of resolving maritime boundary conflicts legally and strengthening the national maritime security system, especially in the context of the dynamics of Indonesia-Malaysia relations.

**Research Methods**

Legal research as explained by Peter Mahmud Marzuki, is a process that aims to explain how legal principles and rules are established in response to legal problems that arise. This type of research aims to find solutions to legal issues or problems that are being studied, and are classified as normative legal research. The main focus of this research is to examine legal norms related to institutions and legal provisions that govern the enforcement of maritime law in Indonesian territory. The approaches used in this study include a legislative approach and a conceptual approach (Zakaria et al., 2023). Legal materials are collected through literature studies, including sources from laws and regulations, books and scientific journals. After the legal materials are collected, the next process is to conduct an analysis and draw conclusions based on these materials to obtain relevant research results.

**Results and Discussion***Settlement of the Maritime Boundary Conflict between Indonesia and Malaysia*

Because the problems in determining the maritime boundaries of the two countries, both Indonesia and Malaysia, are seen from the disputes that occurred are as follows (Yusnita, 2022):

- 1) There is a difference of opinion about what constitutes the maritime border between Indonesia and Malaysia. The four concepts serve as the basis for identifying those with respect to territory, as well as maritime boundaries in UNCLOS of 1982. As an archipelagic country, Indonesia has the following rights when it comes to determining maritime boundaries, as outlined in UNCLOS of 1982:
  - a. Drawing the base line of the archipelago in the measurement of sea boundaries;
  - b. 12 miles can be defined as territorial sea from as far as the base line;
  - c. Measurements of territorial sea widths, from as far as the base line of 200 miles including the exclusive economic zone;
  - d. A continental zone, if it is less than 200 miles away from the baseline, its outer boundary is adjacent to the exclusive economic zone.
- 2) Non-compliance with the UNCLOS of 1982 regulations  
Indonesia ratified the law of the sea convention in 1985, while Malaysia in 1996. These countries or those that have ratified the convention are required to implement the ratified regulations because in the ratification process there is no compulsion to ratify UNCLOS by any party so it must be complied with.

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- 3) The Indonesian government is not optimal for its sea borders and small islands, especially in border areas. In particular, there is a lack of legal certainty regarding the border of Indonesia's maritime area with its neighboring countries.

If the Indonesian government intends to pay attention to territorial boundaries by defining and submitting its maritime boundaries to the UN Secretary-General for international recognition, perhaps border conflicts can be prevented. Article 279 of the UNCLOS of 1982 states that "States Parties to disputes shall settle any dispute between them by peaceful means" with respect to dispute settlement.

Litigation resolution of international conflicts is a step in the settlement process if non-litigation settlements fail to produce results as well (Muharrom et al., 2024). The way in which the parties to the dispute resolve their differences in accordance with international law is the role that international law plays in the settlement of international conflicts. Historical international law does first of all recognize two methods of resolving disputes, namely by war and through peace. Then, as the world community becomes more aware of the increasing risks associated with war, they seek to ban these tactics or at least limit them (Maniku et al., 2023). This clause makes it clear that UNCLOS of 1982 recommends the use of peaceful methods to resolve international maritime conflicts.

The phase of resolving international conflict cases, which is separated into three categories and will be discussed alternately as follows (Akmaliya et al., 2023):

- 1) The mediation stage is a substitute for litigation and can be resolved through a non-litigation procedure. This allows third parties to mediate international disputes impartially. The mediator has responsibility and power in this situation.
- 2) The negotiation stage is an alternative settlement that involves discussions to mutually benefit the parties to the dispute. Giving either party the right to resolve this matter in a foreign court if it is repeated in the future, this agreement will be made in writing and legally enforceable.
- 3) The arbitration stage is a different approach where the arbitration institution handles the resolution of the conflict. Any party to the dispute may apply for a power of attorney for arbitrator.

If the two warring countries cannot reach a peace agreement, international institutions will then assist the disputing parties to handle the problems experienced. The UNCLOS of 1982 Rules, including Article 287, have included provisions that are open to adjudicating these conflicts including: (1) the International Court of the Law of the Sea; (2) the International Court of Justice; and (3) the Arbitration Court, where the arbitrator in charge will carry out the settlement. (4) The Court of Arbitration, which is solely appointed to settle disputes specifically brought before international courts. If there is no solution from the mediation, negotiation, or initial arbitration stage, this type of settlement through an arbitral tribunal is implemented. But on the other hand, each country can make a black-on-white agreement that has legal force in order to achieve its goals and avoid settlement in court.

According to information that has been circulating, the Malaysian and Indonesian Maritime Delimitation Negotiation Team has held up to 39 meetings over 18 years to negotiate the determination of territorial sea boundaries in the Sulawesi Sea and the southernmost part of the Malacca Strait. Basically, the recommendation to sign the Sulawesi Sea Treaty and the Malacca Strait Agreement as a solution to the maritime dispute between Indonesia and Malaysia was accepted by all relevant institutions. Malaysia's Ministry of Foreign Affairs hopes that the signing of the agreement will boost the confidence of the two countries to continue the negotiations on maritime demarcation restrictions that have been completed, especially in the exclusive economic zone and the continental zone (Setyorini, 2023). The governments of Indonesia and Malaysia have completed eighteen years of negotiations on their respective maritime borders, according to President Joko Widodo (Jokowi). The two countries were then urged by Jokowi to accelerate border talks in other regions (Ramadan, 2023).

Malaysia and Indonesia are better suited to resolve their differences through negotiations. In addition, the negotiation talks are considered to be the appropriate measure to resolve the dispute between Malaysia and Indonesia because:

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- 1) The talks were directly carried out by the parties themselves.

A face-to-face meeting of the two parties as a way to conduct talks. This distinguishes negotiations from alternative dispute resolution procedures such as mediation, conciliation, and others that involve third parties in the resolution process. To resolve their disagreements, the parties can meet and communicate with each other during the talks. Each party is free to express its wishes and/or provide concise and reasoned arguments or justifications to the other party for its wishes.

- 2) In accordance with their agreement, the parties are free to decide how this negotiated settlement is carried out.

The parties are free to suggest that they can work together to find cooperative and transparent ways to reach an agreement by providing options or alternatives to resolve the conflict. Other peace treaties require the intervention of the other side. This other party can give one party extra consideration when carrying out its duties, making it possible to produce decisions that do not represent the interests of both parties fairly.

- 3) The parties have the option of closely monitoring or observing the settlement process.

This can remove suspicion, which facilitates the parties' ability to reach an agreement. It will therefore be easier to establish a solution when there are different points of view, attitudes, understandings, or intentions between the parties to the dispute.

- 4) Public scrutiny and domestic political pressure are avoided through negotiations.

Direct talks can avoid media attention because they promote agreement through discussion and joint resolution of issues rather than handling them separately, which would hinder understanding. In addition, he places more emphasis on finding a middle ground or solution rather than the divisions that often attract public attention, especially through the media, which serves as the main source of information.

- 5) The purpose of the negotiation talks is for the parties to reach a mutually agreed and satisfactory conclusion.

Because there will be discussions and bargaining between the parties during negotiations. Political considerations usually influence the conversation. Nonetheless, there are times during the negotiation or discussion process when the positions of the parties are strongly strengthened by legal reasoning.

To prevent this dispute from dragging on and to establish certainty regarding territorial ownership, both countries and their governments may choose to refer the matter to the International Court of Justice of the Sea if negotiations fail to yield results. This is as a result of the UNCLOS of 1982 ratified by both countries. It can be considered that a party has violated the provisions of the KHL 1982 if it asserts ownership of an area without reference to the requirements of UNCLOS of 1982. It is natural that the matter is determined by the International Court of Justice of the Sea and if it violates the provisions of the convention, it can be categorized as a violation of international law as mentioned.

### *Review and Strengthening of the Security of Indonesia's Maritime Areas*

Currently, Indonesia's maritime security system is still sectoral and fragmented. This shows the need to establish an institution or organization with a strong and integrated legal basis to avoid overlapping authorities and regulations between agencies. Indonesia is known as a country rich in potential marine resources, but the extent of the national water area is not proportional to the capacity and efforts to protect the maritime area from various illegal activities (Hermawan & Sutanto, 2022). Problems related to the boundaries of the sea area have become a wide concern and have sparked discussions in various circles. The government itself has established a number of policies in the context of border management, the implementation of which needs to be carried out optimally. In order to increase effectiveness, the evaluation of policies that have been running needs to be carried out periodically so that the management of border areas can encourage the realization of national security defense, community welfare, and environmental sustainability. It is undeniable that border areas are often prone to conflicts and cross-border problems.

One of the main causes of this problem is that development in the border area has so far not been able to produce a significant impact as expected. Given that the border area serves as an entrance to other

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countries, this area is vulnerable to violations of the law such as the entry of foreign ships without permission (Naila & Nugraha, 2025). In this context, the most important factor in maintaining the sovereignty of the border area is the guarantee of national security. However, Indonesia as an archipelagic country faces a big challenge because it has to secure sea and land border areas that directly border several neighboring countries.

The revival of Indonesia's discourse as a maritime country is driven by various important factors, one of which is the security aspect. One of the main challenges faced is the lack of optimal national maritime defense system, which is reflected in the potential of Indonesia's marine economy which is still not optimally developed. In the midst of global dynamics that make sea trade routes increasingly strategic, security issues are increasingly crucial for Indonesia in order to maintain its maritime sovereignty, including ensuring the safety of international logistics ships that cross its waters. This condition shows that Indonesia's national defense strategy is still too oriented to the land aspect, while the strengthening of maritime policy has not been fully maximized. Despite this, Indonesia still has an important position as a large archipelagic country that plays a strategic role in international shipping (Listiyono et al., 2022)

National policies related to law enforcement at sea, including search and rescue activities, protection of fishery resources, and marine environmental conservation, are closely related to maritime security issues. Law enforcement that includes state jurisdiction and territorial boundaries is a fundamental aspect that must be enforced in accordance with the provisions of UNCLOS of 1982. However, in practice, there are still weaknesses in the integration of law enforcement and maritime security by relevant institutions. Therefore, the existence of maritime security institutions that have clear authority and strong policy support is believed to be able to answer various shortcomings in the effective implementation of supervision, law enforcement, and marine protection functions. Thus, the evaluation of the national marine policy is a must. Policy reformulation and strengthening inter-agency coordination need to be carried out to create more integrated and responsive maritime governance to evolving maritime security challenges.

In current practice, a paradigm has been formed that the Indonesian National Army Navy holds the main responsibility in the maritime security aspect, while the Indonesian National Police plays a role in law enforcement based on applicable laws and regulations at sea, and the Ministry of Maritime Affairs and Fisheries focuses on the management of the fisheries sector. However, the dynamics at sea are not only limited to these issues, but include a wide range of problems that vary in scale and form. Parties involved in the marine industry generally have a similar view, namely that the ocean should be a free space from the threat of violence, disruption to navigation, exploitation that damages natural resources, and other violations of the law.

To realize security stability and national development progress in the maritime sector, strong synergy between relevant institutions is needed (Saifulloh & Simabura, 2023). Collaboration between all elements of law enforcement and security is essential so that responses to various threats can be carried out in an integrated manner. In this context, the challenges faced include the limitations of the main tools of the security system such as patrol boats, early detection technology, and still inadequate communication infrastructure. Therefore, improving regulations and policies is a strategic step that must be taken, including drafting and improving the Marine Law and the Fisheries Law comprehensively.

## **Conclusions and Practical Implication**

### *Conclusion*

There are various options that can be taken by Indonesia and Malaysia in resolving their disputes, either through non-jurisdictional or jurisdictional channels, as stipulated in UNCLOS of 1982. In practice, the two countries have agreed to prioritize a negotiation approach as a method of conflict resolution. This commitment is reflected in the implementation of a number of bilateral meetings involving high-ranking officials of the two countries, which aim to find a peaceful solution to existing differences, by making negotiations the main mechanism in the dispute resolution process.

Due to a number of these problems, both national maritime security enforcement and law enforcement in border areas have not been able to function properly. In terms of rules, there are many

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organizations/institutions that are in charge of enforcing so that it is feared that there will be overlap and and that there will be inadequate facilities and infrastructure to strengthen maritime security.

*Practical Involvement*

Therefore, it is an obligation for Indonesia and Malaysia to consistently resolve existing differences in accordance with the provisions of UNCLOS of 1982, which has been ratified by both countries. Efforts to accelerate the negotiation process need to be made so that the agreement on the maritime boundary can be finalized and officially announced immediately. In order to support the strengthening of maritime defense, breakthrough steps and courage are needed to initiate cross-agency meetings to formulate a comprehensive and integrated strategic plan.

Synergy between institutions needs to be realized through an integrated coordination mechanism under one system, especially in the aspects of marine environmental protection, maritime defense, law enforcement, and strengthening the marine-based economy. In addition, the Indonesian government, especially institutions that handle marine and fisheries affairs, is expected to be able to update policies and increase the effectiveness of marine and fisheries law enforcement. This aims to minimize state losses due to illegal activities. Law enforcement must be carried out thoroughly and responsibly.

**References**

- Akmaliya, R. A., Rosida, I. A., Permatadani, E., Amelia, S., & Irawan, A. D. (2023). Implementation of international agreements in the settlement of the exclusive economic zone maritime boundary dispute between Indonesia and Vietnam. *Yustisia Tirtayasa: Journal of Final Projects*, 3(1), 1–17. <http://dx.doi.org/10.51825/yta.v3i1.18808>
- Budidarsono, A. S., Ryanto, L., & Kasslim, V. (2024). Handling of the Sea Boundary Dispute Between Indonesia and Malaysia from the Perspective of International Law. *Journal of Law Education and Business*, 2(2), 989–993. <https://doi.org/10.57235/jleb.v2i2.2892>
- Haerun, A. S. U., Lanini, A., & Fattah, V. (2024). Analysis of the determination of the Lebanon-Israel maritime zone boundary in the Maritime Boundary Line Agreement based on the 1982 Convention on the Law of the Sea. *Toposantaro Journal of Law*, 1(2), 148–159. <https://jurnal.fakum.untad.ac.id/index.php/TPS/article/view/1113>
- Hermawan, T., & Sutanto, R. (2022). "Indonesia's Maritime Defense Strategy in Analyzing Threats and Naval Power." *Journal of Education And Development*, 10(2), 363–371. <https://journal.ipts.ac.id/index.php/ED/issue/view/130>
- Listiyono, Y., Prakoso, L. Y., & Sianturi, D. (2022). Maritime Defense Strategy in Securing the Sea Lanes of the Indonesian Archipelago to Realize Maritime Security and Defend Indonesia's Sovereignty. *Journal of Education and Development*, 10(2), 319–324. <https://doi.org/10.62383/desentralisasi.v2i1.384>
- Maniku, V. K., Sondakh, M. K., & Sualang, D. A. (2023). changes in the international community in their implications for international law. *Lex Administratum*, XI(4), 1–11. <https://ejournal.unsrat.ac.id/v3/index.php/administratum/article/view/48531>.
- Maria, E., Nababan, S. B., & Husna, L., (2022). The case of the settlement of the maritime boundary between Indonesia and Malaysia. *Journal of Cahaya Keadilan*, 10(2), 20–31. <https://doi.org/10.33884/jck.v10i2.6460>
- Muharrom, N. W., Ramadhani, N. S., Magantara, R. P., Irawan, T., Aulia, N., Hernando, F. A., & Pajrin, R. (2024). International Arbitration in Sipadan-Ligitan Disputes: The Process of International Dispute Resolution. *INNOVATIVE: Journal Of Social Science Research*, 4(3), 13391–13405. <https://j-innovative.org/index.php/Innovative>
- Naila, R. A., & Nugraha, I. F. (2025). Indonesia's Strategy in Handling Illegal Fishing Cases in Natuna Waters. *Decentralization: Journal of Law, Public Policy, and Government*, 2(1), 21–35. <https://doi.org/10.62383/desentralisasi.v2i1.384>
- Rahman, H., Abidin, R. Z., & Hidayat, N. (2025, February). Analysis of The Economic Potential of The

**DOI:**

- Marine Capture Fisheries Sector in Sumenep Regency with Gordon-Schaefer Model Approach. In IOP Conference Series: Earth and Environmental Science (Vol. 1454, No. 1, p. 012038). IOP Publishing. <https://doi.org/10.1088/1755-1315/1454/1/012038>
- Rahman, H., Hidayat, N., Arifin, F., & Al Aziz, M. S. K. (2025). AI-Driven Insights into the Determinants of Leadership, Compensation, and Organizational Culture on Employee Work Discipline: A Case Study of NU Gapura Supermarket, Sumenep. *Jurnal Bina Manajemen*, 13(2), 73-84. <https://doi.org/10.52859/jbm.v13i2.745>
- Ramadhan, A. (2023). After 18 years, Indonesia-Malaysia completed sea boundary negotiations. *Kompas.com*, June 8. <https://nasional.kompas.com/read/2023/06/08/13385861/setelah-18-tahun-indonesia-malaysia-selesaikan-negosiasi-batas-laut>
- Saifulloh, P. P. A., & Simabura, C. (2023). Arrangement of Security and Law Enforcement Institutions Based on the Ideals of Pancasila Law. *Journal of Rechts Vinding Media for National Legal Development*, 12(3), 383–404. <https://doi.org/https://dx.doi.org/10.33331/rechtsvinding.v12i3.1413>
- Setyorini, V. P. (2023). "Malaysian Foreign Ministry Explains the Latest Indonesia-Malaysia Sea Boundary Treaty." *Antaranews*, April 25. <https://antaranews.com/berita/3598860/kemlu-malaysia-jelaskan-traktat-batas-laut-terbaru-indonesia-malaysia>
- Yovitasari, A. I., Fitriana, D. Z. W., & Maharani, S. (2024). The Causality of International Law of the Sea with the Law of the Sea of Indonesia. *Journal of Law and Citizenship*, 2(2), 1–17. <https://doi.org/10.3783/causa.v1i1.571>
- Yusnita, U. (2023). Settlement of Territorial Sea Boundaries (Case Study of the Territorial Sea Boundary of the Western Segment of Indonesia with Singapore). *Justice Voice*, 1(1), 45–52. <https://doi.org/10.37893/jv.v1i1.111>
- Zakaria, R., Subekti., Sidarta, D. D., & Uruk, Y. (2023). Criminal Liability for Perpetrators of Criminal Acts of Persecution in the City of Surabaya (Study of Decision Number 1014/Pid.B/2023/Pn.Sby). *Court Review: Journal of Legal Research*, 3(6), 8–14. <https://doi.org/10.69957/cr.v3i06.1513>
- Zulfikar, M. (2023). Experts Explain Indonesia-Malaysia Talks Are Not Over *Antaranews*, April 25. <https://www.antaranews.com/berita/3675933/pakar-jelaskan-perundinganindonesia-malaysia-tidak-kunjung-selesai>