JILPR Vol. 8, No. 1 October 2026
Journal of Indonesia Law & Policy Review 2715-498X

LEGAL PROTECTION FOR COMPANIES HOLDING CERTIFICATES OF CULTIVATION RIGHTS

Hapit Sugandi[1], Muh. Amin Saleh[2], Hotman Sinambela[3], Appe Hutauruk[4*]
[1,2,3,4]Program Studi Ilmu Hukum, Fakultas Hukum, Universitas Mpu Tantular, Jakarta, Indonesia
hapitsugandi@gmail.com[1], aminemi600@gmail.com[2], hotmanbertaok@gmail.com[3], appehturuk@gmail.com[4*]

Abstract

The legal vulnerabilities faced by holders of Land Use Rights (HGU) certificates, particularly those related to the phenomenon of land occupation by third parties and administrative obstacles in renewing rights, have the potential to harm the investment climate. This study aims to analyze legal protection efforts for companies holding HGU certificates based on Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA) and examine legal certainty in the process of extending HGU certificates to ensure investment sustainability. The research method used is normative legal research with a statutory approach and a case approach through an analysis of Case Decision Number 90/Pdt.G/2024/PN Kis. HGU certificates provide preventive legal protection as a strong means of evidence, but in practice, repressive protection still faces obstacles in execution and judges' interpretation of the social function of land. Legal certainty in HGU extensions is a crucial pillar for the sustainability of corporate investment, where the state is obliged to guarantee the stability of land ownership for rights holders who have fulfilled their constitutional obligations. This study recommends the need for synchronization of land regulations to simplify the bureaucracy of land use rights renewal in order to minimize agrarian disputes in the future.

Keywords: Land Use Rights, Investment, Legal Certainty, Legal Protection, UUPA

INTRODUCTION

The nation's right to land and its social function serve as the philosophical and constitutional foundations that underpin the entire national agrarian system in Indonesia (Amasta & Paulus, 2024). This concept is deeply rooted in the mandate that the land, water, and natural resources contained therein are controlled by the state and utilized to the greatest possible extent for the prosperity of the people (Satrianty & Maulisa, 2024). This formulation reflects the view that land is not simply an ordinary economic commodity but rather has a social dimension that must guarantee justice, equity, and sustainability for all citizens. Through this concept of national rights, land control and use must not be solely oriented toward fulfilling the interests of certain individuals or groups but must be subject to the public interest. Thus, the social function of land serves as a legal instrument to prevent monopolistic and exploitative practices that harm the wider community. This principle ensures that the management of all agrarian resources contributes significantly to the common good. This philosophical foundation simultaneously strengthens the state's legitimacy in regulating, controlling, and distributing land and its natural resources, ensuring that national agrarian policy is always grounded in the principle of social justice (Rosmidah, Hosen & Sasmiar, 2023).

The establishment of the Basic Agrarian Regulations represents a historical and constitutional consequence, embodying state control over natural resources for the prosperity of the people. Prior to this legal unification, Indonesia's agrarian system was trapped in a dualism of colonial law, which juxtaposed Western regulations, particularly the Agrarian Law of 1870, with customary law prevailing in the community. The Agrarian Law of 1870 represents a significant milestone in the history of colonial agrarian law. This regulation was created in response to criticism of the Cultivation System (Cultuurstelsel), which was deemed oppressive and inconsistent with the spirit of economic liberalism developing in the Netherlands in the mid-19th century. Issued by the Minister of Colonies, Engelbertus de Waal, this law aimed to open the floodgates for private investment in the plantation sector through a land lease mechanism (erfpacht), while also providing legal security for indigenous people to claim land (Ramadhan, Muntaqo & Rumesten, 2022).

Substantively, colonial law divided land into two categories: state land, which could be leased to foreign private parties for very long periods, up to 75 years. And land owned by indigenous people, which could only be leased for a maximum of 30 years under strict conditions to avoid disrupting the community's basic needs, particularly rice paddies. This provision reflected a dualistic interest. On the one hand, there were formal efforts to protect the agrarian rights of indigenous people, but on the other, it opened up ample space for the expansion of the colonial economy based on private plantations. The impact was significant; private plantation companies flourished in Java and Sumatra, particularly for tobacco, sugar cane, and coffee. Supporting infrastructure, such as railways, was also built to support distribution. However, behind this colonial economic progress, social issues emerged in the form of exploitation of indigenous labor and unequal land distribution. The Agrarian Law of 1870 also triggered a profound dilemma between legal certainty, the economic interests of the colonialists, and social justice for the people (Irawan, Setyawan & Ali, 2023).

On the other hand, the relationship between customary law and land law during the colonial period indicates that the dualism of this legal system was deliberately maintained by the Dutch East Indies government. Customary law was recognized as the law that lived within indigenous communities regarding land ownership and use (Hasanah et al., 2026). From a customary perspective, land was seen as an integral part of communal life. Land rights are collective and inseparable from the social and spiritual ties of the community. However, in practice, colonial recognition of customary law was very limited and instrumental. Customary law was only recognized as long as it did not conflict with colonial interests, particularly in the provision of land for large plantations. This is clearly evident in the principle of domein

verklaring, which states that all land whose ownership cannot be proven under Western law is automatically considered state land (Nuridah & Rakhmanto, 2026). This principle made customary land easily seized and leased to private parties through erfpacht rights. This situation gave rise to acute tension between the communalistic principles of customary law and the individualistic principles of Western law. Indigenous communities fought hard to maintain their customary rights as a form of collective control, while the colonial government continued to push for the transformation of land into an economic commodity through a long-term lease system. Consequently, customary law suffered from subordination, as its existence was only formally recognized but often ignored in practice for the sake of economic gain (Novandana & Setiawati, 2026).

The coexistence of the Agrarian Law of 1870 and customary law without legal certainty ultimately led to inequality in land ownership, monopolies by foreign companies, and the marginalization of indigenous communities and small farmers. National agrarian basic regulations were then enacted as a legal instrument to eliminate this dualism and reaffirm the nation's rights and the social function of land. By positioning land as a resource that must be managed for the benefit of the people, national agrarian law integrates the principles of social justice, equity, and sustainability. This relationship demonstrates the continuity between the constitutional basis and its legal implementation, where the state is given full authority to regulate land ownership so that it does not conflict with its social function. Through this legal unification, it is affirmed that all land within the territory of the Republic of Indonesia is controlled by the state and used for the greatest prosperity of the people. Within this framework, the state grants various forms of land rights to legal entities. One right of strategic economic importance is the Right to Cultivate (HGU), which is the right to cultivate land directly controlled by the state for a specified period for agricultural, plantation, or fishery purposes (Asadi, 2024).

The existence of HGU plays a vital role in supporting national economic development, particularly in the large-scale plantation sector. However, in reality, companies holding HGU often face various complex legal challenges in the field. These challenges include land conflicts with indigenous communities, overlapping permits, boundary disputes, and complex bureaucracy in the HGU certificate extension and renewal process. This situation raises fundamental questions about the extent of legal protection provided to companies holding HGU to ensure investment certainty without sacrificing the principles of social justice and the rights of surrounding communities. Legal protection for HGU holders is crucial because the certificate of rights is not merely an administrative document, but an absolute legal guarantee for a legal business space (Asmin, 2025).

Without adequate legal protection, companies will face significant uncertainty in their operations, which in turn can hamper the investment climate and national economic growth (Silviana & Yunita, 2022). Conversely, such legal protection should not be granted blindly; it must adhere to the principles of justice and sustainability to avoid marginalizing local communities with strong historical ties to the land. Therefore, an analysis of legal protection efforts for companies holding HGU certificates under national agrarian law is highly relevant and significant. An in-depth study of this issue is expected to clarify the boundaries of HGU holders' rights and obligations, while also offering practical recommendations for policymakers and law enforcement officials in resolving various agrarian disputes in a fair, balanced, and sustainable manner.

The evolution of national agrarian law after colonialism has consistently placed the nation's right to land and its social function as key constitutional pillars. Rooted in Article 33 paragraph (3) of the 1945 Constitution, which was transformed into Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA), land is emphasized as not merely an individualistic economic commodity, but rather as having collective social and spiritual

dimensions. The concept of "State Control Rights" (HMN) was born not as a form of absolute state ownership (domein), but rather as a public authority to regulate (regulen), manage (besturen), administer (beheren), and supervise (toezichthouden) agrarian use for the prosperity of the people. This social function of land creates legal restrictions for each legal entity so that large-scale land ownership must contribute to distributive justice and prevent economic inequality in local communities (Sharfinda, Antikowati & Prakoso, 2023).

Historically, the unification of agrarian law in the UUPA was the antithesis of the dualism of land law during the Dutch East Indies colonial era. Through the Agrarian Law of 1870, initiated by Engelbertus de Waal, the colonial government opened up space for capitalism and Western private investment through long-term leaseholds (erfpacht) of up to 75 years. To facilitate the expansion of these large-scale plantations, the principle of domein verklaring (state ownership declaration) was implemented, subordinating customary law (adatbparij). Customary lands of indigenous communities lacking written Western-style ownership documents were unilaterally claimed as free state land (vrije domeinsland). This conflict between the communal-spiritual character of customary law and the individual-liberal nature of Western law triggered structural inequality, the marginalization of smallholders, and prolonged agrarian conflict, the traces of which remain to this day (Rahim & Hanifah, 2024).

In the modern, unified agrarian legal system, the Right to Cultivate (HGU) was established as a strategic instrument to bridge macroeconomic interests through large-scale plantation, agricultural, and livestock industries. HGU certificates serve as a formal guarantee of legality and legal certainty (rechtzekerheid) for business actors regarding their investment space. However, normative legal literature notes that HGU holders often face complex realities on the ground (law in action). Legal uncertainty is often triggered by overlapping permits, cartographically corroded boundaries, bureaucratic complexity during the extension (verlenging) or renewal (vernieuwing) phases of rights, and social resistance from local communities and indigenous peoples claiming customary rights based on historical grounds.

Although studies on the philosophy of the social function of land (UUPA) and investment protection (HGU) have been extensively researched separately, a significant research gap remains in the existing literature. Previous literature examines HGU from a doctrinal-normative perspective regarding the administrative requirements for rights extension (Ayuningtyas et al., 2024). There is a dearth of studies that examine in depth how to operationalize the principles of "social function of land" and "land productivity evaluation" objectively without creating bureaucratic discretion that actually weakens the investment certainty of well-intentioned companies.

Much research has focused on historical critiques of the colonial-era principle of domein verklaring (Monding, Ramaino & Pelealu, 2026). However, there is a lack of legal formulation regarding how to resolve the conflict between active HGU certificates (modern formal legality) and claims of customary/historical community rights (sociological legitimacy) when the HGU expires, without sacrificing either pole (social justice vs. investment certainty). There is little legal literature that formulates a model for the reconstruction of balanced legal relations between corporations, the state, and indigenous communities during the transition period of HGU extensions (Herwansyah, 2025). Existing research tends to be conflictual (black and white), so a study is needed that offers a middle ground by integrating the recognition of communal rights into plantation business schemes stimulated by national agrarian policy. Therefore, this research aims to fill this legal gap by analyzing the legal boundaries of legal protection for HGU certificate holders and formulating parameters for evaluating rights extensions that are just, balanced, and sustainable.

RESEARCH METHODS

This type of research is normative or doctrinal legal research, examining library materials or secondary data. The statutory approach is used to assess legal certainty and protection for Right to Cultivate (HGU) holders based on the Basic Agrarian Law. This approach specifically focuses on applicable positive legal norms through an in-depth review of statutory regulations, expert doctrine, and court decisions directly related to the object of study. First, the statutory approach is applied by examining the hierarchy and substance of all regulations related to HGU issues, particularly the Basic Agrarian Law and its implementing regulations regarding land rights. Second, a conceptual approach is used to examine evolving legal views and doctrines regarding the concepts of legal protection, legal certainty, and social justice in the agrarian context. Third, a case approach is implemented by reviewing several legally binding court decisions related to HGU disputes and overlapping land rights. This is essential for analyzing judges' legal reasoning in deciding concrete cases in the field. In scientific problem-solving, legal research uses the term "legal sources" to refer to the rules, norms, and doctrines being studied. These legal sources are classified into three main categories. Primary legal materials are authoritative and legally binding, such as the Basic Agrarian Law, government regulations, ministerial regulations, and court decisions. Secondary legal materials serve to explain primary materials through references that are not legally binding but are important for analysis, such as legal textbooks, research journals, and scientific papers. Meanwhile, tertiary legal materials serve to provide guidance and additional explanations to primary and secondary materials, such as legal dictionaries, legal indexes, mass media, and official information from the internet.

The process of collecting all these legal materials is carried out systematically through literature review and legal document searches to obtain accurate and objective data. This collection begins with a documentary study of relevant land administration archives, followed by a literature review to build a strong normative foundation from various legal literature and theories. Following this, an inventory was conducted by collecting legal materials chronologically and systematically, followed by a classification process to group the materials based on their legal validity. All important information was then obtained through note-taking and summarizing techniques, including note cards, direct quotations, and structured summaries, to facilitate the analysis process in subsequent stages.

After all legal materials were collected, the next step was to conduct a qualitative analysis of legal sources using descriptive-analytical methods. This method systematically and in-depthly describes applicable legal provisions and then analyzes them based on legal theory and principles of justice to understand legal phenomena from the perspective of legal subjects. The reasoning process used was deductive, starting from general norms and moving to specific conclusions regarding legal protection for companies holding HGU certificates. Finally, this entire series of activities was limited by a research timeframe, focusing on the collection of national legal materials and case studies of HGU implementation in Indonesia, ensuring that the research results were organized and became useful knowledge.

RESULT AND DISCUSSION

This complexity is evident in the agrarian dispute in Case Number 90/Pdt.G/2024/PN Kis in Asahan Regency, North Sumatra. The conflict began when a group of people claimed 1,553.67 hectares of land as ancestral customary land, while PT Bakrie Sumatra Plantations Tbk controlled the land based on a Cultivation Rights Certificate (HGU) Number 1/Huta Padang issued in 1992. Tensions escalated when the community deemed the HGU to expire in 2022, triggering unilateral harvesting that culminated in a criminal report and a civil lawsuit in the Kisaran District Court. Although the panel of judges ultimately dismissed the community's lawsuit due to its inability to formally prove the legal status of the indigenous community, this

case clearly reflects the dialectic between static law (law on the books) and judicial practice (law in action) regarding the conflict between physical claims and formal land legality. Normatively, the Right to Cultivate (HGU) is regulated in Articles 28 to 34 of Law Number 5 of 1960 concerning Basic Agrarian Regulations (UUPA). HGU is designed as a derivative right of state authority, granting limited legality to legal entities to utilize state land for productive sectors such as plantations, agriculture, and fisheries. By granting HGU, the government aims to encourage long-term investment, create jobs, organize spatial planning, increase state revenue, and ensure the land's social function for the welfare of the people. As evidence of its strong legal standing, the state implements a strict HGU certificate issuance mechanism, encompassing the application submission stage, determining the subject's validity, examining the state land's status to ensure it is free from disputes, ensuring spatial planning compliance, conducting a physical field inspection, and registering the rights in the land register. The aforementioned dispute case provides an important lesson: the validity of the initial land status investigation is crucial for determining future legal certainty.

Another crucial aspect of legal protection for plantation companies is ensuring a mechanism for extending and renewing HGU certificates before the initial grant period expires. Based on Government Regulation Number 18 of 2021, rights extensions do not occur automatically but require an official application followed by administrative and legal evaluations and a physical inspection on the ground by the land agency. This evaluation determines whether the rights holder fulfills financial obligations, does not neglect the land, and respects the rights of local communities surrounding the concession. If these requirements are not met or the land is allocated for public purposes, the government has the authority to reject the extension. It is also important to distinguish that extensions are submitted for existing rights, while renewals are carried out after the entire term has expired by granting new rights to the same land. Certainty, objectivity, and bureaucratic consistency in the HGU extension process are key pillars for maintaining the sustainability of agrarian sector investment while mitigating the risk of social marginalization and horizontal conflict with surrounding communities.

Under Article 30 of the UUPA, the legal status of holders of Land Use Rights (HGU) is strictly limited to Indonesian citizens (WNI) and legal entities established and domiciled in Indonesia, including foreign-owned companies (PT PMA) that are subject to national law. Throughout its validity period, HGU holders have valid and strong legal standing over the state land, based on the HGU certificate, which serves as strong physical and legal evidence in the eyes of the law. Civilly, the rights holder has the authority to cultivate, extract economic benefits, transfer, or use it as collateral for a mortgage. Administratively, the rights holder is protected from arbitrary government action and is entitled to protection from interference or unilateral claims by third parties. However, this right is not absolute, as HGU holders remain obligated to fulfill the land's social function by maintaining land productivity and complying with land regulations. The implementation of this formal legal force is evident in the approximately 1,553-hectare land dispute in Case Number 90/Pdt.G/2024/PN Kis, where the Kisaran District Court reaffirmed the legal protection of HGU by rejecting the community's lawsuit, which failed to rigorously prove its customary rights claim. The company, as an Indonesian legal entity, was deemed to have priority legal standing because it controlled the land based on a valid certificate, adopting the principle of presumptio iustae causa, which states that state administrative decisions are considered valid until officially revoked. This ruling sets an important precedent for land-based investment certainty and confirms that historical or unilateral claims cannot invalidate the formal legality of a valid HGU certificate that has not been revoked by a judicial institution or competent authority.

On the other hand, the government's decision to extend or revoke HGU is a manifestation of the implementation of the State's Right to Control (HMN) under Article 33

paragraph (3) of the 1945 Constitution and the Basic Agrarian Law, which must be based on objective parameters. The government can grant an extension or renewal of a HGU (Handhold Title) if the land is used productively according to its original designation, the rights holder complies with tax and administrative obligations, aligns with the Regional Spatial Planning Plan (RTRW), makes a real socio-economic contribution, and is free from serious land disputes. Conversely, the government has the authority to revoke or reject an HGU extension if the land is abandoned, there is a legal violation, the land is needed for public interest, there is a change in spatial planning, the legal subject no longer meets the requirements, or there are legal flaws in the issuance. Therefore, clarity in regulations such as the UUPA and PP No. 18 of 2021 is a key pillar in ensuring long-term investment continuity.

If in practice, an HGU holder is disadvantaged by a unilateral government decision to terminate or revoke the right, the state still provides a path to redress the rights guaranteed by Article 28D paragraph (1) of the 1945 Constitution through the principles of legality and due process of law. HGU holders can take administrative action in the form of an objection or appeal to the land agency, or file a lawsuit with the State Administrative Court (PTUN) against the revocation decree deemed procedurally flawed, along with a request for a suspension to maintain the company's operational status quo. In addition, the company can also file a civil lawsuit for compensation in the district court if the actions of the government agency are categorized as an Unlawful Act (PMH), and even carry out a judicial review in the Supreme Court or the Constitutional Court if the problem stems from a conflict of legal norms that are the basis for the revocation.

CONCLUSIONS

Based on the discussion, it can be concluded that legal protection for companies holding Land Use Rights (HGU) is realized through state recognition of the legality of the rights, certainty of the boundaries of the land, and certainty of the duration of land ownership, as evidenced by certificates as strong evidence. While these right guarantees sustainable investment stability and protection from unilateral claims, it is not absolute because it must comply with the land's social function. This means the state retains the authority to refuse extensions or revoke rights if the land is neglected, violates the law, or is needed for the public interest through transparent procedures. Clarity of regulations, objectivity of government evaluation criteria, and the availability of space for companies to pursue administrative and judicial remedies are crucial elements determining legal certainty and the national investment climate.

To strengthen this certainty, the government is recommended to implement agrarian governance reform by improving regulations to avoid multiple interpretations, digitizing land data to prevent overlapping land use, and implementing transparent and objective periodic performance evaluations for rights holders. Furthermore, companies holding HGU are recommended to improve legal compliance by managing land productively before the validity period expires, preserving the environment, and building dialogical partnerships with surrounding communities. Through this synergy, the national land policy is expected to be able to maintain a harmonious balance between ensuring responsible investment protection and fulfilling the social function of land for the prosperity of the wider community.

REFERENCES

Amasta, A. W., & Paulus, R. S. (2024). Penerapan Asas Fungsi Sosial Hak Atas Tanah Dalam Putusan nomor 28/G/PU/2019/PTUN. PBR. *The Juris*, *8*(1), 17-25. https://doi.org/10.56301/juris.v8i1.1187

Asadi, S. (2024). Eksistensi Hak Guna Usaha (HGU) terhadap Tanah Negara dalam Perspektif Keadilan Agraria:-. *SEIKAT: Jurnal Ilmu Sosial, Politik dan Hukum*, *3*(5), 236-242. https://doi.org/10.55681/seikat.v3i5.1577

Asmin, B. A. S. (2025). Perlindungan Hukum Ahli Waris atas Tanah Eks HGU Berdasarkan Putusan Mahkamah Agung Nomor 6381 K/Pdt/2025. *Jurnal Hukum Lex Generalis*, *6*(9). https://doi.org/10.56370/jhlg.v6i9.3442

Ayuningtyas, T. R., Septiana, N. L. I., Rizki, A. S. B., Rohmah, I. A., & Sarmila, M. (2024). Analisa Hukum Terhadap Pengaturan Hak Guna Usaha di Ibu Kota Negara. *Unes Law Review*, *6*(4), 11766-11776. https://doi.org/10.31933/unesrev.v6i4.2149

Hasanah, A. U., Fahmi, R. F. M., Andiatna, N. B., Rahmawati, S., & Komala, D. Z. (2026). Pengakuan Hak Ulayat Tanah Baduy dalam Lintasan Sejarah: Kolonialisme (Agrarische Wet) Menuju Kebijakan Perda. *Jurnal Artefak*, *13*(1), 69-80. http://dx.doi.org/10.25157/ja.v13i1.22439

Herwansyah, H. (2025). Analisis Dampak Kehadiran Hak Pengelolaan (HPL) bagi Tanah Ulayat MasyarakatAdat Pasca Disahkannya UU Cipta Kerja. *Jurnal Fundamental Justice*, *6*(2), 165-176. https://doi.org/10.30812/fundamental.v6i2.5119

Irawan, R. A., Setyawan, F., & Ali, M. (2023). Kewenangan Badan Pertanahan Nasional Dalam Penertiban Dan Pendayagunaan Tanah-Tanah Terlantar. *HUKMY: Jurnal Hukum*, *3*(1), 308-329. https://doi.org/10.35316/hukmy.2023.v3i1.308-329

Monding, J. G., Ramaino, A. S., & Pelealu, A. E. (2026). AGRARISCHE WET 1870: Amandemen Menjadi Undang-Undang Pokok Agraria Nomor 5 Tahun 1960. *Jurnal Mahkamah Hukum*, *3*(1), 33-42. https://doi.org/10.64924/8qsgwe28

Novandana, M. R., & Setiawati, N. A. (2026). Making Land Leaseable: Woeste Gronden and the Genealogy of Colonial Agrarian Governance in Priangan (1830–1870). *Diakronika*, *26*(1), 12-30. https://doi.org/10.24036/diakronika/vol26-iss1/519

Nuridah, I., & Rakhmanto, B. (2026). A Critical View of the De Locomotief Newspaper on Laborers in Java 1864-1870: Pandangan Kritis Koran De Locomotief Terhadap Buruh di Jawa 1864-1870. *Santhet (Jurnal Sejarah Pendidikan Dan Humaniora)*, *10*(1), 395-405. https://doi.org/10.36526/santhet.v10i1.7131

Rahim, A., & Hanifah, I. (2024). Peran Pemerintah Daerah Dalam Pembatasan Pemilikan Tanah Hak Guna Usaha Kepada Perusahaan Perkebunan. *Jurnal Pengabdian Masyarakat Pengabdian Pencerahan Bangsa*, *2*(1). https://jurnal.mediapencerahanbangsa.co.id/index.php/ppb/article/view/140

Ramadhan, A. R., Muntaqo, F., & Rumesten, I. (2022). Penertiban tanah terlantar dalam rangka penatagunaan dan pemanfaatan tanah. *Repertorium: Jurnal Ilmiah Hukum Kenotariatan*, *11*(1), 92-103. https://doi.org/10.28946/rpt.v11i1.1799

Rosmidah, R., Hosen, M., & Sasmiar, S. (2023). Penataan struktur hukum hak atas tanah dalam rangka keadilan dan investasi. *Recital Review*, *5*(2), 209-244. https://doi.org/10.22437/rr.v5i2.28387

Satrianty, A., & Maulisa, N. (2024). Peran Badan Bank Tanah Sebagai Land Manager Dikaitkan Dengan Fungsi Sosial Atas Tanah. *Unes Journal of Swara Justisia*, *8*(1), 9-25. https://doi.org/10.31933/ujsj.v8i1.474

Sharfinda, N. M., Antikowati, A., & Prakoso, B. (2023). Kepastian Hukum Hak Guna Usaha di atas Hak Pengelolaan. *MIMBAR YUSTITIA: Jurnal Hukum dan Hak Asasi Manusia*, *7*(2), 144-162. https://doi.org/10.52166/mimbar.v7i2.5060

Silviana, A., & Yunita, F. R. (2022). Uang Kerohiman Sebagai Bentuk Ganti Rugi Untuk Penggarap Tanah Tanpa Ijin Pemiliknya. *Jurnal Pembangunan Hukum Indonesia*, *4*(2), 336-363. https://doi.org/10.14710/jphi.v4i2.336-363