

## **Court Decision Regarding Environmental Compensation Costs: Application In Environmental Restoration**

**Rizqya Nafila Putri, Dadang Epi Sukarsa, Imamulhadi**

Universitas Padjadjaran, Indonesia

E-mail: [putririzqyanafila@gmail.com](mailto:putririzqyanafila@gmail.com), [dadang@unpad.ac.id](mailto:dadang@unpad.ac.id), [imamulhadi@unpad.ac.id](mailto:imamulhadi@unpad.ac.id)

\*Correspondence: [putririzqyanafila@gmail.com](mailto:putririzqyanafila@gmail.com)

---

### **KEYWORDS**

environmental  
compensation costs; non-  
tax revenue; recovery plan

### **ABSTRACT**

Law Number 32 of 2009 concerning Environmental Protection and Management regulates the government has the right to file claims for compensation and certain actions. Minister of the Environment Regulation Number 7 of 2014 concerning Compensation for Environmental Pollution and/or Damage regulates that environmental compensation costs that have been paid are entered into the Treasury Fund as Non-Tax State Revenue (PNBP). This research identifies the mechanism for using environmental compensation costs, the implementation of Court Decisions containing environmental compensation before Supreme Court Regulation Number 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases, and how this can be a solution to the problem of environmental compensation costs in Indonesia. This research applies a normative juridical approach method using several approaches. The research results show that the environmental compensation costs that have been paid are included in the PNBP, making it difficult to disburse these funds because the long process and the absence of a recovery plan means that the compensation costs charged to the defendant do not have a detailed calculation basis. Supreme Court Regulation Number 1 of 2023 regulates environmental compensation costs are managed in the court clerk's account and lawsuits are required to include a recovery plan.

---

Attribution- ShareAlike 4.0 International (CC BY-SA 4.0)



---

### **Introduction**

Environmental problems are the responsibility of the government and society because they relate to the quality of life in the future. The 1945 Constitution (UUD 1945) Article 28H paragraph (1) and Law Number 32 of 2009 concerning Environmental Protection and Management (UU PPLH) Article 65 paragraph (1) guarantee that citizens have the right to a good living environment and healthy (Haryono et al., 2022). This article places the state as the main actor in fulfilling these rights. So, Indonesia is taking steps to control environmental damage and pollution. It is hoped that the PPLH Law can further help achieve this goal.

## Court Decision Regarding Environmental Compensation Costs: Application In Environmental Restoration

Article 54 of the PPLH Law paragraph (1) states that every individual who pollutes or damages the environment is responsible for restoring the benefits of the environment (Patoding, 2021). According to Article 4 of the PPLH Law, environmental protection and management includes law enforcement (Abubakar, 2019). The PPLH Law regulates that law enforcement in the context of environmental protection and management can be carried out by resolving disputes through court or outside court, one of which is civil action. Article 90 paragraph (1) of the PPLH Law regulates that the government has the authority to sue for compensation and certain actions. The state, through the Ministry of Environment and Forestry (KLHK), has filed many lawsuits against companies that cause pollution and damage to the environment. Some of them are the cases of PT Kallista Alam (PT KA) and PT Bumi Mekar Hijau (PT BMH).

In 2015-2023, the Ministry of Environment and Forestry handled 23 cases of forest and land fires/environmental damage, with details of 3 of them having been completed with the amount of compensation paid to the state treasury amounting to IDR 222,464,619,000, 6 of them in the process of execution with a total compensation cost and environmental restoration amounting to IDR 20,787,031,689,500 (Sembiring, 2023). Regulation of the Minister of the Environment Number 7 of 2014 concerning Environmental Losses Due to Environmental Pollution and/or Damage (Permen of the Environment Number 7 of 2014) regulates that after compensation costs are paid by the defendant, these costs are allocated to the state treasury as Non-Tax State Revenue (PNBP). (Baittri, 2020)

Dona Pratama Jonaidi together with Andri Gunawan Wibisana through their article entitled "The Concept of a Government Lawsuit for Environmental Pollution: A Comparison Between Indonesia and the United States" explains the calculation of environmental compensation costs in Indonesia and in the United States. In essence, the article states that the calculation of environmental compensation costs in Indonesia does not cover all the losses when compared to the United States. This research will discuss the problem of calculating environmental compensation costs in Indonesia.

The Minister of the Environment (MenLH) sued PT BMH for its actions which caused land fires in South Sumatra to pay compensation amounting to IDR 2,687,102,500,000 and carry out environmental restoration measures for 20 thousand hectares of burned land amounting to IDR 5,299,502,500,000 (Wibisana, 2021). In the first instance, the panel of judges rejected the Minister of Environment's lawsuit in its entirety. At the appeal level, the Minister of Environment sued for the same thing and the panel of judges sentenced the defendant to pay material compensation amounting to 78,502,500,000 through the state treasury account. The PT KA case continued until a judicial review, the panel of judges sentenced PT KA to pay compensation costs amounting to IDR 114,303,419,000.00 and recovery costs amounting to IDR 251,765,250,000.

With provisions regarding the flow of compensation costs and differences in practices that grant environmental compensation costs, this research wants to identify the problems of Court Decision regarding renewal costs in Indonesia and legal solutions to these problems.

## **Research Methods**

This research applying descriptive normative juridical methods. This method is legal research through literature, examining primary and secondary legal materials (Jonaedi Efendi et al., 2018). Primary legal materials include statutory regulations, such as the 1945 Constitution, the PPLH Law, Minister of Environment Regulation Number 7 of 2014, Supreme Court Regulation Number 1 of 2023. In addition, secondary materials are used in the form of books and journal articles to support the analysis carried out. These legal materials will be analyzed using several approaches, namely the conceptual approach, case approach and comparison approach.

## **Results and Discussions**

### **The Problem of Lawsuits for Environmental Compensation Costs in Indonesia**

#### **Lawsuit for Environmental Compensation Costs by the Government**

The government's lawsuit for environmental pollution and/or damage is a form of the principle of state responsibility as stated in the PPLH Law Article 2 letter a. This means that this principle shows the government as a guardian to protect the environment for the benefit of society (Anwar & Sari, 2021). This also provides legal certainty and protection as well as ensuring a good and healthy living environment as mandated by the 1945 Constitution Article 28H paragraph (1) and the PPLH Law Article 65 paragraph (1) (Woran, 2021). The government has the right to file a lawsuit for environmental compensation costs as regulated in the PPLH Law Article 90 paragraph (1). The article states:

"Government agencies and local governments responsible for the environmental sector have the authority to submit claims for compensation and certain actions against businesses and/or activities that cause environmental pollution and/or damage resulting in environmental losses."(Mubin, 2017)

From these provisions we can understand several things. First, the lawsuit is filed against "businesses and/or activities that cause environmental pollution and/or damage resulting in environmental losses." The living environment has grace limits for things that enter it. If this is still within the grace limits, the living environment can still carry out its functions as a living environment. However, when this exceeds the grace limit, the environment will be polluted and/or damaged. In this situation it is said that pollution and/or damage occurs. Determination of quality standards and environmental damage standards for various types of environmental media differs according to the carrying capacity, carrying capacity and resilience of the environment (Imamulhadi et al., 2024).

Second, "the pollution and/or damage results in environmental losses". The loss referred to in the a quo article is when pollution and/or damage occurs to the environment other than private property rights. Therefore, lawsuits can only be filed against land that is public property.

Third, the lawsuit could seek "environmental damages and certain actions." Minister of Environment Regulation Number 7 of 2014 regulates further the compensation costs that can be requested for environmental losses and guidelines for calculating them. The action in question is action to prevent and control pollution and/or damage and restore environmental functions as in the PPLH Law Elucidation of Article 90 paragraph (2).(Jonaidi & Wibisana, 2020)

#### **Status Quo of Setting Environmental Compensation Costs in Indonesia**

To further regulate claims for compensation for environmental pollution and/or damage by the government, Minister of Environment Regulation Number 13 of 2011 was

issued, as revoked by Minister of Environment Regulation Number 7 of 2014. The purpose of this regulation is to become a standard for calculating and paying compensation and also carry out certain actions due to pollution and/or damage to the parties to the dispute. Minister of Environment Regulation Number 7 of 2014 Article 3 regulates the calculation of compensation costs for environmental losses, in the form of: (Fahlafi & Puspitosari, 2023)

- a. losses due to exceeding environmental quality standards;

This can be caused by improper waste processing, so compensation is provided such as building a wastewater treatment plant (IPAL).

- b. losses for reimbursement of costs for implementing environmental dispute resolution;

Such as complaint verification, field verification, laboratory analysis, experts, and supervision of the implementation of payments for environmental losses.

- c. damage to compensate for the costs of dealing with pollution and/or environmental damage as well as environmental restoration; and/or

Compensation costs for this include:

1. mitigation costs;

When there is environmental pollution and/or damage, an immediate response is carried out to overcome this so that it does not get worse and can be stopped. If this is done, the government will pay first and must be reimbursed by the defendant.

- d. recovery costs;

A polluted and/or damaged environment must be preserved by the defendant. When the defendant is unable to take remedial action, he pays compensation costs for environmental restoration to the government and the government is the one who takes the remedial action.

- e. ecosystem loss

Environmental pollution and/or damage has a broad impact so its economic value needs to be calculated. For example, in the case of forest fires, the ecosystem losses experienced include loss of forest capacity to hold water, resist erosion, prevent sedimentation, etc.

After the defendant pays environmental compensation costs, these costs are included in the PNPB and paid directly to the state treasury. However, the same regulation does not regulate how to utilize these costs for environmental restoration. Referring to the 1945 Constitution, Article 28H paragraph (1), funds allocated for pollution control or recovery funds should be used to improve the environment (Silalahi & H., 2015).

### **Problems of Environmental Compensation Costs Based on Existing Cases**

The Ministry of Environment and Forestry, as the agency authorized to file environmental rights lawsuits, has sued for environmental compensation and recovery costs for companies that have polluted and/or damaged the environment. Minister of Environment Regulation Number 7 of 2014 is a guideline for calculating and paying compensation as well as taking certain actions as a consequence of pollution and/or damage for the parties to the dispute. The Ministry of Environment and Forestry won several lawsuits, including against PT KA and PT BMH. Here's the description:

#### **PT BMH**

Based on decision Number 51/PDT/2016/PT Plg, the Minister of Environment as plaintiff sued PT BMH to pay compensation costs worth IDR 2,687,102,500,000 to the state treasury and carry out environmental restoration measures for burned land covering an area of 20 thousand hectares worth IDR 5,299,502,500,000 (Janah, 2016). Material

compensation costs are based on calculations in Minister of Environment Regulation Number 7 of 2014. The costs included are:

- a. ecological losses in the form of:
  - a.1. reservoir construction costs amounting to Rp. 1,270,000,000,000;
  - a.2. reservoir maintenance costs amounting to Rp. 1,500,000,000;
  - a.3. water management arrangements amounting to Rp. 600,000,000;
  - a.4. erosion control Rp. 24,500,000,000;
  - a.5. land forming Rp. 1,000,000,000;
  - a.6. nutrient recycling amounting to IDR 92,200,000,000; And
  - a.7. waste decomposer amounting to IDR 8,700,000,000.
- b. losses due to loss of biodiversity amounting to IDR 54,000,000,000;
- c. losses due to loss of genetic resources amounting to IDR 8,200,000,000;
- d. losses due to the release of carbon into the air, in the form of:
  - d.1. increase greenhouse gas emissions by IDR 12,150,000,000;
  - d.2. carbon slider costs Rp. 4,252,500,000; And
- e. economic loss (loss of useful life) amounting to IDR 1,210,000,000,000.

The appellate panel of judges granted the claim for:

- a. losses due to loss of biodiversity;
- b. losses resulting from loss of genetic resources; and
- c. losses due to the release of carbon into the air

If you look at the types of losses in Minister of Environment Regulation Number 7 of 2014 Article 3, what the panel of judges granted was all ecosystem losses. PT BMH was sentenced to pay compensation costs amounting to 78,502,500,000 for its activities which caused land fires in South Sumatra. The judge's consideration was that it did not grant other costs because the burned land was still under the control of PT BMH, so PT BMH would automatically take action to restore the environment. The panel of judges viewed it as unfair if PT BMH had to pay environmental compensation for these costs. For this matter, PT BMH has made payment in full (Wulandari, 2002).

#### **PT KA**

The Ministry of Environment and Forestry also filed a lawsuit against PT KA at the judicial review level with decision number 1/PK/Pdt/2017. PT KA was sued over a fire on its peat land in Aceh. KLHK as the plaintiff asked PT KA as the defendant to pay compensation costs to the state treasury amounting to IDR 114,303,419,000. Included in calculating losses are:

- a. Ecological loss

These land fires cause damage to the peatland structure, thereby eliminating its function as a water storage area. The plaintiff stated that the land fire was equivalent to 15 years of peat soil with a value of IDR 63,500,000,000.

Due to the loss of the water storage function, an artificial water storage area/reservoir is needed. Required fees: (Priyono & Hendrawati, 2016)

- a.1. reservoir construction costs amounting to Rp. 63,500,000,000;
- a.2. reservoir maintenance costs of IDR 1,500,000,000;
- a.3. water management costs amounting to Rp. 30,000,000;
- a.4. erosion control costs amounting to Rp. 1,225,000,000;
- a.5. land formation costs of IDR 50,000,000;
- a.6. nutrient recycling costs amounting to IDR 4,610,000,000; and
- a.7. waste decomposition costs Rp. 435,000,000.
- b. Losses due to loss of biodiversity and genetic resources consist of:

## Court Decision Regarding Environmental Compensation Costs: Application In Environmental Restoration

- b.1. biodiversity restoration costs of IDR 2,700,000,000; and
- b.2. the cost of recovering genetic resources is IDR 410,000,000.
- c. Losses resulting from the release of carbon into the air consist of:
  - c.1. carbon recovery costs of IDR 1,215,000,000; and
  - c.2. the cost of the carbon slide is IDR 425,250,000.
- d. Economic loss amounting to IDR 38,203,169,000.

If you look at the types of losses in Minister of Environment Regulation Number 7 of 2014 Article 3, what the panel of judges granted was all ecosystem losses. For material compensation, PT KA has made payments amounting to IDR 57,151,709,500 on August 31, 2023 and November 15, 2023 (Istra, 2016) (Setyadi, 2017).

Apart from that, the judge granted the plaintiff's lawsuit to sentence the defendant to take action to restore 1,000 ha of peat land damaged by burning. The total cost is IDR 251,765,250,000 which includes:

- a. the cost of purchasing compost is IDR 200,000,000,000;
- b. transportation costs of IDR 40,000,000,000;
- c. the cost of spreading compost is IDR 2,000,000,000; and
- d. recovery costs amounting to IDR 9,765,250,000.

In practice, there are several problems that arise in cases of environmental pollution and/or damage with claims for compensation and environmental restoration. First, regarding the use of compensation costs for environmental restoration. PT BMH and PT KA make compensation payments of a certain amount of money into the state treasury in accordance with Minister of Environment Regulation Number 7 of 2014 Article 8. In this regulation, it is not explained regarding the use of environmental compensation costs for environmental restoration. The government should submit a claim for compensation to recover losses felt by the public due to pollution and/or damage to the environment. If you look at the practice carried out by the US in CERCLA, the fees obtained by the trustee from the defendant in environmental compensation lawsuits are only used to restore, replace, or obtain equivalent quality natural resources.

Bambang Hero Saharjo, an expert in calculating government environmental losses, stated that the environmental compensation costs paid are the state's right because environmental pollution and/or destruction occurred on state-owned land. Article 33 paragraph (3) of the 1945 Constitution mandates that the state use natural resources (SDA) as much as possible for the benefit of the people. This is because many people need natural resources, but on the other hand, the existence of natural resources itself is very limited. Therefore, its management is handed over to the state so that it is used for the benefit of the people, not individuals. However, it does not ignore individual rights. This article cannot be interpreted to mean that the state is the owner of natural resources, but is limited to control rights.

Second, the panel of judges in the PT BMH case decided not to grant the recovery action costs requested by the plaintiff because the burned land was still under the control of PT BMH so that PT BMH itself would take environmental restoration action. The panel of judges viewed it as unfair if PT BMH had to take recovery action and also pay the costs of the recovery. However, when looking at the PT KA case, the panel of judges granted the plaintiff's demand to sentence PT KA to take recovery action amounting to IDR 251,765,250,000. By looking at the two cases, there are differences regarding the costs that should include environmental compensation costs and restoration costs. Article 90 paragraph (1) of the PPLH Law states that filing claims for compensation and certain actions are cumulative. Therefore, the plaintiff cannot consider which alternative is better

for each case but instead submits both. With the opportunity to consider which alternative is better to use, it will be clearer what could be more effective for environmental recovery. The United States recognizes the concept of a recovery plan as a basis for determining compensation costs (Jonaidi & Wibisana, 2020). The recovery plan functions to explain how recovery costs are used to restore the environment and how compensation costs can restore lost environmental services from the time pollution occurs until recovery is complete.

### **Supreme Court Regulation Number 1 of 2023 concerning Guidelines for Adjudicating Environmental Cases as a Legal Solution to the Problem of Environmental Compensation Costs in Indonesia**

Indonesia, through Supreme Court Regulation Number 1 of 2023, is trying to realize sustainable development and environmental justice. As the title suggests, it is hoped that Supreme Court Regulation Number 1 of 2023 will serve as a guideline for judges when adjudicating environmental cases. Supreme Court Regulation 1 of 2023 regulates that when a judge grants a lawsuit for environmental compensation and/or restoration costs, these costs must be used for environmental restoration. Fees paid are managed in the court clerk's account. This shows a change from previously assuming that the cost of environmental compensation was the state's right because the pollution and/or damage that occurred was carried out on state land so it was natural for it to be included in the PNNP. In addition, environmental compensation costs allocated for environmental restoration reflect legal objectives and are in line with the 1945 Constitution Article 28H Paragraph (1) regarding citizens' rights to a clean and healthy living environment. According to the Director of Environmental Dispute Resolution, Directorate General of Gakkum LHK, a Minister of Environment and Forestry Regulation will later be drafted assigning the Environmental Fund Management Agency to manage these costs (Nani Indrawati, 2020). Supreme Court Justice of the Civil Chamber, Dr. Nani Indrawati, stated that this follows practice in the United States, compensation costs have been managed by a separate agency called the Environmental Protection Agency (EPA) through Superfund.

Then regarding claims for compensation and certain actions, Supreme Court Regulation Number 1 of 2023 Article 31 paragraph (1) emphasizes that claims for compensation and certain actions are alternative in nature. This article opens up the opportunity for plaintiffs to carefully consider whether to file a lawsuit for compensation or certain actions or both. The lawsuit must include a recovery plan for the costs requested. The matters that must be included in the recovery plan are listed in Supreme Court Regulation Number 1 of 2023 Article 55 paragraph (1). Later, the judge in the decision must decide on a recovery plan that is detailed, technical, and adapted to the facts of the trial so that he does not immediately grant the recovery plan proposed at trial without looking at the facts revealed at trial. The existence of a recovery plan as a basis for calculating environmental compensation costs reflects the aim of the law, namely legal certainty. From the plaintiff's side, he can carefully calculate what costs are needed to restore the environment. From the defendant's side, he can clearly understand the use of the costs requested by the plaintiff.

### **Conclusion**

The government's lawsuit over the environment in the PPLH Law Article 90 paragraph (1) is a form of the principle of state responsibility. The government can ask the defendant to pay the costs of environmental compensation and restoration in the lawsuit. Minister of Environment Regulation Number 7 of 2014 regulates that the

## Court Decision Regarding Environmental Compensation Costs: Application In Environmental Restoration

defendant's payment of these costs will go into the state treasury and be mixed with PNBP. This is not in accordance with the function of environmental compensation costs, namely for environmental restoration itself. The cases of PT BMH and PT KA show that there are disparities regarding compensation costs and recovery costs. Supreme Court Regulation Number 1 of 2023 has regulated that costs obtained from environmental compensation lawsuits must be used for environmental restoration and plaintiffs in their lawsuits must include a recovery plan for the compensation costs requested as the basis for calculation. The things that must be included in the recovery plan as per MA Number 1 of 2023 need to be clarified by creating standards and methods regarding making a recovery plan, such as what environmental components must be restored and how the standards of an environment can be said to be recovered.



## References

- Abubakar, M. (2019). Hak Mengajukan Gugatan Dalam Sengketa Lingkungan Hidup. *Kanun Jurnal Ilmu Hukum*, 21(1), 93–108.
- Anwar, M. S., & Sari, R. (2021). Penegakan Hukum Lingkungan Berbasis Asas Tanggung Jawab Negara Di Indonesia. *Progresif: Jurnal Hukum*, 15(1), 112–129.
- Baitri, J. H. (2020). “Menyoal Pemulihan Ekosistem Dalam Hukum Lingkungan Di Indonesia”, Diakses Dari <https://www.mongabay.co.id/2021/04/09/menyoal-pemulihan-ekosistem-dalam-hukum-lingkungan-di-indonesia>.
- Fahlafi, R. K., & Puspitosari, H. (2023). Pemenuhan Ganti Rugi Dan/Atau Melakukan Tindakan Tertentu Atas Kerusakan Lingkungan Hidup Oleh Pt. Greenfields Farm 2 Blitar. *Bureaucracy Journal: Indonesia Journal Of Law And Social-Political Governance*, 3(1), 982–998.
- Haryono, H., Anggraini, S., & Iswahyudi, G. (2022). Tinjauan Yuridis Perizinan Dalam Pengelolaan Lingkungan Hidup Sebagai Sarana Pencegahan Pencemaran Dan Kerusakan Lingkungan Hidup. *Al-Manhaj: Jurnal Hukum Dan Pranata Sosial Islam*, 4(2), 319–324.
- Imamulhadi, I., Idris, I., & Nuriyah, E. (2024). Environmental Justice Framework Based On Local Wisdom Model. *Jurnal Bina Mulia Hukum*, 8(2), 207–226.
- Istra, I. (2016). “Pt Kallista Alam Bayar Ganti Rugi Karhutla Rp57 Miliar”, *Aceh Ekspres*, Diakses Dari <https://acehekspres.com/news/pt-kallista-alam-bayar-ganti-rugi-karhutla-rp-57-miliar/index.html>.
- Janah, N. (2016). *Tanggung Jawab Pt. Bumi Mekar Hijau Dalam Menjaga Wilayah Koneksi Terhadap Kebakaran Lahan (Studi Kasus Putusan Nomor: 24/Pdt. G/2015/Pn. Plg)*. Jakarta: Fakultas Syariah Dan Hukum Uin Syarif Hidayatullah.
- Jonaedi Efendi, S. H. I., Johnny Ibrahim, S. H., & Se, M. M. (2018). *Metode Penelitian Hukum: Normatif Dan Empiris*. Prenada Media.
- Jonaidi, D. P., & Wibisana, A. G. (2020). Landasan Doktriner Hak Gugat Pemerintah Terhadap Kerugian Lingkungan Hidup Di Indonesia. *Jurnal Bina Mulia Hukum*, 5(1), 156–175.
- Mubin, A. (2017). Hak Gugat Pemerintah Untuk Penggantian Kerugian Dan Pemulihan Lingkungan Dalam Sengketa Lingkungan Hidup. *Nagari Law Rev*, 1, 1–15.
- Nani Indrawati. (2020). “Mendorong Percepatan Eksekusi Perdata Lingkungan Hidup Di Indonesia”, Diakses Dari [https://www.youtube.com/watch?v=Ys6pgkdbllc&Ab\\_Channel=Indonesiancenterforenvironmentallaw](https://www.youtube.com/watch?v=Ys6pgkdbllc&Ab_Channel=Indonesiancenterforenvironmentallaw).
- Patoding, M. M. (2021). Pemulihan Lingkungan Hidup Akibat Terjadinya Perusakan Dan Pencemaran. *Lex Privatum*, 9(11).
- Priyono, E. A., & Hendrawati, D. (2016). Pertanggung Jawaban Perdata Pt. Kalista Alam Atas Perbuatan Melawan Hukum Yang Dilakukan Dalam Pembukaan Lahan Kebun Kelapa Sawit Studi Put. Ma No 12/Pdt. G/2012/Pn. Mbo. *Diponegoro Law Journal*, 5(3), 1–17.
- Sembiring, R. G. (2023). *Mendorong Percepatan Eksekusi Perdata Lingkungan Hidup Di Indonesia*, Diakses Dari [https://www.youtube.com/watch?v=Ys6pgkdbllc&Ab\\_Channel=Indonesiancenterforenvironmentallaw](https://www.youtube.com/watch?v=Ys6pgkdbllc&Ab_Channel=Indonesiancenterforenvironmentallaw).
- Setyadi, A. (2017). “Pt Kallista Alam Akhirnya Lunasi Ganti Rugi Karhutla Rp114m”, *Detiksumut*, <https://www.detik.com/sumut/berita/D-7046734/pt-kallista-alam-akhirnya-lunasi-ganti-rugi-karhutla-rp-114-m>.

Court Decision Regarding Environmental Compensation Costs: Application In Environmental Restoration

- Silalahi, M. D., & H., K. P. H. (2015). *Hukum Lingkungan Dalam Perkembangannya Di Indonesia*. Keni Media.
- Wibisana, A. G. (2021). Undang-Undang Cipta Kerja Dan Strict Liability. *Bina Hukum Lingkungan*, 5(3), 494–522.
- Woran, L. (2021). Hak Gugat Atas Pencemaran Dan Perusakan Lingkungan Hidup Menurut Undang-Undang Nomor 32 Tahun 2009 Tentang Perlindungan Dan Pengelolaan Lingkungan Hidup. *Lex Et Societatis*, 9(1).
- Wulandari, S. R. (2002). *Klhk Minta Pengadilan Permudah Eksekusi Perusahaan Pembakar Lahan*”, *Media Indonesia*, Diakses Dari <https://mediaindonesia.com/humaniora/280613/Klhk-Minta-Pengadilan-Permudah-Eksekusi-Perusahaan-Pembakar-Lahan>.