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LEGAL STANDING OF THE FOREST AREA OCCUPATION BOUNDARY REPORT IN PROVING LAND OWNERSHIP DISPUTES

Hadi Prabowo[1], Imam Koeswahyono[2], Iwan Permadi[3]
[1,2,3]Universitas Brawijaya Malang
Corresponding email: hadiprabowo96@gmail.com

Abstract

The legal position of the Minutes of Boundary Documents contains many legal instruments against the state's right to control over forest areas, but this is often misunderstood, causing legal uncertainty, especially the legal position in the trial of proving ownership, for this Minutes of Boundary Demarcations need to be studied further, especially regarding certainty and classification. evidence in civil procedural law. This research is a normative juridical research, using a statutory approach. The conclusions that can be drawn from this research are, firstly, the existence of Minutes of Boundary Demarcation is not merely authentic evidence but an instrumental constitutional authority for the state to control forest areas, and contains three aspects, juridical, historical and sociological.

Keywords**: *Legal Standing, Occupation Boundary Report, Indonesia***

1. INTRODUCTION

As one of the rights of the people and citizens of Indonesia, land ownership holds a crucial meaning for humans - simply put, humans need a place to shelter themselves. To regulate the issue of land ownership, the State plays a role in comprehensively regulating it, and this is the purpose and goal of a legal state that aims to achieve orderly social rules, discipline, balance, and justice. Mochtar Kusumaatmaja once said, "By achieving orderliness in society, it is hoped that the interests of humans will be protected."(Mochtar Kusumaatdmaja, 2012). According to Sudikno Mertokusumo, legal principles not only protect human interests from potential dangers but also regulate relationships among humans. By regulating relationships among humans, in addition to creating order or stability, it is hoped that conflicts or disruptions of those of interest can be prevented or resolved. (Sudikno Mertokusumo, 2019). Satjipto Rahardjo elaborates further that the presence of law serves, among other things, to integrate and coordinate conflicting interests among different parties. Law helps to reconcile the differences in these interests that may collide with one another. (Satjipto Rahardjo, 1991).

At the constitutional level, the meaning of Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia (herein after abbreviated as UUD NRI 1945) provides a strong foundation that land, water, and natural resources contained therein are owned by the state and must be used for the maximum prosperity of the people. The elaboration of this provision was then followed up by Law Number 5 of 1960 concerning the Basic Agrarian Principles (hereafter abbreviated as UUPA)(*Undang-Undang Pokok Agraria* , 1960). Agrarian conflicts seem unavoidable, one of the causes being the transition period from the colonial era to independence, where the implementation of various rules to provide legal certainty was not fully effective, and on the other hand, the community has not fully understood the process taken by the government. The breakthrough made by the government is prioritizing legal certainty by prioritizing the registration of land ownership rights and requiring the government to carry out land registration throughout the territory of the Republic of Indonesia, due to the minimal knowledge and awareness of the community regarding land ownership proof . Often, the community simplifies their understanding

of the letter C.(Aminuddi Salle, 2007) on a par with the Certificate of Ownership (hereinafter referred to as SHM). As a result, the general public, particularly rural communities, are not fully aware of their obligation to register their land ownership, and many landowners have yet to register their land ownership rights. Consequently, there are still many plots of land that have not been registered in accordance with the requirements of the law.

Meanwhile, from a juridical perspective based on Government Regulation No. 24 of 1997 as amended by Government Regulation No. 18 of 2021 on Land Registration, the valid proofs of land ownership rights are strong evidence tools in accordance with Article 19 paragraph (2) letter c, Article 23 paragraph (2), Article 32 paragraph (2), and Article 38 paragraph (2)) of UUPA, but the certificate is not yet absolute or may still be disputed by others who claim to have the same land rights. The same point was also stated by Boedi Harsono that UUPA aims to guarantee legal certainty but does not adopt a positive system. (Widhi Handoko, 2014), Therefore, the registration system in Indonesia uses a negative-positive system, which explains that the certificate is a strong proof of ownership but cannot be considered absolute.

Concerns about increasing land disputes, particularly regarding ownership claims, have been on the rise in recent years. According to the National Development Planning Agency (BAPPENAS), cases involving disputes between community members account for the largest share, at 71.45%. This figure is an accumulation of at least five typologies of cases related to land possession and ownership, land boundary disputes, as well as issues related to land use and management (Armida S. Alisjahbana, 2013). Based on the above case, not all agrarian conflicts are resolved through deliberation, but some parties choose to resolve them through the court system (litigation). This is evidenced by the Annual Report of the Supreme Court which states that for the period of 2018-2019, land disputes totaled 1009 disputes. The table list is as follows :

Tabel 1. Classification of Civil Cases Received by the Supreme Court of the Republic of Indonesia in 2019

No	Classification	Number	Persen
1	Unlawful Acts	1427	44,26
2	Land Disputes	1009	20,17%
3	Contracts	602	16,63 %
4	Resistance	300	4,97 %
5	Divorce	150	4,90 %
6	Inheritance	59	3,69 %
7	Joint property	46	2,46 %
8	Determination	25	1,40 %
9	Breach of contract	97	0, 12 %
10	Others	33	
Number		**3.748**	

Source: (Annual Report of the Supreme Court of the Republic of Indonesia, 2019

Based on the table above, it shows that agrarian conflicts still dominate as the type of disputes in court, indicating a lack of comprehensive legal certainty, particularly regarding proof in court, which is indicated by the fact that the proof of ownership certificate in Indonesia is still follows the negative system. However, there is a jurisprudence of the Supreme Court in MA. Reg No 84/Sip/1973 dated June 25, 1973, which states that records from village books or Letter C cannot be used as proof of ownership in court if not accompanied by other evidence. This is what was raised by the plaintiffs in court in the ruling No. 67/Pdt.G/2021/PN Kwg regarding the dispute over forest area land and Ruling No. 54/Pdt/G/2014/PN.Slmn regarding land ownership disputes,

where the judges have different views on the position of Letter C as evidence in court. This is further explained in the table below :

Table 2. Study of Judgment Examination on the Position of Letter C

Case Number	First Instance	Description
67/Pdt.G/2021/PN Kwg	The judge won Letter C against Perum Perhutani regarding Forest Areas	The judges' consideration regarding the supporting evidence of Letter C, compared to the documents of Perum Perhutani.
21/Pdt.G/2012/PN.Smp	The judge defeated the plaintiff who had Letter C evidence	The judges' consideration regarding the supporting evidence of Letter C, was outweighed by the evidence from Perum Perhutani

The case above involves Perum Perhutani as the defendant party, which definitively is a State-Owned Enterprise (BUMN) engaged in the forestry sector, and its working area covers state forest areas, including production and protected forests, in Java and Madura islands. Its duties and authorities include conducting forest management activities while considering economic, social and environmental aspects. (Perhutani, 1897).

Both of the above decisions can be analyzed in depth as a case study in which the judges are still in a state of doubt in placing Letter C as proof of ownership, even though it has been regulated and established that Letter C is no longer valid proof of ownership. However, this does not mean that Letter C can be ignored as evidence in court because some members of the public still do not understand Letter C. Therefore, a classification/categorization of supporting evidence for Letter C is needed as a guideline for judges in deciding cases so as not to apply the law incorrectly. Therefore, the researcher is interested in studying the topic with the title "LEGAL STANDING OF THE FOREST AREA OCCUPATION BOUNDARY REPORT IN PROVING LAND OWNERSHIP DISPUTES"

2. IMPLEMENTATION METHOD

The type of legal research conducted is normative juridical research, where the law is conceptualized as what is written in legislation (law in books) or law is conceptualized as rules or norms that are a standard of human behavior considered appropriate. (Amiruddin & Zainal Asikin, 2012). In normative research, the law referred to is not only in the form of statutes, but also related to the theoretical framework, philosophy, comparative law, structure, and composition of explanations of each article in the statutes. Thus, normative legal research is not only identified with legislation. Rather, it encompasses various aspects related to the system of norms as its object of study, such as ideal legal values, legal theories, legal principles, legal doctrines, judicial decisions, and legal policies. (Irwansyah, 2021). The author's research will focus on the study of the decision in case number 67/Pdt.G/2021/PN.Kwg Jo. Number 682/Pdt/2021/PT Bdg, where all the issues will be examined based on a juridical normative study with a certain approach as the basis for constructing a proper, logical, and accurate legal argument.

3. RESULTS AND DISCUSSION

Evidence and Legal Status of Berita Acara Tata Batas with the Emergence of Letter C

The Ministry of Forestry has been established as an institution responsible for implementing forest management functions according to the law in Indonesia, as stipulated in the Republic of Indonesia Law Number 41 of 1999 on Forestry. One of the authorities granted to the Ministry of Forestry is to establish companies that manage forestry activities. Perum Perhutani is a management company responsible for forest management activities, which operates under the coordination of the Ministry of Forestry. Perum Perhutani is a state-owned enterprise (BUMN) that has a unique characteristic, which aims to make a profit while also fulfilling the government's mission to provide benefits to communities living around forest areas. According to the Constitution of the Republic of Indonesia Number 5 of 1960, which is the implementing article 33 paragraph 3 of the 1945 Constitution, the state has absolute control over land. Without such control, fair and equitable welfare cannot be achieved. The state is not required to act as the owner of the land, but only as the party that controls the land. This control is legitimate because the state reflects the organizational power of the nation and carries out its duties through rights and obligations based on values and beliefs in the One Almighty God.

The legitimacy of the state's right to control land is derived from its nature as an organizational power representing the entire population and based on state sovereignty. Therefore, the state's right to control land is the highest right, which means that all other rights to the land are subordinate to the right of control. As a consequence, if the state wants to control land that has other rights attached to it, those other rights must be eliminated or replaced. (Winahyu Erwingsih, 2009). The state's right to control land includes the control of forests managed by state-owned enterprises, such as Perum Perhutani. However, the management process is not without challenges, especially in handling forest conflicts. Perum Perhutani faces various forms of conflict in managing forest areas, such as conflicts over claims to forest areas by other parties, including government agencies, legal entities, and local communities. These demands can be based on previous ownership rights, customary rights, or the belief that the land is "free state land" that can be explored, occupied, worked on, and applied for certification.

Talking about tenure conflicts, the word "tenure" comes from "tenure," which originates from the Latin word "tenere" which includes the meanings of maintaining, holding, and owning. According to Wiradi (1984), this term is usually used in descriptions that discuss the fundamental issue of the legal status of resource ownership. In other words, discussing tenure issues in forest resources means discussing the legal status of land ownership and all the vegetation on it. (Soedino MP Tjondronegoro & Gunawan Wiradi, 1984). In the working area of Perum Perhutani, there have been several disputes or claims over forest areas based on land certificates ("girik"). To resolve these lawsuits, a cross-examination of the evidence submitted and gathering information related to the land's history is necessary, which can be obtained from land tax books and land registration officers' records kept at the Village Office or Tax and Building Service Office. Perum Perhutani also needs to provide counter-evidence, known as "tegenbewijs," to challenge the validity of the lawsuit. This can be achieved through an inventory of boundary documents and investigating the possibility of land exchange or purchase processes.

The Boundary Marking Report is the final document in a series of processes for validating forest areas, through which the state's right to control the forest area is legitimized systematically. At least the boundary marking process is regulated in the Ministry of Forestry Regulation No. P.44

/ Menhut-II / 2012 on Forest Area Validation, which includes several stages before the issuance of the Boundary Marking Report. These stages include: (Rahmad Effendi et al., 2020) :

1. Designation of Forest Area

The designation of forest areas begins with the Minister of Forestry's decision on a legal basis along with the attachment of the Forest Area Map of South Kalimantan Province, signed jointly by the Minister of Forestry and the relevant Governor. The proposal is then followed up with the forest boundary arrangement as regulated in Chapter II of the Minister of Forestry Regulation Number: P.44/Menhut-II/2012 dated December 11, 2012 regarding Forest Area Validation which is organized by PTB (Boundary Determination Committee) and carried out by BKPH as the technical implementation unit of the Directorate General of Forestry Planning and Environmental Management, Ministry of Environment and Forestry.

2. Forest Boundary Arrangements

The process of determining forest boundaries involves identifying the outer boundaries of forest areas and the boundaries that separate different functions within the forest area, such as protected forests from production forests. The outer boundary is the boundary between forest areas and non-forest areas, commonly referred to as Non-Forest Use Areas (APL). The functional boundary is the boundary that separates different functions within the forest area, such as the boundary between Protected Forest (HL) and Limited Production Forest (HPT), or between Permanent Production Forest (HP) and Convertible Production Forest (HPK). In addition, the boundaries of conservation areas for water resources must also be considered during the process.

a. Creating boundary route maps

Boundary route maps are maps that show the boundaries of a forest area, including boundaries that have been legally established, such as through certification or licensing in the forestry sector. These maps also take into consideration valid land rights based on relevant legislation, as well as definitive settlement boundaries within villages that have been approved by the Boundary Mapping Committee through authorized officials. These maps are based on boundary projection maps.(*Tentang Panitia Tata Batas Kawasan Hutan* , 2010).

b. Temporary boundary demarcation

The forestry management authority has authorized the temporary establishment of boundaries in the field, along the designated forest area map. Temporary boundaries will be marked by creating fire boundaries and installing stakes as markers, along with forest area announcement boards. This activity will be carried out by members of the forestry management team, who will also include local community members as daily workers.

c. Announcement of the boundary marking results

During the boundary marking process, the results will be announced and recorded in a report by the Village Head. The Sub-district Head and the Forest Manager will be notified of the announcement. If there are any third-party rights within the forest area being marked, the community or the Village Head may raise it. After that, the team will conduct an inventory to identify any issues and report them to the Forest Management Agency (PTB) for further discussion and resolution.

d. Inventory, identification, and resolution of third-party rights

The team will conduct an inventory and identify any third-party rights along the boundary route or near the boundary route, as well as record and collect evidence of the legality of the rights claimed by the community. They will also mark the outer boundaries of the identified objects using GPS navigation so that they can be mapped. Third-party rights

along the forest boundary route will be resolved during the boundary measurement and the installation of definitive boundary markers.

e. Meeting to discuss the results of temporary boundary arrangement and field review by PTB

Discussions on the results of boundary mapping, temporary protection, and field review by PTB will be recorded in the meeting minutes. The discussion and agreement on boundary mapping will involve suggestions on solutions for community land ownership along the boundary line, both within and outside the forest area. After PTB agrees on the results of the temporary boundary arrangement and the community land ownership issue, a definitive boundary mapping work plan will be made as the basis for implementation in the field.

f. Boundary measurement and installation of definitive boundary markers

The implementation of definitive boundary mapping involves installing boundary markers in the field, such as boundary posts, boundary monuments, announcement boards, zinc plates, and others, according to the results of the temporary boundary arrangement meeting.

g. Meeting to discuss the results of the definitive boundary arrangement and field review by the PTB

After the definitive boundary arrangement has been discussed and reviewed in the field by the PTB, the boundary documents will be signed by the PTB.

h. Reporting to the Minister

After all processes for arranging the forest area boundaries are completed and the boundary documents are signed by the PTB, the boundary documents will be sent to the Ministry of Environment and Forestry as a report to the Minister of Environment and Forestry, through the Directorate General of Forestry Planning and Environmental Management.

3. Establishment of Forest Area

The results of the forest boundary arrangement which have been agreed upon are then reviewed by the Director General of Forestry and Environmental Planning to be established as a forest area by the Minister of Environment and Forestry.

The above description confirms the legal position of the Boundary Arrangement Report, which at least contains provisions from various legal aspects, including the following :

a. Juridical aspect

The Minutes of Boundary Demarcation which is studied and implemented by the Boundary Demarcation Committee (PTB), as per the legal administration of the state, the authority source obtained by PTB through delegation (Hamid S. Attamimi, 1993) through the Ministerial Regulation (Wettelijk Regeling) by the Ministry of Environment and Forestry, with the result of the report being determined by the Minister in the form of a Stipulation Letter which is in the form of Beschiking (Determination) (I Gede Pantja Astawa & Suprin Na.a, 2008) This means that the term "decision" is only used for a specific and concrete individual determination, and is not something that contains norms that regulate.

For example, in the decision letter "SK 1858/Menhut-VII/KUH/2014 on the Determination of the Forest Conservation Area of Sukawayana, covering an area of 323,855 hectares", it specifically identifies the area, the size, and the clear category of its function. Therefore, this provision can also be identified as generally binding, meaning it is addressed to the public and has an outward effect, meaning it regulates the relationship between

members of society or between society and the government. According to Bambang Eko Supriyadi, the Forest Area Border Agreement (BATB) is a document that meets the requirements set out in Article 1868 of the Civil Code, and therefore qualifies as an authentic act. As an authentic act, in accordance with Article 165 of the HIR, Article 1870 and Article 1871 of the Civil Code, the BATB has perfect evidentiary strength and is binding (Bambang Eko Supriyadi, 2013a).

b. Historical Aspect

The historical aspect directly relates to the process of forest ownership by the state in a constitutional manner. The phrase legitimizing the government's actions originates from Article 33 paragraph (3) of the 1945 Constitution,(*Bumi, Air Dan Kekayaan Alam Yang Terkandung Di Dalamnya Dikuasai Oleh Negara Dan Dipergunakan Untuk Sebesar-Besar Kemakmuran Rakyat"*, 1945), which the Constitutional Court has interpreted as limited to policies (beleid) and management actions (bestuursdaad), regulations (regelendaad), management (beheersdaad), and supervision (toezichthoudensdaad) for the purpose of maximizing the welfare of the people(*PUU Tentang Ketenagalistrikan Terkait Usaha Penyediaan* (*PUU Tentang Ketenagalistrikan Terkait Usaha Penyediaan Tenaga Listrik Dan Penguasaan Oleh Negara*, 2003). Based on this constitutional authority, one of the management actions is to establish forest areas on behalf of the state based on their function.

However, in the historical context, it is essential to underline that from the colonial era until now, there has been no serious and comprehensive structural reform of forest area management. Tenure problems in forestry are mostly addressed through technocratic approaches. Forest tenure reform efforts are still focused on instrumentalist issues. The changes made are still limited to issues of job description, institutional authority and boundaries, management improvement, infrastructure enhancement, policy strategy evaluation, and human resource strengthening.With the complexity of historical legacies, the structural problems that persist today make it challenging for the government, in this case, the Ministry of Forestry, to easily and genuinely side with the interests of local and indigenous communities regarding forestry tenure issues, namely the imbalance of ownership, use, and utilization of forest areas (P4T).(Amad Maulana Anha & Eman Solaiman, 2022).

Tenurial conflicts over forests and their resolution problems still seem discriminatory, especially for communities who have been cultivating their customary lands for generations. In the field, many communities claim their rights based on Erfpacht Verponding (former western land rights). For western land rights (eigendom or erfpacht) that have been included in forest areas, Bambang Eko Supriyadi argued that these lands had already been classified as "former" western land rights, not existing erfpacht or eigendom rights, with the following explanation. (Bambang Eko Supriyadi, 2013b):

1) The right is a strong property right (zakelijk recht), whose end has been determined by way or event.
2) If the right is revoked by the government, compensation must be provided for any losses.

As regulated in Article 738 in conjunction with Article 718 and Article 719 of the Civil Code (Burgelijke Wetboek), the Right of Erfpacht expires due to the following reasons (Bambang Eko Supriyadi, 2013c) :

1) Declared null and void by the government due to failure to use it properly, failure to pay annual fees (canon), or failure to fulfill the obligation to cultivate (bebouwing clausule) the land.

2) Relinquished or released
3) Transferred to another party
4) Due to expiration of the agreed time period, the holder of the right no longer exists, the land is destroyed, erfpachter obtains the right of ownership, revocation for public interest, and the accumulation of ownership and erfpacht rights in one hand (vermeging).

If the aforementioned rights have been relinquished, the land will then become state-owned land, and the former land with western rights will be designated as a forest area by the government through a Land Boundary Decree or BATB. The BATB is an authentic deed, as it meets the requirements stipulated in Article 1868 of the Civil Code, and as an authentic deed, the BATB has inherent, formal, and material probative force, and therefore functions as a perfect and binding means of proof . This is what makes things complicated going forward, as some communities claim to have traditionally occupied the land, providing evidence of Erfpacht Verponding and Eigendom Verponding (ownership rights). H

owever, legally, after the forest area is relocated through the BATB, the legal status of the forest area is altered based on the Decree, as the BATB is an instrumental obligation of the state to manage the forest and mitigate conflicts over third-party claims . As for Letter C, its validity remains questionable as proof of ownership is not perfect, historically Letter C is only evidence that the land was subject to tax, and furthermore, some experts argue that there is no authentic Letter C. (*Diskusi Terbatas Pertanahan, Letter C Tidak Ada Yang Asli Sumber: Https://Mediaindonesia.Com/Politik-Dan-Hukum/503962/Diskusi-Terbatas-Pertanahan-Letter-c-Tidak-Ada-Yang-Asli*, 2022)

c. From a sociological perspective

It is found that BATB is a complete instrument, including inventorying third-party claims on land within the forest area. The stages are carried out through inventory, identification, and settlement of third-party rights. This stage reflects that Perum Perhutani uses a risk mitigation based on tenure conflict resolution, at least on this stage, generally conflicts oriented on the three stages of conflict as mentioned by Nader and Todd. There are several possible dispute resolutions used by the world community, namely, first, Complaint (Grievance) instrumented by negotiation, Conflict (Confronting) instrumented by mediation, Dispute (Dispute) instrumented by adjudication, Arbitration is a forced option, coercion options, avoidance , and indulgences are options that are always avoided by Perum Perhutani. (Bambang Eko Supriyadi, 2013d). Based on this, it is appropriate for the panel of judges to not only view BATB as authentic evidence, but also as an instrument oriented towards the stages of control and risk mitigation. Therefore, if Perum Perhutani's evidence in the form of BATB is confronted with other authentic evidence, it is necessary to doubt and analyze such evidence thoroughly first.

Such conditions require judges not to rely solely on formal evidence, but to delve deeper into material truth. The freedom and will of the judges in balancing between the principles of freedom and justice are crucial. To deepen the material truth, particularly about the strength of each piece of evidence presented by the parties, a legal reconstruction is needed as an instrument for the judges to discover the material truth and find relative certainty that has varying levels.(Hendri Jayadi Pandiangan, 2017), Therefore, the process of reconstructing evidence is carried out to improve or strengthen the evidence that has been discovered or presented in court, with the aim and purpose of ensuring that the evidence used can be trusted and provide legal certainty in determining the facts that occurred in a case. Generally, the process of reconstructing evidence can be carried out in several ways, such as collecting or obtaining lost or damaged evidence, retesting the authenticity or reliability of

the evidence, or obtaining new evidence that can strengthen the evidence that has already been presented.

Precision and carefulness of judges in assessing a piece of evidence is necessary to comply with the rules of procedure. In a trial, the essence of proof means providing certainty to the judge about the existence of certain events. Indirectly, it is the judge who must interpret the event, qualify it, and then analyze the legal basis. Thus, the purpose of proof is to prove the truth of the legal events, and the judge's decision is based on that proof. Based on the theory of evidence in civil procedure law, the principle of auditu et alteram partem, or equal procedural position of the parties before the judge, is the principle of dividing the burden of proof (Sudikno Mertokusumo, 1998), Therefore, the judge must burden the parties with a balanced or reasonable burden of proof. In the context of this research, this is important, especially for the plaintiff who should prove the background of occupying a piece of land in the forest area, even if they do not have strong legal ownership, especially not only relying on formal proof but also the process of determining the forest area in the BATB process. The defendant, in this case Perum Perhutani, also needs to explain the process from the beginning to the issuance of BATB.

Benchmark for the Strength of Letter C Supporting Evidence in the Proof of State Forest Land Dispute Proof

Based on the analysis of the two aforementioned verdicts between Verdict Number 67/Pdt.G/2021/PN/Kwg (which favored Letter C) and Verdict 21/Pdt.G/2012/PN.Smp (which rejected Letter C), in such situations, judges often make errors in deciding cases related to state forest areas, at least due to the following reasons :

1. **The first,** reason is that judges are bound by the Supreme Court's jurisprudence in the Supreme Court. Reg No 84/Sip/1973 dated June 25, 1973, which states that records from village books or Letter Cs cannot be used as evidence of ownership in court if not accompanied by other supporting evidence. As a rule of content, this jurisprudence is alternative, meaning that Letter C can be used as evidence as long as it is accompanied by other supporting evidence. The dilemma for the judge lies in the other supporting evidence, as in practice, many other supporting evidence are found whose validity and strength still depend on the judge's perspective in assessing them, resulting in judges making wrong decisions
2. **The second,** reason is that the judge is faced with the Minutes of the Limits (BATB) evidence, which is understood only as a record, and this is problematic, especially regarding the position of BATB in the proof and when faced with other evidence such as former freehold land and other girik land evidence, the strength and evidence need to be understood as one of the important elements in finding material truth. Therefore, based on the above reasons, it is necessary for the researcher to provide a benchmark/guideline for judges when faced with such situations and conditions

Basically, what is meant by a "benchmark" is a standard or parameter used as a reference or benchmark in evaluating or measuring something. A "benchmark" can be in the form of values, measurements, or specific criteria used to determine whether something has succeeded or not in achieving its goals. In the context of this research, "benchmark" is intended to enable judges to accept Letter C along with supporting evidence as valid and strong evidence in the dispute resolution process involving forest areas. According to KBBI, it is defined as something used as a

basis for measuring (evaluating, judging, etc.) standards; benchmarks.(*Tolok1 » Tolok Ukur*, n.d.), Using the right benchmark, judges can evaluate the accuracy of their decisions.Peluang diterimanya Letter C beserta alat bukti Pendukung lainnya dalam Sidang Pembuktian Sengketa Kawasan Hutan There is a Jurisprudence related to the clarification that Letter C does not indicate proof of ownership due to two factors.

1. **The First**, Letter C or other Girik evidence is not integrated with each other, especially in the excerpt of Letter C contained in the Land and Building Tax Service Office. The community listed in the Letter C book is also very incomplete and its recording method is not done carefully, resulting in many problems that arise in the future due to incomplete and inaccurate data in the Letter C book. The excerpt of Letter C is located in the sub-district office, while the holder of the land certificate has Girik as evidence of payment of land tax. Therefore, to obtain legal certainty regarding Girik/Letter C, it must be registered with the land office where the object is located. (Masnadi et al., 2019a).
2. **The second,** factor is to stop the dualism of ownership proof rights by the West and replace it with the basic rules set out in Law Number 5 of 1960 concerning Basic Agrarian Principles with follow-up through Number 24 of 1997 concerning Land Registration (*Peraturan Pemerintah (PP) Tentang Pendaftaran Tanah*, 1997) That based on the desired regulations of the latest ownership basis that can be converted into ownership rights according to the latest regulations are as follows (Ali Achmad Chomzah, 2004): 1) Conversion of land rights originating from Western land rights, 2) Conversion of land rights originating from Indonesian rights, 3) Conversion of land rights originating from the former Swapraja land. Therefore, the consequence of the presence of UUPA requires that all ownership documents before the implementation of UUPA must change the status of land rights according to the conversion provisions stipulated in UUPA. The way to change the status of land rights is to register the land to be given a new proof of ownership, namely a land certificate, with the note that it must be done before the deadline set until September 24, 1980, according to Presidential Decree Number 32 of 1979 concerning the Basic Policies in the Framework of Providing New Rights to Converted Western Land Rights..

Based on those 2 normative reasons, the government has made efforts to solve land issues by providing a legal basis for the conversion of western rights, which cannot be separated from the position of Girik which is defined as 2 things, namely only as: a) Land Tax Receipt, and b) Proof of Ownership (Sudarsono, 2005) but based on the certainty of land registration based on Girik, it is possible to change the status of land ownership based on UUPA.(*PERATURAN PEMERINTAH REPUBLIK INDONESIA (PP) TENTANG PENDAFTARAN TANAH* , 1997), However, since the deadline of 20 years has been given, there are still many people who have not converted their land ownership rights, at least some sociological reasons have been found regarding the factors and obstacles of Girik conversion (Masnadi et al., 2019b),

a. The quote from the Letter C Kelurahan, as a result of registration data in 1950, was limited by the limited registration at that time, and the land was not yet fully optimized and often abandoned, so the Lurah only recorded the occupants and the small number of residents. With the limited recording of the Letter C Book, people who will apply for land rights often have difficulty requesting information about the status and condition of the land.
b. If there is a transfer of rights and the origin of the land acquisition cannot be shown, the land history based on the Letter C Kelurahan cannot be created, so there will be obstacles in the

certification process, and the applicant will seek the origin of the transfer of rights until the source of acquisition is found.

c. There are errors in mutations recorded in the Letter C Kelurahan, which are referred to as incorrect books.
d. The division of a territory

The transfer of land rights, such as buying and selling, grants, and inheritance, as well as deeds that have not been registered or mutations of Girik that often occur in the community without being registered at the Land Office, so it is difficult to apply for land rights, especially in obtaining a certificate, and deeds that have been made in the presence of PPAT, with the basis of Girik as evidence, without creating an origin of acquisition.

These conditions indicate that there is a gray area of law, especially regarding the position of BATB which has been proven that the Minutes of Boundaries is not just a record but a constitutional instrument of state ownership over forest resources, as well as containing future risk mitigation mechanisms regarding third-party claims to forest areas. Therefore, this issue is not just a matter of legality, but the obstacles encountered in practice in the field make the law not function effectively, so judicial intervention is needed to bring justice, certainty and benefits to the community. Definitively, Jan Michael Otto has attempted to define legal certainty as the possibility that in certain situations (Soeroso, 2011) which emphasizes the three main understanding elements of legal certainty, namely:

a. The principle of legality, the law must be enforced fairly and transparently, and must not be discriminatory towards anyone, everyone must be subject to the same law including the government.
b. Predictability of law, the law must be predictable and understandable by the public, this allows the public to understand the consequences of actions and make informed decisions.
c. Rule of law, the law must be above the power of the government, the government must not disregard or violate the law without appropriate consequences.

The predictability of the law in this case the written law in the form of laws needs to accommodate language that is orderly, concise and clear. Even the discovery of law in the domain of the court becomes the main activity of judges in implementing the law if there is a concrete event. Casuistically, the Supreme Court's Jurisprudence in MA Reg No. 84 / Sip / 1973 dated June 25, 1973 stated that the notes from the village book or Letter C cannot be used as evidence of ownership in court if not accompanied by other evidence, without finding leading consideration to specific provisions in disputes over forest areas. This is the main reason for accepting or granting Letter C and other Girik evidence in claiming state forest areas, even though there is BATB as authentic constitutional evidence. Therefore, this situation creates ineffective law, because there is no predictability of the law which is the ability of the law to be predicted or predicted, so that it can be understood by the community and parties involved in certain legal situations.

This is important because it allows the community and parties involved to anticipate the legal consequences of actions or decisions taken. In this context, the law must be clear, understandable, and consistent so that it can be predicted by everyone. This means that the law must be written in easily understandable and unambiguous language, and must be applied consistently by the relevant authorities. With the predictability of the law, the community can plan and carry out their activities more planned and safe, and avoid actions that can violate the law and receive unwanted sanctions. Law can become ineffective due to various legal and non-legal factors. In developing countries, legal practitioners often face difficulties in finding and identifying the

right legal sources for the specific situations they face. In addition, they also encounter difficulties in interpreting and understanding the available legal rules. This is related to the incompleteness of legal sources and unclear interpretations of legal rules, which make decision-making difficult and confusing. All of these can result in the law being ineffective in solving problems and ensuring justice for all parties involved. (Otto et al., 2012).

In short, there is uncertainty about what should be considered as law, there is no formal-legal certainty, and even if legal certainty exists, it often only exists in theory. In practice, both government agencies and other parties may not necessarily comply with or obey the law. It can even be said that legal arrangements are rarely or not at all made, and there is a wide gap between legislation and reality. In other words, there is only a small amount of real legal certainty.(Otto et al., 2012). The above description depicts the state of the legal reality in Indonesia, particularly regarding land legality. The process of improving and providing legal certainty needs to be continuously carried out, but clear boundaries are also necessary, such as whether documents like Girik, Letter C, and Petok D can still be used as evidence of ownership, especially in claims over State Forest areas. Moreover, forest areas are treated differently from other residential areas, as explained that the western former land cannot be equated with erfpracht or existing ownership rights. This means that the Supreme Court jurisprudence in MA. Reg No. 84/Sip/1973 dated June 25, 1973, regarding Letter C cannot be used as evidence in land disputes over State Forest areas, even if accompanied by other supporting evidence, because based on the hierarchy of evidentiary strength, BATB has a different specificity, not just authentic but a constitutional instrument with perfect and binding proof. Therefore, this analysis stops at the understanding that jurisprudence as intended does not apply to land disputes over forest areas, while the benchmark for the acceptance of Letter C and other supporting evidence occurs due to the cancellation and mistake in issuing BATB.

Rejecting the Acceptance of Letter C and Its Supporting Evidence as Evidence in State Forest Area Dispute Cases

The understanding of Letter C accompanied by other supporting evidence in disputes over state forest areas has reached a final analysis. Firstly, the Supreme Court's jurisprudence in MA. Reg No 84/Sip/1973 dated June 25, 1973 regarding Letter C does not apply to disputes over state forest areas because Girik or Letter C and similar supporting evidence do not have the same status as BATB evidence (MA. Reg No 84/Sip, 1973). Secondly, as a result of the fact that Letter C cannot be justified even with supporting evidence, its consequence can only be used for proving the validity of BATB.

The meaning of the consequence that Letter C can only be justified as evidence to prove the validity of BATB is that if the judges are faced with a PTUN lawsuit where the parties argue that BATB is not legally valid due to formal or material defects, the difference can be seen fundamentally. If the validity of BATB is the issue, the mechanism process needs to be investigated, and the object of the lawsuit is the decision of the administrative official, not an unlawful act as argued by the plaintiffs in the general court. In this case, Letter C is not used as primary evidence, but the lawsuit is focused on the procedural validity of issuing BATB.

This is evident in the case of PTUN Decision Number: 16/G/2013PTUN.TPI, where the plaintiffs who had a right of ownership certificate and building use rights within a protected forest area experienced legal uncertainty regarding their rights status. After the PTUN decision, the SK 463/Menhut/II/2013 was revoked, which obligated the relevant State Administration Official to

revoke the legal product. This was due to losses suffered by several parties (community/investors) from the issuance of the decision. Furthermore, in the Administrative Court, it was proven that the issuance of SK 463/Menhut-II/2013 was not in accordance with the prevailing laws and regulations in terms of procedural and substantive aspects. This is emphasized in Article 53 paragraph (1) of Law No. 5 of 1986 concerning Administrative Court. In other words, the BATB issued over the forest area was canceled by the court, with the consequence of being canceled entirely for review, including inventorying third-party claims to their rights.

4. CONCLUSION

The existence of BATB (Boundary Determination Report) is not only a mere authentic evidence, but also a constitutional instrument of the state's authority to control forest areas. Moreover, the stages in BATB contain three aspects.;

a. The juridical aspect is generally binding in the sense that it is intended for the general public (addressed to) and has external force (naar buiten werken)
b. The historical aspect is that BATB contains instrumental obligations of the state in managing forests and mitigating conflict risks over third-party claims.
c. The sociological aspect reveals the fact that BATB is a complete instrument, including inventorying third-party claims to land within the forest area.

Theoretically, the gray area does not reflect legal certainty, especially in legal predictability, so Letter C along with other supporting evidence as stipulated in Jurisprudence should be excluded in forest area dispute hearings, MA Reg No 84/Sip/1973 dated June 25, 1973.

Based on these two verdicts, the existence of Letter C cannot be compared with the existence of BATB due to the different strength of the evidence, so claims through general court regarding Unlawful Acts cannot be accepted. Therefore, the acceptance of Letter C along with other supporting evidence can only be accepted in PTUN hearings that question the formal validity of BATB based on the form of Beschiking (Determination) in the Letter of Decision, with the reason that it does not comply with legal procedures, one of which is not involving/resolving the inventory of third-party claims on forest areas persuasively.

Meanwhile, the suggestions that can be proposed by the author consist of 2 (two) alternative suggestions. Firstly, for judges at the first instance, appeal and cassation levels in the institution of the Supreme Court, especially in general courts, it is suggested to exclude Letter C and other types of supporting evidence in forest area disputes because the legal status of proofing through "hak efpracht verponding" does not apply to forest areas. The second suggestion is for the leaders of the Supreme Court institution to start inventorying rulings that annul Letter C in forest area disputes by establishing jurisprudence as a precedent for future judges to avoid making mistakes in deciding forest area disputes while still prioritizing material evidence.

REFERENCES

Ali Achmad Chomzah. (2004). *Hukum Agraria (Pertanahan)*. Prestasi Pustaka Raya.

Amad Maulana Anha, & Eman Solaiman. (2022). Tinjauan Konsep Hak Menguasai Negara dalam Penetapan Kawasan Hutan. *Alauddin Law Development Journal* , *4*(1), 211–211.

Aminuddi Salle. (2007). *Hukum Pengadaan Tanah untuk Kepentingan Umum*. Kreasi Total Media.

Amiruddin, & Zainal Asikin. (2012). *Pengantar Metode Penelitian Hukum*. Raja Grafindo.

Armida S. Alisjahbana. (2013). *Kebijakan Pengelolaan Pertanahan Nasional*. White Paper.

Bambang Eko Supriyadi. (2013a). *Hukum Agraria Kehutanan Aspek Hukum Pertanahan dalam Pengelolaan Hutan Negara*. Raha Grafindo Persada.

Bambang Eko Supriyadi. (2013b). *Hukum Agraria Kehutanan Aspek Hukum Pertanahan dalam Pengelolaan Hutan Negara*. Raha Grafindo Persada.

Bambang Eko Supriyadi. (2013c). *Hukum Agraria Kehutanan Aspek Hukum Pertanahan dalam Pengelolaan Hutan Negara*. Raha Grafindo Persada.

Bambang Eko Supriyadi. (2013d). *Hukum Agraria Kehutanan Aspek Hukum Pertanahan dalam Pengelolaan Hutan Negara*. Raha Grafindo Persada.

Bumi, air dan kekayaan alam yang terkandung di dalamnya dikuasai oleh Negara dan dipergunakan untuk sebesar-besar kemakmuran rakyat", 3 (1945).

Bustani, B., Khaddafi, M. ., & Nur Ilham, R. (2022). REGIONAL FINANCIAL MANAGEMENT SYSTEM OF REGENCY/CITY REGIONAL ORIGINAL INCOME IN ACEH PROVINCE PERIOD YEAR 2016-2020. *International Journal of Educational Review, Law And Social Sciences (IJERLAS)*, *2*(3), 459–468. https://doi.org/10.54443/ijerlas.v2i3.277.

Diskusi Terbatas Pertanahan, Letter C Tidak Ada yang Asli Sumber: https://mediaindonesia.com/politik-dan-hukum/503962/diskusi-terbatas-pertanahan-letter-c-tidak-ada-yang-asli. (2022, July 3). Mediaindonesia.Com.

Falahuddin, F., Fuadi, . F., Munandar, M., Juanda, R. ., & Nur Ilham, R. . (2022). INCREASING BUSINESS SUPPORTING CAPACITY IN MSMES BUSINESS GROUP TEMPE BUNGONG NANGGROE KERUPUK IN SYAMTALIRA ARON DISTRICT, UTARA ACEH REGENCY. *IRPITAGE JOURNAL*, *2*(2), 65–68. https://doi.org/10.54443/irpitage.v2i2.313.

Geovani, I. ., Nurkhotijah, S. ., Kurniawan, H. ., Milanie, F., & Nur Ilham, R. . (2021). JURIDICAL ANALYSIS OF VICTIMS OF THE ECONOMIC EXPLOITATION OF CHILDREN UNDER THE AGE TO REALIZE LEGAL PROTECTION FROM HUMAN RIGHTS ASPECTS: RESEARCH STUDY AT THE OFFICE OF SOCIAL AND COMMUNITY EMPOWERMENT IN BATAM CITY. *International Journal of Educational Review, Law And Social Sciences (IJERLAS)*, *1*(1), 45–52. https://doi.org/10.54443/ijerlas.v1i1.10.

Hamid S. Attamimi. (1993). *Peranan Keputusan Presiden Republik Indonesia dalam Penyelenggaraan Pemerintahan Negara*. Universitas Indonesia.

Hendri Jayadi Pandiangan. (2017). *Perbedaan Hukum Pembuktian dalam Perspektif Hukum Acara Pidana dan Perdata*. *3*(2), 2–2.

I Gede Pantja Astawa, & Suprin Na.a. (2008). *Dinamika Hukum Ilmu Perundang-undangan di Indonesia*. Alumni.

Ilham, Rico Nur. *et all* (2019). Comparative of the Supply Chain and Block Chains to Increase the Country Revenues via Virtual Tax Transactions and Replacing Future of Money. International Journal of Suplly Management.Volume 8 No.5 August 2019.

Ilham, Rico Nur. *et all* (2019). Investigation of the Bitcoin Effects on the Country Revenues via Virtual Tax Transactions for Purchasing Management. International Journal of Suplly Management.Volume 8 No.6 December 2019.

Irwansyah. (2021). *Penelitian Hukum Pilihan Metode dan Praktik Penulisan Artikel*. Mirra Buana Media.

Laporan Tahunan Mahkamah Agung Republik Indonesia . (2019). *MA. Reg No 84/Sip/1973* , (1973).

Lasta Irawan, A. ., Briggs, D. ., Muhammad Azami, T. ., & Nurfaliza, N. (2021). THE EFFECT OF POSITION PROMOTION ON EMPLOYEE SATISFACTION WITH COMPENSATION AS INTERVENING VARIABLES: (Case Study on Harvesting Employees of PT. Karya Hevea Indonesia). International Journal of Social Science, Educational, Economics, Agriculture Research, and Technology (IJSET), 1(1), 11–20. https://doi.org/10.54443/ijset.v1i1.2.

Likdanawati, likdanawati, Yanita, Y., Hamdiah, H., Nur Ilham, R., & Sinta, I. (2022). EFFECT OF ORGANIZATIONAL COMMITMENT, WORK MOTIVATION AND LEADERSHIP STYLE ON EMPLOYEE PERFORMANCE OF PT. ACEH DISTRIBUS INDO RAYA.

International Journal of Social Science, Educational, Economics, Agriculture Research, and Technology (IJSET), 1(8), 377–382. https://doi.org/10.54443/ijset.v1i8.41.

Mahfud *et all* (2020). Developing a Problem-Based Learning Model through E-Learning for Historical Subjects to Enhance Students Learning Outcomes at SMA Negeri 1 Rogojampi. *IOP Conf. Series: Earth and Environmental Science 485 (2020) 012014* doi:10.1088/1755-1315/485/1/012014.

Mahfud *et all* (2021). PEMANFAATAN TRADISI RESIK LAWON SUKU USING SEBAGAI SUMBER BELAJAR SEJARAH LOKAL PADA SMA DI BANYUWANGI. Media Bina Ilmiah Vol.16 No.3 Oktober 2021. http://ejurnal.binawakya.or.id/index.php/MBI/article/view/1294/pdf.

Mahfud, M., Yudiana, I. K., & Sariyanto, S. (2022). HISTORY OF BANYUWANGI KALIKLATAK PLANTATION AND ITS IMPACT ON SURROUNDING COMMUNITIES. International Journal of Educational Review, Law And Social Sciences (IJERLAS), 3(1), 91–104. https://doi.org/10.54443/ijerlas.v3i1.492.

Majied Sumatrani Saragih, M. ., Hikmah Saragih, U. ., & Nur Ilham, R. . (2021). RELATIONSHIP BETWEEN MOTIVATION AND EXTRINSIC MOTIVATION TO ICREASING ENTREPRENEURSHIP IMPLEMENTATION FROM SPP AL-FALAH GROUP AT BLOK 10 VILLAGE DOLOK MASIHUL. *MORFAI JOURNAL*, *1*(1), 1–12. https://doi.org/10.54443/morfai.v1i1.11.

Masnadi, Ahmad Muliadi, & Irawan Santosa. (2019a). Kepastian Hukum Terhadap Surat Girik Sebagai Dasar Bukti Pendaftaran Hak Atas Tanah. *Jurnal Nuansa Kenotariatan*, *5*(1), 31–31.

Masnadi, Ahmad Muliadi, & Irawan Santosa. (2019b). Kepastian Hukum Terhadap Surat Girik Sebagai Dasar Bukti Pendaftaran Hak Atas Tanah. *Jurnal Nuansa Kenotariatan*, *5*(1), 34–34.

Mochtar Kusumaatdmaja. (2012). *Teori Hukum Pembangunan*. Epistema Institute dan Huma.

Nur Ilham, R. ., Arliansyah, A., Juanda, R., Multazam, M. ., & Saifanur, A. . (2021). RELATHIONSIP BETWEEN MONEY VELOCITY AND INFLATION TO INCREASING STOCK INVESTMENT RETURN: EFFECTIVE STRATEGIC BY JAKARTA AUTOMATED TRADING SYSTEM NEXT GENERATION (JATS-NG) PLATFORM. *International Journal of Economic, Business, Accounting, Agriculture Management and Sharia Administration (IJEBAS)*, *1*(1), 87–92. https://doi.org/10.54443/ijebas.v1i1.27.

Nur Ilham, R., Heikal, M. ., Khaddafi, M. ., F, F., Ichsan, I., F, F., Abbas, D. ., Fauzul Hakim Hasibuan, A. ., Munandar, M., & Chalirafi, C. (2021). Survey of Leading Commodities Of Aceh Province As Academic Effort To Join And Build The Country. *IRPITAGE JOURNAL*, *1*(1), 13–18. https://doi.org/10.54443/irpitage.v1i1.19.

Nur Ilham, R., Arliansyah, A., Juanda, R. ., Sinta, I. ., Multazam, M. ., & Syahputri, L. . (2022). APPLICATION OF GOOD CORPORATE GOVERNANCE PRINCIPLES IN IMPROVING BENEFITS OF STATE-OWNED ENTERPRISES (An Emperical Evidence from Indonesian Stock Exchange at Moment of Covid-19). *International Journal of Economic, Business, Accounting, Agriculture Management and Sharia Administration (IJEBAS)*, *2*(5), 761–772. https://doi.org/10.54443/ijebas.v2i5.410.

Nur Ilham, R., Likdanawati, L., Hamdiah, H., Adnan, A., & Sinta, I. . (2022). COMMUNITY SERVICE ACTIVITIES "SOCIALIZATION AVOID STUDY INVESTMENT" TO THE STUDENT BOND OF SERDANG BEDAGAI. *IRPITAGE JOURNAL*, *2*(2), 61–64. https://doi.org/10.54443/irpitage.v2i2.312.

Otto, J.M, & dkk. (2012). *Kepastian Hukum yang Nyata di Negara Berkembang (Real Legal Certainty in Developing Countries)*. Pustaka Larasan.

Peraturan Pemerintah (PP) tentang Pendaftaran Tanah, (1997).

PERATURAN PEMERINTAH REPUBLIK INDONESIA (PP) TENTANG PENDAFTARAN TANAH , (1997).

Perhutani. (1897, February 9). *Sejarah pengelolaan hutan di Jawa dan Madura*.

PUU Tentang Ketenagalistrikan terkait Usaha Penyediaan Tenaga Listrik dan Penguasaan Oleh Negara, (2003).

Rahmad Effendi, Mufidah Ansya'ari, & Syam'ani. (2020). Pengukuhan Kawasan Hutan Lindung Gunung Panti Kabupaten Tanah Laut Provinsi Kalimantan Selatan. *Jurnal Sylva Scienteae*, *03*(04), 723–723.

Rahmaniar, R., Subhan, S., Saharuddin, S., Nur Ilham, R. ., & Anwar, K. . (2022). THE INFLUENCE OF ENTREPRENEURSHIP ASPECTS ON THE SUCCESS OF THE CHIPS INDUSTRY IN MATANG GLUMPANG DUA AND PANTON PUMP. International Journal of Social Science, Educational, Economics, Agriculture Research, and Technology (IJSET), 1(7), 337–348. https://doi.org/10.54443/ijset.v1i7.36.

Rico Nur Ilham, Irada Sinta, & Mangasi Sinurat. (2022). THE EFFECT OF TECHNICAL ANALYSIS ON CRYPTOCURRENCY INVESTMENT RETURNS WITH THE 5 (FIVE) HIGHEST MARKET CAPITALIZATIONS IN INDONESIA. *Jurnal Ekonomi*, *11*(02), 1022–1035. Retrieved from http://ejournal.seaninstitute.or.id/index.php/Ekonomi/article/view/481.

Sandi, H. ., Afni Yunita, N. ., Heikal, M. ., Nur Ilham, R. ., & Sinta, I. . (2021). RELATIONSHIP BETWEEN BUDGET PARTICIPATION, JOB CHARACTERISTICS, EMOTIONAL INTELLIGENCE AND WORK MOTIVATION AS MEDIATOR VARIABLES TO STRENGTHENING USER POWER PERFORMANCE: AN EMPERICAL EVIDENCE FROM INDONESIA GOVERNMENT. *MORFAI JOURNAL*, *1*(1), 36–48. https://doi.org/10.54443/morfai.v1i1.14.

Satjipto Rahardjo. (1991). *Ilmu Hukum*. PT. Citra Aditya Bakti.

Sinta, I., Nur Ilham, R. ., Authar ND, M. ., M. Subhan, & Amru Usman. (2022). UTILIZATION OF DIGITAL MEDIA IN MARKETING GAYO ARABICA COFFEE. IRPITAGE JOURNAL, 2(3), 103–108. https://doi.org/10.54443/irpitage.v2i3.467.

Sinurat, M. ., Heikal, M. ., Simanjuntak, A. ., Siahaan, R. ., & Nur Ilham, R. . (2021). PRODUCT QUALITY ON CONSUMER PURCHASE INTEREST WITH CUSTOMER SATISFACTION AS A VARIABLE INTERVENING IN BLACK ONLINE STORE HIGH CLICK MARKET: Case Study on Customers of the Tebing Tinggi Black Market Online Store. *MORFAI JOURNAL*, *1*(1), 13–21. https://doi.org/10.54443/morfai.v1i1.12.

Soedino MP Tjondronegoro, & Gunawan Wiradi. (1984). *Dua Abad Penguasaan Tanah Pola Penguasaan Tanah Pertanian di Jawa dari Masa ke Masa*. Gramedia.

Soeroso. (2011). *Pengantar Ilmu Hukum*. PT, Sinar Grafika.

Sudarsono. (2005). *Kamus Hukum*. Rineka Cipta.

Sudikno Mertokusumo. (1998). *Hukum Acara Perdata Indonesia*. Libery.

Sudikno Mertokusumo. (2019). *Teori Hukum*. Maha Karya Pustaka.

Tentang Panitia Tata Batas Kawasan Hutan , (2010).

tolok1 » tolok ukur. (n.d.). Kamus Besar Bahasa Indonesia.

Undang-undang Pokok Agraria , (1960).

Wayan Mertha, I. ., & Mahfud, M. (2022). HISTORY LEARNING BASED ON WORDWALL APPLICATIONS TO IMPROVE STUDENT LEARNING RESULTS CLASS X IPS IN MA AS'ADIYAH KETAPANG. International Journal of Educational Review, Law And Social Sciences (IJERLAS), 2(5), 507–612. https://doi.org/10.54443/ijerlas.v2i5.369.

Widhi Handoko. (2014). *Kebijakan Hukum Pertanahan Sebuah Refleksi*, *Keadilan Hukum Progresif*. Thafamedia.

Winahyu Erwingsih. (2009). *Hak Menguasai Negara atas Tanah*. Total Media.

Yusuf Iis, E., Wahyuddin, W., Thoyib, A., Nur Ilham, R., & Sinta, I. (2022). THE EFFECT OF CAREER DEVELOPMENT AND WORK ENVIRONMENT ON EMPLOYEE

PERFORMANCE WITH WORK MOTIVATION AS INTERVENING VARIABLE AT THE OFFICE OF AGRICULTURE AND LIVESTOCK IN ACEH. *International Journal of Economic, Business, Accounting, Agriculture Management and Sharia Administration (IJEBAS)*, *2*(2), 227–236. https://doi.org/10.54443/ijebas.v2i2.191.