

THE LEGAL STANDING OF VIETNAM JOINT VENTURE COMPANIES IN THE FOREIGN INVESTMENT SCHEME: A CASE STUDY OF THE LOBSTER SEED INDUSTRY IN INDONESIA

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Abstract

This research aims to analyze the legal standing of Vietnamese joint venture companies within the framework of foreign investment laws in Indonesia, as well as the legal impacts and juridical implications of their activities in the lobster seed industry. In recent years, Indonesia's lobster seed industry has attracted foreign investors, particularly from Vietnam. The Minister of Maritime Affairs and Fisheries Regulation no. 7 of 2024 provides a legal framework for joint venture companies operating in this sector. However, this policy raises various legal issues, including allegations of monopoly and its effects on local fishermen. The Research Question What is the legal standing of Vietnamese joint venture companies within the framework of foreign investment laws in Indonesia based on the Ministry of Maritime Affairs and Fisheries Regulation No. 7 of 2024 as it relates to the lobster seed industry What are the legal impacts and juridical implications of the activities of Vietnamese joint venture companies as foreign investors in the legal and lobster seed industry sectors in Indonesia. This study finds that Vietnamese joint venture companies have a legitimate position within the foreign investment legal framework in Indonesia; However, the implementation of policies often does not align with the objectives of protecting local fishermen. There are indications of monopolistic practices by these companies, which disadvantage local fishermen and create imbalances in profit distribution within the fisheries sector.

Keywords: *Legal standing; Joint Ventures; Lobster, Vietnam; Export*

1. INTRODUCTION

Indonesia has a water area of 5.8 million km²¹The fisheries sector is an important industrial sector for most people in Indonesia and has the potential to be the main driver of the national economy. In addition, Indonesia has a coastline of 95,181 which is one of the bases of fisheries economic activities.²The fisheries sector is one of the economic sectors that plays a role in national economic development, especially in providing protein food, contributing to foreign exchange earnings and one of the places that has the availability of employment, especially in generating foreign exchange. The marine fisheries and aquaculture sector includes all activities of catching, cultivating, and breeding all types of saltwater biota and fish. Marine fish and aquaculture are natural resources that can always be renewed but can also potentially run out because the environmental system has a population size threshold. If the population size drops below the limit, it can cause extinction. Among the fisheries sub-sectors, the lobster seed industry has a strategic position because of the high international market demand, especially for lobster seeds from Indonesia which are known to have superior quality.³BBL has become One of the sub-sectors that has strategic value is the Clear Lobster Seed industry (hereinafter referred to as BBL) and is an

¹<http://repository.ub.ac.id/id/eprint/11566/1/BAB%20I.pdf>

²Department of Marine Affairs and Fisheries.

³https://berkas.dpr.go.id/pusaka/files/info_cepat/Info%20Singkat-XVI-10-II-P3DI-Mei-2024-1904.pdf

export commodity that has high international demand, especially from countries such as Vietnam. With this great potential, lobster seed cultivation business activities have become one of the main sectors of interest to investors, including the Foreign Investment (PMA) scheme. However, the export of clear lobster seeds has caused problems due to overfishing activities without considering the season and size of the catch, thus threatening the lobster population. This is supported by the serious challenges in the form of smuggling and illegal trade in BBL which has raised concerns about the lobster population in nature. Due to this situation, the government has issued several bans on the export of clear lobster seeds (BBL) since 2016, reopened in 2020, then banned again in 2021 to 2023 until reopened in 2024.⁴ This policy is regulated through one of them, the Regulation of the Minister of Maritime Affairs and Fisheries Number 7 of 2024 which allows lobster cultivation to be carried out abroad with various strict procedures, including permits for the release of seeds based on quotas. Ministerial Regulation Number 7 of 2024 explains that lobster cultivation can be carried out abroad with various procedures, one of which is to submit an application for a permit to release seeds according to the quota to foreign partners.

The Minister of Maritime Affairs and Fisheries gave the reason for opening the BBL export tap because of the difficulty in curbing the illegal trade and smuggling of lobster seeds, especially to Vietnam, even though several export ban policies have been implemented. The fisheries sector, especially the cultivation and export of lobster seeds (BBL), has become a national spotlight given its significant economic value. Indonesia, as one of the main producers of lobster seeds, has great potential in international trade, especially to meet market demand such as Vietnam. However, this industry is not free from serious challenges, such as smuggling and illegal trade in lobster seeds. To overcome these problems, the Ministry of Marine Affairs and Fisheries (KKP) issued Ministerial Regulation (Permen) KP Number 7 of 2024 which allows lobster cultivation to be carried out abroad, with the condition that there are strict licensing procedures, including submitting export permits according to quotas to foreign partners. Minister of Maritime Affairs and Fisheries, Sakti Wahyu Trenggono, explained that opening the BBL export tap was an effort to control the rate of illegal trade that often occurs despite the export ban.⁵ However, this policy has received criticism and special attention, including from the Corruption Eradication Commission (KPK), which received a report from the Negoro Party regarding allegations of a "corruption mode" behind the policy. One of the main allegations is the misuse of export permits under the guise of lobster cultivation abroad, including to Vietnam.

This regulation has become a focus, especially regarding the involvement of foreign investors, such as joint venture companies from Vietnam, which have been granted permission to be involved in this industry. Although this policy aims to suppress illegal trade, criticism has emerged regarding alleged corruption practices behind the implementation of this regulation. The Corruption Eradication Commission (KPK) has received reports regarding alleged misuse of export permits under the guise of lobster cultivation, with Vietnam being one of the main destination countries. This raises questions regarding the legal standing of foreign joint venture companies in foreign investment (PMA) related to the lobster seed industry. Basten Gokkon (2024) in his study entitled "Indonesia resumes lobster larvae exports despite sustainability, trade concerns" explains how Indonesia continues to export lobster seeds to Vietnam, despite concerns about sustainability and trade. Although this policy is expected to boost the economy, many are concerned about its impact on wild lobster stocks in Indonesia and the potential for smuggling. Vietnam, with more advanced cultivation technology, is considered to benefit more. also touched on the issue of

⁴This is done through a ban regulated by the Regulation of the Minister of Marine Affairs and Fisheries Number 56 of 2016, reopening the Export Permit through PMK 12/2020. The ban will be re-opened in 2021-2023 through PMK 17/2021 then, reopening the permit through PMK No. 7/2024.

⁵<https://rmol.id/Hukum/read/2024/07/15/628354/soal-benih-lobster-kpk-bakal-tindakpanjangi-dugaan-kokerja-menteri-kp>

corruption that has occurred in the BBL industry. Meanwhile, this study discusses the legal status of joint venture companies that occur in the lobster seed industry which focuses on the legal impact and regulations of Foreign Investment and Ministerial Regulation Number 7 of 2024 concerning Lobster Seed Exports.

2. METHOD

In this study, the method used is the normative research method. Normative research is a study that aims to examine the norms, provisions, legal principles, and applicable laws and regulations related to the problems raised, namely the position of Vietnamese joint venture companies in the foreign investment scheme in the lobster seed industry in Indonesia.⁶ This study focuses on a systematic analysis of the applicable legal concepts, using library research techniques, and examining legal materials related to the problem, including the Investment Law, Regulation of the Minister of Marine Affairs and Fisheries Number 7 of 2024, and other relevant laws and regulations. This study also considers the comparative legal aspect, especially in the context of foreign investment schemes in other countries such as Vietnam.

3. RESULTS AND DISCUSSION

3.1 Legal Status of Vietnamese Joint Venture Companies in the Legal Framework of Foreign Investment in Indonesia Based on Ministerial Regulation Number 7 of 2024 When Related to the Lobster Seed Industry

Article 1 of Law Number 25 of 2007 concerning Investment explains that Investment is any form of investment activity by both domestic investors and foreign investors to conduct business in the territory of the Republic of Indonesia. Salim Hs said that investment is an investment made by investors, both foreign and domestic, in various business fields that are open to investment with the aim of making a profit. The capital investment itself has elements in it, namely, there is a motive for rotating capital, the existing capital is visible and can be touched but also includes the visible and cannot be touched. Investment itself is divided into 2 types, namely foreign investment and domestic investment, the discussion in this study focuses on foreign investment which is an investment that has a source of financing from abroad which aims to build a business that is open to investment and the goal is to make a profit. In 18953, the government began to draft the PMA Law, the design of which was related to foreign investors with various regulated requirements that had a minimum while encouraging foreign investment in certain business fields. Basically, the regulated law did not provide flexibility for foreign investors to be able to move in certain business fields and only benefited domestic investors in several business fields.⁷ One form of cooperation that emerged as a response to this regulation is a joint venture. A joint venture is a joint venture between two or more companies, where a foreign party collaborates with a local company to run a business together, either by utilizing an existing company or establishing a new company.

Joint venture is a term for a joint venture between two or more foreign or foreign companies that run a business together in the form of togetherness in a company either with an existing company or a company that will be established. In short, a joint venture company is a joint venture company. In the formation of a joint venture company, the parties usually make an agreement in advance as the basis for establishing the joint venture company. In formulating the agreement, the parties will be bound by the rules contained in the law of agreements, both national and international, such as *pacta sunt servanda*, consensus and freedom of contract because the parties come from different countries. In the agreement, the objectives and policies of the joint venture company are determined which can be used to interpret the agreement made by the company with the partners.⁸ Sunaryati Hartono (in Hasanudin, 2010:14) joint venture is used as a term

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⁷ Yahya A. Muhaimin, *Business and Politics*, (Jakarta: LP3ES, 1990), p. 56.

⁸ <https://lib.ui.ac.id/m/detail.jsp?id=20369691&location=lokal>

verzelenaam for various cooperation between national investment and foreign investment. In the academic world, the term joint venture is known by other terms, namely foreign collaboration, international enterprise, and others.

Based on Law No. 25 of 2007 concerning Investment, foreign joint venture companies, including those from Vietnam, have the right to operate in Indonesia through a foreign investment scheme. One popular form of investment is a joint venture, where foreign companies collaborate with local Indonesian partners. In this case, the investment is regulated in Ministerial Regulation Number 7 of 2024 which allows foreign investment in the fisheries sector, including the lobster seed industry. Joint ventures are a vehicle that allows foreign companies (such as those from Vietnam) to operate in Indonesia by sharing resources with local partners. However, based on investigations by fishermen such as Amar Takdim Souwokil, there are concerns that joint venture companies are suspected of monopolizing the BBL export market in an unfair manner, which could harm local fishermen and the country.⁹

The policy governing BBL exports is basically intended to support lobster cultivation, but problems in the field, as expressed by fishermen, show the potential for abuse of regulations. Joint venture companies, which should function as a means of cooperation between foreign and local investors, are actually suspected of being used as a tool to monopolize the market, harm fishermen's cooperatives, and create a dual purchasing system (dual PO). This shows that although Indonesian law, through foreign investment regulations, provides space for joint venture investment, the implementation of this policy in the lobster seed industry has raised various problems, especially related to the distribution of profits and the rights of local fishermen. This inequality indicates the existence of legal loopholes or weaknesses in supervision that allow monopolistic practices by joint venture companies.

In accordance with the principles of *pacta sunt servanda* and freedom of contract, joint venture companies are bound by mutually agreed agreements, both nationally and internationally. However, although these companies are legally permitted to operate, the reality on the ground shows that there are practices that are detrimental to local fishermen. Allegations of corruption and abuse of authority by parties involved in the export of BBL show that although the legal framework for foreign investment (as stipulated in Ministerial Regulation Number 7 of 2024) supports foreign investment, there are problems in its implementation. The regulation that was made to encourage foreign investment in the lobster farming industry was actually intended to create a balance between the needs of foreign investors and local interests. However, with the alleged illegal and monopolistic practices, as conveyed by Amar Takdim, the regulation could actually benefit a handful of parties more than local fishermen or farmers.

The lobster seed industry in Indonesia faces complex challenges, with illegal export practices covered up by aquaculture policies. Vietnamese joint ventures, which legally operate under a foreign investment framework, are involved in this business. However, the implementation of regulations in the field, such as catch quotas and BBL purchases, show inequality that leads to dissatisfaction among local fishermen. This indicates that joint ventures are not only involved in economic development through foreign investment, but are also involved in broader issues related to the distribution of resources and profits in the fisheries sector.

In relation to Vietnam Joint Venture Companies in the Legal Framework of Foreign Investment in Indonesia, it is clear that although regulations such as Ministerial Regulation No. 7 of 2024 are designed to support foreign investment in the lobster farming industry, there are concerns that these regulations do not fully protect the interests of local fishermen. The monopoly carried out by joint venture companies shows that law enforcement and supervision of policy implementation still need to be improved to ensure that foreign investment not only benefits

⁹<https://rmol.id/bisnis/read/2024/09/29/638803/ekspor-bbl-sarat-manipulasi-nelayan-lobster-lapor-ke-bea-cukai>

foreign parties, but also contributes positively to the local community and economy. In the context of foreign investment law in Indonesia, especially through joint ventures, there is a complex dynamic between the interests of foreign investors and local fishermen. Based on Law Number 25 of 2007 concerning Investment, foreign investment, including joint ventures, is expected to improve the industrial sector, such as lobster cultivation. However, practices in the field show concerns about market monopolization by joint venture companies, especially from Vietnam, which can harm local fishermen. Although regulations such as Ministerial Regulation Number 7 of 2024 are designed to support foreign investment, their implementation faces challenges, including dissatisfaction of local fishermen with the distribution of profits and abuse of regulations. Allegations of monopolistic practices and injustice in the distribution of resources indicate gaps in supervision and law enforcement. Therefore, there needs to be an evaluation and improvement in regulations as well as stricter supervision to ensure that foreign investment not only benefits foreign parties, but also provides benefits to local communities and strengthens the regional economy. The balance between investment needs and protection of the interests of local fishermen is key to creating a sustainable and fair fisheries industry.

3.2 Legal Impact and Legal Implications of the Activities of Vietnamese Joint Venture Companies as Foreign Investors in the Lobster Seed Industry Sector in Indonesia

Vietnam and Indonesia have established strong bilateral relations in the fisheries sector since the 2000s, especially related to the increasing global demand for lobster. In the early 2010s, the lobster industry, especially for lobster seed (BBL), began to become one of the sectors that attracted the interest of foreign investors, including Vietnam. Vietnam has long experience and advanced technology in lobster cultivation, which makes them interested in investing in Indonesia, one of the countries rich in lobster seed resources. Based on The Gateway article, it explains that Vietnam is the only country in the world with fully developed lobster cultivation that is commercially successful.¹⁰ International demand for lobsters, especially sand lobsters and pearl lobsters, has increased rapidly since 2010. Vietnam has emerged as one of the world's largest lobster exporters, with China as its main market. Meanwhile, Indonesia is known as a major supplier of lobster seeds which are then exported to be raised in Vietnam, where the lobster farming industry has developed successfully. Indonesia has waters rich in lobster seeds, especially in the eastern regions such as West Nusa Tenggara (NTB) and East Nusa Tenggara (NTT), which is the reason Vietnam is interested in forming a joint venture in the lobster seed industry in Indonesia. So for this reason, Vietnam sees Indonesia as a source of lobster seeds that can be processed into adult lobsters through the cultivation method they have developed.

Vietnamese companies have begun forming joint ventures with local Indonesian partners to exploit lobster seeds from Indonesian waters. With more advanced cultivation methods, Vietnam sees Indonesia as a potential source of seeds that they can develop into mature lobsters to meet the needs of the international market. Through the foreign investment (PMA) scheme, Vietnamese companies are allowed to cooperate with local companies in Indonesia, either by establishing new businesses or using existing companies. These joint ventures then focus on lobster cultivation and the export of lobster seeds (BBL). However, this activity has raised problems related to regulations and impacts on local fishermen. The Indonesian government has implemented a number of regulations related to lobster seed exports. In 2016, the Minister of Marine Affairs and Fisheries, Susi Pudjiastuti, issued Ministerial Regulation of Marine Affairs and Fisheries Number 56 of 2016 which prohibited the export of lobster seeds to protect the sustainability of lobster stocks in Indonesia. However, in 2020, the policy was relaxed with the enactment of Ministerial Regulation of Marine Affairs and Fisheries Number 12 of 2020, which reopened lobster seed exports with certain requirements. The entry of Vietnamese companies through joint ventures has complex legal

¹⁰Clive M. Jones, Tuan Le Anh, and Bayu Priyambodo, "Lobster Aquaculture Development in Vietnam and Indonesia," in *Lobsters: Biology, Fisheries and Aquaculture*, ed. EV Radhakrishnan, Bruce F. Phillips, Gopala-krishnan Achamveetil (The Gateway: Springer Publishing Company Singapore, 2019), p. 545

impacts. On the one hand, foreign investment (PMA) regulations provide space for foreign companies such as Vietnam to invest in this industry, which is expected to support local economic development and increase lobster cultivation. On the other hand, controversy has arisen regarding alleged monopolies by joint venture companies that control the lobster seed export market.

Although government policies aim to protect and conserve lobster resources, new policies introduced provide space for foreign companies such as Vietnam to invest in the industry, which is expected to support local economic development and increase lobster farming. On the other hand, controversy has arisen regarding alleged monopoly by joint venture companies that control the lobster seed export market. The changes in government policies related to lobster seeds from 2015 to 2024 are:

Comparison Table of Government Policies Regarding Lobster Seed Seeds 2015-2024	
2015	Regarding the threat of a decline in the lobster population in the WPP-RI. The party that has the right and authority to handle this problem is the Ministry of Marine Affairs and Fisheries (KKP). This is stated in the Regulation of the Minister of Marine Affairs and Fisheries (Permen-KP) Number 23/PERMEN-KP/2015 concerning the organization and work procedures of the KKP, the task of the KKP is to assist the President of the Republic of Indonesia (RI) in carrying out part of the government's affairs in the field of marine affairs and fisheries. The KKP has formulated a prohibition rule regarding the capture of certain sized lobsters to maintain the sustainability of lobster resources in the WPP-RI through the existence of the Regulation of the Minister of Marine Affairs and Fisheries (Permen-KP) Number 1 of 2015. This Permen-KP prohibits the export of lobster seeds which aims to maintain the sustainability of lobster resources directly from nature.
2016	The Indonesian government through the Minister of Maritime Affairs and Fisheries, Susi Pudjiastuti, implemented a ban on the export of lobster seeds through the Regulation of the Minister of Maritime Affairs and Fisheries Number 56 of 2016. This step was taken to protect Indonesia's lobster stocks and encourage domestic cultivation, because seed exports are considered not to provide optimal added value for the local economy.

2020	The policy changed after Edhy Prabowo was appointed as Minister of Marine Affairs and Fisheries. Through the Regulation of the Minister of Marine Affairs and Fisheries Number 12 of 2020, the Indonesian government reopened the export tap for lobster seeds with certain conditions, including the obligation for business actors to cultivate lobsters domestically and cooperate with local cooperatives.
2024	prioritizing cooperation between the Ministry of Maritime Affairs and Fisheries (KKP) and registered cooperatives and fishermen, with certain requirements for the capture and management of lobster seeds. ¹¹ This regulation is intended to help improve the welfare of fishermen and strengthen lobster management in Indonesia, including through cultivation technology that has been proven effective abroad.

Source: processed from statutory regulations.

The Indonesian government has implemented a number of regulations related to lobster seed exports. In 2016, the Minister of Marine Affairs and Fisheries, Susi Pudjiastuti, issued Ministerial Regulation of Marine Affairs and Fisheries Number 56 of 2016 which prohibits the export of lobster seeds to protect the sustainability of lobster stocks in Indonesia.¹²However, in 2020, the policy was relaxed with the enactment of the Minister of Marine Affairs and Fisheries Regulation Number 12 of 2020, which reopened lobster seed exports with certain requirements. The entry of Vietnamese companies through joint ventures has complex legal impacts. On the one hand, foreign investment (PMA) regulations provide space for foreign companies such as Vietnam to invest in this industry, which is expected to support local economic development and increase lobster cultivation. On the other hand, controversy has arisen regarding the alleged monopoly by joint venture companies that control the lobster seed export market. Although Vietnamese joint ventures are legally permitted, the legal and social impacts of their activities have given rise to a number of conflicts and challenges such as

1) Market Monopoly: Vietnamese joint venture companies are suspected of monopolizing lobster seed management, which has the potential to harm local fishermen. There are indications that these companies are exploiting loopholes in regulations to control the lobster seed export market; 2) Weak Law Enforcement) Several cases show a lack of adequate supervision by authorities in terms of law enforcement. This weakness in regulation allows practices such as dual PO (double purchase) which are detrimental to cooperatives and local fishermen; 3) Conflict of Interest: Although in theory, existing regulations are intended to protect local fishermen and encourage lobster cultivation in Indonesia, the implementation of policies often benefits large companies, such as Vietnamese joint ventures, while local fishermen feel sidelined.

The legal impact and legal implications of Vietnamese joint venture companies' activities in the lobster seed industry sector in Indonesia demonstrate the complexity in natural resource management and foreign investment regulation. Since the 2000s, Vietnam has leveraged its lobster cultivation expertise and technology to invest in Indonesia, which is rich in lobster seed resources. Although the presence of these joint venture companies has the potential to support local economic development and increase lobster cultivation, a number of issues have emerged, such as allegations

¹¹ <https://kkp.go.id/djpb/kkp-terus-kawal-implementasi-pengelolaan-lobster/detail.html>

¹² <https://bisnis.tempo.co/read/1811347/perjalanan-ekspor-benih-lobster-dulu-dilarang-susi-pudjiastuti-dan-kini-akan-dibuka-lagi-oleh-trenggono>

of market monopoly, weak law enforcement, and conflicts of interest between large companies and local fishermen.

The flow of the Minister of Marine Affairs and Fisheries Regulation, which has changed from 2015 to 2024, reflects an effort to maintain the sustainability of lobster stocks while providing space for foreign investment. However, the policy that relaxes the ban on lobster seed exports also poses challenges, where joint venture companies can take advantage of regulatory loopholes to control the market. This has the potential to harm local fishermen, who often feel marginalized in the decision-making process. Thus, it is important for the government to carry out stricter supervision and ensure that existing policies truly benefit all parties, especially local fishermen. The sustainability of the lobster industry in Indonesia depends heavily on the balance between foreign investment and protection of natural resources and local communities.

4. CLOSING

The legal status of Vietnamese joint venture companies in the legal framework of foreign investment in Indonesia, especially in the lobster seed industry sector based on Ministerial Regulation Number 7 of 2024, shows that the existing legal framework provides space for foreign companies to invest. Joint ventures are one form of cooperation that allows foreign companies, including those from Vietnam, to operate with local partners, utilizing existing resources for business development. However, although legally permitted, practices in the field indicate the potential for abuse of regulations, including alleged monopolies by joint venture companies that have detrimental effects on local fishermen. In the context of the legal impact and legal implications of joint venture company activities. Although the purpose of the regulation is to encourage investment and develop the industry, monopolistic practices and lack of adequate supervision indicate a larger problem in policy implementation. This shows that the existing legal framework does not fully protect the interests of local fishermen and creates inequality in the distribution of profits.

REFERENCES

- Salim, H. (2007). *Investment Law*. Jakarta: Sinar Grafika.
- Salim, H. (2007). *Hukum Investasi*. Jakarta: Sinar Grafika.
- Hartono, S. (2010). *Hukum Perjanjian Internasional*. Jakarta: Raja Grafindo Persada.
- Undang-Undang Nomor 25 Tahun 2007 tentang Penanaman Modal.
- Peraturan Menteri Kelautan dan Perikanan Nomor 7 Tahun 2024.
- Souwokil, A. T. (2020). "Dampak Perusahaan Joint Venture terhadap Nelayan Lokal di Indonesia". *Jurnal Perikanan dan Kelautan*.
- Artikel The Gateway. "Vietnam: A Leader in Lobster Aquaculture".
<http://repository.ub.ac.id/id/eprint/11566/1/BAB%20I.pdf>
 Dinas kelautan dan perikanan.
https://berkas.dpr.go.id/pusaka/files/info_singkat/Info%20Singkat-XVI-10-II-P3DI-Mei-2024-1904.pdf
<https://rmol.id/hukum/read/2024/07/15/628354/soal-benih-lobster-kpk-bakal-tindaklanjuti-dugaan-korupsi-menteri-kp>
- Yahya A. Muhaimin, *Bisnis dan Politik*, (Jakarta: LP3ES, 1990), h. 56.
<https://lib.ui.ac.id/m/detail.jsp?id=20369691&lokasi=lokal>
<https://rmol.id/bisnis/read/2024/09/29/638803/ekspor-bbl-sarat-manipulasi-nelayan-lobster-lapor-ke-bea-cukai>
- Clive M. Jones, Tuan Le Anh, and Bayu Priyambodo, "Lobster Aquaculture Development in Vietnam and Indonesia," in *Lobsters: Biology, Fisheries and Aquaculture*, ed. E. V.

<https://radjapublika.com/index.php/MORFAI>

Radhakrishnan, Bruce F. Phillips, Gopalakrishnan Achamveetil (The Gateway: Springer Publishing Company Singapore, 2019), hlm. 545

<https://kkp.go.id/djpb/kkp-terus-kawal-implementasi-pengelolaan-lobster/detail.html>

<https://bisnis.tempo.co/read/1811347/perjalanan-ekspor-benih-lobster-dulu-dilarang-susi-pudjiastuti-dan-kini-akan-dibuka-lagi-oleh-trenggono>