

## WORDS BEHIND MASK: COMPARING COPYRIGHT PROTECTION FOR PSEUDONYMOUS AUTHORS IN INDONESIA AND AUSTRALIA

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### Abstract

This article discusses the regulation of copyright protection for pseudonymous authors from a comparative perspective between Indonesia and Australia, focusing on the fulfillment of moral and economic rights. Using a normative juridical and comparative approach, this study examines the legal gap within the Indonesian system of moral rights and economic rights of works created by authors with concealed identities. Although Article 5 of the 2014 Copyright Law recognizes pseudonymous authors, its implementation remains weak due to the absence of explicit enforcement mechanisms. On the other hand, Australia clearly separates moral rights and economic rights and adopts a statutory presumption approach to recognize and protect pseudonymous authors. However, implementing the Australian model in Indonesia faces limitations, primarily because Indonesia's legal culture has yet to be deeply rooted in public consciousness. This study proposes context-based adaptations, such as confidential registration and the strengthening of publishing agreements, as alternative solutions. By integrating cultural values and the national legal structure, this article emphasizes the importance of localizing copyright protection to align with the legal and social characteristics of Indonesian society, while also promoting the development of a safe and inclusive literacy ecosystem for pseudonymous authors in the future.

**Keywords:** *copyright, pseudonym, moral rights, economic rights*

### INTRODUCTION

Humans have various ways to express themselves, including through writing. Authors convey ideas and emotions in written form for art, science, or resistance. In the literary world, the phenomenon of using pseudonyms is not unfamiliar. Many writers use pseudonyms to liberate themselves from the constraints of certain identities and to ensure privacy. In many cases, especially when social and political risks are high, authors use pseudonyms (assumed names). The modern period, which began from the 16th to the 18th century, was the era when the concept of literary copyright started to emerge, and writers could begin to earn a living from the works they produced. The name William Shakespeare emerged in the 16th century as a pioneer of what we can now refer to as a brand and as someone who earned income from the sale of his works. It should be noted that a significant number of literary works, particularly novels, were published anonymously or under pseudonyms during the 18th to 19th centuries. Historical studies state that one-third of the books published in the 18th century used anonymity or pseudonyms (Goodin, 2023). Pseudonyms became part of the literary landscape, especially when female writers began to emerge as a powerful force in literature. This trend was a distinctive feature of the literary landscape during that period. The reason behind the widespread use of pseudonyms at that time can be associated with social and cultural factors. Many writers during that period, especially women, faced significant restrictions and social judgment due to their gender. By using pseudonyms, they were able to avoid the stigma often attached to their real identities (Brace, 2024). Writers such as the Brontë Sisters, Mary Ann Evans, and Louisa May Alcott used male pseudonyms so that their novels could be accepted by the public. Therefore, pseudonyms were not merely a stylistic choice but a mechanism for protecting identity and intellectual freedom.

In the current context, the phenomenon of threats against freedom of expression has become increasingly evident in Indonesia in recent times. It began with the case of a *Detik* journalist who published a news article criticizing the Draft Bill on the Indonesian National Armed Forces (TNI) in May (Aswara, 2025). Subsequently, the journalist was intimidated by being sideswiped twice by a motorcyclist. In a case involving the same institution, a *Kompas* journalist was also intimidated after interviewing the Commander of the TNI regarding the attack on the

Tarakan Police Headquarters by TNI personnel. It was reported that he was approached by two aides and was threatened to be “dealt with” by the Commander’s aide (Dirgantara & Ramadhan, 2025). These two cases serve as a current illustration of the suppression of voices. If this continues, and every criticism and sensitive question results in intimidation, then democracy must be questioned, and it will inevitably affect other sectors, including writers. Thus, the history of silencing experienced by figures such as Pramoedya Ananta Toer, whose books were banned during the New Order regime, is highly likely to recur, even though Toer's works did not discuss communism at all (Kartikasari, 2014). The turbulence of the times is sometimes unavoidable; civilization will continue to evolve, and humans will always seek ways to survive. This raises the question: what if these works were published under a pseudonym? Would such books have endured longer? Then, how can copyright be fulfilled if the author's identity is not disclosed? Does our current legislation adequately address the aspects of copyright?

Regulations concerning pseudonymous authors cannot be separated from the framework of international law. It began with the Berne Convention of 1886, which became the foundation for global copyright protection of artistic and literary works, and which also includes the moral rights associated with the works of pseudonymous authors (Noor, 2021). The Berne Convention was followed by several derivative instruments, such as the TRIPS Agreement (Trade-Related Aspects of Intellectual Property Rights), which regulates economic rights in greater detail and is binding on the members of the World Trade Organization (WTO) (WIPO, 1886). In this agreement, the economic rights of pseudonymous authors are addressed, although each country interprets and implements them differently. The TRIPS Agreement plays an important role in establishing global standards for intellectual property rights protection and is binding on all WTO members, including Indonesia. A recent development in the 2021 Bangkok Declaration on Artificial Intelligence highlighted AI (Artificial Intelligence) as a specific topic due to its relevance to copyright protection, considering that AI draws from pre-existing written works that have been published on the internet (O’leary, Cox, and Ellsworth 2013). This issue is becoming increasingly urgent and presents a new challenge to copyright, especially for authors who choose to continue using pseudonyms in the digital era. This reinforces the importance of this study in examining how the protection of pseudonymous authors in Indonesia and Australia can be integrated into broader developments. Both Indonesia and Australia regulate copyright based on the derivatives of the Berne Convention; however, the implementation in both countries differs.

In Indonesia, copyright protection is regulated under Law No. 28 of 2014 on Copyright and is applied automatically (Wahyuni et al. 2023). Although the regulation guarantees both moral rights and economic rights for authors, the scope of publication under a pseudonym is not explicitly regulated, and there are several aspects that remain unfulfilled, with indications of overlap between moral rights and economic rights. Meanwhile, Australia, even as a common law jurisdiction, explicitly separates the two types of rights. As a result, there is a legal gap concerning certain moral rights. In Australia, the Copyright Act 1968 automatically provides protection for all forms of writing. Australia grants copyright for free, and it is automatically applied to any creative idea or concept that is documented in physical or digital form (Government of Australia, 1968).

The increasing prevalence of digital publishing and global content creation has facilitated the use of pseudonyms across various fields. This shift needs to be accompanied by an examination of copyright protection to ensure that such protection is robust in upholding both moral rights and economic rights for authors who use pseudonyms. The provisions on moral rights in both Indonesia and Australia apply to pseudonymous authors, but the practical implementation of these regulations raises questions as to whether they are sufficient to protect pseudonymous authors. The ability to create under a pseudonym is closely related to the principles of privacy and freedom of expression. This study aims to assess whether the existing legal frameworks in Indonesia and Australia sufficiently uphold these principles while balancing the economic and moral rights of pseudonymous authors. The introduction of Australia's moral rights legislation marked a significant step in aligning its copyright law with international standards such as the Berne Convention. This study explores how these principles are applied to pseudonymous authorship by addressing the legal aspects of copyright, which are essential in fostering innovation and inclusivity within the creative sector.

## **LITERATURE REVIEW**

Several studies have been conducted previously. First, there is a study conducted by Sugiyanto and Analisa Yahanan with the title “Legal Protection of Authors as Copyright Holders in Book Publishing”. The study focuses on book publishing agreements between authors and publishers, whereas this research focuses on the protection and fulfillment of the rights of pseudonymous authors. The second study was written by Bimo Satria Fajrin Nugroho and Muhamad Adji Rahardian Utama, entitled “Legal Protection of Copyright In The Globalization Era: A Comparison of Indonesia and China.” In that study, the researchers focused on the effectiveness of copyright protection for

creators in an increasingly global and interconnected world. The researchers compared the strengths and weaknesses of copyright regulations in Indonesia and China. In contrast, this study focuses on comparing the copyright regulations of Indonesia and Australia in protecting pseudonymous authors. Then, the third study was conducted by Natasha Noor under the title “Copyright Law In Protecting Creators’ Exclusive Rights In The Creative Industry: A Comparative Study.” That study focused on comparing the copyright law frameworks of Indonesia and the United States. Meanwhile, this research discusses Indonesia’s copyright regulations in governing pseudonymous authors and compares them with those of Australia. Based on the aforementioned issues, this study aims to analyze the existing copyright regulations in Indonesia and compare them with those in Australia. This study will analyze how far the existing regulations are capable of supporting pseudonymous authors in fulfilling their moral and economic rights while maintaining the confidentiality of their identities.

## **METHOD**

The type of research used in this study was normative juridical research. It is carried out by examining library materials or primary and secondary data (Sungono, 2009). The problem approach employed in this study consisted of a comparative approach, a statutory approach, and a conceptual approach. The statutory approach was carried out by examining all laws and regulations related to the legal issue being addressed. The type of comparative approach used in this article was a micro-comparative approach. In this context, the author conducted a comparative approach by performing a substantive comparison of copyright regulations for pseudonymous authors in Indonesia and Australia.

## **RESULTS AND DISCUSSION**

### **Comparison of Moral Rights Regulations for Pseudonymous Authors Between Indonesia and Australia**

Fundamentally, copyright consists of two rights: moral rights and economic rights. Moral rights are intended to protect the personal connection and reputation between the creator and their work. When the author’s identity is concealed for legitimate reasons, such as through the use of a pseudonym, the enforcement of moral rights becomes more complex but remains urgent. In the Berne Convention, moral rights are defined as the rights of the creator to be recognized as the author and to object to any modification or derogatory treatment of their work, as well as other matters related to the author’s reputation (WIPO 1886). The aspects of moral rights regulated under the Berne Convention include the right of attribution and the right of integrity. The right of attribution is the right granted to the creator to receive recognition for their work (Eristadora et al. 2024). This right can be enforced by the creator placing their name on their work or by other means according to the creator’s preference, including publishing the work under a pseudonym (WIPO 1886). Therefore, pseudonymous authors are recognized internationally. Furthermore, the right of integrity grants the creator the right to object to any distortion, mutilation, or any form of transformation of their work that may harm the honor or reputation of the creator (WIPO 1886). These two rights represent the minimum moral rights that must be regulated by member states (WIPO 1978). Each member state may independently add aspects of moral rights beyond those established by the Berne Convention. Many civil law countries, such as France and the Netherlands, have further expanded the scope of moral rights. Thus, in principle, moral rights consist of the right of attribution, the right of integrity, the right of divulgation, and the right to withdraw (Rigamonti 2007).

**Table I. Comparison of Moral Right Aspects between Indonesia and Australia**

Aspect	Indonesia	Australia
<b>Right of Attribution</b> (The right to be recognized as the author)	Article 5(1)(a): Acknowledges and protects pseudonymous. "Moral rights include the right to include or not include the name of the creator..."	Sections 195AC, 195AB, 195AI(1): Acknowledges and protects pseudonymous authors if they can be "reasonably identified."
<b>Right of Integrity</b> (Integrity of the work)	Article 5(1)(c): Protects the work from unauthorized modification. Applies if the author's identity can be proven.	Section 195AI(1): Recognized for pseudonymous authors if the author can be reasonably identified.
<b>Right of Divulcation</b> (The right to publish the work)	Not regulated.	Not regulated.
<b>Right to Withdraw</b> (The right to withdraw the work)	Not regulated.	Not regulated.
<b>Right not to have falsely attributed works</b>	Not regulated.	Section 195AC: Authors have the right to prevent others from falsely claiming authorship of their work.

Source: Indonesia Copyright Law No. 28 of 2014 and Copyright Law 1968, Australia

Indonesia, through its Copyright Law (UUHC), regulates moral rights in Article 5 paragraph (1)(a), in which moral rights are defined as inherent and perpetual rights attached to the creator to include or not include their name, to use an alias or pseudonym, to make changes to the work in accordance with propriety, to change the title, and to defend the work against distortion or mutilation that causes harm. Therefore, it can be concluded that the Copyright Law acknowledges and protects pseudonymous authors, which means the right of attribution is fulfilled. Furthermore, Article 5 paragraph (1)(c) regulates the protection of works from unauthorized modification, but it does not provide an explanation of how a pseudonymous author can claim this right without revealing their identity. Indonesian copyright law does not distinguish the duration of protection based on anonymity or pseudonymity, but rather applies the general rule of the author's lifetime plus 70 years, as stipulated in Article 58 of the Copyright Law. Indonesia adheres to the civil law system; however, based on the table above, it can be concluded that the regulation of moral rights remains insufficient compared to other civil law countries that prioritize moral rights.

Australia is a common law country that explicitly recognizes moral rights and separates them from economic rights. Moral rights were formally and explicitly incorporated into Australian law through the Copyright Amendment (Moral Rights) Act 2000 on 21 December 2000 (Latrobe Education, 2013). Since 2000, moral rights have been regulated under Sections 189 to 195AI of the Copyright Act 1968. Moral rights in Australia include the right of attribution, the right of integrity, and the right not to have falsely attributed works (Government of Australia 1968). In Australia, moral rights apply to both original and pseudonymous authors, with a limitation; authors who choose to use a pseudonym still retain their moral rights as long as their identity can be reasonably identified (Government of Australia 1968). These rights do not apply if the pseudonymous author's identity cannot be reasonably identified by users of the work (such as the public, publishers, or users), meaning that the author's identity must be consistent across all works they produce. Australia regulates moral rights into three aspects. The first is the right of attribution. The right of attribution requires that a work be associated with its creator, including a pseudonym if it has been disclosed; however, this only applies if the author can be reasonably identified (Government of Australia 1968). This means that if the author has never disclosed that they wish to be recognized as "X" (a pseudonym), then the right of attribution cannot be enforced. Such disclosure may be made through a contract or written agreement with the rights holder (Adeney 2012). Second, the right of integrity means that a pseudonymous work remains protected from

distortion, mutilation, or modification that harms the author's reputation, provided the author can be identified. Lastly, Australia recognizes the right not to be falsely attributed. This aspect of moral rights is an addition made independently by Australia beyond the minimum requirements of the Berne Convention. Under this aspect, the author has the moral right not to be falsely attributed, meaning that no one else may be credited as the author of a work they did not create. Conversely, a person must not be associated as the author of a work that is not their own (Adeney 2012).

In the context of reasonable identification in Australia, the author may include a pseudonym that is commonly used and publicly recognized (Government of Australia 1968). Furthermore, the author can be identified through persons who had positions and role within the creations, for example, as a "chief editor" who can be internally verified and has a recognized role concerning the work in question (Adeney 2012). Furthermore, pseudonymous authors are also protected through statutory presumptions as provided in Sections 128–129 of the Copyright Act 1968. Under the statutory presumption, a person named as the author of a work is presumed to be the actual author (Government of Australia 1968). If a person's name appears near the published work (for example, below the title), they are presumed to be the author (Government of Australia 1968). Then, if a person is identified as the copyright holder in a document, they are considered the rights holder (Government of Australia 1968). The publisher (in the case of anonymous or pseudonymous works) is regarded as the representative of the author for legal enforcement purposes, unless proven otherwise (Government of Australia 1968). In Australia, the duration of copyright protection for pseudonymous authors depends on whether the author's identity is publicly known. According to Section 33 of the Copyright Act 1968, if the author's identity has never become publicly known, copyright lasts for 70 years from the year in which the work was first published or created. This approach ensures legal certainty while preserving the anonymity of the author if desired.

When comparing moral rights between Indonesia and Australia, it is important to note that both countries adhere to different legal systems. In civil law countries, the existing legal framework tends to uphold morality, whereas common law systems, which follow the utilitarian concept, place greater emphasis on economic benefit (Goldstein and Hugenholtz 2019). However, Australia regulates moral rights beyond the minimum standards established by the Berne Convention. Furthermore, Australia has a statutory presumption that strengthens the foundation for protecting pseudonymous authors. Therefore, in terms of implementation and protection, Indonesia remains unsystematic and has not yet fulfilled the moral rights obligations expected of a civil law country.

### **Comparison of Economic Rights Regulations for Pseudonymous Authors Between Indonesia and Australia**

In copyright law, economic rights exist to reward creators so that they may enjoy the economic benefits derived from their intellectual effort and creativity expressed in a tangible form. In principle, the regulation of economic rights in both civil law and common law countries consists of eight aspects: reproduction right, adaptation right, distribution right, public performance right, broadcasting right, cablecasting right, *droit de suite*, and the right to lend (Djumhana & Djubaedillah, 2014). Economic rights remain with the creator as long as the creator has not transferred all of their copyright to a transferee (Sari 2016).

**Table I. Comparison of Economic Right Aspects between Indonesia and Australia**

Aspect	Indonesia	Australia
<b>Reproduction Right</b>	Regulated in Article 9 paragraph (1), but there is no clear mechanism for pseudonymous authors.	Section 31(1)(a): Fully recognized. Pseudonymous authors may appoint a representative (publisher).
<b>Adaptation Right</b>	Regulated in Article 9 paragraph (1)(d) but there is no clear mechanism for pseudonymous authors.	Section 31(1)(b): The publisher may represent the pseudonym if there is an internal document (contract).
<b>Distribution Right</b>	Regulated in Article 9 paragraph (1)(c) but there is no clear mechanism for pseudonymous authors.	Section 31(1)(c): Included under the right to communicate.

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<b>Public Performance Right</b>	Regulated in Article 9 paragraph (1)(e) but there is no clear mechanism for pseudonymous authors.	Section 31(1)(a)(ii): Can be exercised by the publisher if the author does not wish to appear publicly.
<b>Broadcasting Right</b>	Regulated in Article 9 paragraph (1)(f) but there is no clear mechanism for pseudonymous authors.	Section 31(1)(c): The author has the right to allow or prohibit commercial rental of their work, if the work has been reproduced in the form of a sound recording.
<b>Cablecasting Right</b>	Included under broadcasting rights (cable).	Included under the right to communicate to the public.
<b>Droit de Suite</b> (Resale royalty right for visual artworks)	Not regulated.	Not regulated under the Copyright Act. Governed by the <i>Resale Royalty Right for Visual Artists Act 2009</i> .
<b>Right to Lend</b> (Public Lending Right)	Not regulated.	Not regulated under the Copyright Act. Governed through PLR & ELR (national administrative policy). (A pseudonym may be registered if the identity is known to the PLR system?)

Source: Indonesia Copyright Law No. 28 of 2014 and Copyright Law 1968, Australia

The Copyright Law (UUHC) does not contain any provisions that exclude authors from economic rights, and the regulation of moral rights also stipulates that authors are not required to disclose their real identities. Therefore, the economic rights stipulated in the Copyright Law apply to all authors without exception. In Indonesia, economic rights are regulated under Article 9, paragraph (1) of the Copyright Law. This article governs the Reproduction Right, Adaptation Right, Distribution Right, Public Performance Right, and Broadcasting Right (Pemerintah Republik Indonesia, 2014). Article 9, paragraph (1) states that any person who uses copyright for commercial purposes must obtain permission from the creator or the copyright holder. Furthermore, Article 9 paragraph (2) explains that the permission referred to in paragraph (1) must be granted based on a written agreement or license. Therefore, it can be concluded that pseudonymous authors may act through a contract or license agreement as long as the document is valid. However, the law does not explicitly distinguish or provide specific mechanisms for pseudonymous authors to exercise their economic rights. As long as there is a valid contract or license agreement with a publisher or a third party, economic rights may be exercised. However, the legal relationship must be proven through civil legal means.

Conversely, the Australian legal system provides a more structured legal approach for pseudonymous authors. The Copyright Act 1968 explicitly includes protection of economic rights without discrimination based on the author's real identity. Section 35 states that the creator is the first owner of the copyright, and Section 31 outlines the scope of economic rights, including the rights to reproduce, publish, and communicate the work to the public. What distinguishes the system is Australia's application of statutory presumption under Sections 128–129, which allows a person or institution to be regarded as the legitimate rights holder of a pseudonymous work in the absence of evidence to the contrary. This mechanism enables the protection and enforcement of economic rights without requiring disclosure of the author's real identity, as long as the author can be identified through formal publication or contractual documentation.

This striking difference indicates that although both Indonesia and Australia formally guarantee economic rights for all creators, Australia has provided a more flexible and efficient legal pathway for pseudonymous authors to protect their economic rights without compromising anonymity. Meanwhile, in Indonesia, although pseudonymous authors may still appoint another party to exercise their economic rights, the absence of an evidentiary mechanism such as statutory presumption may complicate the process of claiming rights in the event of a dispute, especially if the author's real identity is deliberately concealed for reasons of safety or political independence.

## Regulation of Pseudonymity in Copyright to Fulfill the Moral and Economic Rights of Pseudonymous Authors

The copyright regulation in Indonesia has normatively recognized the existence of pseudonymous authors through Article 5 paragraph (1) of Law No. 28 of 2014. Although this recognition exists, the implementation of moral and economic rights fulfillment for pseudonymous authors still faces several challenges. In this context, limitations are found not only in the substantive aspects but also in the legal mechanisms available to ensure that hidden identities continue to receive full protection. This stands in contrast to the approach adopted by Australia, which regulates more explicitly through a statutory presumption system and the “reasonably identifiable” standard to protect authors' rights, even when using a pseudonym.

In Australia, the statutory presumption approach as regulated under Sections 128–129 of the Copyright Act 1968 provides protection by presuming that the name appearing in a publication (including a pseudonym) is considered the legitimate author and copyright holder, unless proven otherwise. If the identity is unknown, the publisher is regarded as the legal representative for the enforcement of the author's rights. This approach demonstrates a legal effort to bridge the need for anonymity with legal certainty. However, when this approach is imagined to be applied in Indonesia, there are several structural and cultural concerns that must be considered. One of these is the dominance of publishers who may monopolize the legal representation of pseudonymous works. This increases the risk of weakening the bargaining power of pseudonymous authors in relation to publishers, digital platforms, or other third parties. When all legal access must be exercised by the publisher, it becomes difficult for authors to maintain control over their own works, especially in cases of moral rights violations.

In this context, the Australian legal approach indeed offers certainty, but it may not be suitable for direct adoption by Indonesia. Indonesia's legal structure still faces various challenges, including weak law enforcement, the dominance of the informal sector in the distribution of creative works, and the lack of public awareness regarding the importance of intellectual property rights (Yusdinsyah 2024). These challenges are further illustrated by studies showing that the enforcement of copyright law in the digital era in Indonesia still faces various obstacles, including the speed and volume of digital content dissemination, anonymity, and global jurisdiction (Sanusi, Sasea, and Bonsapia 2024). Although Indonesian law has regulated the economic and moral rights of creators, law enforcement remains ineffective, and a collaborative approach is needed between the government, rights holders, and digital platforms. In this matter, protection for pseudonymous authors can only be achieved if there is a mechanism that is local, contextual, and gradual.

Furthermore, Indonesia's approach to intellectual property rights has not yet been fully internalized within the society's legal culture. The public often does not understand the importance of copyright and intellectual property rights. A broad public education campaign is needed (Sanusi et al. 2024). This indicates that the establishment of regulations alone is insufficient without efforts to build awareness and supporting infrastructure. If regulations become increasingly complex and mechanical, there is a risk that the public will further disengage from legal protection, especially authors in marginal positions. Considering this situation, reforming the copyright system for pseudonymous authors in Indonesia must be pursued through an approach based on the principles of accessibility, simplicity, and transparency. A proof system based on written declarations, the strengthening of publishing contracts, and the confidential registration of pseudonymous identities are among the initial steps that can be developed toward a more responsive and equitable system.

Therefore, if Indonesia intends to adopt a system such as statutory presumption, it must be established on a foundation that accommodates the structure and legal culture of the nation. Currently, Law No. 28 of 2014 does not explicitly regulate the category of pseudonymous authors as legal subjects equivalent to authors using their real names. This lack of clarity may lead to practical difficulties, particularly in cases of disputes concerning ownership or attribution rights. In comparison, the Australian legal system explicitly recognizes pseudonyms, initials, or monograms as part of the author's identity (Government of Australia 1968). This measure provides a strong legal basis for enforcing copyright without compromising the author's anonymity. Therefore, Indonesia needs to include a specific clause in the Copyright Law that recognizes and guarantees protection for works lawfully published under a pseudonym. Furthermore, it is necessary to establish a pseudonym registration system that allows the author's real identity to be recorded confidentially through a trusted institution such as the Directorate General of Intellectual Property (DJKI). This scheme enables the state to provide moral and economic rights protection to authors without requiring them to disclose their identity to the public. Such a scheme is important in the context of Indonesian culture, which is marked by social and political dynamics, where voicing criticism can be risky. The case of a journalist who was intimidated after writing a critique of the Draft Law on the Armed Forces (RUU TNI) underscores the relevance of an anonymity-based protection system. Through closed registration, the state can still ensure attribution and royalty payments, while the author remains personally protected. Finally, it is necessary to strengthen evidentiary mechanisms through digital documentation and cooperation contracts. In today's digital world, editorial email

correspondence and written agreements with publishers can function as evidence that a person, even when writing under a pseudonym, has a legitimate contribution to a work. This scheme aligns with the concept of "reasonable identification" as stipulated in Australian law, where the author's identity does not need to be publicly disclosed, as long as it can be legally proven when required. In the context of Indonesia, such proof must be reinforced through a standardized system, for example, contract formats recognized by the Directorate General of Intellectual Property (DJKI) based on certified digital signatures. By formulating a progressive and contextual regulation of pseudonymity, Indonesia not only strengthens its copyright legal system but also provides a safe space for the emergence of courageous authors who serve as guardians of democracy through the pen. Legal transplants, such as those from Australia, indeed offer direction; however, their concrete realization must be rooted in the soil where the law grows. And in the land of Indonesia, a living law is capable of protecting, not simply regulating.

## CONCLUSION

The regulation of copyright for pseudonymous authors in Indonesia still does not provide adequate guarantees for moral and economic rights. Although there is normative recognition in Law No. 28 of 2014, there is no specific mechanism available to effectively enforce these rights, especially when the author's identity is concealed. Compared to Australia, the country has provided more progressive legal protection through a statutory presumption system and explicit recognition of moral rights as separate rights. However, the Australian legal approach cannot be immediately transplanted to Indonesia due to differences in legal structure, levels of legal literacy in society, and a legal culture that has not fully supported a functional intellectual property rights protection system.

Given the still low position of authors in the author–publisher relationship, it is necessary to develop a protection model that is more contextual and rooted in the character of national law. One relevant solution is to create a confidential registration system and strengthen publishing agreements as alternative legal instruments. Thus, the development of a copyright protection system oriented toward the needs of pseudonymous authors must consider the harmonization between international norms and domestic conditions to create a fair, safe, and sustainable literacy environment in Indonesia.

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