



## Ulayat Land Registration in Providing Legal Certainty through Certification Based on the Principle of Justice

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DOI: [doi.org/10.66325/nusantaralaw.v5i1.121](https://doi.org/10.66325/nusantaralaw.v5i1.121)

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|| Received: 09-10-2025 || Revised: 15-01-2026 || Accepted: 09-03-2026 || Published On: 14-03-2026

**Abstract:** The registration of ulayat (customary communal) land remains a critical issue in Indonesia's agrarian governance, particularly in relation to ensuring legal certainty while respecting the rights of indigenous communities. This study aims to examine the legal framework and implementation of ulayat land registration as a mechanism for providing legal certainty through certification based on the principle of justice. The research employs a normative juridical approach combined with a socio-legal perspective by analysing statutory regulations, legal doctrines, and relevant case practices concerning customary land rights within the Indonesian land administration system. The findings reveal that although national land regulations formally recognise the existence of ulayat rights, their registration and certification processes remain limited due to normative ambiguities, administrative constraints, and inconsistencies in recognising customary communities. As a result, many indigenous communities experience difficulties in obtaining formal legal protection for their communal land. The study further shows that a justice-based certification model—one that integrates recognition of customary institutions, participatory mapping, and adaptive regulatory mechanisms—can strengthen legal certainty while safeguarding communal ownership values embedded in customary law. This research contributes to the development of agrarian law and socio-legal scholarship by proposing a justice-oriented framework for ulayat land registration that harmonises state land administration with customary legal principles. The study also offers policy recommendations for improving regulatory coherence and institutional coordination to enhance the protection of indigenous land rights and promote equitable land governance.

**Keywords:** Certification; Customary Land; Justice Principle; Legal Certainty; Ulayat Land Registration.



## Introduction

Land has long held a central position in the social, economic, and cultural life of indigenous communities in Indonesia. Among the various forms of land tenure recognised within the Indonesian legal landscape, ulayat land—commonly understood as communal land belonging to customary law communities—occupies a unique and complex position. Ulayat land is not merely a physical resource but also represents collective identity, cultural heritage, and social order maintained through customary institutions. However, despite its importance within customary law systems, the position of ulayat land within the formal national land administration framework often remains uncertain. The tension between customary land governance and the state's formal land registration system has created ongoing challenges in ensuring legal certainty for indigenous communities.<sup>1</sup>

The Indonesian legal system formally acknowledges the existence of customary law communities and their traditional rights, including ulayat land rights. Constitutional recognition is reflected in Article 18B paragraph (2) of the 1945 Constitution, which states that the state recognises and respects units of customary law communities along with their traditional rights as long as they remain alive and in accordance with societal development and the principles of the Unitary State of the Republic of Indonesia. Similarly, agrarian law, particularly Law No. 5 of 1960 concerning Basic Agrarian Principles, also recognises the existence of ulayat rights as part of the national agrarian structure. Nevertheless, in practice, the recognition of ulayat land rights often encounters significant administrative and legal barriers. One of the main issues lies in the difficulty of integrating communal customary land systems into the formal land registration regime, which tends to emphasise individual ownership and standardised legal documentation.<sup>2</sup>

Land registration is widely considered an essential mechanism for providing legal certainty and protection over land rights. Through registration, land ownership and control can be formally recorded, verified, and legally recognised by the state. Certificates issued through the land registration process serve as strong legal evidence of rights and provide protection against disputes or overlapping claims. However, the conventional land registration system in Indonesia has historically been designed to accommodate individual land rights rather than communal customary rights. Therefore, many ulayat lands remain outside the formal registration system, leaving indigenous communities vulnerable to land disputes, land grabbing, and state or corporate development projects that disregard customary claims.<sup>3</sup>

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<sup>1</sup> E. Deliana, M. A. Rauf, and Z. Akmal, 'How Indigenous Peoples Resolve Ulayat Land Disputes (Study in Koto Gasib, Siak Regency)', *IOP Conf. Ser. Earth Environ. Sci.* 1181, no. 1 (2023), <https://doi.org/10.1088/1755-1315/1181/1/012008>.

<sup>2</sup> Imamulhadi and Nia Kurniati, 'Critical Review of Indonesian Government Legal Policies on The Conversion of Protected Forests and Communal Lands of The Indigenous Batak People around Lake Toba', *Padjadjaran Jurnal Ilmu Hukum* 6, no. 3 (2019): 446–465, <https://doi.org/10.22304/pjih.v6n3.a2>.

<sup>3</sup> Abdul Mutolib et al., 'Gender Inequality and the Oppression of Women within Minangkabau Matrilineal Society: A Case Study of the Management of Ulayat Forest Land in Nagari Bonjol, Dharmasraya District, West Sumatra Province, Indonesia', *Asian Women* 32, no. 3 (2016): 23–49.

This condition illustrates a broader structural problem in the governance of customary land. On the one hand, the state promotes legal certainty through formal land certification as part of its land administration policy. On the other hand, the procedural requirements for registration often fail to reflect the collective nature of ulayat rights and the customary mechanisms that regulate them. The absence of a clear and consistent regulatory framework for the registration of ulayat land further complicates the situation. As a result, many indigenous communities face difficulties in obtaining certificates for their communal land, even when their existence and traditional rights have been historically recognised.<sup>4</sup> In recent years, the Indonesian government has introduced various policies aimed at accelerating land registration and strengthening legal protection over land rights. Programs such as systematic land registration have sought to expand the coverage of land certification across the country. While these initiatives represent significant progress in improving land administration, their implementation in relation to ulayat land remains limited. The challenge lies not only in technical aspects of mapping and registration but also in reconciling the principles of state law with the normative values embedded in customary law. Without a justice-oriented approach that acknowledges the communal and cultural dimensions of ulayat land, certification efforts risk undermining the very rights they aim to protect.<sup>5</sup>

Several previous studies have explored the legal status and governance of ulayat land in Indonesia. First, research on the recognition of customary land rights generally emphasises the normative tension between state law and customary law.<sup>6</sup> These studies highlight that although legal recognition exists at the constitutional and statutory levels, practical implementation often remains inconsistent due to bureaucratic obstacles and the absence of clear procedures for recognising customary communities. However, many of these studies primarily focus on legal recognition rather than examining the mechanisms through which recognition can be translated into formal land certification that ensures legal certainty. Second, other studies have examined land conflicts involving ulayat land, particularly in the context of natural resource exploitation and development projects.<sup>7</sup> These studies reveal that the lack of formal legal documentation for communal land frequently places indigenous communities in a weaker position when disputes arise. While such research provides valuable insights into the socio-political dimensions of land conflicts, it often concentrates on conflict resolution rather than addressing the structural issue of how land registration can be designed to prevent disputes and

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<sup>4</sup> Ikhwan Ikhwan, Eri Barlian, and Nurhasan Syah, 'Remote Sensing Based Modeling of Land Use Change on Ulayat Customary Land in Tilatang Kamang Sumatera Barat', *TEM Journal* 12, no. 3 (2023): 1559–1565, <https://doi.org/10.18421/TEM123-37>.

<sup>5</sup> Fauzi Iswari, I. Gusti Ayu Ketut Rachmi Handayani, and Legu Karjoko, 'Portrait of Ulayat Land Conflicts in Minangkabau Customary Law Community: Alternative Resolutions Under Islamic Law', *Al-Istinbath: Jurnal Hukum Islam* 10, no. 1 (2025): 219–249, <https://doi.org/10.29240/jhi.v10i1.11066>.

<sup>6</sup> Mukhrizal Effendi et al., 'Model for Ulayat Land Conflict Resolution in North Sumatra, Indonesia', *International Journal of Sustainable Development and Planning* 18, no. 7 (2023): 2177–2182, <https://doi.org/10.18280/ijstdp.180721>.

<sup>7</sup> Redni Putri Meldianto, Jendrius, and Alfian Miko, 'Conflict in the Management of Ulayat Land in Nagari Sungai Kamuyang: Konflik Pengelolaan Tanah Ulayat di Nagari Sungai Kamuyang', *Jurnal Sosiologi Nusantara* 10, no. 2 (December 2024): 313–326, <https://doi.org/10.33369/jsn.10.2.313-326>.

strengthen legal protection from the outset. Third, several studies have discussed land registration policies in Indonesia as part of broader agrarian reform efforts.<sup>8</sup> These works highlight the importance of certification in providing legal certainty, improving land governance, and supporting economic development. Nevertheless, most analyses focus on individual land rights and rarely explore how communal customary rights can be accommodated within the certification framework. Consequently, the discussion of justice-based approaches to ulayat land registration remains relatively limited in existing scholarship.

Based on this review, a clear research gap can be identified. While previous studies have addressed the recognition of customary land rights, land conflicts, and land registration policies separately, there is still limited analysis that specifically examines the integration of ulayat land registration with a justice-based certification framework. In other words, the question of how land certification can simultaneously provide legal certainty while respecting the communal values and normative structures of customary law remains insufficiently explored. This study, therefore, offers a novel contribution by examining ulayat land registration through the lens of the principle of justice. Rather than viewing certification solely as an administrative procedure, this research conceptualises it as a legal mechanism that must balance state regulatory authority with the rights and cultural identity of indigenous communities. The novelty of this research lies in its effort to formulate a justice-oriented perspective on land certification that accommodates the collective nature of ulayat rights while still ensuring legal certainty within the national land administration system.

In this context, the principle of justice becomes a key analytical framework. Justice in land governance involves not only formal legal recognition but also equitable access to legal protection, meaningful participation of customary communities in land administration processes, and respect for traditional institutions that regulate communal land. By integrating these elements into the land registration framework, certification can function not merely as a bureaucratic requirement but as a tool for protecting indigenous land rights fairly and inclusively. Based on the issues outlined above, this study is guided by the following research question: How can the registration of ulayat land through certification provide legal certainty while reflecting the principle of justice for customary law communities? This question aims to explore the legal and institutional mechanisms necessary to harmonise the objectives of land administration with the normative values embedded in customary land governance.

The significance of this research lies in both its theoretical and practical contributions. Theoretically, the study enriches the discourse on agrarian law and socio-legal studies by offering a justice-based conceptual framework for understanding ulayat land registration. It contributes to bridging the gap between formal legal structures and customary legal traditions within the context of land governance. Practically, the research provides policy-oriented insights that may assist policymakers, land administrators, and legal scholars in designing more inclusive and equitable land registration systems. By emphasising justice as a guiding principle, the study aims to support the development of land administration policies that not only ensure legal certainty but also strengthen the protection of indigenous communal land rights in Indonesia.

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<sup>8</sup> Fhlorida Agustina Simanjuntak, 'Pendaftaran Tanah Di Atas Tanah Ulayat: Dilema Antara Hukum Negara Dan Hukum Adat', *AL-DALIL: Jurnal Ilmu Sosial, Politik, Dan Hukum* 3, no. 2 (July 2025): 1–10, <https://doi.org/10.58707/aldalil.v3i2.1329>.

## Method

This study employs a normative juridical research method with a socio-legal perspective to examine the regulation and implementation of ulayat land registration in providing legal certainty through certification based on the principle of justice. The normative approach is used to analyse the legal framework governing customary land rights and land registration within the Indonesian legal system. The research primarily relies on secondary data, including primary legal materials such as the 1945 Constitution, the Basic Agrarian Law (Law No. 5 of 1960), government regulations, and other statutory provisions related to land administration and the recognition of customary rights. These are complemented by secondary legal materials consisting of academic journals, books, and previous studies discussing customary land, land certification, and agrarian justice. Data collection is conducted through library research, which systematically gathers and reviews legal documents, scholarly publications, and policy reports relevant to the study.

The collected data are analysed using qualitative legal analysis,<sup>9</sup> focusing on interpreting legal norms, examining the consistency between statutory regulations and their practical implications, and identifying gaps in the current land registration framework concerning ulayat land. The analysis is conducted through stages of data reduction, categorisation, and interpretation to develop a coherent understanding of how certification mechanisms can reflect the principle of justice for customary law communities. To ensure the reliability and validity of the findings, this research applies data triangulation, particularly by comparing legal texts, scholarly interpretations, and documented practices related to ulayat land governance. In addition, conceptual validation is carried out using established legal doctrines and theoretical perspectives on justice and legal certainty, enabling the study to produce balanced and academically grounded conclusions.

## Results and Discussion

### The Legal Framework of Ulayat Land Registration in Indonesia

The recognition of ulayat land, commonly understood as communal land belonging to indigenous or customary law communities, occupies an important position within Indonesia's legal and constitutional framework. Historically, the relationship between indigenous communities and their land has been rooted not merely in economic ownership but in a broader socio-cultural system that integrates land, identity, tradition, and collective memory. Within many customary societies across Indonesia—such as the Minangkabau in West Sumatra, the Dayak communities in Kalimantan, and the Papuan indigenous groups—land is considered a communal inheritance that connects past, present, and future generations. Consequently, legal recognition of ulayat land is not simply a matter of property regulation but also a matter of cultural and social justice.<sup>10</sup>

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<sup>9</sup> Matthew B. Miles and A. Michael Huberman, *Analisis Data Kualitatif: Buku Sumber Tentang Metode-Metode Baru* (Jakarta: Universitas Indonesia Press, 2014).

<sup>10</sup> Ahmad Taufik, Moh Annand Ananda Saputra, and Ni'matul Huda, 'Politik Hukum Hak Pengelolaan Atas Tanah Ulayat Dalam Rangka Perlindungan Dan Pemanfaatan Hak Masyarakat Hukum Adat: Studi : Suku Baduy Di Kabupaten Lebak', *Jurnal Sosial Humaniora Dan Pendidikan* 4, no. 1 (January 2025): 184–204, <https://doi.org/10.55606/inovasi.v4i1.4230>.

The constitutional basis for recognising customary land rights is clearly articulated in Article 18B paragraph (2) of the 1945 Constitution, which affirms that the state recognises and respects customary law communities along with their traditional rights, as long as these communities remain alive. Their practices are compatible with societal development and the principles of the Unitary State of the Republic of Indonesia. This provision represents a fundamental constitutional commitment to legal pluralism, acknowledging that Indonesia's national legal system coexists with diverse customary legal traditions. In theory, such constitutional recognition should provide strong legal protection for indigenous land rights. However, the implementation of this principle within the national land administration system remains complex and often contested.<sup>11</sup> One of the earliest statutory frameworks supporting the recognition of customary land rights is the Basic Agrarian Law of 1960 (Law No. 5 of 1960). The law was designed to unify Indonesia's land law after independence and to eliminate colonial land regulations that had marginalised indigenous communities. Article 3 of the Basic Agrarian Law explicitly acknowledges the existence of ulayat rights and similar rights of customary law communities. At the same time, the provision emphasises that the exercise of these rights must align with national interests and existing legislation. This clause illustrates the dual character of ulayat rights within Indonesian land law: they are recognised as legitimate communal rights, yet they are also subject to state regulation and oversight.<sup>12</sup>

This duality often creates interpretative challenges in practice.<sup>13</sup> On one hand, the state recognises ulayat land as part of Indonesia's socio-legal landscape. On the other hand, the formal land administration system developed by the state largely relies on individual land ownership models derived from modern legal frameworks.<sup>14</sup> As a result, communal land rights—whose governance is based on collective authority and customary norms—do not always fit easily into the standardised procedures of land registration and certification. Government Regulation No. 24 of 1997 concerning Land Registration serves as the principal legal instrument governing land registration in Indonesia. The regulation aims to ensure legal certainty for land rights holders by establishing a systematic and continuous process of land documentation, mapping, and certification. Through this regulation, the government seeks to provide clear evidence of land ownership that can be legally defended in cases of dispute. However, the regulation primarily focuses on individual land rights, such as ownership rights (*hak milik*), cultivation rights (*hak guna usaha*), and building rights (*hak guna bangunan*).

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<sup>11</sup> Dwi Anang Syukrisna, Rosita Candrakirana, and Diana Lukitasari, 'Perlindungan Hak Masyarakat Adat Atas Tanah Ulayat Pasca Peraturan Menteri Agraria Dan Tata Ruang Nomor 14 Tahun 2024', *SENTRI: Jurnal Riset Ilmiah* 4, no. 12 (December 2025): 4157–4165, <https://doi.org/10.55681/sentri.v4i12.5088>.

<sup>12</sup> Retno Sariwati, Selvia Wisuda, and Dewi Ayu Rahayu, 'Ulayat Land of Customary Law Communities Post Efforts to Administer Ulayat Land in Indonesia', *Jurnal Cakrawala Hukum* 14, no. 3 (December 2023): 333–345, <https://doi.org/10.26905/idjch.v14i3.11278>.

<sup>13</sup> Nur Azisa et al., 'Psychological Recovery of Crime Victims within Contemporary Restorative Justice: An Islamic Legal Perspective', *MILRev: Metro Islamic Law Review* 4, no. 2 (September 2025): 1098–10127, <https://doi.org/10.32332/milrev.v4i2.11184>.

<sup>14</sup> Agus Triono et al., 'Disparities in Land Economic Value in Public Acquisition: Contextual Islamic Legal Reconstruction of Regulatory Gaps and the Threat of Land Mafia', *Jurnal Ilmiah Mizani: Wacana Hukum, Ekonomi Dan Keagamaan* 13, no. 1 (February 2026): 26–41, <https://doi.org/10.29300/mzn.v13i1.9147>.

Communal land rights such as ulayat are not always explicitly integrated into the operational procedures of land registration, creating uncertainty in their implementation.<sup>15</sup>

In practice, this regulatory gap has significant implications. Many indigenous communities have long maintained well-defined territorial boundaries recognised through customary agreements, oral histories, and traditional governance systems. Yet these boundaries are rarely documented through formal cadastral mapping. When modern land registration procedures require precise geospatial data and official documentation, customary land claims may be considered insufficiently verified within the administrative system. Therefore, the absence of formal documentation can expose customary territories to overlapping claims, particularly when external actors such as corporations, investors, or government development projects seek access to the same land.<sup>16</sup> Another crucial issue concerns the formal recognition of customary law communities themselves. Before ulayat land can be registered or formally acknowledged, the state must first recognise the existence of the relevant customary community. This recognition typically occurs through regional government regulations or administrative decrees. The process often requires extensive verification involving anthropological studies, historical documentation, and consultations with local stakeholders. While these procedures aim to ensure accuracy and legitimacy, they can also create bureaucratic barriers that delay or prevent the recognition of indigenous communities and their land rights.<sup>17</sup>

Several cases across Indonesia illustrate these challenges. In some regions, indigenous communities have occupied and managed their ancestral land for centuries, yet they remain unable to obtain formal recognition because administrative procedures have not been completed. In other cases, the absence of legal recognition has led to conflicts between customary communities and large-scale development projects, particularly in sectors such as mining, plantations, and infrastructure development. These conflicts demonstrate the urgent need for a more coherent legal framework that bridges the gap between customary land tenure systems and modern land administration. Despite these challenges, recent policy developments indicate growing awareness within the Indonesian government regarding the importance of strengthening the legal recognition of customary land rights. One of the most notable initiatives is the Complete Systematic Land Registration program (Pendaftaran Tanah Sistematis Lengkap or PTSL), which aims to accelerate land certification across the country. Through this program, the government has attempted to map and register millions of land parcels to reduce disputes and improve land governance. Within the context of customary land, discussions have

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<sup>15</sup> M. Marizal, Aulia Pravasta Indrianingrum, and Hilman Rigel Nugroho, 'Dynamics of Customary Land Rights for Public Interest in Indonesia', *Widya Pranata Hukum : Jurnal Kajian Dan Penelitian Hukum* 4, no. 2 (October 2022): 155–166, <https://doi.org/10.37631/widyapranata.v4i2.685>.

<sup>16</sup> Ali Ma'ruf et al., 'Tracing the Continued Existence of Ulayat Land: Granting Management Rights in the Context of Protecting the Rights of Indigenous Peoples', *Notaire* 7, no. 1 (March 2024): 23–46, <https://doi.org/10.20473/ntr.v7i1.54223>.

<sup>17</sup> Marchel Christopher Farrel Susanto and Heru Saputra Lumban Gaol, 'Meninjau Kembali Penyelesaian Sengketa Tanah Ulayat Berlandaskan Asas Musyawarah Mufakat: Studi Putusan Nomor 50/Pdt.G/2017/Pn.Son', *SAPIENTIA ET VIRTUS* 10, no. 1 (2025): 559–581, <https://doi.org/10.37477/sev.v10i1.796>.

increasingly focused on the possibility of issuing communal land certificates that recognise collective ownership while maintaining administrative clarity.<sup>18</sup>

The recognition of communal land certificates represents an important step toward integrating customary land rights into the national land administration system. By formally acknowledging communal ownership, such certificates can strengthen the legal position of indigenous communities when facing external claims. At the same time, they provide a clearer legal basis for land management, allowing communities to maintain control over their territories while participating in broader economic and development processes. From a broader perspective, the integration of ulayat land into the national registration system reflects the state's effort to balance two fundamental objectives: legal certainty and social justice. Legal certainty is essential for ensuring that land rights are clearly defined, documented, and protected under the law. Without legal certainty, land disputes can easily arise, undermining social stability and economic development. At the same time, social justice requires that the rights of indigenous communities—who have historically maintained strong relationships with their land—are not marginalised by administrative procedures that fail to recognise their customary systems.<sup>19</sup>

Therefore, the development of an effective legal framework for ulayat land registration requires more than simply expanding land certification programs. It also requires meaningful institutional coordination between national land authorities, regional governments, and customary leaders. Such coordination is necessary to ensure that land registration processes respect local knowledge, cultural traditions, and community participation. In this sense, the recognition of ulayat land should not be viewed solely as a technical administrative issue but as part of a broader effort to build a more inclusive and equitable land governance system. To better understand the relationship between key legal instruments and their implications for ulayat land recognition, the following table summarises the main regulatory frameworks governing customary land rights in Indonesia.

Table 1. Legal Instruments Governing Ulayat Land Recognition in Indonesia

Legal Instrument	Key Provision	Relevance to Ulayat Land	Implementation Challenges
1945 Constitution Article 18B (2)	Recognition of customary law communities and their traditional rights	Provides a constitutional basis for the protection of ulayat land	Conditional recognition depending on state interpretation
Basic Agrarian Law No. 5 of 1960	Article 3 acknowledges ulayat rights within the national interest framework.	Establishes statutory recognition of communal land rights	Balancing customary rights with state authority

<sup>18</sup> Dedy Hernawan, 'Juridical Overview Of Ulayat Land Dispute Resolution And Its Existence', *Jurnal Info Sains : Informatika Dan Sains* 13, no. 01 (March 2023): 68–76.

<sup>19</sup> Arif Ihsan and M. Nazir Salim, 'Ulayat Land and Agrarian Reform Policy in West Sumatra', *Marcapada: Jurnal Kebijakan Pertanian* 1, no. 2 (April 2022): 155–171, <https://doi.org/10.31292/mj.v1i2.17>.

Government Regulation No. 24 of 1997	Regulates national land registration and certification	Provides a legal mechanism for documenting rights	Limited procedural accommodation for communal land
Regional Regulations on Indigenous Communities	Local government recognition of customary law communities	Enables formal acknowledgement of indigenous land ownership	Complex verification and administrative processes
National Land Registration Programs (PTSL)	Accelerated land certification initiative	Potential pathway for communal land certification	Technical and legal adaptation required for communal tenure

Source: Author's Interpretation

The table illustrates that the recognition and regulation of ulayat land in Indonesia are structured through several interconnected layers of legal instruments, ranging from constitutional provisions to administrative policies. At the most fundamental level, Article 18B paragraph (2) of the 1945 Constitution provides constitutional legitimacy for the existence of customary law communities along with their traditional rights, which serves as the normative foundation for the protection of ulayat land. This recognition is further reinforced by the Basic Agrarian Law of 1960, particularly Article 3, which acknowledges the existence of ulayat rights while simultaneously placing them within the framework of national interests and state regulation. At the operational level, Government Regulation No. 24 of 1997 on Land Registration establishes the administrative mechanism for land registration and certification, although in practice the procedures tend to prioritise individual land ownership rather than communal land tenure. In addition, regional regulations concerning the recognition of indigenous communities play an important role in verifying the existence of customary communities as a prerequisite for acknowledging their ulayat territories. Meanwhile, national initiatives such as the Complete Systematic Land Registration (PTSL) program aim to accelerate land certification across the country and create opportunities for the recognition of communal land certificates for indigenous communities. Nevertheless, the overall regulatory framework still faces several implementation challenges, particularly regarding institutional coordination, the verification process of customary communities, and the need to adapt the land administration system to the communal ownership characteristics that define ulayat land.

### Implementation Challenges in Ulayat Land Certification

Although the legal framework for ulayat land recognition exists, the practical implementation of land certification for customary land often faces multiple structural and socio-legal challenges. These challenges arise from differences between customary land tenure systems and the formal land administration system implemented by the state. As a result, the process of registering ulayat land frequently becomes complicated and sometimes generates new legal conflicts rather than resolving existing ones.<sup>20</sup> One of the most prominent challenges is the issue of mapping and boundary determination. Customary communities traditionally determine land boundaries through natural markers, historical narratives, and communal

<sup>20</sup> Revie Kurnia Katjong et al., 'Legal Protection of Customary Law Communities Over Ulayat Land Forests', *JURNAL LEGALITAS* 16, no. 1 (February 2023): 30–44, <https://doi.org/10.33756/jelta.v16i1.18582>.

agreements. These boundaries may be recognised and respected within the community, but are not always documented through formal cadastral mapping. When the land registration process requires precise geographic coordinates and official mapping, discrepancies may emerge between customary perceptions of land boundaries and the technical standards required by the national land administration system.<sup>21</sup>

Another challenge concerns institutional coordination between government authorities and customary leaders.<sup>22</sup> In many regions, the management of ulayat land is deeply embedded in traditional governance structures such as customary councils or tribal leaders. However, these traditional institutions are not always formally integrated into the bureaucratic procedures of land registration. Consequently, the certification process may overlook the role of customary authorities, leading to misunderstandings or resistance from local communities.<sup>23</sup>

Economic and political factors also play a significant role in influencing the implementation of ulayat land certification. Land with high economic value—such as areas rich in natural resources or located near urban development zones—often attracts the interest of external actors, including corporations and investors. In such situations, customary communities may face pressure to relinquish their land or negotiate agreements under conditions that do not fully protect their rights. Without formal certification, these communities may struggle to prove their legal ownership when disputes arise.<sup>24</sup> Furthermore, the lack of comprehensive data on customary land distribution across Indonesia presents another obstacle. Many ulayat territories remain unmapped and undocumented at the national level. This situation complicates efforts to integrate customary land rights into the national land registry system because the government lacks accurate information regarding the location, size, and status of such lands. As a result, land registration programs may unintentionally overlap with customary territories, leading to conflicts between local communities and newly registered landholders.<sup>25</sup> The implementation of ulayat land certification is also influenced by differences in legal interpretation among government officials. Some officials interpret existing regulations as allowing communal land certification, while others consider ulayat rights to be merely socio-cultural rights that cannot be directly registered as formal land rights. These differing interpretations create inconsistencies in policy implementation across regions, thereby undermining the goal of achieving uniform legal certainty in land governance. To better understand the key challenges in ulayat land

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<sup>21</sup> M. Sofyan Pulungan, 'Menelaah Masa Lalu, Menata Masa Depan: Sejarah Hukum Tanah Ulayat Dan Model Penanganan Konflik Sosialnya', *Undang: Jurnal Hukum* 6, no. 1 (May 2023): 235–267, <https://doi.org/10.22437/ujh.6.1.235-267>.

<sup>22</sup> Vincentius Setyawan and Bariah Safrut, 'Rethinking Law and Justice: The Core Principles of Critical Legal Studies against Legal Formalism', *Nusantara: Journal of Law Studies* 4, no. 2 (October 2025): 74–85, <https://doi.org/10.5281/zenodo.17332128>.

<sup>23</sup> Rika Lestari and Djoko Sukisno, 'Kajian Hak Ulayat Di Kabupaten Kampar Dalam Perspektif Peraturan Perundang-Undangan Dan Hukum Adat', *Jurnal Hukum IUS QUILA IUSTUM* 28, no. 1 (March 2021): 94–114, <https://doi.org/10.20885/iustum.vol28.iss1.art5>.

<sup>24</sup> Krisna Angela and Anik Setyawati, 'Analisis Pelaksanaan Pengadaan Tanah di Atas Tanah Ulayat Masyarakat Hukum Adat dalam Rangka Proyek Strategi Nasional (PSN) Demi Kepentingan Umum', *Jurnal Hukum Lex Generalis* 3, no. 3 (March 2022): 199–216, <https://doi.org/10.56370/jhlg.v3i3.196>.

<sup>25</sup> Hidayat Hidayat and Lukitaningsih Lukitaningsih, 'Changes in Ownership and Ulayat Land Use in Lumban Rau Timur Village, Toba Samosir', *Indonesian Historical Studies* 5, no. 2 (March 2022): 161–186, <https://doi.org/10.14710/ihis.v5i2.13452>.

certification, the following table summarizes several major issues encountered during the implementation process.

Table 2. Key Challenges in the Implementation of Ulayat Land Registration

Dimension	Main Issue	Impact on Legal Certainty	Institutional Response
Legal Recognition	Lack of formal recognition of customary communities	Difficulty in registering communal land rights	Regional regulations recognising indigenous communities
Mapping and Documentation	Absence of accurate cadastral mapping	Boundary disputes and overlapping land claims	Participatory mapping involving local communities
Institutional Coordination	Limited collaboration between customary leaders and government agencies	Administrative delays and community distrust	Integration of customary institutions in land registration procedures
Economic Pressures	External investment interests in customary territories	Potential land dispossession of local communities	Legal protection through communal land certification
Regulatory Interpretation	Inconsistent understanding of the ulayat land status among officials	Uneven implementation of certification policies	Clarification of regulations at the national level

Source: Author's Interpretation

The challenges identified in the table illustrate that ulayat land certification involves not only technical administrative processes but also complex socio-political dynamics. Addressing these challenges requires a comprehensive approach that integrates legal reform, participatory governance, and community empowerment. In addition, the involvement of customary communities in the land registration process is crucial for ensuring legitimacy and acceptance of the certification outcomes. Participatory mapping initiatives have been introduced in several regions as a strategy for documenting customary land boundaries while incorporating local knowledge. Through these initiatives, communities actively contribute to the mapping process, thereby increasing the accuracy and credibility of land registration data. Ultimately, the success of ulayat land certification depends on the ability of the state to accommodate the communal characteristics of customary land tenure within the formal land administration system. This requires not only regulatory flexibility but also institutional innovation that bridges the gap between customary law and modern legal frameworks.

### Justice-Based Certification as a Model for Strengthening Legal Certainty

The concept of justice plays a fundamental role in the discourse on ulayat land registration. Legal certainty alone is insufficient if the certification process does not reflect substantive justice for customary communities. Therefore, the implementation of ulayat land certification must

be guided by principles of fairness, recognition, and participation to ensure that the rights of indigenous communities are adequately protected within the national legal system. Justice-based certification emphasises the importance of recognising the historical relationship between customary communities and their land. For many indigenous groups, land is not merely an economic asset but also a cultural and spiritual foundation that shapes their collective identity. Consequently, the process of land certification should acknowledge these socio-cultural dimensions rather than treating land solely as a commodity within the market economy.<sup>26</sup>

Another important aspect of justice-based certification is the principle of participatory governance. Customary communities must be actively involved in every stage of the land registration process, including boundary identification, documentation, and decision-making. Participation ensures that the certification process reflects local realities and prevents the imposition of external administrative frameworks that may not align with customary practices. Justice-based certification also requires the state to provide adequate legal protection for communal land rights after certification is granted.<sup>27</sup> This protection includes mechanisms for dispute resolution, safeguards against unauthorised land transfers, and legal assistance for customary communities in defending their rights. Without such safeguards, certification may fail to achieve its intended objective of protecting customary land from external encroachment. Furthermore, the implementation of justice-based certification must consider the principle of distributive justice. Land policies should aim to balance economic development with the protection of indigenous land rights. Development projects that involve customary land must therefore ensure fair compensation, transparent consultation processes, and equitable benefit-sharing arrangements with local communities.<sup>28</sup>

In practice, the integration of justice principles into ulayat land certification requires policy reforms at multiple levels of governance.<sup>29</sup> National regulations must clearly recognise communal land rights as legitimate forms of land ownership, while regional governments must develop administrative procedures that facilitate the registration of such rights. At the same time, customary institutions must be empowered to participate in land governance alongside state authorities. The application of justice-based certification also contributes to the broader objective of conflict prevention in land governance. Many land disputes in Indonesia arise from

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<sup>26</sup> Edy Nurcahyo et al., 'Legality And Legal Certainty Of Ulayat Land For Indigenous Law Communities (Analysis of Decision Number 1430 K/Pdt/2022)', *Jurnal Hukum Volkgeist* 7, no. 1 (December 2022): 61–67, <https://doi.org/10.35326/volkgeist.v7i1.2859>.

<sup>27</sup> Syavira Alzena Qinayya et al., 'The Position of Ulayat Rights in Land Provision in the Implementation of National Development Viewed from the Perspective of Positive Law and Islamic Law', *Indonesian Journal of Interdisciplinary Research in Science and Technology* 2, no. 4 (April 2024): 455–464, <https://doi.org/10.55927/marcopolo.v2i4.8892>.

<sup>28</sup> Fendi Agus Syaputra and Afrizal Afrizal, 'Pengelolaan Tanah Ulayat Dalam Masyarakat Minangkabau Kontemporer: Studi Kasus Masyarakat Nagari Sungai Kamuyang', *Jurnal Sosiologi Andalas* 11, no. 1 (April 2025): 65–78, <https://doi.org/10.25077/jsa.11.1.65-78.2025>.

<sup>29</sup> M. Yudi Satria, Purwadi Wahyu Anggoro, and Joko Setiono, 'National Law and Minangkabau Customary Law Disparity in Ulayat Land Disputes in the Bidar Alam Area, West Sumatra', *Jurnal Greenation Sosial Dan Politik* 3, no. 3 (August 2025): 423–432, <https://doi.org/10.38035/jgsp.v3i3.425>.

overlapping claims between customary communities, government agencies, and private corporations. By providing clear legal recognition of communal land rights, certification can reduce ambiguity and create a more stable legal environment for all stakeholders.<sup>30</sup>

Moreover, justice-based certification supports sustainable land management by reinforcing the traditional stewardship practices of indigenous communities. Many customary land management systems emphasise environmental balance and long-term sustainability. Recognising these systems through formal certification not only protects community rights but also contributes to environmental conservation and responsible resource management. In conclusion, the registration and certification of ulayat land based on the principle of justice represent a critical step toward achieving legal certainty and social equity in land governance. While significant challenges remain in implementing such policies, the integration of customary law principles with modern land administration systems offers a promising pathway for strengthening the protection of indigenous land rights in Indonesia.

## Conclusion

The study concludes that the registration of ulayat land plays a crucial role in strengthening legal certainty for customary law communities in Indonesia. Although the constitutional and statutory framework—such as the 1945 Constitution, the Basic Agrarian Law of 1960, and Government Regulation No. 24 of 1997—formally recognises the existence of customary land rights, their implementation within the national land administration system remains complex. The communal nature of ulayat land often does not fully align with the predominantly individual-based structure of land registration procedures. As a result, many customary communities still encounter legal uncertainty, particularly when facing land disputes involving state authorities, private investors, or development projects. The findings of this research indicate that certification mechanisms that accommodate communal ownership—supported by participatory mapping, formal recognition of customary communities, and stronger institutional coordination—can serve as an effective instrument for protecting indigenous land rights while simultaneously ensuring administrative clarity in land governance. Furthermore, the study emphasises that the principle of justice must become a central foundation in the implementation of ulayat land certification. Legal certainty should not be interpreted solely as administrative documentation, but also as a form of substantive protection that respects the historical, cultural, and social relationships between indigenous communities and their land. Justice-based certification, therefore, requires inclusive participation of customary institutions, transparent decision-making processes, and regulatory frameworks that recognise communal land tenure as a legitimate form of land ownership. For future research, it is recommended to conduct empirical studies that examine the implementation of communal land certification in specific regions, particularly by exploring the effectiveness of participatory mapping, regional legal recognition of indigenous communities, and conflict resolution mechanisms in land governance. Such studies would provide deeper insights into how justice-oriented land policies can be operationalised to ensure both legal certainty and sustainable land management for customary communities.

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<sup>30</sup> Abdul Hamid Usman, 'Status for Land Rights Ulayat After The Enactment of The Agrarian Constitution', *International Journal Reglement & Society (IJRS)* 2, no. 3 (December 2021): 189–193, <https://doi.org/10.55357/ijrs.v2i3.190>.

## Acknowledgments

The author would like to express sincere appreciation to the Rector of Universitas Islam Sultan Agung, Semarang, Indonesia, for the support and encouragement provided during the completion of this research. The academic environment and institutional facilities offered by the university have played an important role in supporting the research process. The author also acknowledges the university's continuous commitment to advancing academic development and scholarly research.

## Author Contributions Statement

Nova Yarsinab contributed to the conceptualisation of the study, the literature review, and the preparation of the initial manuscript draft. Ari Budianto was responsible for designing the research methodology, supervising the research process, and reviewing the manuscript critically. Marsiansyah contributed to data collection, data analysis, and interpretation of the research findings. Dian Arfianto participated in data validation, manuscript editing, and the final revision of the article. All authors have read and approved the final version of the manuscript and agree to be responsible for the integrity of the research.

## AI Usage Statement

The authors declare that artificial intelligence (AI) tools were used only in a limited capacity for language editing, grammar correction, formatting, and improving the clarity of the manuscript. The use of these tools did not influence the intellectual content of the research. All ideas, research design, data analysis, interpretations, and conclusions are entirely the authors' original work. The authors take full responsibility for the accuracy, integrity, and originality of the manuscript.

## Conflict of Interest

The authors declare that there is no conflict of interest regarding the publication of this study. The research was conducted independently and objectively, without any financial, commercial, or personal influences affecting the study design, data analysis, interpretation of results, or the decision to publish. All findings and conclusions reflect the authors' independent scholarly judgment and adhere to principles of academic integrity and ethical research practices.

## References

- Angela, Krisna, and Anik Setyawati. 'Analisis Pelaksanaan Pengadaan Tanah di Atas Tanah Ulayat Masyarakat Hukum Adat dalam Rangka Proyek Strategi Nasional (PSN) Demi Kepentingan Umum'. *Jurnal Hukum Lex Generalis* 3, no. 3 (March 2022): 199–216. <https://doi.org/10.56370/jhlg.v3i3.196>.
- Azisa, Nur, Audyna Mayasari Muin, M. Aris Munandar, Muhammad Mutawalli Mukhlis, and Aspalella A. Rahman. 'Psychological Recovery of Crime Victims within Contemporary Restorative Justice: An Islamic Legal Perspective'. *MILRev: Metro Islamic Law Review* 4, no. 2 (September 2025): 1098–1127. <https://doi.org/10.32332/milrev.v4i2.11184>.

- Deliana, E., M. A. Rauf, and Z. Akmal. 'How Indigenous Peoples Resolve Ulayat Land Disputes (Study in Koto Gasib, Siak Regency)'. *IOP Conf. Ser. Earth Environ. Sci.* 1181, no. 1 (2023). <https://doi.org/10.1088/1755-1315/1181/1/012008>.
- Effendi, Mukhrizal, M. Arif Nasution, Ramadhan Hamdani Harahap, and Muryanto Amin. 'Model for Ulayat Land Conflict Resolution in North Sumatra, Indonesia'. *International Journal of Sustainable Development and Planning* 18, no. 7 (2023): 2177–2182. <https://doi.org/10.18280/ijstdp.180721>.
- Hernawan, Dedy. 'Juridical Overview Of Ulayat Land Dispute Resolution And Its Existence'. *Jurnal Info Sains : Informatika Dan Sains* 13, no. 01 (March 2023): 68–76.
- Hidayat, Hidayat, and Lukitaningsih Lukitaningsih. 'Changes in Ownership and Ulayat Land Use in Lumban Rau Timur Village, Toba Samosir'. *Indonesian Historical Studies* 5, no. 2 (March 2022): 161–186. <https://doi.org/10.14710/ihis.v5i2.13452>.
- Ihsan, Arif, and M. Nazir Salim. 'Ulayat Land and Agrarian Reform Policy in West Sumatra'. *Marcapada: Jurnal Kebijakan Pertanahan* 1, no. 2 (April 2022): 155–171. <https://doi.org/10.31292/mj.v1i2.17>.
- Ikhwan, Ikhwan, Eri Barlian, and Nurhasan Syah. 'Remote Sensing Based Modeling of Land Use Change on Ulayat Customary Land in Tilatang Kamang Sumatera Barat'. *TEM Journal* 12, no. 3 (2023): 1559–1565. <https://doi.org/10.18421/TEM123-37>.
- Imamulhadi, and Nia Kurniati. 'Critical Review of Indonesian Government Legal Policies on The Conversion of Protected Forests and Communal Lands of The Indigenous Batak People around Lake Toba'. *Padjadjaran Jurnal Ilmu Hukum* 6, no. 3 (2019): 446–465. <https://doi.org/10.22304/pjih.v6n3.a2>.
- Iswari, Fauzi, I. Gusti Ayu Ketut Rachmi Handayani, and Lego Karjoko. 'Portrait of Ulayat Land Conflicts in Minangkabau Customary Law Community: Alternative Resolutions Under Islamic Law'. *Al-Istinbath: Jurnal Hukum Islam* 10, no. 1 (2025): 219–249. <https://doi.org/10.29240/jhi.v10i1.11066>.
- Katjong, Revie Kurnia, Harry Tuhumury, Anwar Moch Roem, and Liani Sari. 'Legal Protection of Customary Law Communities Over Ulayat Land Forests'. *JURNAL LEGALITAS* 16, no. 1 (February 2023): 30–44. <https://doi.org/10.33756/jelta.v16i1.18582>.
- Lestari, Rika, and Djoko Sukisno. 'Kajian Hak Ulayat Di Kabupaten Kampar Dalam Perspektif Peraturan Perundang-Undangan Dan Hukum Adat'. *Jurnal Hukum*

- IUS QUA IUSTUM* 28, no. 1 (March 2021): 94–114.  
<https://doi.org/10.20885/iustum.vol28.iss1.art5>.
- Marizal, M., Aulia Pravasta Indrianingrum, and Hilman Rigel Nugroho. ‘Dynamics of Customary Land Rights for Public Interest in Indonesia’. *Widya Pranata Hukum : Jurnal Kajian Dan Penelitian Hukum* 4, no. 2 (October 2022): 155–166.  
<https://doi.org/10.37631/widyapranata.v4i2.685>.
- Ma’ruf, Ali, Moh Ainul Yakin, Ervita Septyanto Putri, Erlisa Akhlakul Karimah, and Oemar Moechthar. ‘Tracing the Continued Existence of Ulayat Land: Granting Management Rights in the Context of Protecting the Rights of Indigenous Peoples’. *Notaire* 7, no. 1 (March 2024): 23–46.  
<https://doi.org/10.20473/ntr.v7i1.54223>.
- Meldianto, Redni Putri, Jendrius, and Alfian Miko. ‘Conflict in the Management of Ulayat Land in Nagari Sungai Kamuyang: Konflik Pengelolaan Tanah Ulayat Di Nagari Sungai Kamuyang’. *Jurnal Sosiologi Nusantara* 10, no. 2 (December 2024): 313–26. <https://doi.org/10.33369/jsn.10.2.313-326>.
- Miles, Matthew B., and A. Michael Huberman. *Analisis Data Kualitatif: Buku Sumber Tentang Metode-Metode Baru*. Jakarta: Universitas Indonesia Press, 2014.
- Mutolib, Abdul, Yonariza, Mahdi, and Hanung Ismono. ‘Gender Inequality and the Oppression of Women within Minangkabau Matrilineal Society: A Case Study of the Management of Ulayat Forest Land in Nagari Bonjol, Dharmasraya District, West Sumatra Province, Indonesia’. *Asian Women* 32, no. 3 (2016): 23–49.
- Nurchayyo, Edy, Hudali Mukti, Ahmad Rosidi, Yogi Yasa Wedha, and Ayu Putu Laksmi Danyathi. ‘Legality And Legal Certainty Of Ulayat Land For Indigenous Law Communities (Analysis of Decision Number 1430 K/Pdt/2022)’. *Jurnal Hukum Volkgeist* 7, no. 1 (December 2022): 61–67.  
<https://doi.org/10.35326/volkgeist.v7i1.2859>.
- Pulungan, M. Sofyan. ‘Menelaah Masa Lalu, Menata Masa Depan: Sejarah Hukum Tanah Ulayat Dan Model Penanganan Konflik Sosialnya’. *Undang: Jurnal Hukum* 6, no. 1 (May 2023): 235–267. <https://doi.org/10.22437/ujh.6.1.235-267>.
- Qinayya, Syavira Alzena, Devi Lusany, Kharisma Ika, Febriana Ayu Nirmalatifa, and Rizki Cahya Kusuma Riyanto Putri. ‘The Position of Ulayat Rights in Land Provision in the Implementation of National Development Viewed from the Perspective of Positive Law and Islamic Law’. *Indonesian Journal of Interdisciplinary Research in Science and Technology* 2, no. 4 (April 2024): 455–464.  
<https://doi.org/10.55927/marcopolo.v2i4.8892>.

- Sariwati, Retno, Selvia Wisuda, and Dewi Ayu Rahayu. 'Ulayat Land of Customary Law Communities Post Efforts to Administer Ulayat Land in Indonesia'. *Jurnal Cakrawala Hukum* 14, no. 3 (December 2023): 333–345. <https://doi.org/10.26905/idjch.v14i3.11278>.
- Satria, M. Yudi, Purwadi Wahyu Anggoro, and Joko Setiono. 'National Law and Minangkabau Customary Law Disparity in Ulayat Land Disputes in the Bidar Alam Area, West Sumatra'. *Jurnal Greenation Sosial Dan Politik* 3, no. 3 (August 2025): 423–432. <https://doi.org/10.38035/jgsp.v3i3.425>.
- Setyawan, Vincentius, and Bariah Safrut. 'Rethinking Law and Justice: The Core Principles of Critical Legal Studies against Legal Formalism'. *Nusantara: Journal of Law Studies* 4, no. 2 (October 2025): 74–85. <https://doi.org/10.5281/zenodo.17332128>.
- Simanjuntak, Fhlorida Agustina. 'Pendaftaran Tanah Di Atas Tanah Ulayat: Dilema Antara Hukum Negara Dan Hukum Adat'. *AL-DALIL: Jurnal Ilmu Sosial, Politik, Dan Hukum* 3, no. 2 (July 2025): 1–10. <https://doi.org/10.58707/aldalil.v3i2.1329>.
- Susanto, Marchel Christoper Farrel, and Heru Saputra Lumban Gaol. 'Meninjau Kembali Penyelesaian Sengketa Tanah Ulayat Berlandaskan Asas Musyawarah Mufakat: Studi Putusan Nomor 50/Pdt.G/2017/Pn.Son'. *SAPIENTIA ET VIRTUS* 10, no. 1 (2025): 559–581. <https://doi.org/10.37477/sev.v10i1.796>.
- Syaputra, Fendi Agus, and Afrizal Afrizal. 'Pengelolaan Tanah Ulayat Dalam Masyarakat Minangkabau Kontemporer: Studi Kasus Masyarakat Nagari Sungai Kamuyang'. *Jurnal Sosiologi Andalas* 11, no. 1 (April 2025): 65–78. <https://doi.org/10.25077/jsa.11.1.65-78.2025>.
- Syukrisna, Dwi Anang, Rosita Candrakirana, and Diana Lukitasari. 'Perlindungan Hak Masyarakat Adat Atas Tanah Ulayat Pasca Peraturan Menteri Agraria Dan Tata Ruang Nomor 14 Tahun 2024'. *SENTRI: Jurnal Riset Ilmiah* 4, no. 12 (December 2025): 4157–465. <https://doi.org/10.55681/sentri.v4i12.5088>.
- Taufik, Ahmad, Moh Annand Ananda Saputra, and Ni'matul Huda. 'Politik Hukum Hak Pengelolaan Atas Tanah Ulayat Dalam Rangka Perlindungan Dan Pemanfaatan Hak Masyarakat Hukum Adat: Studi : Suku Baduy Di Kabupaten Lebak'. *Jurnal Sosial Humaniora Dan Pendidikan* 4, no. 1 (January 2025): 184–204. <https://doi.org/10.55606/inovasi.v4i1.4230>.
- Triono, Agus, Andriyan Syaputra, F. X. Sumarja, Ima Frafika Sari, and Makmur Harun. 'Disparities in Land Economic Value in Public Acquisition: Contextual Islamic Legal Reconstruction of Regulatory Gaps and the Threat of Land Mafia'. *Jurnal*

*Ilmiyah Mizani: Wacana Hukum, Ekonomi Dan Keagamaan* 13, no. 1 (February 2026): 26–41. <https://doi.org/10.29300/mzn.v13i1.9147>.

Usman, Abdul Hamid. ‘Status for Land Rights Ulayat After The Enactment of The Agrarian Constitution’. *International Journal Reglement & Society (IJRS)* 2, no. 3 (December 2021): 189–193. <https://doi.org/10.55357/ijrs.v2i3.190>.