

# Analysis of Damages and Remedies In Environmental Law: Case Study of PT. Kallista Alam

Miftahur Rahmah<sup>1\*</sup>, Nurlili<sup>1</sup>, Riski Anggara<sup>1</sup>, Sahrizal<sup>1</sup> and Muhammad Hatta<sup>1</sup>

<sup>1</sup>Faculty of Law, Universitas Malikussaleh, Aceh, Indonesia

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## Abstract:

One of the important events in environmental law enforcement in Indonesia is the case of PT. Kallista Alam who was involved in the burning of peatland in the Rawa Tripa area, Aceh. Based on the decision of the Meulaboh District Court No. 12/PDT. G/2012/PN. MBO which was strengthened by the Banda Aceh High Court and the Supreme Court, this study aims to examine in depth aspects of environmental compensation (compensation) and restoration (restoration) as an instrument of environmental law enforcement. This research uses a juridical-normative method with a case study approach through the analysis of court decisions and related legal provisions. The results of the study show that, referring to Article 88 of Law No. 32 of 2009 concerning Environmental Protection and Management, the court applies the principle of strict liability, which establishes the obligation of compensation without proving the element of fault. PT. Kallista Alam was ordered to pay compensation of Rp366 billion, which includes ecological losses and the cost of active restoration of peat ecosystems. However, the implementation of the verdict faced various obstacles, such as the resistance of the defendants, the follow-up legal process, and weak execution supervision. From the perspective of ecological justice and sustainable development, this ruling sets an important precedent in environmental law enforcement in Indonesia, although its effectiveness relies heavily on synergy between judicial institutions, government, and the active participation of civil society. This study recommends strengthening the mechanism for the execution of decisions and improving coordination between stakeholders to ensure optimal environmental recovery.

**Keywords:** Compensation; Environmental Restoration; Environmental Law; Strict Liability; PT. Natural Kallista

## INTRODUCTION

The environmental crisis is increasingly demanding national and global attention owing to the increasing degradation of ecosystems caused by uncontrolled human activities (World Wide Fund for Nature, 2022). Indonesia, with its abundant biodiversity, faces major challenges in preserving its environment (Ministry of Environment and Forestry of Indonesia, 2021). The unsustainable exploitation of natural resources has led to serious ecological damage, including forest and land fires, pollution, and biodiversity loss (Margono, Potapov, Turubanova, Stolle, & Hansen, 2014). In this context, environmental law plays an important normative role in ensuring sustainable management and protection of the environment (Birnie, Boyle, & Redgwell, 2021).

The peat forest fire in Rawa Tripa, Aceh Province, involving PT. Kallista Alam, is one of the important cases that shows the urgency of environmental law enforcement in Indonesia. These companies have been shown to illegally clear land by burning peat forests, resulting in significant ecological losses, including biodiversity loss, ecosystem degradation, and the release of carbon emissions that contribute to climate change (Margono et al., 2014). The negative impact is not only

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\*Suitable Author : Miftahur Rahmah, Faculty of Law, Universitas Malikussaleh, Aceh, Indonesia, ORCID iD 0000-0001-5305-0560, E-mail: [miftahur.rahman@gmail.com](mailto:miftahur.rahman@gmail.com)

felt by the environment but also by the health of the surrounding community due to smoke pollution and declining air quality (Tacconi, 2016). In the decision of the Meulaboh District Court Number 12/PDT. G/2012/PN. MBO, PT. Kallista Alam was required to pay environmental compensation of Rp114 billion and restore the ecosystem at a cost of Rp251 billion (Meulaboh District Court, 2014).

Civil liability for environmental damage has become an important precedent in Indonesia. This case not only shows that companies can be held legally accountable but also shows how effective the system of environmental restoration and compensation is. However, there are difficulties in implementing this decision, especially in ensuring that ecological restoration actually occurs and that environmental losses can be fully recovered.

Therefore, the purpose of this study was to thoroughly examine the PT. Kallista Alam is responsible for environmental damage, how environmental damage is calculated in court rulings, and how environmental restoration is carried out after the verdict. This study is important for strengthening the enforcement of environmental laws in Indonesia and building ecological justice and the principles of environmental pollutant spending.

## METHOD

This study adopts a normative juridical approach. The normative juridical approach is used to examine the legal principles that govern the responsibility for compensation and recovery of environmental damage, based on laws, regulations, and juridical documents such as court decisions (Soekanto & Mamudji, 2011). Meanwhile, the empirical juridical approach is intended to analyze the concrete implementation of legal responsibility in the case of PT. Kallista Alam, especially in terms of implementing ecological restoration and compensation payments (Fajar & Achmad, 2017).

This study used secondary and primary data. Secondary data include primary legal material (Law Number 32 of 2009, Decree Number 12/PDT. G/2012/PN. MBO), secondary legal materials (books, scientific journals, research reports), and tertiary legal materials (legal dictionaries and encyclopedias). Primary data were obtained through semi-structured interviews with resource persons from environmental law practitioners, academics, and officials of the Ministry of Environment and Forestry (MoEF) who had direct knowledge of the case (Moleong, 2014).

Data collection techniques were conducted through literature studies and interviews. The literature study aims to obtain theoretical foundations and legal documents, while interviews are used to obtain information about the barriers and implementation of post-decision environmental restoration. The data were analyzed in a qualitative descriptive manner through a *content analysis* approach, which allowed the researchers to interpret the data in depth and describe the reality of the implementation of the law factually (Hadi, 2010).

To maintain the validity and reliability of the data, source triangulation was carried out, namely a comparison of data from court decisions, laws and regulations, interview results, and media and NGO reports. This technique was chosen to obtain the accuracy of the data objectively and to avoid interpretation bias.

## RESULT

### Chronology and Legal Facts of the Case of PT. Natural Kallista

Kallista Alam became the subject of a case in 2012 when the company established an oil palm plantation in the Rawa Tripa peat area, Nagan Raya Regency, Aceh. The Tripa Swamp is part of the Leuser Ecosystem Area (KEL), which plays an important ecological role as a carbon store and habitat for endangered animals. At that time, PT. Kallista Alam illegally burned peatlands to clear land for oil palm plantations without considering the environmental consequences and legal licensing (Walhi, 2014).

The area of 1,605 hectares that is allowed to be burned is part of the Decree of the Governor of Aceh No. 525/BP2T/5322/2011. However, the Ministry of Forestry later revoked the permit and declared it

invalid because it was in a protected zone and did not undergo the EIA procedure (YEL, 2015). According to research conducted by the Ministry of Environment and Forestry (MoEF), more than 1,000 hectares of peatland have been burned, causing significant damage to peat ecosystems, including the loss of endemic flora, destruction of orangutan habitats, and increased carbon emissions that impact climate change in the region (MoEF, 2014).

The Ministry of Environment (before becoming the Ministry of Environment and Forestry) took over the case. Kallista Alam has been proven to burn land systematically and deliberately without precautions to damage the environment. In a civil lawsuit registered at the Meulaboh District Court with Case Registration Number 12/PDT. G/2012/PN. MBO.

In a decision made on January 8, 2014, PT. Kallista Alam was sentenced to pay environmental damage of Rp114,327,000,000 and environmental restoration costs of Rp251,765,000,000, with a total of Rp366,092,000,000. In addition, the Meulaboh District Court decision (2014) asked the company to restore the damaged land. Through the cassation decision, the Banda Aceh High Court and the Supreme Court of the Republic of Indonesia supported this ruling. However, ecological restoration at the site did not go well until a few years after the decision. According to environmental organizations, the company has not complied with all court orders regarding land rehabilitation (Damanik, 2020).

### **The Decision Of The Meulaboh District Court, The Banda Aceh High Court, The Aceh Court, And The Amount Of Losses And Damages**

#### **The District Court's decision was overturned.**

In the case of Number 12/PDT. G/2012/PN. MBO, the Meulaboh District Court ruled that PT. Kallista Alam was legally and convincingly proven to have committed an unlawful act for burning 1,000 hectares of peatland in the Rawa Tripa area, Nagan Raya Regency, Aceh Province. On January 8, 2014, the Panel of Judges ruled that the defendant's actions caused significant environmental damage, threatened the sustainability of the ecosystem, and resulted in ecological losses (Meulaboh District Court Decision, 2014).

The judge granted part of the lawsuit of the Ministry of Environment and ordered PT. Kallista Alam paid as follows: environmental compensation of Rp114,327,000,000.00; environmental restoration costs of Rp251,765,000,000.00; and carry out land restoration and ecosystem rehabilitation using a recovery plan. The company must pay a total of IDR 366,092,000,000.00.

#### **Banda Aceh High Court Decision**

Kallista Alam has appealed to the High Court of Banda Aceh. The panel of high judges rejected all the defendant's appeals in decision No. 50/PDT/2014/PT BNA, upholding the decision of the Meulaboh District Court. According to the decision of PT Banda Aceh (2014), the panel ruled that the evidence of the Ministry of Environment and Forestry was strong enough to show that the defendant had committed serious negligence in preventing fires.

#### **Decision of the Supreme Court of the Republic of Indonesia**

Through decision No. 651 K/Pdt/2015, the Supreme Court again rejected the PT. The Supreme Court stated in its decision that the company violated the law and significantly damaged the environment. The Supreme Court also emphasized that land burning cannot be justified without legal consequences (Supreme Court of the Republic of Indonesia Decision, 2015). The Supreme Court also strengthened the content of the decisions of the Meulaboh District Court and PT Banda Aceh.

All legal remedies have been stopped by this Supreme Court cassation decision, which stipulates a permanent legal ruling on compensation and recovery of Rp366 billion. The costs incurred for damages in this case are the largest in the history of environmental law enforcement in Indonesia. This is considered an important precedent for law enforcement against companies that damage the environment, as well as the application of strict responsibility principles and pollutant emission principles (Damanik, 2020).

Ecological recovery remains difficult to achieve due to corporate compliance and a lack of government oversight. This shows how difficult it is to recover and compensate for the damage on the ground (Greenpeace, 2015).

## DISCUSSION

### **The Application of the Strict Responsibility Principle in the Case of PT. Kallista Alam Refers to Article 88 of Law No. 32 Of 2009**

The Article 88 of Law Number 32 of 2009 concerning Environmental Protection and Management (PPLH Law) explicitly states the following principles: "Every person whose actions, efforts, and/or activities use hazardous materials and/or produce waste and/or cause pollution and/or environmental damage, are obliged to bear losses and make restitution, without the need to prove elements of wrongdoing" (Law No. 32 of 2009, Article 88).

This method is used to speed up the law enforcement process, avoid difficult evidence, and create significant environmental justice. The basis of this principle is *the "polluter pays principle"*, which states that people who pollute the environment must be responsible for the impact they cause (Rangkuti, 2016).

The government (through the Ministry of Environment) filed a civil lawsuit over the burning of more than 1,000 hectares of peatland in Rawa Tripa, Aceh, in the case of PT. Decision No. 12/PDT. G/2012/PN. MBO, 2014 stipulates that the company is fully responsible for the damage to the ecosystem that occurs in its concession area without the need to prove that the company burned intentionally or accidentally.

The Panel of Judges stated that PT. Kallista Alam as a business license holder has a legal responsibility to prevent environmental damage, including preventing fires in its concessions. Although there is no evidence of personal wrongdoing, the company remains responsible for the absence of a fire control system and ecological damage (Decree of PT Banda Aceh No. 50/PDT/2014/PT BNA, 2014).

The Supreme Court of the Republic of Indonesia strengthened this decision with Decision No. 651 K/Pdt/2015, which stated that environmental responsibility in this case does not require proof of intentionality; it is sufficient based on legal consequences such as damage and pollution.

In the case of large-scale and complex environments such as forest fires, Article 88 of Law No. 32 of 2009 is relevant because it can hinder substantive justice during the process of proving the element of wrong. This principle allows the state and society to recover from environmental damage and claim compensation without having to undergo a complicated evidentiary process, as done in civil law (Erwiningsih, 2018).

This principle is also by the principle of prudence, or the principle of prudence, which demands that the person making the effort be responsible for any negative effects produced by his actions, either directly or indirectly. Legal responsibility is inherent and automatic based on the consequences caused, not due to intention or negligence, when damage occurs (Soemartono, 2013).

Although the principle of strict responsibility has been applied in the case of PT. Kallista Alam, there are several problems in implementing the decision, especially at the stage of implementing compensation and ecological restoration. According to a report by civil society organizations, the restoration of the Tripa Swamp land is still incomplete. They also stated that there were problems in the supervision and implementation of corporate responsibilities (Damanik, 2020). This suggests that the principle of strict responsibility must be applied not only in substantive law but also requires strong institutional support and oversight.

## Calculation and Assessment of Compensation in the Case of PT. Natural Kallista

### Legal Basis for Calculating Environmental Compensation

The imposition of compensation sanctions in environmental cases in Indonesia refers to Articles 87 and 88 of Law No. 32 of 2009 concerning Environmental Protection and Management (PPLH Law). Article 87 stipulates that every person responsible for a business and/or activity that causes pollution and/or environmental damage is obliged to pay for the cost of recovery and compensation for the losses caused. Meanwhile, Article 88 confirms that liability can be imposed without proof of firm responsibility (Law No. 32 of 2009).

The government through the Ministry of Environment and Forestry demands that PT. Kallista Alam pays two types of damages: (1) damages for environmental damage and loss (compensation) and (2) environmental restoration costs (restoration). In these cases, environmentalists, resource economists, and forestry experts appointed by the plaintiff and approved by the judge use this method to assess losses.

Environmental harm assessment is usually carried out using the environmental economic assessment method, which is recognized in various international legal instruments and is also used in litigation in Indonesia. In this case, three main approaches are used. The first is the Market Value Approach, also known as the Market Value Approach. This approach was used to evaluate the value of crops, forest products, and vegetation that had been burned. Replacement Cost (Replacement Cost) is a method used to calculate the cost required to restore a damaged ecosystem to its original state. The Contingent Award Method is used to calculate the losses of ecosystem services that do not have direct market prices, such as hydrological functions and biodiversity (Perman et al., 2011).

Natural resource economics has adopted this approach in environmental litigation cases worldwide, including Indonesia (Klassen, 2020).

Based on the consideration of the Panel of Judges in the Decision of the Meulaboh District Court No. 12/PDT. G/2012/PN. MBO, details of compensation calculation for PT. Natural Kallista includes two broad categories:

a. Environmental Compensation (IDR 114,327,000,000)

The destruction of natural vegetation and the economic value of burned peat forest vegetation are part of this disadvantageous situation. Loss of biodiversity: including the loss of habitat of Sumatran orangutans and other endemic flora; Environmental service disadvantages: including hydrological services, carbon sequestration, and wildlife habitat protection.

b. Ecological Restoration Cost (IDR 251,765,000,000)

The cost includes an estimated amount of funds needed for peatland rehabilitation, which includes replanting endemic vegetation, restoring water system function, fire control, and post-rehabilitation supervision. Biodiversity restoration includes habitat and wildlife preservation. Administrative and technical costs: Research, EIA re-study, and long-term monitoring. The principle of "full repair" is used in this calculation, which emphasizes partial repair rather than the return of the ecosystem to pre-damage conditions (Turner et al., 2003).

### Validity and Challenges of Indemnity Assessment

Although this method is legal and recognized by the courts, environmental assessment is difficult because many parts of the ecosystem have non-market values that are not easy to calculate. However, the principle of "it is better to estimate than to ignore"—or better to estimate than to ignore—becomes the basis for courts to accept the results of environmental assessments (Boyd, 2010). In this case, the court chose to pay damages and recovery of Rp366,092,000,000, as it was considered to include all costs related to the value of damages and restorative costs that could be calculated scientifically and technically.

## **Forms of Ecological Restoration in Court Decisions**

PT. Kallista Alam was sentenced to pay environmental damage of Rp114.3 billion and environmental restoration costs of Rp251.7 billion based on the decision of the Meulaboh District Court No. 12/PDT. G/2012/PN. MBO. The court also issued an order for serious ecological restoration, which includes the restoration of more than 1,000 hectares of peatland in Rawa Tripa, revitalization of damaged areas, including replanting endemic crops, and restoration of natural vegetation. Restoration of the hydrological system through canal closure and restoration of the peat water system. Periodic reporting and monitoring of the progress of restoration (Meulaboh District Court Decision, 2014). In addition to monetary compensation, this decision affirms the legal commitment to the recovery of the ecosystem as a whole.

Although it has been enforced at the High Court and Supreme Court levels (PT Banda Aceh Decision No. 50/PDT/2014/PT BNA & Supreme Court of the Republic of Indonesia Decision No. 651 K/Pdt/2015), recovery on the ground has not started at the planned time. Some of the obstacles that arise include: PT. Kallista Alam appealed and sought further legal remedies, which hindered the implementation of the decision. Objections to the confiscation of collateral and requests for review (PK) extend the execution time (Damanik, 2020).

According to Yel (2019), executions have become slower and ineffective because there is no dedicated court system to oversee ecological restoration in a technical and sustainable manner. When it comes to environmental issues, Indonesia does not yet have a legally strong non-monetary enforcement system. As a result, there is no court structure specifically responsible for the implementation of ecological restoration, even though such a ruling is a very important act (Afandi, 2018).

Recovery is supervised by the government, especially the Ministry of Environment and Forestry (MoEF). In addition to acting as a plaintiff, the Ministry of Environment and Forestry should be responsible for directly monitoring the restoration process. Their duties include drafting a technical recovery plan that matches the decision. Conduct on-the-ground oversight of how the company is improving. Provide periodic monitoring reports to the public and the courts. However, in reality, cooperation between law enforcement, the central government, and local governments does not always go well; administrative and budgetary problems often occur (MoEF, 2017).

**The Role of Civil Society and Environmental Organizations:** WALHI, Greenpeace, and YEL are examples of environmental organizations that contribute greatly to the ecological restoration process. They did: conduct independent supervision of the condition of Rawa Tripa after the decision. Public campaigns to encourage the implementation of legal decisions and pressure governments and businesses. Reporting of violations and omissions to the media and law enforcement officials

The YEL report (2019) reported that the condition of the land had not been fully restored until five years after the decision, and some areas were still in a damaged or abandoned condition. This shows how important it is to monitor civil society as decision-makers in the enforcement of environmental justice.

## **Juridical Analysis and Relevance to Environmental Law**

### **Relevance to the Principles of Sustainable Development**

According to Article 2 letter f of Law Number 32 of 2009 concerning Environmental Protection and Management (PPLH Law), the decision against PT. Kallista Alam has significant legal value because it reflects the application of sustainable development principles. According to this principle, all economic and development efforts must consider the sustainability of the environmental carrying capacity for future generations.

In this context, this principle is contrary to PT. Kallista Alam who burned peatlands for the expansion of oil palm plantations. As part of the Leuser Ecosystem Area, Rawa Tripa peatlands have high ecological value. It is important for hydrological functions, as well as for biodiversity conservation and climate change mitigation (YEL, 2015). The court juridically stated that economic benefits cannot

be achieved at the expense of ecological integrity by ordering companies to carry out ecological restoration and pay compensation (Erwiningsih, 2018).

In addition, the value recovery approach in the decision confirms that internalizing environmental costs is one way to achieve sustainable development. This means that the company is solely responsible for the costs caused by environmental damage; the state or society should not bear it (Soemartono, 2013).

### **Ecological Justice in Court Decisions**

In addition to being based on the principle of strict responsibility, the verdict against PT Kallista Alam also reflects the application of the principle of ecological justice—namely the idea that every living thing and ecosystem has the right to live and thrive, and that environmental damage is a violation of all living systems, not just humans (Bosselmann, 2010).

The panel of judges firmly acknowledged that the destruction of the Tripa Swamp not only caused losses to the state but also threatened the existence of protected animal species such as the Sumatran orangutan (*Pongo abelii*) and disrupted the ecosystem functions that are important for the lives of the surrounding communities. This shows that the court sees the environment as an entity that has value, not just a financial commodity.

Active ecological restoration orders demonstrate the importance of ecological justice. This restoration is not only a sign of accountability but also a real effort to restore environmental rights lost due to the company's actions. This is a big step forward in strengthening the more progressive paradigm of environmental law in the current era.

### **The Position of Judgments in the Development of Environmental Jurisprudence**

Because of the application of Article 88 of the PPLH Law with a strict liability approach without proving the element of error, this decision can be considered as an important jurisprudence in the enforcement of environmental law in Indonesia. To recognize the economic and intrinsic value of the environment, a large ecological compensation of Rp366 billion was set. The call for full ecological restoration suggests that restoration is not symbolic enough but must be done substantially.

## **CONCLUSION**

Case study of PT. Kallista Alam pointed out that Indonesia's environmental law system has provided progressive juridical tools through the application of strict responsibility principles and the imposition of ecological restoration and compensation obligations. The court's decision in this case is an important milestone in the implementation of Articles 87 and 88 of Law No. 32 of 2009, which allows companies to be held accountable without the need to prove that there is an element of error. The compensation cost of 114 billion rupiah and the restoration cost of 251 billion rupiah indicate that there is actual ecological loss and a thorough restoration is needed.

However, the implementation of the verdict has not been fully optimal due to various execution constraints, including rejection from the defendant and weak post-verdict supervision system. This highlights the need for reforms in the governance of environmental case execution, including the establishment of ecological restoration monitoring units.

This ruling also affirms the relevance of the principles of sustainable development and ecological justice in Indonesia's positive law, where the environment is not only seen from the economic side, but as an entity entitled to be restored. Therefore, the sustainability of environmental law enforcement must be followed by strengthening inter-agency coordination, increasing technical capacity, and civil society participation as independent monitors.

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All authors state that there is no conflict of interest.

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