

Initiating Omnibus Law In Environmental Field In Indonesia: Between Tradition And Renewal

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Abstract: *Environmental pollution and damage is a major problem in the environmental field. Therefore, the regulation to prevent and overcome environmental damage becomes very important. This research is a normative-legal research using a statute, comparative and conceptual approaches. The results show that in Indonesia, Omnibus Law is possible to be implemented to simplify legislation in the environmental field. However, before doing this Omnibus Law method, it is necessary to first stipulate the scope of environmental law material which is the basis for grouping/clustering in Omnibus Law in the field of environmental legislation. It is also necessary to identify laws whose material will be changed, revoked and then merged in an Omnibus Law. The next step is the selection of material from the identified laws which are categorized as overlapping rules which will then be simplified in Omnibus Law. The drafting of a law using Omnibus Law method must also considers the time. The more material rules that will be included in an Omnibus Law, requires a longer time.*

Keywords: *Environmental Law; Green Constitution; Healthy Environment; Omnibus Law*

1. INTRODUCTION

Issue of environmental is a popular issue lately. The awareness of the importance of maintaining the environment for the lives of future generations is increasing. Eco-friendly lifestyle becomes a lifestyle that is believed to be able to compensate for the increase in environmental pollution and damage.¹

Environmental pollution and damage is a major problem in the environmental field.² Therefore, the regulation to prevent and overcome environmental damage becomes very important. The last regulation on the environment in the legislation is Act No. 32 of 2009 concerning Environmental Protection and Management (Environmental Law/ UU PPLH – *Perlindungan dan Pengelolaan Lingkungan Hidup*). There are regulations by sector relating

¹ Irwansyah. (2017). "Research-Based Environmental Law: The Debate Between Ecology Versus Development." *Sriwijaya Law Review* Vol. 1, No. 1: 44-66.

² Yusrizal. (2017). *Reformulasi Kewenangan Polri dan PPNS Dalam Penyidikan Tindak Pidana Lingkungan Hidup*, Malang, Media Nusa Creative, p.5

to the environment such as fisheries, forestry, plantations, water resources, mineral and coal mining and so on which also aim at preventing and overcoming environmental pollution and damage. This is because environmental law occupies a crossing-point for various public and private laws and the enforcement of environmental law becomes a crossing-point for the use of these legal instruments, especially administrative, civil and criminal laws.³

Article 1 No. 1 of Environmental Law defines the environment as “the unity of space with all objects, power, conditions and living things, including humans and their behavior that affect nature itself, the continuity of life and well-being of humans and other living things.” Based on these definitions, humans and all objects, power, conditions and living things have certain patterns of relationships that are permanent, orderly and influence each other.⁴ This means that the policies adopted in preventing and overcoming environmental pollution and damage must also be holistic. The regulation of the environment not only regulates the obligations in the prevention and destruction of the environment, but also includes law enforcement in the event of violations of these obligations.

The enforcement of environmental law does not only go through court proceedings. It is an obligation of the whole community.⁵ The public is not a spectator of how the law is enforced but plays an active role in law enforcement. Law enforcement is carried out through various channels with various sanctions such as administrative sanctions, civil lawsuits and criminal sanctions.⁶ This is considering that various environmental problems that hit the world and Indonesia today are caused by 2 (two) important problems, namely not only about the chaotic governance in the environmental field, but also the lack of public awareness.

In term of governance, Indonesia is a perfect example of poor environmental governance, both in terms of rules, institutions and officials. In terms of rules, there are a lot of asynchronous rules at the vertical level (central-regional). While on the horizontal side, there are a lot of overlapping regulations between sectors, such as in the forestry, mining, agriculture, environment and land sectors.⁷ Therefore, it is not surprising that proposals for improvement of regulations have been raised through the concept of the omnibus law.

According to Black’s law dictionary, Omnibus is “for all containing two or more independent matters, applied most commonly to a legislative bill which comprises more than one general subject.”⁸ The concept of *Omnibus Law* or also known as *Omnibus Bill* is often used in countries that adhere to the *Common Law* system such as the United States in making regulations. In this concept, the regulation is to make a new law to amend several laws at once.⁹ The concept of *Omnibus Law* that will be applied in the near future is in the fields of investment and employment. In the field of environment it is also hoped that this concept can be applied to prevent overlapping regulations in the field. This research aims to analyze the possibility of establishing an omnibus law in the field of environmental legislation in Indonesia.

³ Hamzah, A. (2008). *Penegakan Hukum Lingkungan*, Jakarta, Sinar Grafika, p.9

⁴ Ali, M., and Elvany, A.I. (2014). *Hukum Pidana Lingkungan: Sistem Pemidanaan Berbasis Konservasi Lingkungan Hidup*, Yogyakarta, UII Press, p. 2

⁵ McCarthy, J., & Zen, Z. (2010). Regulating the oil palm boom: Assessing the effectiveness of environmental governance approaches to agro-industrial pollution in Indonesia. *Law & Policy*, 32(1), 153-179.

⁶ Hardjasoemantri, K. (2002). *Hukum Tata Lingkungan*, 7th edition. Yogyakarta, Gajahmada University Press, pp. 375 & 376

⁷ Santosa, M.A. (2016), *Alam pun Butuh Hukum dan Keadilan*, Asa-Prima Pustaka, Jakarta, pp. 88-89

⁸ Black, H.C. (1990). *Black’s Law Dictionary*, 6th Edition, St. Paul Minn, West Publishing Co., p. 1087

⁹ Considering a concept of *Omnibus Law* if applied in Indonesia, Hukum Online, 17 February 2019, accessed on <https://www.hukumonline.com/berita/baca/lt58a6fc84b8ec3/menimbang-konsep-omnibus-law-bila-diterapkan-di-indonesia/>

2. METHOD

This research is a normative-legal research using a statute, comparative and conceptual approaches.¹⁰ Its data will be provided from primary and secondary legal materials. The primary legal materials resulted from some relevant laws and legislation. Those legal material collected are analysed descriptively related to the problems and prescriptively.

Initiating the Possibility of Implementing Omnibus Law in the Environmental Field

In Indonesia, the concept of *Omnibus Law* appeared in the speech of President Joko Widodo during his inauguration on 20 October 2019. This concept is the concept of establishing a main law to regulate issues previously regulated by a number of laws or one law which simultaneously revised several laws. Not only does it mean cutting down the laws, but also considers the consistency, substance and neatness of the arrangements so that the existing procedures become simpler and more targeted. The aim is to strengthen the national economy.¹¹

Although the concept of “*Omnibus Law*” is not a new concept in the law, but this concept is more often used in *Common Law* countries such as the United States, Canada and Ireland than in countries with a *Civil Law* legal system such as Indonesia.¹² Thus, the implementation of this concept in Indonesia is an original concept. Especially in the environmental field, considering that this concept by President Joko Widodo will initially be applied in the economic field, such as investment, taxation and employment creation.

There are several opinions regarding the definition of Omnibus Law, and based on these various opinions, Maria Farida Indrati defines Omnibus Law as a (new) law that contains or regulates various subjects for the simplification of several applicable laws.¹³ In Indonesia, the known concept is umbrella act and the creating of law through codification. The umbrella law is often interpreted as a law which is the “*parent*” of other laws so that its position is higher than the “*child*” law. While, the codification is a preparation and stipulation of legal regulations in the book of law systematically regarding a broader field of law, such as the field of civil law, commercial law and criminal law.¹⁴

So far, the environmental law is an umbrella law, only regulating the basic provisions on environmental management.¹⁵ The sector aspects are regulated in a separate law.¹⁶ Thus, the next question is whether the environmental regulation remains in the form of umbrella law as it is now or is possible to establish an *Omnibus Law* in the field of environmental legislation?

Omnibus Law or *Omnibus Bill* is considered as an answer to the problem of overlapping laws and regulations in Indonesia. According to the government perception, the application of this concept has 3 (three) benefits, eliminating overlapping rules, the efficiency of the process of

¹⁰ Marzuki, P.M. (2009). *Penelitian Hukum*. 5th ed. Jakarta: Kencana, p 59

¹¹ “Kolaborasi Tuntaskan Masalah SDM, Harian Kompas, Friday, 29 November 2019, p.1

¹² Sodikin. (2020). Paradigma Undang-Undang dengan Konsep Omnibus Law Berkaitan dengan Norma Hukum yang Berlaku di Indonesia, *Jurnal Rechtsvinding*, 9 (1): 147

¹³ Indrati, M.F. (2020). “Omnibus Law, UU Sapu Jagat ? Article on Kompas Daily, Saturday, 1 January 2020, p.5

¹⁴ *Ibid*. There are also basic laws such as Act No. 5 of 1960 known as the Basic Agrarian Law and legal compilation models such as the Compilation of Islamic Law. See Sodikin, Op.cit., p.147 and 157

¹⁵ Nugraha, A. (2020). Current Issues of Taiwan's Marine Protected Areas Legal Regime. *Hasanuddin Law Review*, 6(3), 172-183. doi: <http://dx.doi.org/10.20956/halrev.v6i3.2484>

¹⁶ Rangkuti, S.S. (2005). *Hukum Lingkungan dan Kebijakan Lingkungan Nasional*. Third Edition, Surabaya, Airlangga University Press, p. 192

change or revocation of legislation and eliminating the egos by sector contained in various laws and regulations.¹⁷

According to Vincent Suriadinata¹⁸, based on practice in several countries, there are 2 (two) characteristics of *Omnibus Law*, namely general and specific characteristics. General characteristics are the acceleration of the legislative process and the complexity of the problem. While, the specific characteristic are in the form of codification and political style or motives, namely the methods used by the legislative or executive body to expedite the legislative process. This concept can be applied in Indonesia considering that the Omnibus Law is actually a more effective and efficient formulation of a law¹⁹ so that it does not conflict with Act No. 12 of 2011. On the other hand, according to Barbara Sinclair, *Omnibus Bill* is a complex decision-making process and its completion takes a long time because it contains a lot of material even though the subject, issue, and program are not always related.²⁰

If it is related to the environment, then it is clear that the environment is a very complex field of study. This is caused by all aspects of life in this world, especially humans, always in contact with the environment. Even according to Laode M. Syarif and Andri G. Wibisana, the definition of the environment in Article 1 of the PPLH Law should be “land, water, air, sea, sunlight and other sources of life, without which humans and other living things will die due to loss of life.” The environment is the source of life for all beings. The environment is the mother of life.²¹ Therefore, the study of law on the environment in Indonesia is also a very broad, and if the regulatory criteria in Omnibus Law are complex material substances, then the environmental field has fulfilled these criteria.

The next problem is whether the environmental content material that will be regulated in the Omnibus Law that has been regulated in previous legislation? Referring to the study results of the Corruption Eradication Commission in collaboration with the Ministry of Law and Human Rights with the support of experts, there are 26 laws and regulations governing the Natural Resources and Environment. It is grouped into 5 (five) groups: (1) agrarian, environmental and spatial planning, (2) forestry, agriculture and plantation, (3) mining and energy, (4) maritime and fisheries; and (5) support group.²²

Legislation in the field of natural resources is not yet harmonious because there are no laws governing the interaction between natural resources and the agrarian, environmental and spatial planning approaches that regulate important principles across sectors have not yet been referred. Therefore, the recommendations include improving various laws by sector in the field of natural resources that ensure environmental protection arrangements and

¹⁷ Sodikin, *Op.cit.*, p.149

¹⁸ Suriadinata, V. (2019). Penyusunan Undang-undang di Bidang Investasi : Kajian Pembentukan Omnibus Law di Indonesia, *Jurnal Refleksi Ilmu Hukum*, 4 (1): 34

¹⁹ Louis Massiocotte in his writing also states directly that *Omnibus Bills* as legislation technique. See Louis Massicotte, *Omnibus Bills in Theory and Practice*, Canadian Parliamentary Review, Spring 2013, p.15 downloaded on the website <https://www.google.com/search?q=omnibus+bill+case+and+practice&oq=omnibus+bill+case+and+practice&q=chrome..69i57.27398j1j7&sourceid=chrome&ie=UTF-8#>

²⁰ Paulus Aluk Fajar Dwi Santo, Memahami Gagasan Omnibus Law, 3 October 2019, downloaded on the website <https://business-law.binus.ac.id/2019/10/03/memahami-gagasan-omnibus-law/>

²¹ Syarif, L.M., and Wibisana, A.G (Eds). Hukum Lingkungan : Teori, Legislasi dan Studi Kasus, Jakarta : USAID, Kemitraan dan The Asia Foundation, p.xvii

²² Komisi Pemberantasan Korupsi, Kajian Harmonisasi Undang-undang di Bidang Sumber Daya Alam dan Lingkungan Hidup, Jakarta, 2018, h.4-7. Downloaded on the website <https://acch.kpk.go.id/id/berkas/litbang/kajian-harmonisasi-undang-undang-di-bidang-sumber-daya-alam-dan-lingkungan-hidup>

formulating laws on the control and management of natural resources that govern the control, ownership, use of natural resource utilization and planning, the use and resolution of disputes between natural resources.²³ If this recommendation is implemented in the form of *Omnibus Law*, then all matters regulated in these 26 laws and regulations which are reviewed will be merged into one new law. Certainly, this is not an easy legislation work and can be completed quickly.

The author also classifies regulations in the environmental field based on the legal basis. There are 68 laws divided into 9 (nine) groups, namely: *the first*, groups that refers to Article 28 paragraph (1) of the 1945 constitution includes 5 laws; *the second*, groups that refers to Article 28 H paragraph (1) and Article 33 paragraph (3) of the 1945 constitution includes 5 laws; *the third*, groups that refers to Article 28 H paragraph (1) and Article 33 paragraph (3) and paragraph (4) includes 1 law; *the fourth*, groups that refers to Article 33 of the 1945 constitution includes 19 laws; *the fifth*, groups that refers to Article 33 paragraph (3) of the 1945 constitution includes 15 laws; *the sixth*, groups that refers to Article 33 paragraph (3) and paragraph (4) of the 1945 constitution includes 3 laws; *the seventh*, groups that refers to Article 33 of the 1945 constitution and Act No. 4 of 1982 concerning Basic Environmental Provisions includes 1 law; *the eighth*, groups that refers to Article 33 of the 1945 constitution and Act No. 23 of 1997 concerning Environmental Management includes 1 law; and *the ninth*, groups which do not base on Articles 28 and 33 of the 1945 constitution or the Environmental Law but have environmental content includes 18 laws.

If the spirit of the formation of *Omnibus Law* is to eliminate overlapping rules in the environmental field, then from 78 laws and regulations as mentioned above, must be elaborated related with the provisions that are considered to be overlapping, so that there is a clear argument against amending or eliminating a regulation and then combined in *Omnibus Law*.²⁴ The thing to note is that it must be comprehensive so that it does not conflict with the principles of the law, considers that that *Omnibus Law* is a law and not a government regulation or a regulation below it.²⁵ If the overlap is related to licensing in the environmental field, the provisions that will join the Omnibus Law are based on the spirit of simplifying licensing procedures, not cutting the licensing instrument itself.²⁶

Then, it is related to the time of formation of *Omnibus Law*. Satya Arinanto argues that Indonesia has experience in simplifying regulations including revoking previous provisions. He referred to the practice of simplification from the beginning of independence until the New Order. At the time of independence, Indonesia inherited seven thousand colonial

²³ *Ibid.*

²⁴ In the Study on Regulatory Harmonization for Governance Reform of the Natural Resources by the Corruption Eradication Commission, indicators used to measure overlapping rules are authority, rights and obligations, environmental protection and law enforcement. *Ibid.*, pp.10-11

²⁵ The spirit of eliminating “*thorns*” due to overlapping rules by only revoking and amending the provisions of certain articles in the existing law on the omnibus law should not break through the principles of the law so that what happens is to revoke the lives of the laws that have been existed. Shidarta, “*Kawin Paksa Legislasi Ala “Omnibus Law”*”, 9 February 2020, downloaded on the website <https://business-law.binus.ac.id/2020/02/09/kawin-paksa-legislasi-ala-omnibus-law/>

²⁶ Environmental instruments through licensing in the environmental field such as Environmental Impact Analysis and so on are often considered obstacles to investment. This certainly cannot be justified because the licensing is true to ensure that investors have compliance with environmental instruments. The eliminating or simplification of licensing will actually eliminate the spirit of the State in implementing the principles of sustainable development that have been called for by various countries and become a global problem. Wahyu Nugroho, *Bencana Lingkungan & Urgensi Omnibus Law Lingkungan*, downloaded on the website <https://www.hukumonline.com/berita/baca/lt5e1edc4e585a1/bencana-lingkungan-urgensi-omnibus-law-lingkungan-oleh-wahyu-nugroho?page=2>

regulations which were gradually simplified into national regulations, so that in 1995 there were only four hundred regulations. Until 1998, of 400 regulations were processed into eighty-two academic texts.²⁷ Referring to the statement, it is clear that the formation of *Omnibus Law* cannot be done in a short-time. The more material content that will be arranged in an *Omnibus Law*, it will certainly require a longer period of time.

The simplification of regulations and bureaucracy to ease investment which is an economic policy is always opposed to the preservation of environment. This should not need to happen if it refers to the principles stipulated in the 1945 constitution. By this provision, environmental norms have been constitutionalized to become the content of the constitution as the highest law.²⁸ As a consequence, there should be no more policies, governmental and developmental actions in the form of laws or regulations below which contradict this pro-environment constitutional provision.²⁹

The use of *Omnibus Law* method in the formation of legislation is not free from controversy³⁰ and it is not always used in origin countries such as Britain, Canada and the United States. This method is considered less democratic and less participatory. This method has the potential to disregard the philosophy of origin. This method also changes the deliberative discussion to be accelerated because Omnibus Law is usually formed to meet certain targets. Complicated methods of drafting also allow for rules that are not monitored in detail by the House of Representatives, which results in the hiding of crucial rules.³¹ Certainly, these things must be considered in applying the method of Omnibus Law.

To realize a balance of ecological and economic interests, various approaches to environmental management in Indonesia have been used, including command and control, self-regulation, autonomy, education and information and economic instruments.³² But in practice, more consistent policies are needed in applying the principles of sustainable development for the control and utilization of environmental resources. In addition, strengthening the right to the environment as part of human rights requires support from changes in the paradigm of policy makers and more concrete steps at the level of legislative policies in the field of environmental protection and management that are pro-people and supports more rational and responsive judicial decisions. From this, then the handling of the environment in the field of law does not only talk about the regulation in the legislation but also to its application in decisions by judicial powers.

The issue of regulation in environmental field in the form of legislation is indeed an important matter, but it should not ignore the facts about environmental problems that already exist in Indonesia. The problem of national environmental, if narrowed become 2 (two) main problems, namely (i) lack of public awareness of the environment so that a lot of

²⁷ "Omnibus Law" is considered not in accordance with Act No. 12/2011, Kompas Daily, Thursday, 30 April 2020, p.2

²⁸ Aspan, Z., and Yunus, A. (2019). The right to a good and healthy environment: Revitalizing green constitution, IOP Conference Series: Earth and Environmental Science 343 (1), 012067.

²⁹ Asshiddiqie, J. (2009). *Green Constitution: Nuansa Hijau Undang-Undang Dasar Negara Republik Indonesia Tahun 1945*, Jakarta : Rajawali Pers, p. 79, 91 and 94

³⁰ Louis Masicotte exemplifies Bill C-94, The Energy Security Act, 1982 as *Omnibus Bill* is controversy in Canada. He also argues that some jurisdictions in the United States, such as the California State Constitution prohibit this legislative technique. Article 4 Paragraph 9 regulates that "*a statute shall embrace but one subject, which shall be expressed by its title. If a statute embraces a subject not expressed in its title, only the part not expressed is void*".

³¹ "Omnibus Law" and Harmonisasi UU, Kompas Daily, Thursday, 12 March 2020, p.3

³² Mujiyanto, S., & Tiess, G. (2013). Secure energy supply in 2025: Indonesia's need for an energy policy strategy. *Energy policy*, 61, 31-41.

environmental damage arises and (ii) chaos of environmental and natural resources governance. In this case, chaotic is not only in terms of rules, but also institutions and officials. The first and foremost is the practice of corruption committed by officials who do not enforce the rules, allowing environmental destruction and pollution to occur. This should be a major concern compared to the debate about how environmental legislation should be prepared.

3. CONCLUSION

In Indonesia, Omnibus Law is possible to be implemented to simplify legislation in the environmental field. However, before doing this Omnibus Law method, it is necessary to first stipulate the scope of environmental law material which is the basis for grouping/clustering in Omnibus Law in the field of environmental legislation. It is also necessary to identify laws whose material will be changed, revoked and then merged in an Omnibus Law. The next step is the selection of material from the identified laws which are categorized as overlapping rules which will then be simplified in Omnibus Law. The drafting of a law using Omnibus Law method must also considers the time. The more material rules that will be included in an Omnibus Law, requires a longer time.

REFERENCES

- [1]. Ali, M., and Elvany, A.I. (2014). *Hukum Pidana Lingkungan: Sistem Pemidanaan Berbasis Konservasi Lingkungan Hidup*, Yogyakarta, UII Press.
- [2]. Aspan, Z., and Yunus, A. (2019). The right to a good and healthy environment: Revitalizing green constitution, *IOP Conference Series: Earth and Environmental Science* 343 (1), 012067.
- [3]. Asshiddiqie, J. (2009). *Green Constitution: Nuansa Hijau Undang-Undang Dasar Negara Republik Indonesia Tahun 1945*, Jakarta : Rajawali Pers.
- [4]. Black, H.C. (1990). *Black's Law Dictionary*, 6th Edition, St. Paul Minn, West Publishing Co.
- [5]. Hamzah, A. (2008). *Penegakan Hukum Lingkungan*, Jakarta, Sinar Grafika.
- [6]. Hardjasoemantri, K. (2002). *Hukum Tata Lingkungan*, 7th edition. Yogyakarta, Gajahmada University Press.
- [7]. Indrati, M.F. (2020). "Omnibus Law, UU Sapu Jagat? Article on Kompas Daily, Saturday, 1 January 2020, p.5
- [8]. Irwansyah. (2017). "Research-Based Environmental Law: The Debate Between Ecology Versus Development." *Sriwijaya Law Review* Vol. 1, No. 1: 44-66.
- [9]. Komisi Pemberantasan Korupsi, *Kajian Harmonisasi Undang-undang di Bidang Sumber Daya Alam dan Lingkungan Hidup*, Jakarta, 2018, h.4-7. Downloaded on the website <https://acch.kpk.go.id/id/berkas/litbang/kajian-harmonisasi-undang-undang-di-bidang-sumber-daya-alam-dan-lingkungan-hidup>
- [10]. Marzuki, P.M. (2009). *Penelitian Hukum*. 5th ed. Jakarta: Kencana.
- [11]. McCarthy, J., & Zen, Z. (2010). Regulating the oil palm boom: Assessing the effectiveness of environmental governance approaches to agro-industrial pollution in Indonesia. *Law & Policy*, 32(1), 153-179.
- [12]. Mujiyanto, S., & Tiess, G. (2013). Secure energy supply in 2025: Indonesia's need for an energy policy strategy. *Energy policy*, 61, 31-41.

- [13]. Nugraha, A. (2020). Current Issues of Taiwan's Marine Protected Areas Legal Regime. *Hasanuddin Law Review*, 6(3), 172-183. doi: <http://dx.doi.org/10.20956/halrev.v6i3.2484>
- [14]. Nugroho, W. *Bencana Lingkungan & Urgensi Omnibus Law Lingkungan*, downloaded on the website <https://www.hukumonline.com/berita/baca/lt5e1edc4e585a1/bencana-lingkungan-urgensi-omnibus-law-lingkungan-oleh-wahyu-nugroho?page=2>
- [15]. Paulus Aluk Fajar Dwi Santo, Memahami Gagasan Omnibus Law, 3 October 2019, downloaded on the website <https://business-law.binus.ac.id/2019/10/03/memahami-gagasan-omnibus-law/>
- [16]. Rangkuti, S.S. (2005). *Hukum Lingkungan dan Kebijaksanaan Lingkungan Nasional*. Third Edition, Surabaya, Airlangga University Press.
- [17]. Santosa, M.A. (2016), *Alam pun Butuh Hukum dan Keadilan*, Asa-Prima Pustaka, Jakarta.
- [18]. Shidarta, “*Kawin Paksa Legislasi Ala “Omnibus Law”*”, 9 February 2020, downloaded on the website <https://business-law.binus.ac.id/2020/02/09/kawin-paksa-legislasi-ala-omnibus-law/>
- [19]. Sodikin. (2020). Paradigma Undang-Undang dengan Konsep Omnibus Law Berkaitan dengan Norma Hukum yang Berlaku di Indonesia, *Jurnal Rechtsvinding*, 9 (1): 147
- [20]. Suriadinata, V. (2019). Penyusunan Undang-undang di Bidang Investasi : Kajian Pembentukan Omnibus Law di Indonesia, *Jurnal Refleksi Ilmu Hukum*, 4 (1): 34
- [21]. Syarif, L.M., and Wibisana, A.G (Eds). *Hukum Lingkungan : Teori, Legislasi dan Studi Kasus*, Jakarta : USAID, Kemitraan dan The Asia Foundation.
- [22]. Yusrizal. (2017). *Reformulasi Kewenangan Polri dan PPNS Dalam Penyidikan Tindak Pidana Lingkungan Hidup*, Malang, Media Nusa Creative.