

# THE ROLE OF THE FORESTRY POLICE IN RESOLVING CRIMINAL CASES OF LAND CONTROL WITHOUT PERMISSION PERMITTED BY COMMUNITY PERSONS IN THE GUNUNG LEUSER NATIONAL PARK AREA

(Research Study at SPTN VI Besitang)

### Eka Rizky Ginting1\*, Timothy Aritonang2, T. Riza Zarzani N3

1,2Criminal Law, Panca Budi Development University Indonesia

\*Corresponding author: rizkiginting379@gmail.com

### ARTICLE INFO

### Date received: 28 Oct 2022 Revision date: 23 Nov 2022 Date received: 28 Nov 2022

### **Keywords:**

Forestry Police, Land Control Without Permit, TNGL

#### **ABSTRACT**

To maintain and protect forests from criminal acts of land use without permission, the role of the Forestry Police is needed. The formulation of the research problem is: What is the modus operandi of community members in carrying out land control without permission in the Gunung Leuser National Park area? What are the duties and authorities of the Forestry Police in resolving the problem of forest destruction in the Gunung Leuser National Park area? criminal case of land control without permission committed by members of the public in the Gunung Leuser National Park area? This research is empirical juridical, namely research carried out directly in the field so that it is in accordance with the facts, by collecting data and information obtained directly from sources through conducting direct interviews in the field related to the author's research material. The modus operandi of criminal cases of land possession without permission committed by community members in the Gunung Leusers National Park area is very complex and from different points of view. Duties and Authorities of the Forestry Police as regulated in Article 4 paragraph (1) of the Regulation of the Minister of Forestry of the Republic of Indonesia Number P.75/Menhut-II/2014 concerning Forestry Police and Article 51 paragraph (2) of the Law of the Republic of Indonesia Number 41 of 1999 concerning Forestry . In this research, it can be concluded that the role of the Forestry Police, SPTN VI Besitang, the Gunung Leuser National Park Center along with elements of the Forestry Police, always work hard to resolve conflicts that occur in the Gunung Leuser National Park area, such as forest land tenure issues. That the partnership efforts with the community and Regional Government carried out by the Forestry Police are very important and appropriate.



### INTRODUCTION

Indonesia is a beautiful country. A country rich in natural beauty. Natural beauty is in the form of natural resources, the natural resources in question are forest resources. Forests are one of the creations and natural resources that can be used to improve human welfare and are an award given by God Almighty who has a very important role in maintaining the balance of nature on this earth. Forests are the lungs for every living creature in the world. In the forest, all living creatures have been created, both large, small and those that cannot be seen with the eye. In line with this, in it also live a number of plants that form a bed, which unite to form one complementary whole. One of the natural resources is forests which are a gift from God Almighty that can be managed well, which are used to build the Nation and State. The aim is to manage it well so that it is necessary to be careful so as not to have an impact on destruction on this earth.

In line with this, the assets contained in the forest are really needed to increase state and regional income, so that forest management can also support the income of the people who live around the forest. Natural wealth, one of which is forests, can support the success of development in Indonesia, so it needs to be explored and utilized optimally. Regarding this, Supriadi is of the opinion that it can be interpreted that if an area whose forests experience a drastic decline, this will have a negative influence, one of which will be on the community itself. This also needs to be known so that the use and utilization of forest areas can be protected as well as possible to avoid conflicts between the government and the community over the interests of forest management.

In forest areas, there are many cases of forest destruction where the perpetrators are irresponsible people or community members, so this needs to be followed up. People or the public do not know that Gunung Leuser National Park is a conservation area which has dual objectives including: Absolute protection and preservation of ecosystem types and species diversity, controlled use of ecosystems and species diversity as natural resources for the welfare of the wider community. People or community members do this for reasons of minimal economic income and limited area for the person or community member to live in. This irresponsible activity began with the presence of people who fled from Aceh during the GAM riots or the Free Aceh Movement, so they had to allocate some time to the Gunung Leuser National Park, North Sumatra, which is one of three National Parks in Sumatra registered as a site, world heritage or Tropical Rainsforest Heritage of Sumatra.

This is what has brought Indonesia to a status where its sustainability is starting to be threatened because its management concept is very centralized. It is estimated that 48.8 million people in Indonesia depend directly on biodiversity in nature for their livelihoods and no less than 10.2 million are categorized as poor. Gunung Leuser National Park (hereinafter referred to as TNGL) is a world heritage site located in Indonesia. Not only that, TNGL is a conservation forest area so that the Indonesian state and international perspective are very interested in paying more attention to the condition of this forest area. The government gave a concrete form of establishing the Leuser International Foundation, which is a form of collaboration between the Indonesian government and the European Union to manage the Leuser ecosystem area. The area of this national park was reduced to 838,872 hectares.

Problems that occur in this area are not only in plantation or residential areas, they will be resolved using existing and applicable regulations. Together with people or community members to realize conservation and welfare functions, one of them will be synergized with partnership programs. For this reason, forest areas are very important to be maintained and utilized optimally. Alam Setia Zein believes that: Forest areas are open natural resources, so people have very large access to use them. This triggers problems in forest management. There are various factors that support the occurrence of forest damage, including the intentional actions or negligence of legal subjects consisting of humans and/or legal entities, due to livestock and natural forces such as earthquakes, volcanic eruptions, floods and so on, and can also occur due to attacks. tree pests and diseases. In this regard, Salim HS in his book describes the benefits of forests which can be interpreted as meaning that forests have direct benefits of economic value by producing wood, rattan, latex and fruit. Forests also have indirect benefits, namely preventing erosion, regulating water management, providing health benefits, providing a sense of beauty in the tourism sector, and also increasing the country's foreign exchange in the defense and security sector.

The actions of these people or community members are synonymous with destruction and violation of the law, so they refer to criminology. Criminology is a science that studies crime or criminals. Etymologically, the term criminology comes from the words crime and logos. Crime means crime, while logos means science. So in general, criminology can be interpreted as a science that studies crime or more specifically, it can be interpreted as a means of knowing the causes and effects of crime. As is known, to maintain and protect forests from irresponsible individuals, law enforcement officers are required to take action against all forms of forest



destruction, such as occupying and/or controlling forest land without permission. In Article 1 paragraph 15 of Law of the Republic of Indonesia Number 18 of 2013 concerning Prevention and Eradication of Forest Destruction, it is stated that "to ensure the implementation of forest protection, certain forestry officials, in accordance with the nature of their work, are given special police authority". In this case the special police referred to in the Law are the Forestry Police (hereinafter referred to as the Forestry Police).

However, the problem that occurs is that large numbers of immigrants occupy the TNGL area and cannot keep or have residence permits at the TNGL location. Therefore, the attitudes or behavior of people or community members who live in the GLNP area are included in the indicators of entering an area without permission or a criminal incident has occurred due to excessive and uncontrolled exploitation of natural resources so that the function of GLNP as a conservation forest area is not realized. The author believes that the resolution of the problem of land control without permission carried out by community elements needs to be studied in a research study. The formulation of the problem in this research is what is the role of the Forestry Police in resolving criminal cases of land possession without permission committed by community members in the Gunung Leuser National Park area?, and what are the Duties and Authorities of the Forestry Police in resolving the problem of forest destruction in the Gunung Leuser National Park area?? therefore the author conducted research in the form of a journal with the title: "The Role of Forestry Police in Resolving Criminal Cases of Land Control Without Permits Committed by Individuals in the Community in the Gunung Leuser National Park Area (Research Study at SPTN VI Stabat)".

### **METHOD**

This research method is descriptive research. The definition of descriptive research has the aim of obtaining clear data and information or to determine whether or not there is a relationship between a symptom and other things in society as a solution to the problem in this research. This type of research uses empirical juridical research through field research. Empirical juridical research is a type of sociological legal research and can also be called field research, namely examining applicable legal provisions and what happens in reality in society. Because this research is field research, the data collection method used is field study by means of interviews, namely by conducting interviews at the Besitang BPTN Region III Stabat Region VI Section office. In this research, all data can be obtained and then it can be used to obtain a theoretical basis in the form of positive legal material, opinions, or opinions of experts or other parties who can provide information in formal form or in official texts so that later the data can be analyzed qualitatively so that will produce a certain classification according to the problems in this thesis. Qualitative analysis will take the form of a systematic description and explain the relationship between various types of data. This will be selected and then analyzed descriptively with the aim of providing a way out or solution to the problems in this journal research.

### RESULTS AND DISCUSSION

# 1. Dissection of criminal cases of land possession without permission committed by community members in the Gunung Leuser National Park area

Before discussing the case analysis, it is necessary to know the opinion of T. Sakti who states that in general, land disputes are mainly triggered by inequality in land control. These disputes are latent, difficult to identify and result in complex problems. In particular, forest land disputes can be caused by unequal control and use of forest areas, overlapping forest areas, changes in the value orientation of forests from religious-ecological functions to economic commodities as well as damage to ecosystems and the order of life of local communities. Regarding criminal cases of land control without permission committed by community members in the Gunung Leuser National Park area, the author found one case that occurred on December 7 2011. In this case the perpetrator was a community member who worked on, used or occupied a field in the village. Sei Siminyak Besitang Region, Langkat Regency, North Sumatra Province. Regarding the whereabouts of the perpetrator, the Forestry Police Operations Team from the Gunung Leuser National Park Center went to the field and took the coordinates, it turned out that the field was in the Gunung Leuser National Park Forest area. This case has been rolled out at the Stabat District Court with Decision Number: 162/Pid.Sus/2012/PN.Stb, where the perpetrator has been proven legally and convincingly guilty of committing the criminal act of "Working on Forest Areas Unauthorizedly" so he was sentenced to prison for 1 ( one) year 6 (six) months. The results of the author's case analysis of the case above are that the perpetrator should be held accountable for his actions before the law.

Because by working on or controlling land in a forest area, the perpetrator has fulfilled the elements of a criminal act as stated in Article 50 paragraph (3) letter a juncto Article 78 paragraph (3) of Law of the Republic of Indonesia Number 41 of 1999 concerning Forestry. According to the author, with strict enforcement of



criminal law against any individual in the community who controls land without permission, it is hoped that this will have a deterrent effect on the general public not to destroy forest areas in any way prohibited by law and /or without permission from the relevant Ministry. Moreover, the existence of Gunung Leuser National Park as a conservation area must be maintained and maintained because it has many benefits for Indonesia and as the lungs of the world. That protected forests, especially as conservation areas, are actually overgrown with trees, with all kinds of flora and fauna as the riches contained therein, which are destroyed only because of the actions of unscrupulous people who deliberately and slowly because of greed, for various reasons and personal defenses for controls the forest land of Gunung Leuser National Park.

Therefore, the author strongly recommends that there must be strict and serious criminal law enforcement against anyone who commits the crime of land use without permission in the Gunung Leuser National Park area. Because if this happens continuously without firm and measurable action from the Forestry Police together with the relevant Ministries and the local Regional Government, then the future of Gunung Leuser National Park as a world heritage as well as the lungs of the world will be just a memory that will leave stories behind. The tragic failure of the Indonesian nation to preserve its own forests, which is a natural gift from Almighty God.

## 2. Forestry Police's Efforts to Resolve Criminal Cases of Land Control Without Permits Committed by Individuals in the Gunung Leuser National Park Area

The Forestry Police's efforts in resolving criminal cases of land use without permission committed by community members in the Gunung Leuser National Park area are as follows:

- a. Arrest the perpetrator.
- b. Conduct an examination of the perpetrator.
- c. Collaborating with NGOs in controlling Land Tenure.
- d. Forming SPORC (Quick Response Forestry Police Unit).

The protection aspects in the management of Gunung Leuser National Park include:

- a. Civil servants
- b. PPNPM
- c. Surrounding communities as forestry partners
- d. NGO partners such as OIC, PETAI, and others.
- e. Forestry Extension Officer.
- f. Forest Ecosystem Controller.
- g. Forestry Police.

One of the concrete efforts made to support ecosystem restoration as an effort to resolve tenure conflicts in the Gunung Leuser National Park area in the Besitang area, the Gunung Leuser National Park Center with the support of the Indonesian Tropical Pesona Foundation (PETAI) held a Conservation Partnership Socialization activity at the Coordination Forum Regional Leadership (FORKOPIMDA) Langkat Regency on January 20 2021 in Stabat. The parties agreed to support the implementation of the conservation partnership through their respective roles. Assistance and law enforcement by related parties prioritizes the principle of justice. Synergy and collaboration between parties is an important part of efforts to make conservation partnerships a success as one of the current strategic programs of the Indonesian government. Then, on June 29 2021, the Gunung Leuser National Park Office signed a conservation agreement with 7 (seven) buffer village governments around the Gunung Leuser National Park area. Each of them is represented by the Head of the Regional SPTN and the Village Head, namely:

- 1. Daud Syah, Head of Alue Sungai Pinang Village, Jeumpa District, Southwest Aceh Regency, Aceh Province.
- 2. Irfan Rahim, head of Bineh Krueng Village, Tangan-tangan District, Southwest Aceh Regency, Aceh Province.
- 3. Muhammad Ganti, Head of Blang Dalam Village, Babahrot District, Southwest Aceh Regency, Aceh Province.
- 4. Fixed Ukur Ginting, Head of Batu Jongjong Village, Bahorok District, Langkat Regency, North Sumatra Province.
- 5. Rasliadi, Head of Namo Sialang Village, Batang Panggang District, Langkat Regency, North Sumatra Province.
- 6. Bahagia Ginting, Head of Sampe Raya Village, Bohorok District, Langkat Regency, North Sumatra Province.
- 7. Wahid, Head of Bukit Mas Village, Besitang District, Langkat Regency, North Sumatra Province.



The contents of the Conservation Agreement are the Village's acknowledgment of the existence of the TNGL area as state land and not a property right that can be bought and sold, inherited, transferred or mortgaged and to participate in management activities of the TNGL area in order to preserve it. In this agreement, the Gunung Leuser National Park Center is also committed to carrying out community empowerment activities in accordance with applicable regulations in an effort to improve the welfare of village communities. These community empowerment activities include the formation of conservation community groups, providing productive economic assistance, training in the context of developing productive economic businesses and group mentoring. From the series of explanations above, it can be seen that the Gunung Leuser National Park Office along with elements of the Forestry Police always work hard to resolve conflicts that occur in the Gunung Leuser National Park area, such as forest land tenure issues. According to the author, these partnership efforts are very important and appropriate because they involve elements of society and the local regional government. So that problems can be resolved and even avoid prolonged conflicts related to criminal acts of controlling forest land in the Gunung Leuser National Park area. The obstacles to the Forestry Police in resolving criminal cases of land control without permission committed by members of the public in the Gunung Leuser National Park area are as follows:

- a. Village officials are not cooperative in handling land tenure
- b. Not fully supported by law enforcement
- c. The number of personnel is lacking
- d. Facilities and infrastructure are lacking
- e. The number of conservation land holdings is greater than that of Forestry Police personnel.

Furthermore, based on the results of interviews, it was found that the dynamics or ups and downs of the Forestry Police in resolving criminal cases of land possession without permission committed by community members in the Gunung Leuser National Park area, include:

- a. When the perpetrator of land use has been convicted and sentenced by the judge
- b. Can solve a problem
- c. Public recognition that the area is a GLNP conservation area
- d. When carrying out an arrest, there are individuals who obstruct or free the perpetrator
- e. Conflict with society.

From the series of obstacles above, the most important inhibiting factors are the lack of Forestry Police personnel and the lack of facilities and infrastructure needed for personnel to work in the field. According to the author, the government, in this case the relevant ministry, should pay attention to this matter considering that the Gunung Leuser National Park area is very large with quite difficult terrain, plus various elements of society who have the intention of controlling forest land without permission. That through this research it is also linked to facts that have been seen and felt by the author himself in the field, the author is of the opinion that land control or development of residential areas in the Gunung Leuser National Park area occurs in order to accommodate the victims of war in the past based on a sense of humanity. , this should be accommodated by the local regional government in collaboration with the central government. By providing the right solution without destroying the biological beauty and sustainability of the forest, such as looking for residential land in areas outside the Gunung Leuser National Park area to build subsidized residential houses from the Government for the victims of the war.

### **CONCLUSION**

The role of the Forestry Police at SPTN VI Besitang, the Gunung Leuser National Park Center along with elements of the Forestry Police, always work hard to resolve conflicts that occur in the Gunung Leuser National Park area, such as forest land tenure issues. That the partnership efforts carried out are very important and appropriate because they involve elements of society and the local regional government. So that problems can be resolved and even avoid prolonged conflicts related to criminal acts of controlling forest land without permission in the Gunung Leuser National Park area.

Duties and Authorities of the Forestry Police as regulated in Article 4 paragraph (1) of the Regulation of the Minister of Forestry of the Republic of Indonesia Number P.75/Menhut-II/2014 concerning Forestry Police and Article 51 paragraph (2) of the Law of the Republic of Indonesia Number 41 of 1999 concerning Forestry , is the most important and leading element in protecting forests in Indonesia according to its working area, as well as being the enforcer of forestry regulations that apply in a forest area. Thus, one of the important roles of the Forestry Police is in terms of protection and forest security against the possibility of criminal acts of land control without permission committed by community elements.



#### REFERENCES

### A. Buku

Abdul Muis yusuf, 2011, Hukum Kehutanan Di Indonesia, Riena Cipta, Jakarta.

Ahmad, Redi, 2014, Hukum Sumber Daya Alam Sektor Kehutanan, Sinar Grafika, Jakarta.

Amiruddin, Zainal, Asikin, 2014, Pengantar Metode Penelitian Hukum, Rajawali Pers, Jakarta.

Andrisman, Tri, 2009, *Hukum PIdana, Dan Dasar Aturan Umum Hukum Pidana Di Indonesia*, Universitas Lampung, Lampung

Anonim, 2009, Himpunan Undang-Undang Kehutanan dan Perkebunan, Permata Press, Jakarta.

Ediwarman, 2014, Penegakan Hukum Pidana Dalam Perspektif Kriminologi, Genta Publishing, Yogyakarta.

Fuady, Munir, 2018, Metode Riset Hukum Pendekatan Teori dan Konsep, PT. Raja Grafido Persada, Jakarta.

Harsono, Boedi, 2003, *Undang-Undang Pokok Agraria, Sejarah Penyusunan, Isi dan Pelaksanaannya*, Djambatan, Jakarta.

Harsono, Boedi, 2008, Hukum Agraria Indonesia Sejarah Pembentukan Undang-Undang Pokok Agraria, Isi dan Pelaksanaannya (Jilid I Hukum Tanah Nasional), Djambatan, Jakarta.

Harsono, Boedi, 2008, *Hukum Agraria Indonesia: Sejarah Pembentukan Undang-Undang Pokok Agraria*, Djambatan, Jakarta.

Helmi, 2013, Hukum Perizinan Lingkungan Hidup, Sinar Grafika, Jakarta.

HS, Salim, 2013, Dasar-Dasar Kehutanan, Sinar Grafika, Jakarta.

Hutagalung, Sukanti, Arie, 2009, dan Markus Gunawan, Kewenangan

Pemerintah Dalam Bidang Pertanahan, Rajawali Press, Jakarta.

Ilyas, Amir, 2012, *Asas-Asas Hukum Pidana Indonesia*, Rengkang Education Yogyakarta dan Pukap Indonesia, Yogyakarta.

Marhiyanto, Bambang, 2015, Kamus Lengkap Bahasa Indonesia, Victory Inti Cipta, Jakarta.

Muwahid, 2016, Pokok-pokok Hukum Agraria di Indonesia, UIN Sunan Ampel Press, Surabaya.

Nasution, Johan, Bahder, 2011, Negara Hukum dan HAM, Mandar Maju, Bandung.

Nurrochmat, Ridho, Dodik, 2005, Strategi Pengelolaan Hutan, Pustaka Pelajar, Yogyakarta.

Perangin, Effendi, 1991, Praktik Permohonan Hak Atas Tanah, Rajawali Press, Jakarta.

Rahmadi, Takdir, 2015, Hukum Lingkungan, Rajawali Pers, Jakarta.

Saleh, Wantijk, 1982, Hak Anda Atas Tanah, Ghalia Indonesia, Jakarta.

Sarjita, 2005, *Teknik Dan Strategi Penyelesaian Sengketa Pertanahan (Edisi Revisi)*, TUGUJOGJA Pustaka, Yogyakarta.

Setia, Alam, Zein, 1996, Hukum Lingkungan Konservasi Hutan, Rineka Cipta, Jakarta.

Soerianegara I, Dan Indrawan A, 2012, Ekologi Hutan Indonesia, Sinar Grafika, Jakarta.

Sumarjono, Maria, SW, 2008, *Tanah dalam Perspektif Hak Ekonomi, Sosial dan Budaya*, Kompas Gramedia, Jakarta.

Supriadi, 2011, Hukum Kehutanan Dan Hukum Perkebunan Di Indonesia, Sinar Grafika, Jakarta.

Sutedi, Adrian, 2010, Hukum Perizinan dalam Sektor Pelayanan Publik, Sinar Grafika, Jakarta.

Yusuf, Muis, Abdul, dan Mohammad Taufik Makarao, 2011, *Hukum Kehutanan Di Indonesia*, Rineka Cipta, Jakarta.

Zakie, Mukmin, 2013, Kewenangan Negara Dalam Pengadaan Tanah Bagi Kepentingan Umum di Indonesia dan Malaysia, Buku Litera, Yogyakarta.

### B. Peraturan Perundang-Undangan

Undang-Undang Dasar Negara Republik Indonesia Tahun 1945.

Kitab Undang-Undang Hukum Pidana.

Kitab Undang-Undang Acara Pidana.

Undang-Undang Republik Indonesia Nomor 41 Tahun 1999 tentang Kehutanan.

Undang-Undang Republik Indonesia Nomor 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup.

Undang-Undang Republik Indonesia Nomor 18 Tahun 2013 Tentang Pencegahan Dan Pemberantasan Perusakan Hutan.

Undang-Undang Republik Indonesia Nomor 37 Tahun 2014 Tentang Konservasi Tanah Dan Air.

Peraturan Menteri Kehutanan Nomor: P.5/MENHUT-II/2010 Tentang Standar Peralatan Polisi Kehutanan.



### C. Jurnal

- Fx. Sumarja dan Muhammad Akib, *Forest Resources Access Moro-Moro Farmer at Register 45 Lampung*, Fiat Justisia Jurnal Ilmu Hukum, Volume 12, Nomor 1, 2018.
- M. Hariyanto, *Tindak Pidana dalam Bidang Kehutanan dalam Undang-Undang Nomor 18 Tahun 2013*, Jurnal Hukum dan Pembangunan, Volume 3, Nomor 2, Desember 2013.
- M. Hariyanto, *Tindak Pidana dalam Bidang Kehutanan dalam Undang-Undang Nomor 18 Tahun 2013*, Jurnal Hukum dan Pembangunan, Volume 3, Nomor 2, Desember 2013.
- Siburian Robert, *Pengelolaan Taman Nasional Gunung Leuser Bagian Bukit Lawang Berbasis Ekowisata*, Volume 8, Nomor 1, 2006.
- T. Sakti, *Peran Mediasi dalam Penanganan Konflik Pertanahan*, Jurnal Pertanahan, Volume 2, Nomor 1, 2012. Yosia Arya Ginting, Hadi Dharmawan, Soehartini Soekartjakrarini, *Interaksi Komunitas Lokal Di Taman Nasional Gunung Leuser*, ISSN. 1978-4333, Volume 4, Nomor 1, April 2010.

### **D.** Internet

- Fika Deiz Fira, *Upaya Penegakan Hukum Terhadap Pelaku Pengerusakan Hutan Bakau (Mangrove) Di Kabupaten Langkat (Studi di Kesatuan Pengelolaan Hutan (KPH)*),<file:///C:/Users/NOW/Downloads/Documents/Upaya%20Penegakan%20Hukum%20Terhadap%20Pelaku%20Pengrusakan%20Hutan%20Bakau%20(Mangrove)%20Di%20Kabupaten%20Langkat%20%20>,diakses tgl 05 September 2020, pkl 20:14 WIB.
- http://eprints. uny. ac. id/8538/3/BAB%202%20-%2008401244022. pdf, diakses tanggal 17 Januari 2021, Pukul 15:00 WIB.
- Teten Susmihara Haeruddin, *Tinjauan Kriminologi Terhadap Kejahatan Illegal Logging Di Kabupaten Kolaka Utara (Studi kasus 20082012)*,<a href="https://core.ac.uk/download/pdf/25490383.pdf">https://core.ac.uk/download/pdf/25490383.pdf</a>, diakses tgl 05 September 2020, pkl 13.12 WIB.
- Zul Ramadhan, *Tinjauan Kriminologis Terhadap Kejahatan Illegal Logging (Studi kasus di Kabupaten Muna*,<a href="https://core.ac.uk/download/pdf/25496434.pdf">https://core.ac.uk/download/pdf/25496434.pdf</a>, diakses tgl 05 September 2020, pkl 12:48 WIB.