



JLPH:
**Journal of Law, Politic
and Humanities**

E-ISSN: 2962-2816
P-ISSN: 2747-1985

<https://dinastires.org/JLPH> dinasti.info@gmail.com +62 811 7404 455

DOI: <https://doi.org/10.38035/jlph.v6i3>
<https://creativecommons.org/licenses/by/4.0/>

Settlement of International Disputes Through Diplomacy: The Case of the Collision of an Indonesian Navy Ship by a Vietnamese Fishing Vessel

Gede Jeje Vijnathananda Sara^{1*}, Dewa Gede Sudika Mangku², Ni Putu Rai Yuliantini³

¹ Postgraduate Master of Laws Program, Ganesha University of Education, Indonesia, jeje@student.undiksha.ac.id

² Postgraduate Master of Laws Program, Ganesha University of Education, Indonesia, sudika.mangku@undiksha.ac.id

³ Postgraduate Master of Laws Program, Ganesha University of Education, Indonesia, raiyluliantini@undiksha.ac.id

*Corresponding Author: jeje@student.undiksha.ac.id

Abstract: This study aims to determine and examine the international dispute resolution actions taken by Indonesia in the case of the collision of an Indonesian Navy ship by a Vietnamese fisheries surveillance vessel in violation of the COLREG 1972 and UNCLOS 1982 regulations. The type of research used is normative legal research, with a legislative approach, a case approach, and a conceptual approach. The sources of legal materials used are inseparable from the existing rules in national law and international law, with a special focus on regulations governing ship collisions and maritime law. The legal material collection technique used is by exploring the normative framework and also document study techniques using legal materials that discuss the theories of maritime law, especially COLREG 1972 and UNCLOS 1982. The results of the study indicate that the resolution of international legal problems carried out by the State of Vietnam against the State of Indonesia regarding violations of COLREG 1972 and UNCLOS 1982 in the Indonesian ZEE was resolved through maritime diplomacy efforts.

Keywords: Legal protection; COLREG 1972; UNCLOS 1982; international dispute resolution

INTRODUCTION

International law may be defined as the body of law which consists for its greater part of the principles and rules of conduct which states feel themselves bound to observe, and therefore, generally do observe in their relations with each other, and which includes also:¹ a) The rules of law relating to the functioning of international institutions or organizations, their relations with each other, and their relations with other states and individuals; in addition b)

¹ Starke, J. G. *Pengantar Hukum Internasional*. Jakarta: Sinar Grafika, 2010: 22

Certain rules of law relating to individuals and non-state entities insofar as the rights and duties of such individuals and non-state entities are of importance to the international community.²

The role of maritime law lies not only in the fact that 70%, or 140 million square miles, of the Earth's surface is covered by sea, but also because the sea serves as a highway connecting one nation to another across the globe for all kinds of activities, and because of its wealth of fish species vital to human life, but also because of the richness of the sea's minerals. The world is not just an archipelagic nation, but also a vast number of archipelagic nations with maritime territories.³

As we know, Indonesia enjoys a strategic position, flanked by two continents and two oceans: Asia and Australia, and the Pacific Ocean and the Indian Ocean. Furthermore, Indonesia is located on the equator. In geography, the equator is an imaginary line drawn through the center of the planet, between the two poles, parallel to the planet's axis of rotation.⁴ The equator divides the Earth into the northern hemisphere and the southern hemisphere. At the equator the sun is directly overhead at midday during the equinox so that the duration of daylight is the same throughout the year, approximately 12 hours.⁵

According to Charles Ramage (1969), the Indonesian archipelago is the largest maritime continent, after the Philippines and Papua New Guinea. Furthermore, Indonesia functions as a global circulatory system due to its high humidity and tropical forests, which are central to the world's climate control system. According to the United Nations Convention on the Law of the Sea (UNCLOS), a coastal state has the right to a territorial sea extending to 12 nautical miles, a contiguous zone extending to 24 nautical miles, an Exclusive Economic Zone extending to 200 nautical miles, and a continental shelf extending to 350 nautical miles or more. Maritime law is a very broad area of regulation, encompassing not only legal regulations related to sea navigation, particularly the transport of goods or people by ship, but also all aspects related to the sea, including the regulation of state-to-state use of the sea.⁶

Article 1 of international maritime law states that a state's territory encompasses a sea lane, which in this convention is called the territorial sea.⁷ Sovereignty over these sea lanes is equalized according to the provisions stipulated in international law. Article 2 states that the territory of a coastal state includes the airspace above its territorial waters, as well as the seabed of the territorial sea and the subsoil thereof.⁸

Speaking of seas, there is the Natuna Sea, a body of water stretching from the Natuna Islands to the Lingga Islands in the Riau Islands province of Indonesia. This sea is bordered by the North Natuna Sea to the north, northwest, and east. The Natuna Sea is also bordered by the Karimata Strait to the southeast and the Singapore Strait to the west.⁹ The Natuna Sea's proximity to neighboring countries, namely Malaysia, Singapore, and Vietnam, makes the islands in this sea one of Indonesia's outermost islands.

² Sefriani. *Hukum Internasional Suatu Pengantar Edisi Ke Dua*. Depok: PT. Raja Grafindo Persada, 2018: 56

³ Danusaputro, Munadjat. *Wawasan nusantara dalam hukum laut internasional*. Bandung: Alumni, 1982: 12

⁴ Dewa Gede Sudika Mangku. *Pengelolaan Perbatasan Darat Indonesia-Timor Leste Di Wilayah Enclave Oecussi*. Yogyakarta: GENTA Publishing, 2020: 67

⁵ Rahim. *Pokok-Pokok Upaya Hukum Terhadap Putusan Pengadilan Dalam Perkara Perdata*. Makassar: Humanities Genius: 2021: 21

⁶ Ma'rifat, Tian Nur dkk. *Dasar-Dasar Perikanan Dan Kelautan*. Malang: UB Press, 2020: 25

⁷ Kraska, J., & Pedrozo, R. (2013). *International maritime security law*. Martinus Nijhoff Publishers. 23

⁸ Vigni, P., & Francioni, F. (2017). Territorial claims and coastal states. In *Handbook on the Politics of Antarctica* (pp. 241-254). Edward Elgar Publishing. 18

⁹ Irawan, H. D., & Carnegie, P. J. (2026). Different Strokes: Indonesian Statecraft in the North Natuna Sea. *Journal of Current Southeast Asian Affairs*, 45(1), 30-58.

Transportation is the lifeblood of the Indonesian economy. The increasing development of transportation in Indonesia is a result of the economic and socio-cultural activities of the community.¹⁰ According to Noel John Vavasour, maritime transport is a mode of transportation currently receiving significant attention from the government, as it is seen as having significant potential for economic and social development in Indonesia, a nation comprised of thousands of islands. Cooperation between countries in technology and economic exchange, including the export and import of goods, is largely facilitated by sea routes due to their significantly lower transportation costs compared to air transportation. The existence of shipping routes will increase trade, which in turn leads to economic growth in the maritime transport sector. This achievement must be balanced with high-quality and efficient shipping.¹¹

The International Regulations for Preventing Collisions at Sea 1972 (COLREG 1972) is an international convention initiated by the International Maritime Organization (IMO). In Indonesian, COLREG 1972 is commonly known as P2TL (Peraturan Persiapan Kolliskan Laut). COLREG 1972 applies to all ships, including warships. This aligns with COLREG 1972's function as rules and procedures for preventing collisions at sea. COLREG 1972 has been amended four times: in 1987, 1989, 1993, and 2001.

COLREG 1972 regulates the actions of crew members when navigating in crowded waters. As a preventative measure, COLREG 1972 is crucial for preventing collisions. Failure to implement COLREG 1972 can negatively impact ship safety. COLREG 1972 is also considered in maritime court proceedings when ship collisions occur. Reflecting on this, Hasugian conducted a 2018 study entitled "Mapping the Characteristics of Ship Accidents in Indonesian Waters Based on KNKT Investigations." The study found that collisions accounted for 46% of all accidents in Indonesia between 2007 and 2014, and 100% of these collisions involved human error.¹²

Furthermore, regulations for additional markings such as lights, whistles, and shapes must be different from those in the 1972 COLREG to prevent confusion in identifying these markings (e.g., the lights used on warships differ from those on merchant vessels). This exemption from these regulations is intended to avoid interfering with vessels with specialized functions. For example, on aircraft carriers, masthead lights cannot be placed on the ship's longitudinal axis, as this could interfere with the ship's ability to embark and land aircraft.

A 1 minute 24 second video, uploaded on Youtube on April 28, 2019, recorded an incident when a Vietnamese government fisheries surveillance vessel collided with an Indonesian warship, KRI Tjiptadi 381. In the video, a number of Indonesian Navy members on the KRI Tjiptadi 381 were seen angry because of the actions of the Vietnamese vessel. Commander of Koarmada I Rear Admiral TNI AL, Yudo Margono stated that the incident of the collision of the Vietnamese Fisheries Surveillance Vessel with the KRI Tjiptadi-381 really happened. Yudo said that the incident in the North Natuna Sea, which is still in the Indonesian Exclusive Economic Zone (ZEE), occurred at 14.45 WIB, Saturday (27/4/2019). "The incident began when the KRI Tjiptadi-381 carried out Law Enforcement in the Indonesian ZEE, specifically in the North Natuna Sea, against the Vietnamese Foreign Fishing Vessel (KIA) BD 979 which was carrying out Illegal Fishing (fish theft) and captured the Vietnamese KIA. According to the Commander of Koarmada I Rear Admiral TNI AL Yudo Margono in his

¹⁰ Hadiningrat, K. S. S., Wiradanti, B., & Umar, Y. F. (2024). Transformation of Indonesian sea transportation and maritime logistics to realize the vision of Golden Indonesia 2045. *JIPower: Journal of Intellectual Power*, 1(1), 89-107.

¹¹ Martínez-Zarzoso, I. (2013). Alternative sea routes: what effects on maritime trade?. *SAIS Review of International Affairs*, 33(2), 61-74.

¹² Achioti, E. (2021). To what extent can unmanned ships comply with COLREGs 1972 and how will the liability of such vessels be assessed? *Southampton Student L. Rev.*, 11, 77.

official statement on Sunday (28/4/2019) said "However, the Vietnamese KIA was escorted by a Vietnamese Fisheries Surveillance Vessel."¹³

Yudo Margono stated that the Vietnamese fisheries surveillance vessel attempted to obstruct the law enforcement process carried out by the KRI Tjiptadi-381. According to him, the Vietnamese fisheries surveillance vessel interfered by ramming the port side of the KRI Tjiptadi-381. However, Yudo stated that the KRI Tjiptadi-381's actions were correct and in accordance with procedure, as the illegal fishing incident occurred within Indonesian territory. "Based on the location of the arrest, it is true that the incident occurred within Indonesia's ZEE. Therefore, the arrest carried out by the KRI Tjiptadi-381 was correct and in accordance with procedure," said Yudo Margono, Commander of Fleet Command I, Rear Admiral of the Indonesian Navy. "However, Vietnam also claims that the area is Vietnamese waters."¹⁴

Large Foreign Vessels Still Frequently Slip Through Riau Waters. Yudo emphasized that the KRI Tjiptadi-381's actions were also appropriate because they did not make excessive contact. Furthermore, he said this case should be resolved bilaterally between the two countries. In the incident, two Vietnamese fisheries surveillance vessels (KN 264 and KN 231) disrupted the law enforcement process carried out by KRI Tjiptadi-381. KN 264 and KN 231 initially maneuvered by approaching the Vietnamese Foreign Fishing Vessel (KIAV) BD 979 and rammed it several times until its fuel tank was damaged. KRI Tjiptadi ignored the maneuvers of KN 264 and KN 231 and continued to guide KIAV BD 979 to Lanal Ranai. However, it turned out that KN 264 then hit the left hull of KRI Tjiptadi. Meanwhile, KN 231 hit KIAV BD 979 until it leaked and sank. Two crew members of KIAV BD 979 jumped overboard and were rescued by a Vietnamese fisheries surveillance vessel. Despite this, the KRI Tjiptadi-381 was still able to capture 12 crew members of KIAV BD 979. "The 12 crew members of the Vietnamese ship were then taken and will be handed over to Lanal Ranai for further legal proceedings".¹⁵

Based on the frequent violations of maritime borders and ship collisions by neighboring countries, the author conducted a study aimed at examining the case with applicable laws and regulations, with the title: "Resolving International Disputes through Diplomacy: The Case of the Collision of an Indonesian Navy Ship by a Vietnamese Fishing Vessel."

METHODS

Research is a process or activity of gathering data to answer a research problem. A simple definition of a research method is the procedure for conducting research. Research methods discuss the procedures for conducting research. The term "research method" consists of two words: "method" and "research." The word "method" comes from the Greek word "methodos," meaning "way" or "path." A method is a scientific activity related to a systematic way of understanding a research subject or object, as an effort to find answers that can be scientifically justified and validated.¹⁶

The type of legal research used in this study is normative legal research, which examines various document studies. It utilizes secondary data such as legislation, court decisions, books, legal theories, and journals focusing on positive and international legal norms

¹³ Hiebert, M. (2020). *Under Beijing's Shadow: Southeast Asia's China Challenge*. Bloomsbury Publishing PLC.

¹⁴ Rizkiyah, F., Legowo, E., Ras, A. R., Widodo, P., Saragih, H. J. R., & Suwarno, P. The Efforts of The Indonesian Government In Overcoming Seed Smuggling Benur Lobsters Overseas. *International Journal of Humanities Education and Social Sciences (IJHESS)*, 2.

¹⁵ Baird, A. J. (2002). Container vessels in the new millennium: Implications for seaports. *Ocean Yearbook Online*, 16(1), 300-327.

¹⁶ Mukherjee, S. P. (2019). *A guide to research methodology: An overview of research problems, tasks and methods*. Crc Press.

governing the Settlement of International Disputes through Diplomacy: The Case of the Collision of an Indonesian Navy Ship by a Vietnamese Fishing Vessel.

DISCUSSION AND RESULT

Legal Regulations in the North Natuna Sea: A National Legal Perspective.

The sea holds immense significance for a nation because it can be designated as national territory, particularly national waters. It can be utilized as a means of transportation, a tourist attraction, and its natural resources can generate state revenue. The role of maritime law lies not only in the fact that 70%, or 140 million square miles, of the Earth's surface is covered by sea, but also because it serves as a highway connecting one nation to another across the globe for all kinds of activities, and because of its rich diversity of fish species vital to human life, but also because of the mineral wealth contained within it. There is not just one archipelagic state in the world, but a vast number of archipelagic states with maritime territories.¹⁷

Regarding legal regulation, it can be concluded that a state is a legal system. In constitutional law, the requirements for the establishment of a state are determined by at least three main elements: territory, people, and power or government.¹⁸ Of these three elements, territory or state territory is considered the primary essence of a state, namely that the state occupies a territory with specific boundaries. Border management is an indicator of a state's commitment to managing its borders. This is demonstrated by the existence of a set of formal, clear, and comprehensive rules. The Indonesian government's commitment to managing its borders is demonstrated by the issuance of Law Number 43 of 2008 concerning State Territory. This law demonstrates the country's commitment to managing its borders. This is demonstrated, among other things, by the existence of a set of formal, clear, and comprehensive legal rules.¹⁹

The Indonesian government demonstrated this commitment by issuing Law Number 43 of 2008 concerning State Territory. This law does not specify state boundaries with coordinates, as international law prohibits unilaterally establishing state boundaries. These boundaries must be established through an agreement, formalized in a border treaty between countries. However, this law explains which countries Indonesia borders on, both land and sea, including regulations regarding the management of state borders, both at the central and regional government levels, which happen to be state borders.²⁰

The Central Government's authority in managing the country's territory and border areas according to this law is as follows:

1. Establishing policies for the management and utilization of the country's territory and border areas;
2. Conducting negotiations with other countries regarding the determination of national borders in accordance with statutory provisions and international law;
3. Constructing or creating national boundary markers;
4. Collecting data and naming islands or archipelagos and other geographical features;
5. Granting permission for international flights to cross territorial airspace on routes specified in statutory regulations;

¹⁷ Oxman, B. H. (2006). The territorial temptation: a siren song at sea. *American Journal of International Law*, 100(4), 830-851.

¹⁸ Yuliantini, N. P. R., & Mangku, D. G. S. (2020). Legal protection for women victims of trafficking in Indonesia in an international human rights perspective. *International Journal of Criminology and Sociology*, 9(2), 1397.

¹⁹ Sedgh, G., Singh, S., Henshaw, S. K., & Bankole, A. (2011). Legal abortion worldwide in 2008: levels and recent trends. *Perspectives on sexual and reproductive health*, 43(3), 188-198.

²⁰ Mangku, D. G. S., Yuliantini, N. P. R., Kbarek, L. N., & Monteiro, S. (2025). Land Border Dispute Resolution Model in the Involvement of Customary Leaders Between Indonesia and Timor Leste in the Oecussi Enclave Area. *Journal of Law and Legal Reform*, 6(1), 329-356.

6. Granting permission for innocent passage to foreign vessels to cross territorial seas and archipelagic waters on routes specified in statutory regulations;
7. Implementing supervision in additional zones as necessary to prevent violations and punish violators of customs, fiscal, immigration, or sanitary laws within the country's territory or territorial sea;
8. Establishing airspace prohibited for international flights for defense and security purposes;
9. Create and update a map of the country's territory and submit it to the House of Representatives (DPR) at least every five years; and
10. Maintain the integrity, sovereignty, and security of the country's territory and border areas.

In accordance with the above, the regulation of the North Natuna Sea area within the national legal framework is also regulated through several laws and regulations, including Law Number 6 of 1996 concerning Indonesian Waters. Article 4 of Law Number 6 of 1996 states that the sovereignty of the Republic of Indonesia in Indonesian waters includes territorial seas, archipelagic waters, and inland waters.²¹

In addition, the legal basis that the Indonesian government has to regulate its maritime borders is Law Number 5 of 1983 concerning the Exclusive Economic Zone,²² where this regulation regulates the outer routes and borders with the Indonesian territorial sea as stipulated based on the applicable laws regarding Indonesian waters which include the seabed, the land beneath it and the water above it with an outer limit of 200 (two hundred) nautical miles measured from the baseline of the Indonesian territorial sea. So that in Article 4 of Law Number 5 of 1983 concerning the Exclusive Economic Zone, it is explained that in the ZEE area, Indonesia has the right to conduct exploration and exploitation, management and conservation of living and non-living natural resources from the seabed and the land beneath it and the water above it and other activities for the exploration and exploitation of the zone (Article 4 of Law Number 5 of 1983 concerning the Exclusive Economic Zone).

Furthermore, Presidential Regulation No. 16 of 2017 explains that this regulation contains a policy on Indonesian maritime affairs, which regulates the management of marine resources. This means that all natural resources available within the territory of the Republic of Indonesia have the right to be managed and preserved for the benefit of the Indonesian nation and state (Presidential Regulation No. 16 of 2017 concerning Indonesian Maritime Policy).

Furthermore, Law No. 32 of 2014 concerning Maritime Affairs also outlines that, in Article 6, paragraph 1, maritime territory consists of territorial waters and jurisdictional areas, as well as high seas and international maritime areas. Furthermore, the jurisdictional area in Article 6, paragraph 1, includes the additional zone, the Indonesian Exclusive Economic Zone, and the continental shelf (Article 6, paragraph 1 of Law No. 32 of 2014 concerning Maritime Affairs). So the legal regulations in the North Natuna Sea are very clear, besides that neighboring countries such as Malaysia, Singapore and Vietnam have recognized the concept of the Indonesian archipelagic state, where the territorial sea is measured from a straight baseline drawn from the outermost points on the outermost islands in the North Natuna Sea.²³

²¹ Mangku, D. G. S. (2020). Implementation of technical sub committee border demarcation and regulation (TSC-BDR) agreement between Indonesia-Timor Leste in the resolution of the land border dispute. *Jurnal IUS Kajian Hukum dan Keadilan*, 8(3), 405-419.

²² Yuliantini, N. P. R. (2021, December). Legal Protection of Women and Children in the Perspective of Human Rights. In *ICLSSE 2021: Proceedings of the 3rd International Conference on Law, Social Sciences, and Education, ICLSSE 2021, 09 September 2021, Singaraja, Bali, Indonesia* (p. 185). European Alliance for Innovation.

²³ Pedersen, M. P. (2004). Territorial jurisdiction in article 1 of the european convention on human rights. *Nordic J. Int'l L.*, 73, 279.

Legal Regulations in the North Natuna Sea from an International Law Perspective.

A state's territorial boundary is a boundary line that separates a state's sovereignty based on international law. The border area is the part of the state's territory located on the inner side along Indonesia's borders with other countries. The jurisdictional boundary is a boundary line that separates the sovereign rights and certain authorities held by a state, based on statutory provisions and international law.²⁴

In the context of international law, the principle of sovereignty defines a state's authority over a territory and the rights arising from the exercise of territorial power. Sovereignty implies that a state has full authority to exercise its territorial rights within its borders. The principle of sovereignty, as enshrined in the UN Charter, is one of the most important and respected fundamental principles, particularly regarding the equality of rights among states worldwide.²⁵

International law is a legal system primarily concerned with relations between states. In addition to regulating relations between states, international law also regulates a collection of legal provisions whose validity is maintained by the international community.²⁶ As a body of legal provisions, international law is a subset of law. As a body of law, international law fulfills the elements that define the definition of law, namely, a body of provisions governing the behavior of individuals within a society, the validity of which is maintained by the "external power" of the society in question. As a subset of law in general, the purpose of international law is also the same as the purpose of law in general. The purpose of law is to create order and justice in the society in which it applies.²⁷

Within the scope of international law, international recognition of a state is based on whether or not the requirements for the establishment of a state are met, including the state's territory, particularly in the context of land territory. Therefore, no state is recognized without a territory. Given this reality, a state always has a territory with certain internationally recognized boundaries, even if these boundaries remain undetermined or disputed.²⁸

Territorial sovereignty ends at the outermost boundaries of a country's territory, and because a country's territorial jurisdiction also encompasses territorial waters, the outermost boundary of a country's territory is essentially the outermost boundary of its territorial sea.²⁹ Therefore, for Indonesia, as an archipelagic nation, its territorial boundaries are partly regulated by the 1982 UNCLOS, which was later ratified through Law Number 17 of 1985 concerning the Ratification of UNCLOS 1982. Others are regulated through agreements or treaties between Indonesia and neighboring countries, such as Malaysia, Australia, Papua New Guinea, Timor Leste, and Vietnam. These agreements or treaties serve as the basis for determining the territorial boundaries of the Republic of Indonesia.³⁰

²⁴ Jeanne Dare Noviyanti Manik. 2018. *Pengaturan Hukum Perbatasan Negara Kesatuan Republik Indonesia Berdasarkan Undang-Undang Wilayah Negara*. Jurnal Hukum Progresif, 12 (1).

²⁵ Santoso, Imam Totok. 2020. *Aksi Agresivitas China Pada Zona Ekonomi Eksklusif Indonesia Laut Natuna Utara (Perspektif Tugas Pokok TNI)*. Jurnal Kajian Lemhannas RI, Edisi 41.

²⁶ Yuliantini, N. P. R. (2021). Legal protection of women and children from violence in the perspective of regional regulation of buleleng regency number 5 year 2019. *Jurnal Pendidikan Kewarganegaraan Undiksha*, 9(1), 89-96.

²⁷ Yuliantini, N. P. R., & Mangku, D. G. S. (2020). Legal protection for women victims of trafficking in Indonesia in an international human rights perspective. *International Journal of Criminology and Sociology*, 9(2), 1397.

²⁸ Dina Sunyowati. 2013. *Hukum Internasional Sebagai Sumber Hukum Dalam Hukum Nasional (Dalam Perspektif Hubungan Hukum Internasional Dan Hukum Nasional Di Indonesia)*. Jurnal Hukum Dan Peradilan, 2 (1).

²⁹ Mangku, D. G. S. (2016). Indonesian government authority in terms of border management with other countries. *International Journal of Business, Economics, and Law*, 10(4), 55-58.

³⁰ Aichel Miranda. 2018. *Pelanggaran Terhadap Hak Berdaulat Indonesia (Studi Kasus Tiongkok Di Laut Natuna Utara)*. Jurnal Of International Relations, 4 (4).

Although Indonesia has sovereignty over its territorial sea, other countries still have the right of innocent passage. Article 17 of UNCLOS 1982 states that all ships, both coastal state ships and non-coastal state ships, have the right of innocent passage through territorial waters.³¹ Furthermore, Article 18 explains the definition of passage in paragraphs 1 and 2 as follows:

"(1) Passage means navigation through the territorial sea for the purpose of:

- (a) passing that sea without entering internal waters or calling at a roadstead or port facility outside internal waters; or
- (b) proceeding to or from internal waters or a call at such roadstead or port facility.

(2) Passage shall be continuous and expeditious. However, passage includes stopping and anchoring, but only in so far as the same are incidental to ordinary navigation or are rendered necessary by force majeure or distress or for the purposes of rendering assistance to persons, ships or aircrafts in danger or distress".³²

According to Article 19 Paragraph 1, the peacefulness of a passage is determined by the nature of the passage, which must not be detrimental to the peace, good order, and security of the coastal state. Therefore, it must be carried out in accordance with the provisions of the Convention and other international law. Paragraph 2 lists the activities of foreign vessels that are considered non-peaceful, namely:³³

1. Threatening or using force against the sovereignty, territorial integrity, or political independence of the coastal state, or in any other manner violating the principles of international law enshrined in the Charter of the United Nations;
2. Conducting war games or exercises with any type of weapon;
3. Conducting acts aimed at gathering information detrimental to the defense or security of the coastal state;
4. Conducting acts that constitute propaganda aimed at influencing the defense or security of the coastal state;
5. Launching, landing, or embarking an aircraft and/or a ship; Launching, landing, or embarking any military equipment or supplies from or onto a ship;
6. Unloading or loading any commodity, currency, or person in a manner contrary to customs, fiscal, immigration, and sanitary laws and regulations;
7. Committing an act of deliberate pollution that causes serious pollution;
8. Conducting illegal fishing activities;
9. Conducting research or survey activities without permission from the coastal state;
10. Conducting acts intended to disrupt information systems, any other communication facilities, or installations; and
11. Conducting other activities not directly related to passage.

Based on the above description, it can be concluded that the right of a foreign vessel to engage in innocent passage in the territorial sea of a coastal state is determined by whether the vessel engages in one of the activities prohibited by Article 19. Engaging in any of these activities will detract from innocent passage. In this regard, UNCLOS 1982 has successfully achieved fairness in the interests of states, particularly Indonesia, which seeks to maintain its national defense and security.³⁴

³¹ Sodik, Dikdik Mohamad. (2016). *Hukum laut internasional dan pengaturannya di Indonesia*. Bandung: PT Refika Aditama.

³² Purwendah, E. K., & Mangku, D. G. S. (2021). Implementation of compensation for oil pollution by tanker ships in the Indonesian legal system. *International Journal of Criminology and Sociology*, 10(2), 111.

³³ Baxter, R. R. (1980). International law in "her infinity variety". *International & Comparative Law Quarterly*, 29(4), 549-566.

³⁴ Nguyen, Y. T. H., Nguyen, T. T., & Trong, H. D. (2025). Equitable Benefit Sharing in the Exploitation of Common Heritage of Mankind Areas According to the Provisions of UNCLOS 1982: Current Situation, Challenges and Prospects. *Braz. J. Int'l L.*, 22, 53.

International Legal Settlement by Indonesia Regarding the Case of the Collision of an Indonesian Navy Ship by a Vietnamese Fisheries Surveillance Vessel.

Indonesia's geographical location and conditions make it a country with a very high potential for maritime conflict. By placing Pancasila as its ideological foundation, the Indonesian people place its values as a source of inspiration and motivation in facing every societal development. Pancasila embodies the values of divinity, humanity, unity, democracy, and justice.³⁵ Therefore, handling potential and actual threats in the maritime sector, as well as "friction" or "conflict" between neighboring countries and stakeholders, must refer to the values of Pancasila. Handling maritime issues must be based on divinity, humanity, unity, priority for the people, and justice.³⁶

In accordance with Article 1 of the Convention on the Peaceful Settlement of Disputes, signed in The Hague on October 18, 1907, the declaration calls on all countries to resolve disputes peacefully in such a way as not to disturb international peace, security, and justice. Indonesia itself has also pursued a diplomatic approach through bilateral negotiations to resolve this dispute.³⁷

International relations between countries are not always smooth. These relationships often give rise to disputes between them. Disputes can stem from various potential sources. Potential sources of disputes between countries can include borders, natural resources, environmental damage, trade, ownership of islands, and so on. When such disputes arise, international law plays a significant role in resolving them. Efforts to resolve these disputes have received significant attention from the international community since the early 20th century.³⁸

These efforts are aimed at creating better relations between countries based on the principles of international peace and security. The role of international law in international dispute resolution is to provide a means for disputing parties to resolve their disputes according to international law. In its early development, international law recognized two methods of resolution: war (military or violent) and peace. Legal remedies are legal remedies or rights granted by law to parties in disputes or interested parties to seek justice from the authorities.³⁹

Furthermore, based on the concept outlined above, international law is law born from international communication, resulting in mutually binding relations (Latipulhayat, 2021:20). Based on the previous description, coastal states have full sovereignty over their territorial seas (including the seabed and airspace above it), along with an obligation to guarantee the right of innocent passage for foreign vessels. Indonesia is one of the countries with numerous coastlines, given its status as an archipelagic state. Indonesia is also said to possess significant natural resource wealth and potential. This potential presents economic opportunities and potential that can be utilized for the advancement of the Indonesian economy and serve as the backbone of national development.⁴⁰

The maritime areas subject to the sovereignty of a coastal/archipelagic state are its internal waters and territorial seas, or its archipelagic waters and territorial seas. Meanwhile,

³⁵ Mangku, D. G. S. (2021, December). Implementation and Consequences for the Indonesian Nation After the Ratification of the Kyoto Protocol. In *ICLSSE 2021: Proceedings of the 3rd International Conference on Law, Social Sciences, and Education, ICLSSE* (Vol. 9, p. 178).

³⁶ Yuliantini, N. P. R., Hartana, H., Kbarek, L. N., & Monteiro, S. (2025). From Retribution to Restoration: Human Rights-Based Legal Protection for Women Victims of Sexual Violence. *Jurnal Media Hukum*, 32(2), 281-300.

³⁷ Mochtar Kusumaatmadja, 1978. *Hukum Laut Internasional*. Bandung: Angkasa Offset Bandung.

³⁸ Hadiwijoyo, Suryosakti. (2008). *Batas wilayah Negara Indonesia "dimensi, permasalahan, dan strategi penanganan"* (sebuah tinjauan empiris dan yuridis). Yogyakarta: Gaya media

³⁹ Syamsumar Dam, (2010). *Politik kelautan*. Jakarta: Bumi Aksara.

⁴⁰ Dewa Gede Sudika Mangku, (2021). *Pengantar Hukum Internasional*. Jawa Tengah: Penerbit Lakeisha.

the maritime areas over which a coastal/archipelagic state has sovereign rights and jurisdiction are the Exclusive Economic Zone (ZEE) and the Continental Shelf. The ZEE has a sui generis (unique/distinct) legal status. This uniqueness lies in the existence of the rights and obligations of coastal states and other countries within the ZEE. Unlike territorial waters, where coastal states have sovereignty, in the ZEE, coastal states only have sovereign rights. These sovereign rights are limited to the exploration and exploitation of marine resources, both living and non-living. Indonesia's maritime potential is very profitable for Indonesian fishermen. However, Indonesia is often infuriated by the influx of foreign vessels into its waters. Foreign vessels often assume their vessels are still on the continental shelf. In fact, the Natuna waters are within Indonesia's Exclusive Economic Zone (ZEE).⁴¹

Indonesia's maritime diplomacy in an effort to resolve the case of ship collisions and violations of the Indonesian ZEE boundaries carried out by Vietnam in the North Natuna Sea area is not only supported by international legal regulations regarding UNCLOS 1982 and COLREG 1972 but is also strengthened by national regulations and policies, some of these regulations and policies include Law No. 5 of 1983 concerning the Exclusive Economic Zone, where this regulation regulates the outer routes and borders with Indonesian territorial seas as stipulated based on the applicable Law on Indonesian waters which include the seabed, the land beneath it and the water above it with an outer limit of 200 (two hundred) nautical miles measured from the baseline of the Indonesian territorial sea. So in Article 4 of Law No. 5 of 1983 concerning the Exclusive Economic Zone, it is explained that in the ZEE area, Indonesia has the right to carry out exploration and exploitation, management and conservation of living and non-living natural resources from the seabed and the land beneath it and the water above it and other activities for the exploration and exploitation of the zone (Article 4 of Law No. 5 of 1983 concerning the Exclusive Economic Zone).

Etymologically, the word "diploma" comes from the Greek "diploun," meaning duplication or copying. Meanwhile, the word "diploma" is also closely related to the English word "duplicity," meaning deception or two-facedness, such as the Bulgarian culture of shaking their heads when they say "yes." In the Indonesian dictionary published by the Ministry of National Education, the word "diplomacy" is defined as the business or organization of official relations between one country and another; the affairs of a country's interests through its representatives in other countries; the knowledge and skill of using appropriate word choice for the benefit of the parties concerned (in negotiations, answering questions, expressing opinions, and so on). Meanwhile, according to the Collins Dictionary, "diplomacy is the activity or profession of managing relations between the governments of different countries."⁴²

According to Lord Strang, diplomacy is the work related to foreign relations or the implementation of foreign policy. Lord Strang also stated that diplomacy is the conduct of relations between governments of various countries through appointed permanent representatives domiciled in the country where they are assigned. Harold Nicolson also provided a definition of diplomacy, including the management of international relations through negotiation. According to him, diplomacy is the skill of expressing ideas in the implementation of interactions and negotiations between nations. Diplomacy is the means by which relations between nations are regulated and managed by ambassadors and special envoys of states. Diplomacy is the business or art of diplomats in persuading other diplomats from abroad. Furthermore, according to Rivier, he provides a definition of diplomacy that encompasses three things:

⁴¹ Dewa Gede Sudika Mangku. (2020). *Pengelolaan Perbatasan Darat Indonesia-Timor Leste Di Wilayah Enclave Oecussi*. Yogyakarta: GENTA Publishing

⁴² Anwar, Syaiful. 2018. *Peran Diplomasi Pertahanan Dalam Mengatasi Tantangan di Bidang Pertahanan*. Jurnal Pertahanan Dan Bela Negara Universitas Pertahanan, 4 (2).

1. Diplomacy is the science that teaches the intricacies of maintaining and developing relations between nations through representatives who master the techniques and strategies of negotiation;
2. Diplomacy is the expression of a concept encompassing all issues of international relations, conveyed by official representatives of states, including foreign ministries and all political agents, to dialogue partners peacefully; Diplomacy is the expression of a concept encompassing all issues of international relations, conveyed by official representatives of states, including foreign ministries and all political agents, to dialogue partners peacefully; Diplomacy is the practice of communicating a concept encompassing all issues of international relations, conveyed by official representatives of states, including foreign ministries and all political agents, to dialogue partners peacefully; Diplomacy is also defined as the career or profession of a diplomat who perseveres and perseveres in negotiations to achieve victory or glory for the country they represent, in accordance with the values and principles of their authority and responsibilities.

Diplomacy is also defined as the career or profession of a diplomat who perseveres and perseveres in negotiations to achieve victory or glory for the country they represent, in accordance with the values and principles of their authority and responsibilities. Diplomacy uses negotiation to manage conflict between actors. It is perhaps the most well-known tool in foreign policy available to actors for managing conflict.⁴³

In general, diplomacy is the management of relations between states carried out by a country to achieve national interests as an implementation of its foreign policy. The concept of diplomacy has subsequently expanded, both in terms of issues and actors, which has given rise to various forms and types of diplomacy, one of which is maritime diplomacy.

Simply put, maritime diplomacy is the management of relations between states through the maritime domain. Maritime diplomacy not only means the use of diplomacy to manage conflicts and tensions between states related to maritime issues through the development of international legal instruments. It also involves the use of assets or resources within the maritime domain to regulate relations between states. While diplomacy generally involves diplomats as representatives of states, maritime diplomacy involves more than just policymakers (state actors). Maritime diplomacy can involve analysts and academics to examine trends, cases, and developments in international relations and global security.⁴⁴

Maritime diplomacy, in the dimension of sovereignty, aims to safeguard Indonesia's political sovereignty and territorial integrity. With this operational understanding, its implementation is directed at strengthening maritime law and agreements, accelerating the completion of border negotiations, strengthening maritime defense and resilience, and enhancing maritime regional development (Setiawan, 2020:10). Maritime diplomacy, in its security dimension, aims to support the creation of security stability in Indonesian waters. As the world's largest archipelagic nation, Indonesian waters are vulnerable to various threats, such as illegal fishing, piracy, maritime pollution, terrorism, and other illegal and unlawful activities (Setiawan, 2020:10).

Maritime diplomacy is categorized into three typologies:

1. *Cooperative maritime diplomacy*;
2. *Persuasive maritime diplomacy*;
3. *Coercive maritime diplomacy*.

Cooperative Maritime Diplomacy, or cooperative maritime diplomacy, is Indonesian maritime diplomacy that seeks to resolve various maritime-related issues with neighboring

⁴³ Hart, D., & Siniver, A. (2020). The meaning of diplomacy. *International Negotiation*, 26(2), 159-183.

⁴⁴ Sigit, Novia Rahmawati. 2019. *Penyelesaian Kasus Pelanggaran Hukum di Perairan Natuna Yang Dilakukan Oleh Kapal Asing Vietnam Dalam Perspektif Hukum Laut Internasional*. Jurnal Selat, 7 (1)

countries, such as maritime boundaries, maritime incidents, and ZEE boundaries (Sigit, 2019:113).

This cooperative maritime diplomacy effort can be seen in Indonesia's efforts to encourage the establishment of various cooperation forums and bilateral and trilateral agreements with other countries in the region. According to the Ministry of Foreign Affairs, "a maritime cooperation forum is an institution, agency, or forum between countries established to prioritize cooperation in the maritime sector, including maritime security and safety, marine resource management, and border management" (Sigit, 2019:114).

In addition to cooperative maritime diplomacy, Indonesian maritime diplomacy is also implemented through persuasive efforts. These persuasive efforts are interpreted as Indonesia's actions to encourage recognition by other countries of Indonesia's contributions and leadership in maritime affairs. Persuasive efforts in Indonesian maritime diplomacy are also carried out by Indonesia by taking a significant role in leadership within ASEAN. These efforts can be seen as the government's attempt to demonstrate its authority, which can then serve as a means of persuasion towards other countries in achieving national interests in the maritime sector.

In addition to the two forms of maritime diplomacy implemented by Indonesia and described above, Indonesia's maritime diplomacy efforts are also demonstrated through coercive maritime diplomacy. This coercive maritime diplomacy is demonstrated through decisive action involving military force and law enforcement through a policy of burning and sinking foreign vessels violating Indonesia's ZEE and illegal fishing activities within the Indonesian ZEE.⁴⁵

From the above explanation, Indonesia has implemented three maritime diplomacy efforts simultaneously: cooperative, persuasive, and coercive, in resolving the ship-ramming case committed by Vietnam within the Indonesian ZEE. This method demonstrates the government's broad considerations in maintaining sovereignty within the Natuna maritime borders, more specifically within the Indonesian ZEE, which extends 200 nautical miles from the Natuna coast.⁴⁶

Indonesia has implemented three forms of maritime diplomacy, which have been very effective. First, cooperative diplomacy, aimed at promoting bilateral cooperation with Vietnam, aims to resolve the issue of ship collisions by Vietnamese fisheries surveillance vessels in Indonesia's ZEE. This is realized through technical and collaborative meetings with Vietnam. Second, persuasive maritime diplomacy is carried out to gain and enhance recognition from other countries of Indonesia's maritime sovereignty. Third, Indonesia's maritime diplomacy demonstrates the government's integration of soft maritime diplomacy (cooperative and persuasive) and coercive maritime diplomacy.⁴⁷

While coercive maritime diplomacy is carried out by Indonesia as an affirmation of the country's independence to safeguard its maritime sovereignty from all forms of threats, soft maritime diplomacy requires Indonesia to actively promote synergistic cooperation and collaboration with various actors, particularly at the Southeast Asian regional level and within the ASEAN regional organization. In this case, the Indonesian government decided to resolve the incident with Vietnam in the North Natuna Sea through diplomatic means. The Secretary General of the Ministry of Maritime Affairs and Fisheries (KKP), Rifky Effendi Hardijanto,

⁴⁵ Setiawati, N., Mangku, D. G. S., & Yuliantini, N. P. R. (2019). Penyelesaian Sengketa Kepulauan Dalam Perspektif Hukum Internasional (Studi Kasus Sengketa Perebutan Pulau Dokdo antara Jepang-Korea Selatan). *Jurnal Komunitas Yustisia*, 2(3), 168-180.

⁴⁶ Astiti, M., Mangku, D. G. S., & Windari, R. A. (2019). Penyelesaian Sengketa Internasional Terkait Pencemaran Laut Timor Akibat Tumpahan Minyak Montara Antara Indonesia dan Australia. *Jurnal Komunitas Yustisia*, 2(1), 11-21.

⁴⁷ Putra, B. A., & Cangara, A. R. (2022). Deficiencies of coercive maritime diplomacy: An Indonesian perspective. *The International Journal of Interdisciplinary Global Studies*, 17(2), 9.

stated that the two countries had agreed to resolve the Natuna incident, which occurred in Indonesia's Exclusive Economic Zone (ZEE), diplomatically and without protracted disputes.⁴⁸

CONCLUSION

Efforts to resolve international law undertaken by Indonesia regarding the case of the collision of an Indonesian Navy vessel by a Vietnamese Fisheries Surveillance Vessel were resolved through 3 maritime diplomacy methods, namely Cooperative maritime diplomacy, Persuasive maritime diplomacy, and Coercive maritime diplomacy. These cooperative maritime diplomacy efforts can be seen from Indonesia's efforts to encourage the establishment of various cooperation forums and bilateral and trilateral agreements with other countries in the region. Persuasive efforts in Indonesian maritime diplomacy were also carried out by Indonesia by taking an important role in leadership in ASEAN. These efforts can be seen as the government's efforts to demonstrate authority, which can then be a means of persuasion towards other countries in achieving national interests in the maritime sector and this coercive maritime diplomacy method is demonstrated through firm actions involving military force with law enforcement through the policy of burning and sinking foreign vessels that violate the Indonesian ZEE and illegal fishing activities in the Indonesian ZEE.

REFERENCE

- Achnioti, E. (2021). To what extent can unmanned ships comply with COLREGs 1972 and how will the liability of such vessels be assessed?. *Southampton Student L. Rev.*, 11, 77.
- Aichel Miranda. 2018. *Pelanggaran Terhadap Hak Berdaulat Indonesia (Studi Kasus Tiongkok Di Laut Natuna Utara)*. *Jurnal Of International Relations*, 4 (4).
- Anwar, Syaiful. 2018. *Peran Diplomasi Pertahanan Dalam Mengatasi Tantangan di Bidang Pertahanan*. *Jurnal Pertahanan Dan Bela Negara Universitas Pertahanan*, 4 (2).
- Astiti, M., Mangku, D. G. S., & Windari, R. A. (2019). Penyelesaian Sengketa Internasional Terkait Pencemaran Laut Timor Akibat Tumpahan Minyak Montara Antara Indonesia dan Australia. *Jurnal Komunitas Yustisia*, 2(1), 11-21.
- Baird, A. J. (2002). Container vessels in the new millennium: Implications for seaports. *Ocean Yearbook Online*, 16(1), 300-327.
- Baxter, R. R. (1980). International law in "her infinity variety". *International & Comparative Law Quarterly*, 29(4), 549-566.
- Danusaputro, Munadjat. *Wawasan nusantara dalam hukum laut internasional*. Bandung: Alumni, 1982: 12
- Dewa Gede Sudika Mangku. (2020). *Pengelolaan Perbatasan Darat Indonesia-Timor Leste Di Wilayah Enclave Oecussi*. Yogyakarta: GENTA Publishing
- Dewa Gede Sudika Mangku. *Pengelolaan Perbatasan Darat Indonesia-Timor Leste Di Wilayah Enclave Oecussi*. Yogyakarta: GENTA Publishing, 2020: 67
- Dina Sunyowati. 2013. *Hukum Internasional Sebagai Sumber Hukum Dalam Hukum Nasional (Dalam Perspektif Hubungan Hukum Internasional Dan Hukum Nasional Di Indonesia)*. *Jurnal Hukum Dan Peradilan*, 2 (1).
- Hadiningrat, K. S. S., Wiradanti, B., & Umar, Y. F. (2024). Transformation of Indonesian sea transportation and maritime logistics to realize the vision of Golden Indonesia 2045. *JIPower: Journal of Intellectual Power*, 1(1), 89-107.
- Hadiwijoyo, Suryosakti. (2008). *Batas wilayah Negara Indonesia "dimensi, permasalahan, dan strategi penanganan"* (sebuah tinjauan empiris dan yuridis). Yogyakarta: Gaya

⁴⁸ Mouslim, H. (2025). Coercive Diplomacy Recalibrated: Evaluating Effectiveness, Risks, and Modern Challenges. *African Scientific Journal*.

- media
- Hart, D., & Siniver, A. (2020). The meaning of diplomacy. *International Negotiation*, 26(2), 159-183.
- Hiebert, M. (2020). *Under Beijing's Shadow: Southeast Asia's China Challenge*. Bloomsbury Publishing PLC.
- International Regulations For Preventing Collisions At Sea (COLREG)*
- Irawan, H. D., & Carnegie, P. J. (2026). Different Strokes: Indonesian Statecraft in the North Natuna Sea. *Journal of Current Southeast Asian Affairs*, 45(1), 30-58.
- Jeanne Dare Noviayanti Manik. 2018. *Pengaturan Hukum Perbatasan Negara Kesatuan Republik Indonesia Berdasarkan Undang-Undang Wilayah Negara*. Jurnal Hukum Progresif, 12 (1).
- Kraska, J., & Pedrozo, R. (2013). *International maritime security law*. Martinus Nijhoff Publishers. 23
- Law Number 17 of 1985 concerning the Ratification of UNCLOS 1982.
- Law Number 32 of 2014 concerning Maritime Affairs (State Gazette of the Republic of Indonesia 2014 Number 294).
- Law Number 5 of 1983 concerning the Exclusive Economic Zone (State Gazette of 1983 Number 44).
- Law Number 6 of 1996 concerning Indonesian Waters.
- Ma'rifat, Tian Nur dkk. *Dasar-Dasar Perikanan Dan Kelautan*. Malang: UB Press, 2020: 25
- Mangku, D. G. S. (2016). Indonesian government authority in terms of border management with other countries. *International Journal of Business, Economics, and Law*, 10(4), 55-58.
- Mangku, D. G. S. (2020). Implementation of technical sub committee border demarcation and regulation (TSC-BDR) agreement between Indonesia-Timor Leste in the resolution of the land border dispute. *Jurnal IUS Kajian Hukum dan Keadilan*, 8(3), 405-419.
- Mangku, D. G. S. (2021, December). Implementation and Consequences for the Indonesian Nation After the Ratification of the Kyoto Protocol. In *ICLSSE 2021: Proceedings of the 3rd International Conference on Law, Social Sciences, and Education*, ICLSSE (Vol. 9, p. 178).
- Mangku, D. G. S., Yuliantini, N. P. R., Kbarek, L. N., & Monteiro, S. (2025). Land Border Dispute Resolution Model in the Involvement of Customary Leaders Between Indonesia and Timor Leste in the Oecussi Enclave Area. *Journal of Law and Legal Reform*, 6(1), 329-356.
- Mangku, Dewa Gede Sudika. (2021). *Pengantar hukum internasional*. Jawa tengah: penerbit lakeisha.
- Martínez-Zarzoso, I. (2013). Alternative sea routes: what effects on maritime trade?. *SAIS Review of International Affairs*, 33(2), 61-74.
- Mochtar Kusumaatmadja, 1978. *Hukum Laut Internasional*. Bandung: Angkasa Offset Bandung.
- Mousslim, H. (2025). Coercive Diplomacy Recalibrated: Evaluating Effectiveness, Risks, and Modern Challenges. *African Scientific Journal*.
- Mukherjee, S. P. (2019). *A guide to research methodology: An overview of research problems, tasks and methods*. Crc Press.
- Nguyen, Y. T. H., Nguyen, T. T., & Trong, H. D. (2025). Equitable Benefit Sharing in the Exploitation of Common Heritage of Mankind Areas According to the Provisions of UNCLOS 1982: Current Situation, Challenges and Prospects. *Braz. J. Int'l L.*, 22, 53.
- Pedersen, M. P. (2004). Territorial jurisdiction in article 1 of the european convention on human rights. *Nordic J. Int'l L.*, 73, 279.
- Presidential Regulation Number 16 of 2017 concerning Indonesian Maritime Policy.

- Purwendah, E. K., & Mangku, D. G. S. (2021). Implementation of compensation for oil pollution by tanker ships in the Indonesian legal system. *International Journal of Criminology and Sociology*, 10(2), 111.
- Putra, B. A., & Cangara, A. R. (2022). Deficiencies of coercive maritime diplomacy: An Indonesian perspective. *The International Journal of Interdisciplinary Global Studies*, 17(2), 9.
- Rahim. *Pokok-Pokok Upaya Hukum Terhadap Putusan Pengadilan Dalam Perkara Perdata*. Makassar: Humanities Genius: 2021: 21
- Rizkiyah, F., Legowo, E., Ras, A. R., Widodo, P., Saragih, H. J. R., & Suwarno, P. The Efforts Of The Indonesian Government In Overcoming Seed Smuggling Benur Lobsters Overseas. *International Journal Of Humanities Education and Social Sciences (IJHESS)*, 2.
- Santoso, Imam Totok. 2020. *Aksi Agresivitas China Pada Zona Ekonomi Eksklusif Indonesia Laut Natuna Utara (Perspektif Tugas Pokok TNI)*. Jurnal Kajian Lemhannas RI, Edisi 41.
- Sedgh, G., Singh, S., Henshaw, S. K., & Bankole, A. (2011). Legal abortion worldwide in 2008: levels and recent trends. *Perspectives on sexual and reproductive health*, 43(3), 188-198.
- Sefriani. *Hukum Internasional Suatu Pengantar Edisi Ke Dua*. Depok: PT. Raja Grafindo Persada, 2018: 56
- Setiawati, N., Mangku, D. G. S., & Yuliantini, N. P. R. (2019). Penyelesaian Sengketa Kepulauan Dalam Perspektif Hukum Internasional (Studi Kasus Sengketa Perebutan Pulau Dokdo antara Jepang-Korea Selatan). *Jurnal Komunitas Yustisia*, 2(3), 168-180.
- Sigit, Novia Rahmawati. 2019. *Penyelesaian Kasus Pelanggaran Hukum Di Perairan Natuna Yang Dilakukan Oleh Kapal Asing Vietnam Dalam Perspektif Hukum Laut Internasional*. Jurnal Selat, 7 (1).
- Sodik, Dikdik Mohamad. (2016). *Hukum laut internasional dan pengaturannya di Indonesia*. Bandung: PT Refika Aditama.
- Starke, J. G. *Pengantar Hukum Internasional*. Jakarta: Sinar Grafika, 2010: 22
- Syamsumar Dam, (2010). *Politik kelautan*. Jakarta: Bumi Aksara.
- United Nations Convention on The Law Of The Sea 1982*
- Vigni, P., & Francioni, F. (2017). Territorial claims and coastal states. In *Handbook on the Politics of Antarctica* (pp. 241-254). Edward Elgar Publishing. 18
- Yuliantini, N. P. R. (2021). Legal protection of women and children from violence in the perspective of regional regulation of buleleng regency number 5 year 2019. *Jurnal Pendidikan Kewarganegaraan Undiksha*, 9(1), 89-96.
- Yuliantini, N. P. R. (2021, December). Legal Protection of Women and Children in the Perspective of Human Rights. In *ICLSSE 2021: Proceedings of the 3rd International Conference on Law, Social Sciences, and Education, ICLSSE 2021, 09 September 2021, Singaraja, Bali, Indonesia* (p. 185). European Alliance for Innovation.
- Yuliantini, N. P. R., & Mangku, D. G. S. (2020). Legal protection for women victims of trafficking in Indonesia in an international human rights perspective. *International Journal of Criminology and Sociology*, 9(2), 1397.
- Yuliantini, N. P. R., & Mangku, D. G. S. (2020). Legal protection for women victims of trafficking in Indonesia in an international human rights perspective. *International Journal of Criminology and Sociology*, 9(2), 1397.
- Yuliantini, N. P. R., Hartana, H., Kbarek, L. N., & Monteiro, S. (2025). From Retribution to Restoration: Human Rights-Based Legal Protection for Women Victims of Sexual Violence. *Jurnal Media Hukum*, 32(2), 281-300.