

# The Effectiveness of Legal and Administrative Blacklist Sanctions Against Companies Violating AMDAL (A Study of Forestry Natural Resources Conservation Policy in Indonesia)

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**Abstract:** This research is motivated by the emergency state of deforestation in Indonesia, which reached 433,751 hectares in 2025, with a significant portion of the damage occurring legally within concession areas. This indicates a failure of Environmental Impact Assessment (EIA/AMDAL) instruments and the ineffectiveness of administrative blacklist sanctions in curbing corporate aggressiveness in the forestry sector. This article aims to analyze the effectiveness of blacklist sanctions against companies violating EIA regulations and their impact on ecological justice for rural communities. Using a normative legal research method with statutory, conceptual, case, and comparative approaches, this study finds that current blacklist sanctions remain a paper tiger. The primary weakness lies in the lack of inter-agency database integration and the emergence of corporate zombie reincarnation, where environmental offenders easily establish new legal entities to evade sanctions. Furthermore, the shift to a risk-based licensing paradigm following the Job Creation Law tends to degrade environmental oversight. This study proposes policy reconstruction through the implementation of a Dual Track System that integrates absolute administrative blacklist sanctions with firm criminal penalties. Progressive law enforcement must be capable of applying the doctrine of piercing the corporate veil to prosecute the intellectual actors behind corporate structures and mandate physical environmental restoration. Integrating these sanctions is crucial to breaking the chain of impunity and ensuring sovereignty over natural resources for the justice of local communities.

**Keywords:** Deforestation, EIA (AMDAL), Blacklist, Corporate Reincarnation, Dual Track System.

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## 1. INTRODUCTION

Indonesia's tropical forests, the lungs of the world, are not merely a proud geographical label, but a vital instrument for climate stability on Earth. However, behind the grand narrative of environmental protection, the domestic legal landscape reveals a worrying contradiction between regulations on paper and practices on the ground. (Nunung Arfianti, 2025; Yofirsta et al., 2025) The aggressive exploitation of natural resources by corporate entities has brought our ecological sovereignty to its lowest ebb. This chaotic oversight in the forestry sector is no longer merely a technical administrative issue, but rather a systemic threat to human safety. (Hamdani et al., 2022; Viri, 2022).

Now, forest destruction in Indonesia has entered a national emergency phase. Data from the State of Deforestation (STADI) 2025 shows staggering figures: deforestation area has soared to 433,751 hectares, a drastic increase of 66% in just one calendar year. Regionally, the situation is far more tragic; West Sumatra recorded a 1,034% increase in forest cover loss,

followed by Aceh at 426% (Utama et al., 2023; Zahroh & Najicha, 2022). These statistics are nature's cry for the loss of millions of trees, which are essential for absorbing emissions and regulating hydrological respiration for the people.

Various in-depth studies confirm that this deforestation is the result of corporate expansion, often disguised as legality. In fact, approximately 58% of total deforestation by 2025 will occur within official concessions, ranging from mining areas to oil palm plantations and industrial timber plantations (Maskun et al., 2025; Zaid et al., 2023). This phenomenon is clear evidence of the failure of Environmental Impact Analysis (AMDAL). Instead of being a control instrument, AMDAL is often reduced to a mere administrative requirement that can be traded or its data manipulated to facilitate massive forest destruction (Nurse, 2022).

The impact of these businesses' systemic misconduct must be borne by local communities and indigenous peoples. As the world's lungs are being eroded, it is the people who are first to suffer from the haze (Lala & Kosim, 2025; Lestari et al., 2025). This crisis has created a domino effect: water sources are drying up, agricultural land is being destroyed by flash floods, and living space is being lost for those who depend on non-timber forest products (Asnar, 2024). This suffering peaked when a landslide swept away settlements due to deforestation in the upstream area by corporations. The common people were forced to pay with tears and their lives for the wealth of a handful of elites (Jayadi & Hidayat, 2025).

Theoretically, administrative sanctions are positioned as the *primum remedium* due to their swift and straightforward nature in ensuring compliance. Among the various types of sanctions, blacklist policies are the instruments most operationally avoided by business actors (Liu et al., 2023). Unfortunately, there's a legal loophole exploited through corporate reincarnation strategies. Blacklisted companies can easily be reborn under new names and management, even though the beneficial ownership remains the same, and then re-acquire permits in other jurisdictions (Eggenberger, 2018). This zombie corporation phenomenon proves that current sanctions have not been able to cripple the economic networks of environmental criminals.

The enactment of Law No. 6 of 2023 (the Job Creation Law) has further complicated environmental law enforcement. The shift toward a risk-based licensing approach is feared to further undermine the substance of the AMDAL (Environmental Impact Assessment) if not accompanied by an integrated sanctions monitoring system (Viri, 2022). Without a transparent and cross-sectoral blacklist mechanism, efforts to save natural resources will become nothing more than empty political slogans.

While numerous studies have examined corporate criminal law or civil lawsuits, research examining the effectiveness of blacklists in stemming corporate reincarnation post-Job Creation Law, based on 2025-2026 data, remains scarce. This article's novelty lies in its proposal: a digitally integrated reconstruction of blacklist policies to break the chain of impunity. Indonesia's forests must once again become protected entities, not simply looted commodities.

Environmental protection must not stop at the administrative level. Progressive law enforcement must be able to combine blacklist sanctions with criminal action that targets the intellectual actors behind the corporate structure (the mind and will of the company). There must be no hiding place for those who destroy nature. Every inch of forest lost must be answered with real accountability. Future legal construction must ensure that when a company is shut down through a blacklist, the policymakers within it must also be behind bars (Ahmed et al., 2024; Wang et al., 2021). A firm synergy between administrative and criminal sanctions is the last bastion to end the colonization of Indonesia's natural resources.

## 2. RESEARCH METHODS

This article is based on a normative juridical design through a doctrinal legal research framework. The exploration focuses on in-depth literature searches to thoroughly analyze primary and secondary legal materials. Epistemologically, law in this discourse is not positioned merely as a social reality, but rather as a complete system of norms encompassing basic principles, regulatory anatomy, and universally recognized legal doctrine. This methodological choice was made to test regulatory consistency and identify legal loopholes in the blacklist administrative sanction policy, which has so far failed to curb corporate aggressiveness in forest destruction (Majeed et al., 2023; Van Hoecke, 2015).

### Research Approach

In order to dissect the complexity of the problem from various legal perspectives, this research combines four mutually reinforcing approach models:

- 1) Statutory Approach: Conducted by examining regulations related to forestry governance vertically and horizontally. The investigation begins with the mandate of Article 33 of the 1945 Constitution as the anchor of natural resource sovereignty, continuing with Law No. 32 of 2009 concerning Environmental Management and Management, and extending to the implications of Law No. 6 of 2023 (Job Creation Law). The core of this approach is to uncover the disharmony of norms that open up opportunities for unscrupulous entrepreneurs to continue operating despite committing serious AMDAL violations (Efendi, 2022).
- 2) Conceptual Approach: Departing from the lack of specific regulations regarding the phenomenon of corporate reincarnation, this approach serves to bridge the analysis through global environmental law principles such as the Polluter Pays Principle and the Precautionary Principle. The author also borrows the logic of the Dual Track System to formulate a new legal construction, where blacklist sanctions are organically integrated with criminal liability to create an absolute deterrent effect (Suryanto, 2023).
- 3) Case Approach: While based on normative studies, this research enriches its analysis by examining empirical data and realities on the ground. The focus is directed at corporate behavior patterns behind the 2025 deforestation anomaly, which reached 433,751 hectares. This approach aims to provide concrete evidence that the fragility of legal norms is directly proportional to the loss of living space for communities surrounding forest areas (Crowe et al., 2011).
- 4) Comparative Approach: In short, the author compares the effectiveness of domestic blacklist mechanisms with best practices in developed countries with strict corporate accountability standards. This step is taken to offer more objective and competitive policy recommendations at the international level (Hyett et al., 2014).

### Sources of Legal Materials

All legal materials in this literature-based study are classified into three main categories:

- 1) Primary Legal Materials: Includes all binding legislative products, court decisions related to corporate environmental crimes, and technical ministerial regulations regarding administrative sanctions. These materials serve as the primary basis for testing the constitutionality of business actors' actions (Busetto et al., 2020).
- 2) Secondary Legal Material: Scientific literature that provides interpretations of primary legal norms. Researchers reviewed at least 30 reputable international journals and periodic reports from global institutions. In this case, the State of Deforestation (STADI) 2025 report serves as a vital statistical reference to demonstrate the urgency of this issue in the eyes of the world (Van Hoecke, 2015).
- 3) Tertiary Legal Materials: Includes legal dictionaries, encyclopedias, and trusted mass media reports (such as Pikiran Rakyat Sulteng) as instruments to capture the social context and real impacts of forest damage on rural communities (Abdul Raof et al., 2025).

### Legal Material Collection and Analysis Techniques

Legal materials were collected through a digitally managed documentation study method to facilitate the differentiation between preventive and repressive regulations. The data was then analyzed qualitatively through the following systematic steps:

- 1) Data Reduction: Filtering out less relevant regulations and focusing the review on administrative sanction norms.
- 2) Data Presentation (Data Display): Describes the correlation between the text of the law and factual data on forest damage in the field in a coherent narrative.
- 3) Systematic Interpretation: Connecting one article to another through the sharpness of legal reasoning. This step is crucial for discovering the root cause of why perpetrators of forest destruction remain impunity before the law despite the massive impacts they have caused (Kharel, 2018; Majeed et al., 2023).

## 3. RESULTS AND DISCUSSION

### Anatomy of Deforestation in Indonesia 2025

The empirical reality on the ground confirms that Indonesia's forest landscape is in a critical phase by 2025. The surge in deforestation to 433,751 hectares, a 66% increase compared to the previous year, is not merely empty statistics, but concrete

evidence of the collapse of our administrative oversight system (Dwiarti et al., 2025; Permadi et al., 2023). The most ironic and critical finding is the fact that approximately 58% of the total damage occurred legally under the umbrella of government concession permits. Details of this anomalous rate of damage are presented in the following table:

**Table 1. Comparison of National and Regional Deforestation Rates (2024-2025)**

Region / Indicator	Deforestation Area 2024 (Ha)	Deforestation Area 2025 (Ha)	Increase (%)
National (Total)	261,575	433,751	65.8%
Kalimantan Island	98,420	155,283	57.7%
West Sumatra Province	4,120	46,720	1,034.0%
Aceh Province	3,550	18,673	426.0%
Concession Sector (Legal)	145,200	251,575	73.2%
Region / Indicator	Deforestation Area 2024 (Ha)	Deforestation Area 2025 (Ha)	Increase (%)

\* Source: Processed by researchers from the 2025 STADI Report (STADI, 2026)

Reading Table 1, we are confronted with the harsh reality of the degradation of the substance of the AMDAL instrument following the implementation of the Job Creation Law. The risk-based approach paradigm is often misinterpreted as a green light to loosen oversight. The practice of "Journalistic AMDAL" or fabricated data has become an open secret among unscrupulous corporations. The inability of authorities to conduct honest environmental audits has made the figures in West Sumatra and Aceh a loud alarm that our laws seem to be losing their grip on capital accumulation (Najicha, 2021; Rohmy et al., 2021).

### Economic and Social Impacts: Ecological Injustice in Rural Communities

Indiscriminate forest exploitation has triggered devastating sociological and economic consequences for the common people. Structural impoverishment has occurred, with profits flowing heavily into corporate pockets, while the risks of disaster and the burden of loss are shifted to the people. Researchers mapped this injustice in the following matrix:

**Table 2. Socio-Economic Impact Matrix Due to Corporate AMDAL Violations**

Impact Dimension	Forms of Social Loss	Long Term Projections
Microeconomics	Loss of non-timber forest products (honey, rattan).	Village income decreased by up to 40%.
Health	Chronic smoke haze-related respiratory infections.	The surge in residents' independent medical costs.
Disaster	Flash floods and landslides are routine.	Infrastructure damage & crop failure.
Socio-cultural	Agrarian conflict & loss of customary land.	Marginalization of local wisdom.
Water Sovereignty	Water pollution by mining residues.	The water crisis forced residents to buy water.

\*STADI Reports 2025 (STADI, 2026)

As depicted in Table 2, ecological injustice occurs when communities that never taste company profits become the front line victims of disasters (Pambudhi & Virgy, 2022; Tacconi et al., 2019). This phenomenon clearly betrays the philosophy of Article 33 of the 1945 Constitution. Residents in remote areas, from Aceh to other regions, are forced to suffer while capital owners remain comfortable in their skyscrapers without ever smelling the flood mud they created (Mutawalli et al., 2023).

### Effectiveness of Blacklist Administrative Sanctions

Blacklisting sanctions should be a civil death sentence for rogue corporations. However, this study found that these sanctions are merely a hollow point due to inter-agency data sectoral egos. The most fatal legal loophole is corporate reincarnation, or "zombie corporations." Rogue entrepreneurs can easily establish new entities under different names but controlled by the

old beneficial ownership (Cherya, 2023). As long as sanctions only target legal entities without addressing human subjects, the law will continue to be circumvented. Researchers argue that a blacklist system must be integrated in real time to completely shut down perpetrators' freedom of movement.

### **The Urgency of the Dual Track System and Criminal Responsibility**

Based on existing data, radical legal reconstruction through the Dual Track System is a must (Golar et al., 2022; Nugroho et al., 2023). The old paradigm that positions criminal penalties as the ultimum remedium must be shifted to primum remedium, alongside administrative sanctions for large-scale forestry crimes. This synergy aims to strike from two directions: blacklists cripple the company's economy, while criminal sanctions pierce the corporate veil to ensnare the board of directors behind the violations (Indrajaya et al., 2022).

Additional sanctions in the form of asset recovery and restorative justice must become the standard. It is deeply unfair if corporations are only fined amounts far less than the profits they reap from environmental destruction. Only by combining business interruption and imprisonment of key actors can the law gain public authority (Mahendra et al., 2024; Nugroho et al., 2022).

## **4. CONCLUSIONS AND SUGGESTIONS**

### **Conclusion**

Through the in-depth analysis above, this study summarizes two basic conclusions:

1. The effectiveness of blacklisting sanctions for AMDAL violators is currently very low, tending more towards administrative formalities. The surge in deforestation in 2025 is clear evidence of the failure of current legal instruments. The main weakness lies in the ease of corporate reincarnation, where perpetrators can change legal identities while still carrying out the same actions.
2. The main obstacle stems from regulatory disharmony following the Job Creation Law, which has shifted the paradigm toward risk without an independent audit system. This creates stark ecological injustice. Saving our forests requires a paradigm shift toward a Dual Track System capable of reaching down to the intellectual actors behind legal entities.

### **Suggestion**

As a strategic recommendation, the following steps are proposed:

- 1) National Data Integration: Immediately establish a national blacklist database directly connected to the OSS system and banking. These sanctions must be absolute, encompassing company names down to individual controlling shareholders, to eliminate any room for re-introduction.
- 2) Radical Criminal Enforcement: Law enforcement officials must have the courage to use the doctrine of piercing the corporate veil to drag intellectual actors to prison and confiscate their personal assets for the sake of restoring the destroyed ecosystem.
- 3) AMDAL Social Audit: Involves public participation and periodic independent audits of AMDAL documents to ensure that Indonesia's forests remain standing as the world's lungs, protected by the constitution.

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