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The Legal Status of Customary Law in Land Dispute Resolution in Indonesia

Muhammad Faisal Rahendra Lubis, Deandra Aprilia Dalimunthe, Nayla Elfira Manik, Gabena Rizky Putri Byd, Rizky Kurniawan
Universitas Islam Sumatra Utara, Indonesia
faisal.rahendra@fh.uisu.ac.id

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Abstract

Customary law plays an important role in resolving land disputes and protecting communal land rights in Indonesia. Its application nevertheless faces tensions between ancestral tenure and formal land administration, limited evidence of ownership, and inadequate protection of customary law communities' rights. This study examined the position of customary law within the national legal system, the role of communal rights in customary land tenure, and the application of customary dispute resolution mechanisms. Normative legal research was conducted using statutory and case approaches. The legal materials examined included the 1945 Constitution of the Republic of Indonesia, Law Number 5 of 1960 on Basic Agrarian Principles, Constitutional Court Decision Number 35/PUU-X/2012, and regulations governing the administration and registration of communal land rights. The findings indicate that customary law is recognized within the national legal system, although its application remains subject to applicable legal requirements. Customary deliberation can provide an alternative mechanism for achieving peaceful settlements and preserving social relationships, provided that legal certainty and the parties' rights are safeguarded. The study concludes that equitable land dispute resolution requires stronger recognition and administration of communal land rights, together with closer coordination between customary mechanisms and national law. These priorities have implications for protecting customary law communities and ensuring legal certainty in the resolution of customary land disputes.

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Keywords: Customary Law; Land Disputes; Communal Land Rights; Customary Law Communities; Legal Certainty

INTRODUCTION

Land holds an important position in the lives of Indonesian communities, particularly for customary law communities, which regard land not merely as a source of livelihood but also as an integral part of their cultural identity, social relationships, and ancestral heritage. This relationship is reflected in the existence of *ulayat rights*, which regulate land ownership and utilization based on the customary provisions in force (Hamid & Suryana, 2024). However, the increasing demand for land, along with differences in the legal foundations of land tenure, may give rise to disputes among customary law communities, individuals, business entities, and the government. This situation raises questions concerning the extent to which customary law is recognized and protected in the resolution of land disputes in Indonesia (Tambunan et al., 2025).

Normatively, the recognition of customary law has acquired a constitutional foundation through Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, which recognizes and respects customary law communities and their traditional rights, subject to certain requirements (Soetijono et al., 2025). This recognition is reinforced by Articles 3 and 5 of Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles, which regulate the existence of *ulayat rights* and the legal position of customary law within the national agrarian legal system. Nevertheless, the recognition of the rights of customary law communities is not absolute; rather, it must take into account the existence of customary law communities, the exercise of *ulayat rights*, and the applicable statutory provisions (Wangi et al., 2023).

Problems arise when such normative recognition encounters the evidentiary and land administration requirements involved in dispute resolution. Land that has been controlled from generation to generation under customary law is not always accompanied by adequate formal documentation, whereas dispute resolution requires clarity regarding the parties entitled to the land, the object of the disputed land, and the legal basis of its tenure. Differences between community recognition of customary land and the evidentiary requirements for land rights within the formal legal system may give rise to legal uncertainty. Therefore, the main issue lies not only in the existence of regulations recognizing customary

law but also in how such recognition is implemented to provide effective legal protection (Ramansyah & Kontesa, 2026).

The relevance of this issue can be observed in Constitutional Court Decision Number 35/PUU-X/2012, which affirmed that customary forests are not state forests but forests located within the territories of customary law communities (Fajar et al., 2024). The decision, pronounced on May 16, 2013, strengthened the recognition of customary law communities' rights in the context of forestry (Adib & Siddiq, 2015). Although it does not directly resolve all issues concerning *ulayat land* disputes, the decision demonstrates that the recognition of customary communities' rights has legal consequences that must be taken into consideration in natural resource management. Furthermore, Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 14 of 2024 governs the administration of land affairs and the registration of *ulayat rights* belonging to customary law communities, making it relevant for examination in relation to legal certainty over *ulayat land* (Tambunan et al., 2025).

In dispute resolution, customary mechanisms through deliberation can serve as a means of reaching agreements by taking into consideration the values prevailing within the community. Such mechanisms have the potential to maintain social relationships and resolve disputes peacefully (Kurniawan et al., 2024). However, the legal standing of outcomes reached through customary mechanisms needs to be analyzed based on the nature of the agreements produced, the authority of the parties involved, and their conformity with national law. Accordingly, customary law should not be understood merely as a set of practices prevailing within society but should also be examined in relation to legal certainty, the protection of rights, and access to formal dispute resolution mechanisms (Siregar et al., 2026).

Based on these issues, this study focuses on the legal position of customary law in the resolution of land disputes in Indonesia, particularly concerning the basis for the recognition of customary law within the national legal system, the role of customary dispute resolution mechanisms, and the challenges of their implementation in providing legal protection for the rights of customary law communities (Kurniawan et al., 2024). This study employs a normative legal research method using a statutory approach and a case approach through an analysis of relevant regulations and related court decisions (Handayani, 2026). This study aims to analyze the relationship between customary law and national law and to

formulate an understanding of strengthening the protection of customary law communities' rights without disregarding the principle of legal certainty (Sumaya, 2025).

METHODS

This study employs a normative legal research method, namely research that focuses on examining legal norms, legal principles, statutory regulations, and court decisions related to the legal position of customary law in the resolution of land disputes in Indonesia (Muhaimin, 2020). The approaches employed include the statutory approach and the case approach. The statutory approach is conducted by examining the provisions of Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, Articles 3 and 5 of Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles, as well as other regulations relevant to the recognition and protection of customary law communities' rights over land (Marzuki, 2017). Meanwhile, the case approach is conducted by analyzing Constitutional Court Decision Number 35/PUU-X/2012 to understand the recognition of customary law communities' rights in natural resource management (Amiruddin & Asikin, 2016).

RESULTS

The Position of Customary Law within the Indonesian National Legal System

The research findings indicate that customary law occupies an important position within the Indonesian national legal system, particularly in the regulation of agrarian affairs and the resolution of land disputes. Its existence is recognized as part of the legal foundations governing relationships between communities and land, reflecting the historical, social, and cultural realities of Indonesian society. This recognition is constitutionally established through Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, which acknowledges and respects customary law communities and their traditional rights, subject to specific legal requirements. Furthermore, Articles 3 and 5 of Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles establish the recognition of *ulayat rights* and the position of customary law as one of the foundations of national agrarian law.

The findings further demonstrate that the recognition of customary law is conditional rather than absolute. The existence of customary law communities, the continuity of customary institutions, the recognition of customary territories, and the implementation of

traditional rights constitute important considerations in determining their legal standing. Consequently, customary law cannot be separated from the national legal framework, as its application must remain consistent with statutory provisions, national interests, and the principle of legal certainty. This relationship indicates that customary law and national law function within an interconnected legal structure rather than as entirely separate systems.

Furthermore, the recognition of customary law has significant implications for land dispute resolution, particularly when disputes involve differences between customary claims and formal land ownership documentation. The research identifies that normative recognition alone is insufficient to guarantee effective legal protection without adequate evidence concerning customary land ownership, territorial boundaries, and the historical relationships between communities and their land. Therefore, the legal position of customary law requires not only constitutional and statutory recognition but also consistent implementation through legal institutions and land administration mechanisms. These findings establish that strengthening the integration of customary law into the national legal system is essential to ensuring legal certainty and protecting the traditional rights of customary law communities in Indonesia.

Ulayat Rights as the Basis of Land Tenure by Customary Law Communities

The research findings indicate that *ulayat rights* constitute a fundamental basis of land tenure for customary law communities in Indonesia, reflecting the collective authority of communities to regulate, control, and utilize land within their customary territories. These rights possess a communal character because they are attached to the customary community as a legal entity and are exercised according to established customary rules. The scope of *ulayat rights* encompasses the regulation of land utilization, territorial boundaries, inheritance arrangements, and the management of land for collective interests. Nevertheless, the existence of individual land rights within customary territories remains possible, provided that such rights are recognized and exercised in accordance with applicable customary and national legal provisions.

The findings also demonstrate that *ulayat rights* differ fundamentally from individual ownership rights under the national agrarian legal system. While individual ownership emphasizes the legal relationship between a person and a particular parcel of land, *ulayat rights* concern the collective authority of customary law communities over their territories.

Therefore, the resolution of customary land disputes requires a broader examination than merely identifying formal ownership documents. Relevant considerations include the historical background of land tenure, the boundaries of customary territories, the authority of community representatives, and the validity of any transfer or relinquishment of land rights.

Furthermore, the research identifies that the protection of *ulayat rights* faces administrative and evidentiary challenges, particularly regarding the formal recognition of customary territories and the documentation of traditional land tenure. In this regard, Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 14 of 2024 provides a regulatory framework for the administration and registration of *ulayat rights* belonging to customary law communities. The regulation strengthens the administrative basis for documenting customary land rights and maintaining relevant land information. These findings demonstrate that the effective protection of *ulayat rights* requires the integration of customary recognition, clear territorial identification, and formal land administration to ensure legal certainty and prevent overlapping land claims.

DISCUSSION

The Position of Customary Law within the Indonesian National Legal System

Customary law is a body of law that grows, develops, and is maintained through customs and norms prevailing within society (Arrasid, 2021). In the land sector, customary law holds significant importance because it regulates the relationships among communities, individuals, and land as an integral part of collective life. This relationship is reflected in the concept of *ulayat rights*, which positions land as both an identity and a source of livelihood for customary law communities (Warman & Andora, 2014; Shebubakar & Raniah, 2019). This relationship concerns not only land utilization but also rights of control, inheritance, territorial boundaries, and the authority of communities to determine land use based on applicable customary provisions. Therefore, the existence of customary law in land dispute resolution needs to be understood as part of the Indonesian legal system, rather than merely as a social tradition without legal relevance (Radjawane, 2016).

In agrarian law literature, Boedi Harsono, through his book *Indonesian Agrarian Law: The History of the Formation of the Basic Agrarian Law, Its Contents and Implementation*, discusses the relationship between customary law and the formation of national land law (Rafie, 2025).

The discussion of customary law within national land law constitutes one of the important aspects of this work. This agrarian legal perspective is relevant to understanding that the formation of national land law cannot be separated from the social realities and structures of land tenure that have long existed within Indonesian society. The bibliographic information of this book can be traced through the library catalogue of the Constitutional Court (Islam & Sulastri, 2026).

Constitutionally, the position of customary law obtains its basis for recognition under Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia (Bayo et al., 2023). This provision states that the state recognizes and respects customary law communities and their traditional rights insofar as they remain in existence, are consistent with societal developments and the principles of the Unitary State of the Republic of Indonesia, and are regulated by law. This provision places the recognition of customary law communities within the constitutional framework while simultaneously establishing requirements for such recognition to be implemented within the national legal system (Sari, 2023).

Further regulation is provided under Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles, or the Basic Agrarian Law (UUPA). Article 3 of the UUPA recognizes the exercise of *ulayat rights* and similar rights of customary law communities insofar as they continue to exist in reality, provided that their exercise is consistent with national and state interests and does not conflict with higher statutory regulations. Meanwhile, Article 5 of the UUPA stipulates that the agrarian law applicable to land, water, and outer space is customary law, insofar as it does not conflict with national and state interests, national unity, Indonesian socialism, and the provisions of the UUPA and other statutory regulations, while taking into account the elements of religious law as referred to in the article.

These two articles serve different functions. Article 3 concerns the recognition and exercise of *ulayat rights*, whereas Article 5 explains the position of customary law as a foundation of national agrarian law, subject to the limitations established by legislation. Accordingly, customary law is not an entirely separate system from national law; rather, it constitutes one of its foundations, the applicability of which must be understood in relation to the Indonesian agrarian legal system (Diksy & Raynee, 2026).

However, such recognition does not mean that every claim to land identified as customary land automatically receives legal protection. The existence of customary law communities, the claimed territory, the relationship between the community and the land, and the rights in dispute still need to be established in accordance with the applicable provisions. The distinction between normative recognition and concrete evidentiary requirements constitutes one of the important issues in resolving customary land disputes (Simarmata, 2021).

Accordingly, the position of customary law within the national legal system can be understood through three aspects. First, customary law is recognized as part of the foundation for national agrarian regulation (Hastarini et al., 2022). Second, *ulayat rights* receive recognition subject to certain requirements. Third, the application of customary law in land disputes must be situated within the framework of legal certainty, rights protection, and respect for statutory provisions (Supriyanto, 2025).

Ulayat Rights as the Basis of Land Tenure by Customary Law Communities

Ulayat rights constitute the rights of customary law communities over specific territories, enabling such communities to regulate relationships with and the utilization of land based on the customary law in force. These rights have a communal character because they relate to the interests of the community as a legal entity, although within customary territories there may also be parcels of land controlled or owned individually in accordance with the applicable legal provisions (Wangi et al., 2023).

Ulayat rights cannot simply be equated with individual ownership rights. Ownership rights are essentially individual rights as regulated under the UUPA, whereas *ulayat rights* concern the authority of customary law communities over their territories (Sari, 2017). In practice, land within customary territories may be used for settlements, agriculture, plantations, burial grounds, water sources, forests, and various collective interests. Such utilization follows the social structure, distribution of authority, and customary rules applicable to each community (Evitasari et al., 2024).

The characteristics of *ulayat rights* indicate that customary land disputes cannot always be resolved merely by determining who holds the ownership documents. In certain cases, the issues that need to be examined also include whether the land forms part of a customary territory, who has the authority to represent the community, the history of land tenure, and

whether any valid relinquishment or transfer of rights has previously occurred (Ramli et al., 2024).

More specific regulations concerning the land administration of *ulayat rights* are contained in Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 14 of 2024 concerning the Administration of Land Affairs and Registration of *Ulayat Rights* of Customary Law Communities. This regulation governs the administration, registration, maintenance of data, and information concerning *ulayat rights* over land. The regulation also replaces Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 18 of 2019. The complete document is available through the Legal Documentation and Information Network (JDIH) of the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency.

Research implications, this study highlights the importance of strengthening the recognition and protection of customary land rights through the integration of customary law and national agrarian regulations. Effective land administration and registration are essential to ensuring legal certainty and preventing land disputes.

Research limitations, this study is limited to normative legal analysis of statutory regulations, legal principles, and Constitutional Court Decision Number 35/PUU-X/2012. It does not examine the empirical implementation of customary law in specific communities.

CONCLUSION

Based on the discussion, customary law plays an important role in resolving land disputes in Indonesia as part of the national agrarian legal system and as a means of protecting customary law communities' rights over *ulayat land*. Such recognition is grounded in Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, Articles 3 and 5 of Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles (UUPA), and Constitutional Court Decision Number 35/PUU-X/2012. Customary dispute resolution through deliberation provides an alternative for achieving peace and maintaining social relationships. However, its implementation faces challenges, including limited ownership evidence, differences between customary land tenure and formal land administration, and inadequate legal protection. Therefore, strengthening the recognition and protection of *ulayat rights* through clear land administration and registration, particularly under Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the

National Land Agency Number 14 of 2024, is essential to achieving fair dispute resolution, ensuring legal certainty, and protecting customary law communities' rights in accordance with national law.

This study contributes to the development of agrarian law by clarifying the legal position of customary law and ulayat rights within Indonesia's national legal system, particularly in relation to land dispute resolution and legal protection.

Future researchers are encouraged to conduct empirical studies examining the implementation of customary land rights, the effectiveness of dispute resolution through customary institutions, and the coordination between customary communities, land authorities, and government institutions.

REFERENCES

Amiruddin, & Asikin, Z. (2016). *Pengantar Metode Penelitian Hukum*. Rajawali Pers.

Arrasid, S. E. (2021). Eksistensi Hak Ulayat Masyarakat Adat dalam Undang-Undang Pokok Agraria. *Ikatan Penulis Mahasiswa Hukum Indonesia Law Journal, 1*(1), 80–90. https://doi.org/10.15294/ipmhi.v1i1.49861

Bayo, R., Wijaya, A. U., & Hadi, F. (2023). Pengakuan Masyarakat Adat dalam Peraturan Perundang-Undangan di Indonesia. *Jurnal Ilmu Hukum Wijaya Putra, 1*(1), 1–11. https://doi.org/10.38156/jihwp.v1i1.87

Diksy, K. P., & Raynee, R. R. (2026). Kedudukan Hukum Adat di Tengah Dominasi Hukum Nasional dalam Perspektif Pluralisme Hukum di Indonesia. *Jurnal Riksa Cendikia Nusantara, 2*(9), 19–27. https://ejournal.lembagarisetmandirinusantara.or.id/index.php/jrcn/article/view/198

Evitasari, S., Syafira, A., & Saleh, R. D. D. (2024). Pendaftaran Tanah Masyarakat Adat Toraja. *Widya Bhumi, 4*(1), 35–54. https://doi.org/10.31292/wb.v4i1.54

Fajar, P. P. P., Aloysius, S., & Dinata, H. K. (2024). Implikasi Putusan Mahkamah Konstitusi Nomor 35/PUU-X/2012 terhadap Pengaturan Hutan Adat dan Dampaknya terhadap Hak Masyarakat Adat. *Perkara: Jurnal Ilmu Hukum dan Politik, 2*(2), 39–61. https://doi.org/10.51903/perkara.v2i2.1844

Hamid, A. R., & Suryana, A. (2024). Dinamika Konversi Hak atas Tanah Ulayat (Studi Kasus Tanah Ulayat di Bali): Dynamics of conversion of customary land rights (case study of customary land in Bali). *Jurnal Kolaboratif Sains, 7*(12), 4739–4750. https://jurnal.unismuhpalu.ac.id/index.php/JKS/article/view/6527

Handayani, L. E. (2026). Penegakan Hukum Pidana terhadap Penyalahgunaan Wewenang dalam Administrasi Publik: Kajian Normatif atas Jaminan HAM Aparatur Sipil Negara. *Jurnal STIA Bengkulu: Committe to Administration for Education Quality, 12*(1), 17–26. https://jurnal.stiabengkulu.ac.id/index.php/jsb/article/view/309

Hastarini, A., & Luthfan, G. F. F. (2022). Kedudukan Hukum Masyarakat Adat dalam Memperoleh Hak atas Tanah di Indonesia. *Jurnal Hukum Sasana, 8*(2), 243–264. https://doi.org/10.31599/sasana.v8i2.1272

Islam, M. H., & Sulastri, D. (2026). Pluralisme Hukum dan Konflik Normatif: Analisis Sosiologis Penyelesaian Sengketa Tanah Adat versus Hukum Agraria Nasional. *Jurnal Penelitian Ilmiah Multidisipliner, 2*(4), 1453–1462. https://ojs.ruangpublikasi.com/index.php/jpim/article/view/1462

Kurniawan, A., Triana, N., Sari, M., Hasibuan, N. L., & Ramadhona, A. (2024). Hukum Adat dan Nilai Restoratif: Kontekstualisasi Penyelesaian Konflik Sumbang Adat di Jambi. *Masalah-Masalah Hukum, 53*(2), 111–122. https://doi.org/10.14710/mmh.53.2.2024.111-122

Laturette, A. I. (2016). Penyelesaian Sengketa Hak atas Tanah Masyarakat Hukum Adat. *SASI, 22*(2), 52–66. https://doi.org/10.47268/sasi.v22i2.168

Marzuki, P. M. (2017). *Penelitian Hukum* (Edisi revisi). Kencana.

Muhaimin. (2020). *Metode Penelitian Hukum*. Mataram University Press.

Rafie, M. A., & Happier, W. C. (2024). Sejarah Perkembangan Hukum Agraria di Indonesia Sebelum Dibentuknya Undang-Undang No. 5 Tahun 1960 tentang Peraturan Dasar Pokok-Pokok Agraria (UUPA) dan Dampaknya bagi Keadilan di Masyarakat. *Journal Sains Student Research, 2*(5), 340–350. https://ejurnal.kampusakademik.co.id/index.php/jssr/article/view/2677

Ramansyah, R. Z., & Kontesa, E. (2026). Rekonstruksi Perlindungan Tanah Ulayat Pasca Putusan Mahkamah Konstitusi Nomor 64/PUU-XXIV/2026: Model Pendaftaran Tanah Berbasis Rekognisi Hak Masyarakat Hukum Adat. *SEIKAT: Jurnal Ilmu Sosial, Politik dan Hukum, 5*(5), 3414–3429. https://ejournal.45mataram.ac.id/index.php/seikat/article/view/4113

Ramli, D. H., Nobatonis, O. J., & Pello, H. F. (2024). Faktor Penyebab dan Mekanisme Penyelesaian Sengketa Tanah Warisan (Studi Kasus: Kampung Ulayat Mbehal Menjerite, Kecamatan Boleng, Kabupaten Manggarai Barat). *Jurnal Hukum, Politik dan Ilmu Sosial, 3*(4), 205–221. https://doi.org/10.55606/jhpis.v3i4.4441

Sari, I. (2017). Hak-Hak atas Tanah dalam Sistem Hukum Pertanahan di Indonesia Menurut Undang-Undang Pokok Agraria (UUPA). *Jurnal Mitra Manajemen, 9*(1), 15–33. https://journal.universitassuryadarma.ac.id/index.php/jmm/article/view/492

Sari, R. A. D. P. (2023). Perlindungan dan Kesejahteraan Masyarakat Adat dalam Memenuhi Hak-Haknya Berdasarkan Pasal 18B UUD 1945. *Jurnal Hukum dan HAM Wara Sains, 2*(11), 1006–1016. https://doi.org/10.58812/jhhws.v2i11.730

Shebubakar, A. N., & Raniah, M. R. (2019). Hukum Tanah Adat/Ulayat. *Jurnal Magister Ilmu Hukum: Hukum dan Kesejahteraan, 4*(1), 14–22. https://doi.org/10.36722/jmih.v4i1.758

Simarmata, R. (2021). The states position regarding registration of customary land (Orientasi Negara dalam Pendaftaran Tanah Adat di Indonesia). *The Indonesian Journal of Socio-Legal Studies, 1*(1), Article 3. https://doi.org/10.54828/ijsls.2021v1n1.3

Siregar, M. S., Sukti, S., & Ihsan, R. N. (2026). Peran Lembaga Adat Dayak dalam Penyelesaian Tindak Asusila Perspektif Hukum Nasional. *Jurnal USM Law Review, 9*(2), 757–770. https://doi.org/10.26623/julr.v9i2.13989

Soetijono, I. K., Ranie, N. A., & Rato, D. (2025). Pengakuan Konstitusional Hak Masyarakat Adat atas Sumber Daya Alam di Indonesia. *KUNKUN: Journal of Multidisciplinary Research, 2*(1), 75–93. https://ejournal.mediakunkun.com/index.php/kunkun/article/view/259

Sumaya, P. S. (2025). Konflik antara Hukum Adat dan Hukum Negara: Tantangan Penegakan Keadilan dalam Masyarakat Adat. *MANIFESTO: Jurnal Gagasan Komunikasi, Politik, dan Budaya, 3*(2), 1–12. https://journal.awatarapublisher.com/index.php/manifesto/article/view/308

Tambunan, S. A. E., Tarigan, G. A. M., & Manurung, A. D. B.-H. (2025). Hak Ulayat versus Hak Milik: Dinamika, Konflik, dan Resolusi. *Neoclassical Legal Review: Journal of Law and Contemporary Issues, 4*(1), 28–35. https://idjpcr.usu.ac.id/nlr/article/view/20611

Tandori, & Supriyanto, V. H. (2025). Kontradiksi Hak Komunal dan Hak Ulayat dalam Hukum Pertanahan Indonesia: Tinjauan Yurisprudensi dan Regulasi Indonesia. *Tunas Agraria, 8*(3), 380–400. https://doi.org/10.31292/jta.v8i3.483

Wangi, N. K. P. S. S., Dantes, K. F., & Sudiatmaka, K. (2023). Analisis Yuridis Hak Ulayat terhadap Kepemilikan Tanah Adat Berdasarkan Undang-Undang Nomor 5 Tahun 1960 tentang Peraturan Dasar Pokok-Pokok Agraria. *Jurnal Ilmu Hukum Sui Generis, 3*(3), 112–121. https://doi.org/10.23887/jih.v3i3.2606

Warman, K., & Andora, H. (2014). Pola Hubungan Hukum dalam Pemanfaatan Tanah Ulayat di Sumatera Barat. *Mimbar Hukum, 26*(3), 366–381. https://doi.org/10.22146/jmh.16031