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The Legitimacy Controversy Surrounding Mass Organizations as Holders of Mining Business Licenses within the Framework of National Mining Law

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Original Article

Abstract

This study analyzes the legitimacy of religious-based organizations (ormas) as holders of mining business permits under Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining. Using a normative juridical approach, it evaluates the policy's alignment with the constitutional principles of Article 33 of the 1945 Constitution and the framework of good mining governance. The findings indicate that prioritizing Special Mining Business Permit Areas (WIUPK) for business entities owned by religious organizations is formally recognized but substantively fragile. The policy creates risks of political clientelism, conflicts of interest, and environmental harm due to insufficient technical capacity and weak oversight. Normatively, it does not fulfill the constitutional mandate to promote public welfare but instead opens pathways for abuses of authority and the politicization of religion. Strengthening implementing regulations is essential to ensure transparency, accountability, and environmental sustainability in natural resource management.

Keywords: *Legitimacy of Religious Organizations, Mining Governance, Abuse of Power.*

Abstrak

Penelitian ini mengkaji legitimasi organisasi kemasyarakatan (ormas) keagamaan sebagai pemegang izin usaha pertambangan berdasarkan Undang-Undang Nomor 2 Tahun 2025 tentang Perubahan Keempat atas Undang-Undang Nomor 4 Tahun 2009 tentang Pertambangan Mineral dan Batubara. Pendekatan yuridis normatif digunakan untuk menelaah konsistensi kebijakan ini dengan prinsip konstitusional Pasal 33 UUD NRI 1945 dan konsep good mining governance. Hasil analisis menunjukkan bahwa pemberian prioritas Wilayah Izin Usaha Pertambangan Khusus (WIUPK) kepada badan usaha milik ormas keagamaan bersifat formal namun lemah secara substantif. Kebijakan tersebut menimbulkan risiko klientelisme politik, konflik kepentingan, serta degradasi lingkungan akibat lemahnya kapasitas teknis dan mekanisme pengawasan. Secara normatif, kebijakan ini tidak mencerminkan amanat konstitusi tentang kemakmuran rakyat, melainkan membuka celah penyalahgunaan kekuasaan dan politisasi agama. Reformasi regulasi pelaksana diperlukan untuk menjamin transparansi, akuntabilitas, dan keberlanjutan lingkungan dalam pengelolaan sumber daya alam nasional.

Kata kunci: *Legitimasi Ormas Keagamaan, Tata Kelola Pertambangan, Penyalahgunaan Kekuasaan.*

1. INTRODUCTION

Indonesian is endowed with abundant natural resources, yet these assets frequently fail to generate equitable benefits for the broader population. The clearing of tropical forests, the increasing threat to biodiversity, and the extensive extraction of mineral reserves such as nickel, gold, tin, coal, oil, and natural gas often result not in shared prosperity but in environmental degradation, social tensions, and deepening economic disparities. The mining sector, in particular, extends beyond a commercially profitable industry and has become a source of various hazards, including flash floods linked to deforestation, fatal abandoned mine pits, water contamination affecting rural communities, and the displacement of Indigenous groups without adequate compensation.[1]

Within this broader landscape, national mining regulations—intended to safeguard the public interest—are frequently leveraged to serve elite agendas, including through controversial policies that permit non-corporate actors, such as religious organizations, to participate in mining activities. Article 33 of the 1945 Constitution is often invoked to justify state control over natural resources for the greatest benefit of the people. However, in practice, such control tends to favor large corporate interests or oligarchic groups, while local communities bear the adverse impacts and receive minimal tangible benefits. Law Number 4 of 2009 on Mineral and Coal Mining (the Minerba Law), as amended by Law Number 3 of 2020, Law Number 11 of 2020 on Job Creation, and Law Number 2 of 2025 on the Fourth Amendment to Law Number 4 of 2009, was expected to strengthen governance but has instead generated substantial controversy.

The policy granting priority to religious organizations in managing former Work Permit Areas (WIUPK) previously operated under mining concessions (PKP2B), without an open tender mechanism, raises fundamental questions regarding whether the state is consistently adhering to its constitutional mandate or creating opportunities for clientelism and abuses of authority that may significantly reduce non-tax state revenue (PNBP). This controversy emerged following the issuance of Government Regulation No. 25 of 2024, which amends Government Regulation No. 96 of 2021, particularly Article 83A, which explicitly provides preferential access for religious organizations to obtain Special Mining Business Licenses (WIUPK).[2] The normative justification offered, namely "improving community welfare," appears problematic as it contradicts core principles of natural resource governance that require competitive and accountable selection processes. It is therefore unsurprising that PWYP and ICEL

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1 Anisa Trinata et al., *Bencana Ekologis: Mereduksi Risiko, Memulihkan Indonesia*, ed. oleh Parid Ridwanuddin (Yogyakarta: Samudra Biru, 2025), hal. 11.

2 Wahyu Nugroho et al., "Ormas Keagamaan Jadi Korporasi: Politik Hukum di Ujung Tambang," *Jurnal Litigasi* 26, no. 1 (2025): 307–43, https://doi.org/10.23969/litigasi.v26i1.20375.

view this policy as inconsistent with the earlier Minerba Law, which emphasized that state-owned enterprises (BUMN) and regional-owned enterprises (BUMD) should serve as the primary actors in this sector.

Compounding the issue, religious organizations—which fundamentally operate as non-profit entities focused on religious and social activities—were positioned to participate in the extractive mining sector, thereby exposing them to potential conflicts of interest, misuse of authority, and the politicization of religious institutions. Tempo, in its article "Mining Permits and the Mandate of Religious Organizations," noted that this development risks undermining the role of such organizations and contradicts the principles of the 1945 Constitution, which emphasizes institutional neutrality. This policy direction was further solidified by Law No. 2 of 2025, enacted in February 2025, which through Articles 51, 60, and 75, grants priority access to Mining Business Permits (WIUP) and Special Mining Business Permits (IUPK) for cooperatives, small and medium enterprises, religious organizations, and even universities.[3]

Nahdlatul Ulama (NU) was allocated approximately 23,000–26,000 hectares from the former Bakrie Group PKP2B area in East Kalimantan, as announced by Minister Bahlil Lahadalia in June 2024.[4] Although the Minister framed the allocation as part of a long-term welfare initiative subject to strict verification, it has been widely viewed as a form of political co-optation, particularly in the context of regional elections and political transitions. Mass organizations with large membership bases, such as NU, may consequently face tensions with affected local communities, including horizontal conflicts, criminalization of opposition groups, or the instrumentalization of mass organizations in state coercive practices. Furthermore, religious organizations often lack technical mining capacity, making them reliant on established corporate actors, which increases the likelihood of majority share transfers. From this perspective, the policy functions less as a form of empowerment and more as a structural liability.

Instead of functioning as a mechanism to advance public welfare as mandated by the constitution, the policy of granting mining business permits to religious community organizations has the potential to foster new forms of clientelism within government. The relationship between the state and these organizations has taken on a transactional character, in which political loyalty and social support appear to be exchanged for mining concessions. Within this dynamic, the principles of good mining governance are increasingly undermined by concealed corruption, unregulated environmental degradation, and social fragmentation at the community level.[5] This development raises

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[3] Tempo, "Risiko Izin Tambang Ormas Keagamaan," Tempo.co.id, 2025, https://www.tempo.co/kolom/risiko-izin-tambang-ormas-keagamaan-22803.

[4] CNBC Indonesia, "Akhirnya Terungkap! NU Bakal Dapat Jatah Tambang Batu Bara Raksasa Ini," 2024, https://www.cnbcindonesia.com/news/20240611143928-4-545697/akhirnya-terungkap-nu-bakal-dapat-jatah-tambang-batu-bara-raksasa-ini.

[5] Muhammad Tanzil Aziz Rahimallah, Andi Dewi Pratiwi, dan Achmad Fauzi Kusmin, "Pengelolaan Minerba Dalam Perspektif Good Governance (Tinjauan Teoritik)," *Arajang: Jurnal Ilmu Sosial Politik* 4, no. 1 (2021): 34–

fundamental concerns regarding the legal and moral legitimacy of religious organizations serving as holders of Mining Business Permits (IUP).

Moreover, the policy carries significant implications for mining governance, which should be grounded in transparency, accountability, and environmental sustainability. Within this framework, the study identifies two primary areas of inquiry: first, assessing the legitimacy of religious organizations as holders of Mining Business Permits (IUP) from a constitutional standpoint and the potential for misuse of authority; and second, evaluating the policy's implications for the principles of good governance in the mining sector, including information transparency, social responsibility, ecosystem protection, and the safeguarding of the rights of affected communities.

Based on the issues outlined in the background section, it is necessary to formulate research questions that not only capture the core of the problem but also critically assess the legitimacy and normative implications of the policy permitting religious community organizations to engage in mining activities. Accordingly, this study identifies two principal questions aimed at examining the legal foundations, potential deviations, and practical consequences of the policy: first, how the legitimacy of religious community organizations in conducting mining operations is established under Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining; and second, how the granting of mining business permits to such organizations affects good mining governance as mandated by statutory provisions.

2. RESEARCH METHODOLOGY

This study employs a normative juridical approach, which focuses on examining law as a set of norms governing social behavior and the exercise of state authority. Rather than merely compiling library data, this approach interprets law as a value-based system that functions within social structures. In this regard, the research views law not solely as a formal textual provision but also as an ideological instrument reflecting the political and moral orientations of its drafters.[6] The primary sources consist of statutory regulations as primary legal materials, complemented by secondary legal materials such as scholarly literature, doctrinal opinions, and relevant prior studies. The analysis utilizes deductive reasoning, whereby conclusions are drawn from generally accepted principles to address the specific issues under review. This method enables a critical evaluation of the coherence between applicable legal norms and constitutional principles, including justice, certainty, and legal utility. Through qualitative analysis, the study not only interprets legal texts dogmatically but also assesses their practical relevance and the potential for distortion arising from political or economic interests.

54, https://doi.org/10.31605/arajang.v4i1.

6 Bambang Sunggono, *Metodologi Penelitian Hukum* (Jakarta: Raja Grafindo Persada, 2003), hal. 73.

3. RESULT AND DISCUSION

3.1. The Legitimacy of Religious Community Organizations in Conducting Mining Activities under Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining

Religious-based community organizations (ORMAS) hold a strategic position within Indonesian society. Their functions extend beyond social, educational, and economic domains and reach into natural resource governance, including the mining sector. In this context, religious organizations may serve as strategic partners of the government in promoting equitable, transparent, and sustainable natural resource management. However, their involvement in mining cannot be unrestricted and must operate within a clearly defined regulatory framework. This is essential to mitigate risks of conflicts of interest, misuse of authority, and potential legal violations or environmental degradation. Provisions concerning the granting of Special Mining Business Permit Areas (WIUPK) to religious organizations are explicitly regulated in Article 83A paragraph (1) of Government Regulation Number 25 of 2024.

This provision establishes the legal basis for the government to prioritize the allocation of WIUPK to business entities owned by religious organizations for the purpose of enhancing community welfare. Nevertheless, such priority is conditional rather than automatic. Business entities affiliated with religious organizations must still comply with substantive requirements, including corporate legality, technical and operational capacity, commitments to environmental sustainability, and plans for local economic development. Since the policy's enactment, several major organizations, including Nahdlatul Ulama (NU) and Muhammadiyah, have expressed interest in managing WIUPK areas.

Muhammadiyah emphasized that the pursuit of mining permits is not motivated by commercial interests but is instead oriented toward advancing religious outreach and strengthening charitable initiatives that contribute to broader community welfare. From an administrative law perspective, permits function as legal instruments through which the government exercises regulatory and supervisory authority. Mining permits confer legal legitimacy upon business entities to undertake the exploration and exploitation of natural resources. These permits are constitutive in nature, as mining activities lack legal standing without them. Accordingly, mining permits serve not only as administrative tools but also as mechanisms of state oversight to ensure that mining operations adhere to legal norms, principles of social justice, and environmental protection.

However, the Indonesian Mining Experts Association (PERHAPI) underscores several critical considerations before religious organizations become directly involved in mining management. First, a professional and competent institutional and managerial structure is essential within the mining sector. Second, robust due diligence processes

must be implemented to evaluate investment feasibility, including technological requirements, economic viability, and socio-political acceptance. Third, due diligence must also encompass comprehensive feasibility studies, environmental impact assessments (AMDAL), and evaluations of mine exploration and construction. These stages are necessary to ensure that mining operations conducted by religious organizations are not only legally valid but also socially legitimate and environmentally sustainable.[7]

Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining—hereinafter referred to as the 2025 Minerba Law—confers legal legitimacy on religious community organizations (CSOs) to participate in mining activities, albeit indirectly and conditionally, through Indonesian-owned legal entities. This legitimacy does not position CSOs as primary actors, but rather designates them as priority recipients in the allocation of Mining Business Permit Areas (WIUP) or Special Mining Business Permits (IUPK), with the stated normative objective of enhancing their economic role in regional development. The law expressly amends several key provisions to accommodate this arrangement, including Articles 51, 60, and 75, which provide such priority without fully removing the auction mechanism applicable to private entities.[8]

However, this regulatory construction produces an ontological inconsistency between the non-profit and missionary nature of religious CSOs and the commercial, high-risk, and potentially environmentally harmful characteristics of the mining sector. From a constitutional law standpoint, granting priority to religious organizations that do not possess the same technical, financial, or governance qualifications as private enterprises may contravene the principles of fair business competition and professionalism in natural resource management. The 2025 Minerba Law does not mandate assessments of religious organizations' capacity in mining technology, environmental management, or post-mining obligations, all of which constitute essential requirements for other business actors.[9]

This framework produces unequal and discriminatory access, creating the risk that mass organizations may function more as political–economic instruments than as entities dedicated to community empowerment. In addition, the ambiguous definition of a "business entity owned by a religious organization" enables potential misuse through the creation of shell companies controlled by third parties, with the

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7 Indonesia, "Peraturan Pemerintah Nomor 25 Tahun 2024 tentang Pelaksanaan Kegiatan Usaha Pertambangan Mineral dan Batubara Pasal 83A ayat (1)," 2024.

8 Muhammad Hasgar, Huzaiman, dan Wahyudi Umar, "Reconfiguration of Indonesian Mining Laws: Review of law Number 2 of 2025 and Good Governance," *Al-Ahkam: Jurnal Hukum Pidana Islam* 7, no. 2 (2025): 184–98, https://doi.org/10.47435/al-ahkam.v7i2.4183.

9 Anggawira dan Rahmat Dwi Putranto, "Analisis Yuridis Peraturan Pemerintah Nomor 25 Tahun 2024 tentang Organisasi Masyarakat Keagamaan dan Pelaksanaan Kegiatan Usaha Pertambangan Mineral dan Batubara," *Iblam Law Review* 5, no. 2 (2025): 43–57, https://doi.org/10.52249/ilr.v5i2.608.

organization serving merely as a nominal shareholder. In the absence of mechanisms to verify substantive ownership and integrated financial reporting, such legitimacy becomes susceptible to exploitation for profit laundering or political patronage. Moreover, the obligation to meet domestic needs, as provided in Article 5 paragraph (3), stipulates that "to implement the national interest as referred to in paragraph (1), holders of IUP or IUPK during the Production Operation stage must satisfy domestic demand prior to exports and prioritize fulfilling the needs of state-owned enterprises that provide essential public services." The continued prioritization of strategic SOEs places religious organizations in a subordinate position to state interests rather than treating them as equal business actors.[10]

Accordingly, although the 2025 Mineral and Coal Mining Law formally confers legal legitimacy, such legitimacy is conditional, procedural, and accompanied by significant constitutional risks. It reflects not substantive empowerment but symbolic political affirmation that may undermine principles of environmental sustainability, technical competence, and fair competition. To ensure integrity, implementing regulations must clearly define: (i) the criteria for business entities owned by mass organizations, (ii) requirements for independent capacity assessments, (iii) prohibitions on conflicts of interest, and (iv) mechanisms for permit revocation in cases of governance failures or environmental harm. Absent these safeguards, the legitimacy provided does not constitute an empowerment policy but instead represents a vulnerable and potentially harmful legal loophole.

3.2. The Implications of Granting Mining Business Permits to Religious Community Organizations for Good Mining Governance under Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining

Law Number 2 of 2025, the Fourth Amendment to Law Number 4 of 2009 on Mineral and Coal Mining, normatively reinforces the framework of good mining governance through principles of transparency, accountability, technical professionalism, environmental sustainability, and the prioritization of national interests. However, the provisions granting priority access to Mining Business Permit Areas (WIUP) and Special Mining Business Permits (IUPK) for business entities owned by religious community organizations, as stipulated in Article 51 paragraph (3), Article 60 paragraph (3), and Article 74 paragraph (3), weaken this foundation by creating a regime of privileged access based on ideological affiliation rather than substantive competence. This construction has the potential to intensify normative tensions with Law Number 17 of

[10] Tandori dan Caritas Woro Murdiati, "Implikasi Hukum dan Sosial Keterlibatan Ormas Keagamaan dalam Sektor Pertambangan Studi atas Pasal 83A Peraturan Pemerintah No. 25 Tahun 2024," *Jurnal Panorama Hukum* 10, no. 1 (2025): 17–33, https://doi.org/10.21067/jph.v10i1.12122.

2013 on Community Organizations and Law Number 3 of 2020 on Mineral and Coal Mining.[11]

Systematically, these implications can be described across four critical dimensions. First, in terms of transparency and fair business competition, although the 2025 Minerba Law formally requires open auctions for WIUP and WIUPK as provided in Article 51 paragraph (2) and Article 74 paragraph (4), the prioritization mechanism for religious organizations without measurable qualification standards—such as minimum financial capacity of IDR 500 billion, at least five years of operational experience, or ISO 14001 certification for environmental management—creates information and access asymmetries that violate the principle of equal footing. This situation opens the possibility for corrupt practices through concealed direct appointments or the establishment of proxy entities that exploit the organizational legitimacy of mass organizations to benefit unverified third parties, a concern highlighted by Indonesia Corruption Watch (ICW) for its strong elements of political patronage.

Second, in the domain of technical professionalism and environmental sustainability, good governance requires comprehensive feasibility assessments, Environmental Impact Analyses (EIAs), reclamation planning, and post-mining obligations. However, religious organizations, whose core functions relate to religious outreach, education, and socio-religious activities, do not possess inherent competencies in extraction processes, mineral processing technologies, or environmental remediation. Without independent capacity audits conducted by institutions such as the Geological Agency or through international certification mechanisms, this policy risks enabling unsustainable resource extraction, irreversible environmental degradation, and failures in post-mining management, as evidenced by unmanaged artisanal mining cases documented by the Corruption Eradication Commission (KPK) between 2021 and 2023.

Third, in relation to public accountability and the prioritization of national interests, Article 5 paragraph (3) mandates that domestic needs be fulfilled prior to exports and that strategic state-owned enterprises be prioritized. However, religious organizations—which are not subject to direct oversight by institutions such as the Supreme Audit Agency (BPK), the Corruption Eradication Commission (KPK), or the Financial Transaction Reports and Analysis Center (PPATK) in the same manner as state-owned enterprises—may become potential channels for illicit exports, below-market sales, or money-laundering activities facilitated by opaque mining fund flows. This undermines the principle of state financial accountability and creates non-transparent financing pathways that conflict with national policy mandates.[12]

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[11] Afifudin Nur Rosyid Astinda, Wahyu Pujo Pratama, dan Muhammad Bagas Haidar, "Konflik Regulasi dan Masalah Kelayakan pada Kebijakan Izin Usaha Pertambangan bagi Ormas Keagamaan," *USM Law Review* 7, no. 3 (2024): 1851–64, https://doi.org/10.26623/julr.v7i3.10900.

[12] Sri Nurnaningsih Rachman dan Melki T. Tunggati, "Kontradiksi Pengaturan Penawaran Prioritas Wilayah Izin

Fourth, the constitutional implications are particularly concerning. Article 33 paragraph (3) of the 1945 Constitution requires that natural resources be managed professionally for the greatest prosperity of the people, rather than privileging specific groups. A priority mechanism based on ideological affiliation risks being challenged as disproportionate positive discrimination and a violation of the rule of law, while also potentially triggering horizontal conflicts within local communities due to the convergence of religious interests with high-risk economic activities.

In this context, although the 2025 Minerba Law formally subjects religious organizations to standard obligations such as environmental impact assessments, royalties, and non-tax state revenue (PNBP), its prioritization scheme structurally undermines good mining governance by compromising competence, transparency, and accountability. This creates risks for the sustainability of national natural resources and for the realization of social justice. To mitigate these concerns, the government must promptly issue implementing regulations in the form of a government regulation or a stringent ministerial regulation that provides for: (i) independent capacity audits prior to the granting of priority status, (ii) annual financial reporting audited by the Supreme Audit Agency (BPK), (iii) a maximum subcontracting threshold of 30 percent to third parties, and (iv) automatic revocation of IUP/IUPK in the event that environmental or governance violations are identified within the first two years. Without such reforms, the policy does not constitute inclusive empowerment but instead represents a structural vulnerability that endangers the people's sovereignty over natural resources, as mandated by Article 33 paragraph (3) of the 1945 Constitution.

4. CONCLUSION

This study's normative legal analysis shows that the legitimacy granted to religious community organizations (ormas) as holders of mining business permits (IUP/IUPK) under Law Number 2 of 2025 is formal and conditional yet substantively weak and potentially harmful. The policy prioritizing WIUPK allocations for entities owned by religious organizations, ostensibly to promote community welfare, opens legal loopholes conducive to political clientelism, conflicts of interest, and abuses of authority. Religious organizations—whose core mandate is non-profit religious and social work—are placed in a high-risk, technically complex sector without qualifications comparable to private actors or state-owned enterprises. This contradicts the constitutional principles of transparency and fair competition and threatens good mining governance by increasing environmental risks, social tensions, and opportunities for hidden corruption through proxy entities or subcontracting schemes.

The governance implications further weaken transparency, accountability, and

Usaha Pertambangan Khusus Terhadap Badan Usaha Milik Organisasi Kemasyarakatan Keagamaan," *Jurnal Ilmu Hukum The Juris* 8, no. 1 (2024): 349–65, https://doi.org/10.56301/juris.v8i1.1315.

sustainability, transforming mass organizations into potential political–economic instruments rather than agents of public welfare, as illustrated by the unverified allocation of former PKP2B areas to Nahdlatul Ulama (NU). While the paper identifies key constitutional inconsistencies, it lacks concrete alternative proposals and empirical evidence that could strengthen its conclusions. Overall, the policy does not constitute meaningful empowerment; instead, it creates a structural vulnerability that undermines the constitutional mandate. Without urgent reforms—such as strict capacity audits, transparent financial reporting, and automatic permit revocation—it risks exacerbating the natural resource curse for the public while benefitting elite and oligarchic interests under religious pretexts.

REFERENCES

Journals

Anggawira, dan Rahmat Dwi Putranto. "Analisis Yuridis Peraturan Pemerintah Nomor 25 Tahun 2024 tentang Organisasi Masyarakat Keagamaan dan Pelaksanaan Kegiatan Usaha Pertambangan Mineral dan Batubara." *Iblam Law Review* 5, no. 2 (2025): 43–57. https://doi.org/10.52249/ilr.v5i2.608.

Astinda, Afifudin Nur Rosyid, Wahyu Pujo Pratama, dan Muhammad Bagas Haidar. "Konflik Regulasi dan Masalah Kelayakan pada Kebijakan Izin Usaha Pertambangan bagi Ormas Keagamaan." *USM Law Review* 7, no. 3 (2024): 1851–64. https://doi.org/10.26623/julr.v7i3.10900.

Hasgar, Muhammad, Huzaiman, dan Wahyudi Umar. "Reconfiguration of Indonesian Mining Laws: Review of law Number 2 of 2025 and Good Governance." *Al-Ahkam: Jurnal Hukum Pidana Islam* 7, no. 2 (2025): 184–98. https://doi.org/10.47435/al-ahkam.v7i2.4183.

Nugroho, Wahyu, Erwin Syahruddin, Saiful Anam, dan Aris Yulia. "Ormas Keagamaan Jadi Korporasi: Politik Hukum di Ujung Tambang." *Jurnal Litigasi* 26, no. 1 (2025): 307–43. https://doi.org/10.23969/litigasi.v26i1.20375.

Rachman, Sri Nurnaningsih, dan Melki T. Tunggati. "Kontradiksi Pengaturan Penawaran Prioritas Wilayah Izin Usaha Pertambangan Khusus Terhadap Badan Usaha Milik Organisasi Kemasyarakatan Keagamaan." *Jurnal Ilmu Hukum The Juris* 8, no. 1 (2024): 349–65. https://doi.org/10.56301/juris.v8i1.1315.

Rahimallah, Muhammad Tanzil Aziz, Andi Dewi Pratiwi, dan Achmad Fauzi Kusmin. "Pengelolaan Minerba Dalam Perspektif Good Governance (Tinjauan Teoritik)." *Arajang: Jurnal Ilmu Sosial Politik* 4, no. 1 (2021): 34–54. https://doi.org/10.31605/arajang.v4i1.

Tandori, dan Caritas Woro Murdiati. "Implikasi Hukum dan Sosial Keterlibatan Ormas Keagamaan dalam Sektor Pertambangan Studi atas Pasal 83A Peraturan Pemerintah No. 25 Tahun 2024." *Jurnal Panorama Hukum* 10, no. 1 (2025): 17–33. https://doi.org/10.21067/jph.v10i1.12122.

Books

Sunggono, Bambang. *Metodologi Penelitian Hukum*. Jakarta: Raja Grafindo Persada, 2003.

Trinata, Anisa, Dimas Ramadhan Perdana, Ginda Harahap, Hasna Arifa Fadillah, Jason Renardi Marrino, Jonathan Putra Pamungkas, dan Melva Harahap. *Bencana Ekologis: Mereduksi Risiko, Memulihkan Indonesia*. Diedit oleh Parid Ridwanuddin. Yogyakarta: Samudra Biru, 2025.

Regulations

Indonesia. "Peraturan Pemerintah Nomor 25 Tahun 2024 tentang Pelaksanaan Kegiatan Usaha Pertambangan Mineral dan Batubara Pasal 83A ayat (1)," 2024.

Webpages

CNBC Indonesia. "Akhirnya Terungkap! NU Bakal Dapat Jatah Tambang Batu Bara Raksasa Ini," 2024. https://www.cnbcindonesia.com/news/20240611143928-4-545697/akhirnya-terungkap-nu-bakal-dapat-jatah-tambang-batu-bara-raksasa-ini.

Tempo. "Risiko Izin Tambang Ormas Keagamaan." Tempo.co.id, 2025. https://www.tempo.co/kolom/risiko-izin-tambang-ormas-keagamaan-22803.