

Judicial Reasoning in Sidoarjo District Court Decision No. 199/Pid.Sus/2023: Corporate Criminal Liability in Environmental Crimes

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Abstract

This study analyzes the judicial reasoning behind Putusan Pengadilan Negeri Sidoarjo No. 199/Pid.Sus/2023/PN Sda, a landmark decision involving corporate criminal liability for environmental violations in Indonesia. The case centers on PT Surya Prima Semesta's illegal disposal of hazardous waste (fly ash and bottom ash) without an environmental permit, resulting in the prosecution of its corporate director. Employing a normative juridical method, the research examines the court's application of doctrines such as strict liability and identification theory within the framework of Law No. 32 of 2009 on Environmental Protection and Management. The findings show that the court adopted a formalistic, text-based legal reasoning model, treating permit violations as inherently punishable acts regardless of actual environmental harm. While the decision reinforces regulatory compliance and affirms corporate culpability, it lacks engagement with broader organizational responsibility and foundational environmental law principles like the precautionary principle and sustainability. This study argues for a more integrated doctrinal approach one that balances rule-based logic with value-oriented reasoning to enhance legal consistency, advance environmental justice, and align Indonesia's corporate accountability framework with international standards.

Keywords:

Corporate criminal liability, Environmental law, Strict liability, Legal reasoning, Identification theory

Abstrak

Studi ini menganalisis alasan hukum di balik Putusan Pengadilan Negeri Sidoarjo No. 199/Pid.Sus/2023/PN Sda, putusan penting yang melibatkan tanggung jawab pidana korporasi atas pelanggaran lingkungan di Indonesia. Kasus ini berpusat pada pembuangan limbah berbahaya (abu terbang dan abu dasar) secara ilegal oleh PT Surya Prima Semesta tanpa izin lingkungan, yang mengakibatkan penuntutan terhadap direktur korporasinya. Menggunakan metode yuridis normatif, penelitian ini mengkaji penerapan doktrin-doktrin seperti tanggung jawab mutlak dan teori identifikasi oleh pengadilan dalam kerangka Undang-Undang No. 32 Tahun 2009 tentang Perlindungan dan Pengelolaan Lingkungan Hidup. Temuan menunjukkan bahwa pengadilan mengadopsi model penalaran hukum formalistik dan berbasis teks, menganggap pelanggaran izin sebagai tindakan yang secara inheren layak dihukum tanpa mempertimbangkan kerusakan lingkungan yang sebenarnya. Meskipun putusan ini memperkuat kepatuhan regulasi dan menegaskan tanggung jawab korporasi, putusan tersebut kurang memperhatikan tanggung jawab organisasi yang lebih luas dan prinsip-prinsip hukum lingkungan dasar seperti prinsip kehati-hatian dan keberlanjutan. Studi ini mengusulkan pendekatan doktrinal yang lebih terintegrasi, yang menyeimbangkan logika berbasis aturan dengan penalaran berbasis nilai, guna meningkatkan konsistensi hukum, mendorong keadilan lingkungan, dan menyelaraskan kerangka kerja akuntabilitas korporasi Indonesia dengan standar internasional.

Kata Kunci : Tanggung jawab pidana korporasi, Hukum lingkungan, Tanggung jawab mutlak, Penalaran hukum, Teori identifikasi.

INTRODUCTION

In the context of environmental protection, corporations often find themselves at the forefront of both industrial progress and ecological degradation. Indonesia, a country rich in biodiversity, has witnessed a growing number of environmental crimes perpetrated by corporate

actors. To respond to such challenges, Law No. 32 of 2009 concerning Environmental Protection and Management (PPLH) establishes the legal foundation for holding corporations criminally liable for environmental harm (Presiden Republik Indonesia, 2009). This law introduces concepts such as strict liability and vicarious liability, making it possible to assign criminal responsibility to legal entities without necessarily proving *mens rea* (Handayani et al., 2024; Wijaya & Dzaki, 2023). Furthermore, Indonesian environmental law adopts a preventive and restorative approach, emphasizing sustainable development and environmental justice (Presiden Republik Indonesia, 2009).

Government public communication plays a pivotal role in this response, as it shapes public understanding, influences societal norms, and informs regulatory frameworks. Communication strategies must not only provide clarity on the regulations in place but also foster engagement between the government and the public to build trust and promote compliance (Sufa et al., 2025). Globally, the doctrine of corporate criminal liability has evolved to encompass various theoretical frameworks including identification theory, aggregation theory, and vicarious liability. These models facilitate assigning culpability to corporations through the actions of their agents or by holding them liable irrespective of intent (Inayah, 2020; Parker & Dodge, 2022). In environmental law, the emphasis often falls on strict liability due to the irreversible and often large-scale impact of corporate misconduct. Comparative legal studies have shown that jurisdictions such as the United States and European Union member states regularly utilize these doctrines to strengthen enforcement of environmental regulations (Hapiz et al., 2022; Mrabure & Abhulimhen-Iyoha, 2020).

Within this evolving doctrinal and regulatory landscape, the District Court of Sidoarjo's decision No. 199/Pid.Sus/2023/PN Sda stands as a landmark ruling that warrants scholarly scrutiny (Pujiono, 2023). The verdict addresses corporate criminal liability in an environmental dumping case involving PT Surya Prima Semesta. The court's application of legal reasoning, its articulation of *ratio decidendi*, and the integration of legal doctrines present an opportunity to explore how jurisprudence aligns with normative frameworks and environmental justice principles in Indonesia. In line with broader trends in Indonesian institutional reform, the challenge of integrating regulatory standards with legal reasoning reflects a broader governance issue similar to how adaptive policy programs like *Prakerja* aim to bridge implementation gaps in workforce systems (Soekiman et al., 2025). This study critically analyzes the legal rationality and implications of the decision to contribute to the discourse on corporate accountability in environmental crimes.

Despite the progressive regulatory structure provided by Law No. 32 of 2009, judicial interpretations of corporate criminal liability in environmental cases remain inconsistent and underexplored in Indonesian jurisprudence. The decision of the District Court of Sidoarjo in Case No. 199/Pid.Sus/2023/PN Sda represents a critical precedent wherein a corporate director, acting on behalf of PT Surya Prima Semesta, was found guilty of illegally dumping hazardous waste fly ash and bottom ash without a valid permit (Pujiono, 2023). Yet, there is a notable absence of comprehensive academic analysis concerning the legal rationale (*ratio decidendi*) behind the court's ruling and its congruence with the doctrinal principles of corporate environmental accountability.

This study seeks to bridge this gap by offering a doctrinal legal analysis of the judicial reasoning embedded in the Sidoarjo decision. It examines whether the application of legal principles such as corporate *mens rea*, strict liability, and the precautionary principle align with both national legal doctrines and international best practices. Furthermore, it proposes interpretative harmonization between legal reasoning theory and corporate environmental accountability, drawing from MacCormick's and Dworkin's jurisprudential approaches to reinforce consistency and transparency in environmental law enforcement (Baroni et al., 2020; Steging et al., 2023).

Scholarly literature has long grappled with the complexities of assigning criminal liability to corporations. The identification theory, a cornerstone of the corporate liability doctrine, attributes criminal conduct to a corporation when committed by a high-ranking individual acting

within the scope of their duties. This is particularly relevant in the case at hand, where Johny Hidajat, the director of PT Surya Prima Semesta, oversaw operations that resulted in the unregulated disposal of hazardous waste (Wijaya & Dzaki, 2023; Winjaya & Pujiyono, 2023). Such application directly aligns with identification theory, affirming that when a corporate decision-maker acts unlawfully, the corporation itself can be deemed criminally liable.

Another relevant framework is strict liability, which is often invoked in environmental law due to the need for deterrence and the inherent danger of industrial waste. Under this doctrine, corporations may be held criminally responsible for environmental harm regardless of intent. This concept is embedded in Article 88 of Law No. 32 of 2009 and serves as a fundamental principle in environmental jurisprudence (Presiden Republik Indonesia, 2009). Empirical studies reinforce that strict liability provisions, when applied decisively, foster compliance and enhance environmental governance (Handayani et al., 2024; Sriwidodo, 2023).

In addition, legal reasoning theory provides a meta-theoretical foundation for evaluating judicial decisions. According to MacCormick and Dworkin, legal decisions must not only be coherent with statutory text but also reflect principled reasoning grounded in justice and social values (Dyrda & Gizbert-Studnicki, 2020). The Sidoarjo case offers an important site for applying rule-based and value-based reasoning, enabling a comprehensive review of how judges interpret corporate criminal liability in practice. Integrating these theories into judicial decision-making enhances legitimacy, accountability, and public trust in environmental adjudication.

Several studies have examined corporate criminal liability in the Indonesian context, focusing on either theoretical development or statutory interpretation (Handono & Setiyono, 2023; Pujiyono & Riyanta, 2020). However, few delve into the actual judicial reasoning used in environmental criminal decisions, particularly in cases involving hazardous waste disposal. Most existing analyses remain abstract or doctrinal, with minimal emphasis on how courts operationalize legal doctrines such as strict liability, vicarious liability, and corporate *mens rea* in environmental jurisprudence. This disjunction reveals a significant research gap in bridging theoretical models with case-based legal analysis.

Moreover, while the identification and strict liability theories are widely discussed, their practical integration with Indonesian judicial decisions remains fragmented. No comprehensive study has investigated the *ratio decidendi* of environmental crime cases in light of both national law (UU 32/2009) and international standards. In the case of Putusan No. 199/Pid.Sus/2023/PN Sda, there is a clear opportunity to assess how these principles have been interpreted, internalized, or potentially misapplied by the judiciary in addressing corporate environmental crimes.

Lastly, the intersection of legal reasoning theory and environmental law in Indonesia is underdeveloped in scholarly work. Although legal theorists have emphasized the value of structured judicial interpretation, limited attention has been paid to the epistemological and logical patterns embedded in judicial rulings on corporate environmental liability. As such, this study aims to advance legal scholarship by offering a critical, structured analysis of the judicial decision in the Sidoarjo case, identifying implications for both legal theory and practice.

This study has three primary objectives: (1) to analyze the *ratio decidendi* of Decision No. 199/Pid.Sus/2023/PN Sda; (2) to examine the legal application of corporate criminal liability within the environmental legal framework of Indonesia; and (3) to evaluate the alignment of the court's reasoning with doctrinal principles such as strict liability, precautionary principle, and corporate *mens rea*. The research also explores the legal interpretation patterns that inform the court's decision-making process, offering insights into the interface between statutory interpretation and judicial discretion.

The novelty of this study lies in its integrated methodological approach—combining case-oriented doctrinal analysis, legal reasoning theory, and corporate liability doctrines—to fill the existing gap in literature. It is among the first in Indonesia to scrutinize the legal reasoning (not just the outcome) of a criminal court ruling involving a corporate environmental offender. The scope of the study is confined to Indonesian jurisdiction, focusing exclusively on one legal decision

while contextualizing its relevance within broader environmental criminal law and corporate liability discourse.

METHOD

This study employs a normative juridical research method, also known as doctrinal legal research, which emphasizes the systematic interpretation of legal norms, statutory texts, and court decisions as primary sources of data (Soekanto, 1986; Marzuki, 2017). It analyzes legal materials comprising primary sources such as *Putusan Pengadilan Negeri Sidoarjo Nomor 199/Pid.Sus/2023/PN Sda*, Law No. 32 of 2009 on Environmental Protection and Management (UU PPLH), the Indonesian Penal Code (KUHP), and PERMA No. 13/2016 alongside secondary materials like scholarly books, journal articles, and doctrinal commentary. Tertiary sources such as legal dictionaries and encyclopedias are used to clarify terminology and ensure conceptual precision. These materials are selected based on their relevance to corporate criminal liability, environmental law, and legal reasoning theory.

In line with doctrinal methodology, the research incorporates three main approaches: the statutory approach, which examines the legal framework governing environmental and corporate offenses; the case approach, focusing on the specific judicial reasoning in *Putusan No. 199/Pid.Sus/2023/PN Sda*; and the conceptual approach, which interprets key doctrines such as *strict liability*, *corporate mens rea*, *vicarious liability*, and *ratio decidendi*. The research design is case-oriented, centering on one judicial decision as a unit of analysis to evaluate the consistency, coherence, and doctrinal alignment of the court's legal reasoning. By concentrating on this single case, the study seeks to reveal how corporate environmental accountability is operationalized within Indonesian jurisprudence and whether the judicial reasoning aligns with national legal principles and international standards.

Data are collected using legal documentation techniques, involving systematic reading and analysis of the judgment, relevant laws, and interpretive guidelines. The analysis process is conducted through qualitative prescriptive-deductive reasoning, allowing the researcher to evaluate the legal logic and doctrinal soundness of the court's interpretation. Specific focus is given to the identification and assessment of the *ratio decidendi*, the application of legal doctrines, and the use of teleological and value-based reasoning in the judgment. This method aligns with normative legal research objectives: to not only describe what the law is but to prescribe how legal reasoning ought to reflect principles of justice, consistency, and environmental protection. The goal is to determine whether the court's legal reasoning upholds doctrinal integrity and contributes to the evolution of corporate environmental liability in Indonesia.

RESULTS AND DISCUSSION

Legal Classification of the Act and Its Factual Foundation

The court began its reasoning by establishing that the corporate actor PT Surya Prima Semesta, represented by its director Johnny Hidajat had committed a violation of Article 104 jo. Article 60 of Law No. 32 of 2009 concerning Environmental Protection and Management (Presiden Republik Indonesia, 2009). The unlawful act concerned the unauthorized disposal of hazardous and toxic waste (*limbah B3*) in the form of Fly Ash and Bottom Ash (FABA), which were dumped at an unregistered site without a valid environmental permit (*izin pengelolaan limbah B3*). The legal classification of the act was centered not on the resulting environmental damage, but on the mere absence of administrative compliance specifically, the failure to obtain an environmental management license as mandated by the regulation.

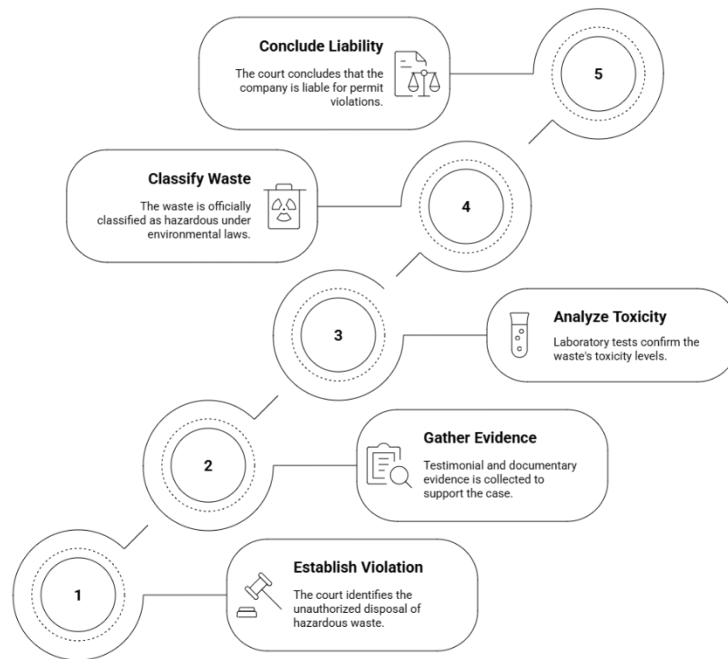


Figure 1. Journey to Legal Conclusion

Factually, the court's findings were grounded in testimonial evidence, including statements from local residents and environmental enforcement officers, and documentary evidence, such as inspection reports and internal correspondence from PT Surya Prima Semesta. These showed that the disposal site lacked any legal status under government or environmental authority registration. While laboratory analysis revealed that the FABA samples were below certain toxicity thresholds, the court concluded that the classification of FABA as *limbah B3* as per the applicable environmental laws and government regulations was sufficient to trigger criminal liability. This factual conclusion underpins a formalistic interpretation of regulatory compliance, treating permit violations as inherently punishable acts under strict liability doctrine.

Structure of Legal Reasoning and Judicial Interpretation

The court's legal reasoning was firmly grounded in a textualist and statutory approach, relying heavily on the wording of Article 60 of UU PPLH, which explicitly prohibits the disposal of hazardous waste without a valid permit (Presiden Republik Indonesia, 2009). The judicial reasoning did not explore the actual or potential harm caused by the disposal, nor did it engage in any risk assessment or scientific deliberation. Instead, the reasoning followed a strict application of legal norms, suggesting that regulatory offenses are punishable *per se* without the need for environmental degradation to occur.

However, despite its formalist tone, the decision implicitly reflects elements of the identification theory, as the court placed primary liability on the corporate director as the controlling mind of the corporation. It acknowledged that the decision to dispose of waste without a permit was executed directly under the director's authority and knowledge, thereby imputing liability to both the individual and the corporate entity. This approach reveals an interplay between strict liability and organizational accountability, where the agency and control of high-ranking officers serve as the basis for assigning blame to the corporation.

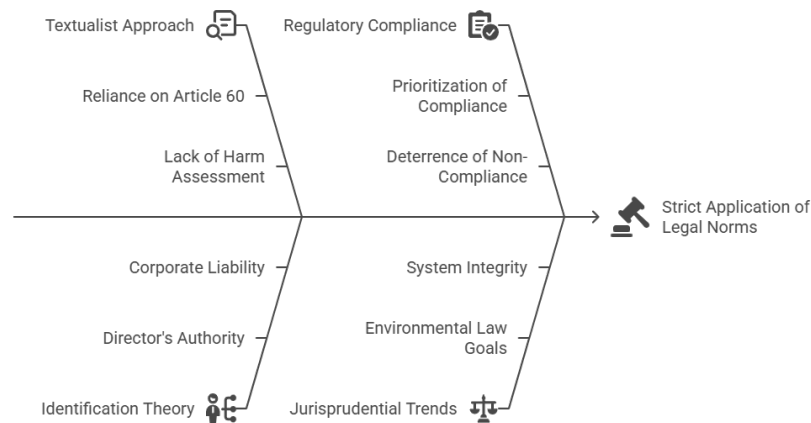


Figure 2. Analyzing Legal Reasoning in Environmental Law

While the court's reasoning was largely deductive, its interpretive choices indicate an institutional prioritization of regulatory compliance. This reflects broader jurisprudential trends in environmental law, where the goal is not merely to punish actual harm, but to deter non-compliance and uphold the integrity of environmental regulatory systems.

Judicial Application of Corporate Criminal Liability Doctrines

The decision presents a hybrid doctrinal application of corporate criminal liability. On one hand, the court's reliance on Article 104 jo. 60 underscores a strict liability regime, where proof of *mens rea* is unnecessary and the focus rests on the objective failure to comply with statutory environmental obligations (Presiden Republik Indonesia, 2009). This is consistent with Article 88 of UU 32/2009, which allows imposition of liability without fault, as long as harm arises or is potentially caused by prohibited acts (Presiden Republik Indonesia, 2009). The use of this framework in the ruling serves to strengthen preventive mechanisms in Indonesia's environmental governance, creating a high deterrence threshold for corporate actors.

On the other hand, by naming and prosecuting the director, the court also invoked the identification theory, treating the director's decisions and actions as representative of the corporation's will. However, the court did not extend its analysis to broader corporate structures, such as compliance systems, environmental risk management policies, or failures within the company's chain of command. The absence of this broader organizational inquiry represents a doctrinal limitation, as it restricts liability to personal wrongdoing rather than examining corporate governance failures, thus missing an opportunity to apply vicarious liability or aggregation models of corporate guilt (Inayah, 2020; Wijaya & Dzaki, 2023).

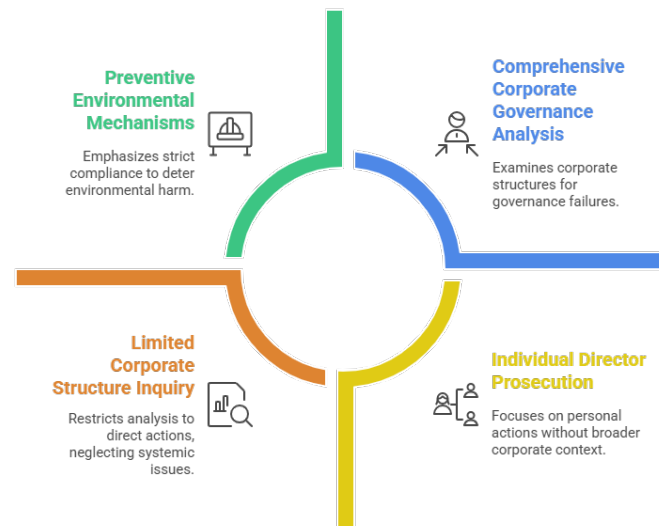


Figure 3. Corporate Criminal Liability Framework

This narrow doctrinal focus may create inconsistencies in future cases involving indirect violations or systemic corporate negligence, especially where liability might arise from corporate culture or policy omissions rather than direct actions of a single individual. Nonetheless, the judgment marks significant judicial affirmation of corporate culpability for environmental infractions, reinforcing regulatory strictness.

Ratio decidendi and Its Doctrinal Implications

The *ratio decidendi* of the decision can be distilled into two legal propositions: (1) hazardous waste disposal without a valid permit constitutes a criminal offense regardless of actual environmental damage; and (2) the corporate director, acting in an official capacity, can serve as the locus of liability for the corporation. The court emphasized that the act of dumping FABBA classified as *limbah B3* without a valid permit was a violation in itself. It stressed that permit-based regulation forms the backbone of Indonesia's environmental protection regime and that administrative non-compliance constitutes a criminally punishable act, even in the absence of direct harm.

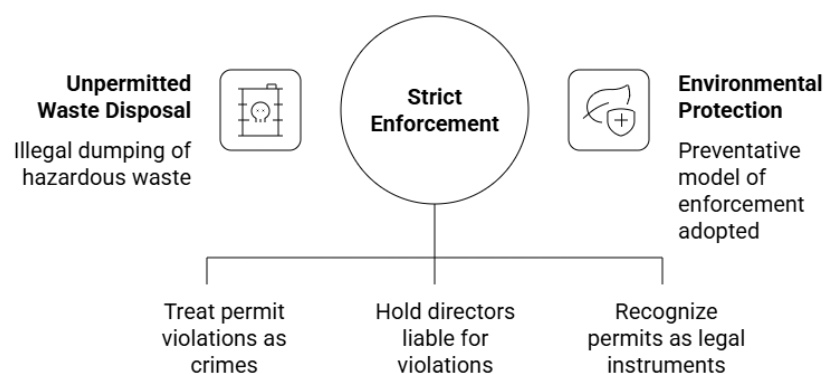


Figure 4. Enforcing Environmental Regulations in Indonesia

The doctrinal implication of this is that the judiciary recognizes environmental permits not as mere formalities, but as substantive legal instruments that determine the legality of corporate conduct. The court's position strengthens the regulatory philosophy of Indonesian environmental law, which adopts a precautionary and preventive model of enforcement, in contrast to damage-based liability systems. This doctrinal emphasis aligns with environmental legal principles enshrined in Articles 2 and 3 of UU 32/2009 particularly the principles of sustainability,

intergenerational justice, and environmental stewardship even though they were not explicitly cited in the reasoning (Presiden Republik Indonesia, 2009).

Consistency with Environmental Law Principles

While the judgment achieves statutory consistency, it falls short in explicitly engaging with environmental legal principles as foundational interpretive tools. For instance, the precautionary principle, which holds that legal intervention is justified even in the absence of conclusive scientific proof of harm, was not explicitly mentioned despite its clear relevance. The same applies to the polluter pays principle, which underpins environmental liability models worldwide. The court did not explore the ethical dimensions of environmental harm or sustainability, thus restricting its reasoning to procedural legality and textual statutory interpretation.

This lack of value-based reasoning limits the normative depth of the ruling. Jurisprudential scholars such as Dworkin and MacCormick argue that legal decisions should be grounded in principles that reflect societal values, moral reasoning, and justice not merely procedural accuracy. Therefore, while the court's decision is legally sound, its reasoning would have benefited from a more teleological and principle-oriented approach, which could have enhanced both its doctrinal richness and persuasive authority.

Implications for Future Jurisprudence and Legal Reform

The implications of this decision are doctrinally significant. It confirms that Indonesian courts can and will hold corporations accountable for environmental violations using strict liability standards. However, the narrow application of the identification theory and the absence of systemic inquiry into corporate governance structures may limit its long-term utility as a guiding precedent. To build a coherent body of jurisprudence, future decisions should consider integrating corporate-wide assessments, examining whether organizational policies, oversight systems, or internal audits failed to prevent environmental harm.

Moreover, this decision underscores the urgent need for judicial capacity building in environmental reasoning and corporate accountability. It calls for the adoption of more integrated doctrines that balance textual, value-based, and purposive interpretations. Just as institutional reforms like the Prakerja Program have demonstrated the importance of policy coherence and adaptive implementation to meet socio-economic challenges (Soekiman et al., 2025), similar institutional learning is required within the judiciary to deepen its interpretive approaches and ensure effective enforcement of environmental laws. Legal reforms may also be required to guide courts in evaluating collective corporate fault, addressing not only the actions of individual agents but also the institutional culture and environmental due diligence of the corporation as a whole.

Ultimately, *Putusan No. 199/Pid.Sus/2023/PN Sda* represents a critical juncture in the evolution of environmental criminal law in Indonesia (Pujiono, 2023). It reinforces formal regulatory compliance but leaves space for deeper doctrinal development. By expanding the scope of legal reasoning in future cases, Indonesian courts can move toward a more robust and principled framework for corporate environmental liability.

DISCUSSION

The Sidoarjo District Court Decision No. 199/Pid.Sus/2023/PN Sda reaffirmed that the disposal of hazardous waste without a permit constitutes a criminal offense, even in the absence of demonstrable environmental damage. This conclusion was based on the application of Article 104 in conjunction with Article 60 of Law No. 32 of 2009 on Environmental Protection and Management (Presiden Republik Indonesia, 2009). The factual basis of the ruling was supported by witness testimony, inspection reports prepared by environmental supervisory officials, and internal company records confirming that no license for hazardous waste management had been issued for the Fly Ash and Bottom Ash (FABA) disposal site. Although laboratory results indicated that the toxicity level of FABA was relatively low, the court maintained that its legal classification as hazardous waste was sufficient to establish criminal liability. This reasoning reflects a

formalistic approach that emphasizes administrative compliance as the foundation of criminalization.

The judicial reasoning adopted a textual and normative juridical method, with explicit reliance on Article 60 of the Environmental Protection Law. The court did not consider potential environmental risks or damage, relying instead on deductive reasoning centered on statutory compliance. Nonetheless, the court implicitly applied identification theory by attributing liability to the corporation through its director, Johnny Hidajat, whose decisions and actions were deemed to represent the will of the company. This reasoning illustrates an attempt to reconcile strict liability with corporate accountability, although the analysis remained narrowly focused on individual responsibility.

Doctrinally, the ruling reflects a hybrid model of corporate criminal liability. The application of strict liability, as stipulated under Articles 60, 88, and 104 of Law No. 32 of 2009, demonstrates that malicious intent (*mens rea*) is unnecessary, with liability arising solely from non-compliance with statutory obligations. At the same time, by prosecuting the director, the court adopted the identification theory. However, the analysis did not extend to broader elements of corporate governance, internal control mechanisms, or organizational culture. This limitation underscores the absence of a vicarious liability or aggregation theory framework, thereby restricting culpability to the personal level rather than addressing systemic or structural corporate failures (Inayah, 2020; Wijaya & Dzaki, 2023). In practice, this approach may present challenges in cases involving systemic negligence or procedural deficiencies, which cannot be adequately addressed through individual identification alone.

The ratio decidendi of the ruling rests on two key propositions: the disposal of hazardous waste without a valid permit constitutes a criminal offense regardless of whether environmental harm occurs, and corporate directors, when acting in their official capacity, may serve as the locus of corporate liability. These propositions establish environmental permits as substantive legal instruments rather than procedural formalities. Such a position aligns with the underlying philosophy of Indonesian environmental law, which emphasizes prevention and precaution, even though the court did not explicitly invoke the precautionary principle, sustainability, or intergenerational justice as outlined in Articles 2 and 3 of the Environmental Protection and Management Law (Presiden Republik Indonesia, 2009). In doing so, the court reinforced the view that administrative compliance forms the core of environmental protection, rather than merely a technical requirement.

Despite its statutory consistency, the ruling demonstrates limitations in explicitly integrating fundamental principles of environmental law. The precautionary principle and the polluter pays principle could have enriched the reasoning by situating the case within a broader normative framework of ecological justice. By restricting the analysis to procedural legality, the court missed an opportunity to incorporate moral reasoning and societal values into its decision. As Dworkin and MacCormick argue, judicial rulings should not only adhere to legal texts but also embody principles of fairness and justice. The absence of teleological reasoning renders the decision legally sound but philosophically incomplete.

The decision carries significant implications for the development of Indonesian environmental jurisprudence. It confirms that corporations may be held criminally liable under a strict liability regime, yet its failure to address structural corporate deficiencies risks undermining its precedential value. A more integrative doctrine is required one that combines individual accountability with organizational analysis. Legal reforms should also provide clearer guidance for courts in assessing collective corporate fault, including the evaluation of environmental audits, risk management systems, and evidence of cultural or systemic non-compliance.

Moreover, strengthening judicial capacity in environmental legal reasoning is imperative. Training in environmental jurisprudence would enable judges to balance textual interpretation with ecological and teleological perspectives. As demonstrated by (Soekiman et al., 2025) in the realm of public policy, institutional coherence and adaptive learning are critical for effective

regulation. The same principle applies to environmental adjudication, where legal interpretation must respond to ecological complexities while reinforcing corporate accountability.

In conclusion, Decision No. 199/Pid.Sus/2023/PN Sda represents a meaningful advancement in the enforcement of strict liability within Indonesian environmental law, affirming the substantive role of permits as instruments of legality. However, the ruling's limitations lie in its narrow focus on individual culpability and its failure to incorporate broader environmental principles. Moving forward, Indonesian courts should expand their legal reasoning methodologies by embracing more comprehensive doctrines of corporate liability and by integrating environmental principles to establish a jurisprudence that is not only normatively coherent but also ecologically just and globally relevant.

CONCLUSIONS

The judicial decision rendered in *Putusan Pengadilan Negeri Sidoarjo Nomor 199/Pid.Sus/2023/PN Sda* affirms Indonesia's movement toward stricter enforcement of corporate environmental accountability. By applying a strict liability model under Article 104 jo. Article 60 of Law No. 32 of 2009, the court established that unauthorized hazardous waste disposal regardless of demonstrable environmental harm constitutes a criminal offense. The decision exemplifies a textualist and statutory approach, interpreting environmental permits as substantive legal instruments, not procedural formalities. It further applied identification theory by assigning criminal liability to the corporation through the director's actions, reinforcing that high-ranking officials serve as the legal conduit for corporate culpability.

Doctrinally, this case illustrates both the strength and limitation of Indonesia's environmental criminal jurisprudence. While the strict liability framework ensures regulatory compliance, the absence of a broader analysis into systemic or structural corporate fault reveals an underutilization of other corporate criminal liability doctrines, such as vicarious liability or aggregation theory. Furthermore, the judgment lacks explicit engagement with core environmental principles such as the precautionary principle or sustainability that could have enriched the normative quality of the legal reasoning. This omission narrows the interpretive depth of the ruling and limits its potential as a persuasive jurisprudential model.

In light of these findings, the study concludes that while the Sidoarjo District Court's ruling represents progress in enforcing environmental law against corporate actors, further doctrinal refinement is necessary. Future judicial decisions should adopt more integrative reasoning methods that incorporate rule-based and value-based approaches, rooted in both legal text and environmental ethics. Legal reforms and judicial training in environmental jurisprudence are also recommended to advance a more comprehensive and principled system of corporate accountability. Such developments are essential for aligning Indonesian environmental law with global standards and for promoting ecological justice in an era of intensifying environmental risks.

SUGGESTIONS

Future judicial rulings on environmental crimes should adopt a broader doctrinal approach beyond strict statutory interpretation. This includes applying doctrines like vicarious liability and aggregation theory to address systemic corporate failures, rather than solely individual misconduct. Doing so would promote consistent enforcement of corporate criminal liability. Indonesian courts should also formally integrate foundational environmental law principles such as the precautionary principle, the polluter pays principle, and the principle of sustainability into legal reasoning. This would strengthen environmental jurisprudence, align with international norms, and reinforce ecological justice.

Judicial training in environmental law should be prioritized through continuous professional development focused on comparative law, legal interpretation, and theory. Such training would help judges better navigate complex corporate liability cases with both legal rigor and value-based reasoning. Legislative reforms should provide clearer criteria for assessing collective corporate fault, requiring courts to examine governance structures, compliance

systems, environmental audits, and risk management. This would enhance liability determinations by encompassing both individual and institutional responsibility. Lastly, greater collaboration among the judiciary, academia, and regulators should be encouraged to foster interdisciplinary insights, doctrinal innovation, and evidence-based policies, ultimately aligning Indonesia's corporate environmental accountability with global standards.

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