

The Role and Limits of the Sebalos Customary Institution in Resolving the Bakati Riuk Ulayat Land Dispute with PT Ceria Prima

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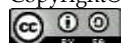
Abstract

This article examines the role and practical limits of the Sebalos Customary Institution in resolving the ulayat land dispute between the Bakati Riuk customary law community and PT Ceria Prima in Bengkayang Regency, West Kalimantan. The study uses empirical legal research with socio-legal and case-study approaches. Primary data were derived from semi-structured interviews with the head of the customary institution and affected community members, while documentary materials included objection letters, customary deliberation minutes, an investigative-team decree, meeting records, and relevant legislation. The data were organized chronologically, coded thematically, and cross-checked across oral and documentary sources. The findings identify three principal roles: representing community claims before government and the company, organizing customary deliberation, and enforcing customary norms through sanctions and rituals. These roles demonstrate strong internal legitimacy as living law, an expression of volksgeist, and a form of community-based conflict resolution. Their external legal effectiveness, however, remains limited. The principal barriers are the weak binding force of customary decisions against a corporation, the absence of completed formal recognition of the community, incomplete participatory mapping and administrative recording of the disputed territory, unequal bargaining resources, and unresolved tension between customary legitimacy and company reliance on administrative authorization. The article contributes by distinguishing the existence of a socially legitimate customary role from its capacity to produce an enforceable inter-party settlement.

Keywords: agrarian dispute, customary institution, indigenous community, legal pluralism, ulayat land

Abstrak

Artikel ini mengkaji peran dan batasan praktis Lembaga Adat Sebalos dalam penyelesaian sengketa tanah ulayat antara masyarakat hukum adat Bakati Riuk dan PT Ceria Prima di Kabupaten Bengkayang, Kalimantan Barat. Penelitian ini menggunakan metode penelitian hukum empiris dengan pendekatan sosio-legal dan studi kasus. Data primer diperoleh melalui wawancara semi-terstruktur dengan ketua lembaga adat dan anggota masyarakat yang terdampak, sedangkan data dokumen mencakup surat keberatan, berita acara musyawarah adat, surat keputusan tim investigasi, catatan rapat, dan peraturan perundang-undangan terkait. Data disusun secara kronologis, dikodekan secara tematis, dan diverifikasi silang antara sumber lisan dan dokumen. Hasil penelitian mengidentifikasi tiga peran utama: mewakili



tuntutan masyarakat di hadapan pemerintah dan perusahaan, menyelenggarakan musyawarah adat, serta menegakkan norma adat melalui sanksi dan ritual. Peran-peran ini menunjukkan legitimasi internal yang kuat sebagai hukum yang hidup (*living law*), perwujudan jiwa bangsa (*volksgeist*), dan bentuk penyelesaian konflik berbasis masyarakat. Namun, efektivitas hukumnya secara eksternal masih terbatas. Hambatan utamanya meliputi lemahnya daya ikat keputusan adat terhadap korporasi, belum tuntasnya pengakuan formal terhadap masyarakat adat, belum lengkapnya pemetaan partisipatif dan pencatatan administratif wilayah sengketa, ketimpangan sumber daya tawar-menawar, serta ketegangan yang belum terselesaikan antara legitimasi adat dan ketergantungan perusahaan pada otorisasi administratif. Artikel ini memberikan kontribusi dengan membedakan antara keberadaan peran adat yang memiliki legitimasi sosial dan kapasitas peran tersebut dalam menghasilkan penyelesaian sengketa yang dapat ditegakkan di antara para pihak.

Kata kunci: lembaga adat, masyarakat adat, pluralisme hukum, sengketa agrarian, tanah ulayat

Introduction

Agrarian conflicts involving customary territories remain a persistent problem in Indonesia because formal land administration, plantation licensing, and community-based tenure frequently operate through different sources of legitimacy. Studies of palm-oil-related land disputes show that formal regulations do not necessarily prevent dispossession when rural communities have weaker documentation, bargaining power, and access to state institutions (Berenschot & Dhiaulhaq, 2025). Likewise, legal recognition of indigenous rights may have limited substantive effect when the settlement of claims depends on informal relations and unequal negotiating positions (van der Muur, 2018). These conditions make customary institutions important not only as cultural bodies but also as local forums for representation, deliberation, and conflict management.

The Indonesian Constitution recognizes customary law communities and their traditional rights, subject to their continued existence and consistency with the principles of the Republic of Indonesia (Article 18B(2) and respects their cultural identities and traditional community rights (Article 28I (3). At the statutory level, Article 3 of Law Number 5 of 1960 on Basic Agrarian Principles recognizes ulayat rights insofar as they continue to exist and are exercised consistently with national interests and higher laws. In the forestry sector, Constitutional Court Decision Number 35/PUU-X/2012 removed customary forests from the category of state forests, thereby strengthening the constitutional position of customary communities, although administrative recognition and implementation remain critical (Tobroni, 2013).

The Bakati Riuk customary law community is part of the Dayak Bakati population living in Sebalos Hamlet, Sango Village, Sanggau Ledo District, Bengkayang Regency. For the community, land and forest are not merely economic assets but also spaces of identity, livelihood, social memory, and spiritual relations. Community records describe an initial company survey covering approximately 4,000 hectares in 1993, while the specific area later demanded for return through the 2024 customary decision was 117 hectares. The distinction is important: the larger figure refers to the reported survey area, whereas 117 hectares refers to the particular disputed tract identified in the community demand.



The dispute developed in a regional legal setting that already provides a framework for recognition. Bengkayang Regency Regulation Number 4 of 2019 regulates the recognition and protection of customary law communities, and Bengkayang Regent Regulation Number 18 of 2020 provides procedures for identification, verification, and determination. Nationally, Minister of Home Affairs Regulation Number 52 of 2014 provides guidance for local-government recognition, while Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Regulation Number 18 of 2019 regulates the administration of ulayat land. These instruments create a pathway for recognition and territorial recording, but they do not automatically settle conflicts involving pre-existing company operations and contested administrative rights.

Previous research has examined the gap between formal recognition and actual protection of indigenous land rights (Nurdin, 2022; van der Muur, 2018), the use of counter-mapping by West Kalimantan communities facing oil palm expansion (de Vos, 2018), and the structural conditions that facilitate land dispossession by plantation companies (Berenschot & Dhiaulhaq, 2025). However, limited attention has been given to the long-term operation of a hamlet-level customary institution in one continuing dispute and to the distinction between its internal social legitimacy and its external legal effectiveness against a corporation. This distinction constitutes the analytical contribution of the present article.

Accordingly, this study asks: (1) what roles has the Sebalos Customary Institution performed in the Bakati Riuk ulayat land dispute with PT Ceria Prima; and (2) what legal, institutional, and practical barriers have prevented those roles from producing a final settlement? The study aims to analyze the institution as living law, as an expression of the community's *volksgeist*, and as a community-based conflict-resolution mechanism, while also assessing the constraints created by legal pluralism, administrative recognition, territorial documentation, and unequal bargaining power.

Research Methods

Research Design and Approaches

This study is empirical legal research using socio-legal and case-study approaches. The socio-legal approach examines how customary norms operate in social interaction and how they encounter state law and corporate claims. The case-study approach reconstructs the development of the dispute and evaluates the role of the Sebalos Customary Institution within its specific legal, institutional, and cultural setting.

Research Location, Period, and Participants

The study was conducted in Sebalos Hamlet, Sango Village, Sanggau Ledo District, Bengkayang Regency, West Kalimantan. The available research record identifies the Head of the Sebalos Customary Institution, Mr Kenedi, and affected Sebalos residents as the principal categories of informants. Informants were selected purposively because of their knowledge of customary rules, the chronology of the dispute, and the institution's settlement efforts.

Data Collection and Documentary Sources

Primary data were obtained through semi-structured interviews. Documentary sources included the community objection letter dated 3 December 2004, minutes of the customary



deliberation dated 2 February 2005, documents concerning the customary payment, the decree and minutes establishing the investigative team dated 28 March 2016, minutes of the meeting dated 28 April 2016, and other community records available to the researchers. Oral statements are treated as informant accounts rather than as adjudicated facts. Where the company or government position was not supported by a directly examined document, the article uses qualified expressions such as "according to community accounts" or "the available records indicate."

Legal Materials

Primary legal materials comprised the 1945 Constitution; Law Number 5 of 1960 on Basic Agrarian Principles; Law Number 41 of 1999 on Forestry as amended; Law Number 39 of 2014 on Plantations as amended; Law Number 6 of 2014 on Villages as amended by Law Number 3 of 2024; Constitutional Court Decision Number 35/PUU-X/2012; Minister of Home Affairs Regulation Number 52 of 2014; Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Regulation Number 18 of 2019; Bengkayang Regency Regulation Number 4 of 2019; and Bengkayang Regent Regulation Number 18 of 2020. Secondary materials included books, peer-reviewed journal articles, government reports, and relevant institutional publications.

Data Analysis, Validity, Translation, and Ethics

The empirical data were reduced, organized into a chronological matrix, and coded under the themes of representation, deliberation, customary enforcement, effectiveness, and implementation barriers. The legal materials were interpreted grammatically, systematically, and teleologically. Source triangulation was undertaken by comparing oral accounts with surviving letters, minutes, decrees, and the sequence of recorded events. Local terms, including Nd'o Na'i, Pamagon, Ramin, and alang, are retained in their original form and explained contextually to avoid altering their customary meaning in English translation. The study also distinguishes community allegations from verified legal findings.

Results and Discussion

Development of the Dispute

The available evidence is more analytically useful when organized into five phases rather than presented as nineteen isolated events. The phases show changes in company activity, community strategy, government involvement, and the use of customary mechanisms. Table 1 summarizes the sequence; the detailed chronology remains part of the researchers' field archive.

Table 1. Phases of the Bakati Riuk Ulayat Land Dispute with PT Ceria Prima

No.	Period	Main Development	Community/Institutional Response	Available Evidence
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No.	Period	Main Development	Community/Institutional Response	Available Evidence
1	1993-1995	Community accounts report a company survey and land parceling over approximately 4,000 hectares, followed by resistance to company entry.	Written objection, protest, and the Nd'o Na'i customary sanction after alleged damage to community fields.	Community testimony; customary-leader account.
2	2003-2005	Reported clearing and eviction activities intensified the dispute.	Letter requesting government assistance; customary deliberation and imposition of customary obligations.	Letter dated 3 December 2004; minutes dated 2 February 2005; payment records.
3	2010-2017	After a period of reduced activity, harvesting and boundary disputes re-emerged.	Blocking of activities, formation of an investigative team, joint-meeting commitments, community harvesting ritual, and rejection of a boundary process considered inconsistent with historical boundaries.	Decree/minutes dated 28 March 2016; meeting minutes dated 28 April 2016; community testimony.
4	2020	The community received reports of renewed harvesting on the disputed land.	A peaceful protest was held at the company office, but no final settlement followed.	Community testimony and protest records, if available.
5	2024	The conflict escalated again, including a peaceful protest and reported arrests.	A customary ritual at the Ramin imposed a sanction of three along jars and demanded the return of the identified 117-hectare tract.	Community testimony; customary decision/ritual record, if available.

The phased chronology reveals a shift from immediate resistance to repeated institutionalization of claims. Early responses relied on protest and customary sanctions; later phases added written objections, investigative teams, meetings involving village authorities, and demands for administrative intervention. The recurrence of conflict after each initiative indicates that the dispute has not lacked community action. Rather, the central problem is the absence of a settlement mechanism capable of connecting customary decisions to enforceable administrative or inter-party obligations.

Roles of the Sebalos Customary Institution

The institution's conduct can be grouped into three roles with identifiable indicators and outcomes. This classification avoids treating every customary activity as equivalent and provides a basis for assessing both the existence and effectiveness of the institution's role.

Table 2. Indicators of the Sebalos Customary Institution's Roles



Role	Indicators	Illustrative Acts	Assessment
Community representation	Articulating collective claims; communicating with government and company; organizing collective action.	Objection letters, requests for assistance, participation in meetings, and public articulation of the 117-hectare claim.	Strong internal mandate, but limited influence over external administrative decisions.
Customary deliberation and mediation	Convening forums; hearing accounts; formulating a collective position; seeking a negotiated settlement.	Customary meetings in 2005 and 2024; participation in the 2016 meeting and boundary discussions.	Effective in consolidating the community position, but unable to secure a final company-government agreement.
Customary norm enforcement	Identifying violations; determining sanctions; performing rituals; demanding restoration.	Nd'o Na'i sanction in 1995 and the 2024 sanction involving three alang jars and a demand for land return.	Socially authoritative within the community; weak coercive force against an external corporation.

1. Community Representation

The institution functioned as a representative body by translating individual and household concerns into a communal claim. It communicated rejection of company activities, requested government assistance, and maintained a collective narrative of the territory. This representational role is consistent with community-based conflict resolution, which depends on local participation and social capital rather than solely on external adjudication. It also reflects living law because the authority to speak for the community is derived from accepted social practice, not merely from a state-issued mandate.

2. Customary Deliberation and Mediation

Customary deliberation provided a forum for determining the community's response, defining violations, and deciding the form of restoration. The meetings strengthened internal solidarity and helped prevent the dispute from being reduced to isolated individual claims. Yet the deliberative role did not mature into a binding inter-party agreement. This outcome illustrates a central feature of legal pluralism: a norm may be valid and legitimate within one normative order while remaining unenforceable against an actor operating primarily through another legal order.

3. Customary Enforcement

The imposition of customary sanctions and the performance of rituals demonstrate the institution's normative authority. Nd'o Na'i and the later sanction involving three alang jars were not merely symbolic acts; within the community they expressed acknowledgment of harm, restoration of balance, and collective accountability. In *volksgeist* terms, these practices embody the community's historically formed understanding of justice. Nevertheless, their legal



reach depends on acceptance by the addressee or recognition through a state or contractual mechanism.

Existence of a Role versus Effectiveness of a Role

The evidence supports a clear distinction between the existence of the customary institution's role and the effectiveness of that role. The institution has continuously represented the community, convened deliberations, and imposed sanctions. Its existence and internal legitimacy are therefore well established in the available data. Effectiveness, however, must be measured by outcomes: cessation of disputed activities, restoration or legally recognized control over land, implementation of sanctions, or a binding settlement. By these external indicators, the role has remained limited. The dispute's persistence does not negate the institution's social authority; it demonstrates the gap between social legitimacy and enforceable legal power.

This finding is consistent with van der Muur's (2018) observation that formal recognition alone may have little impact where bargaining positions and institutional relationships remain unequal. It also aligns with Nurdin's (2022) conclusion that inconsistency among levels of government can weaken the protection of customary rights. In West Kalimantan, de Vos (2018) shows that participatory mapping can improve leverage without guaranteeing long-term protection. The Bakati Riuk case extends these findings by showing that a strong customary institution may sustain resistance for decades while still being unable to convert a customary decision into an externally enforceable settlement.

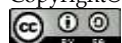
Barriers to Implementation

1. Limited External Binding Force and Legal Pluralism

Customary decisions bind community members through shared norms, authority, and social sanctions. PT Ceria Prima, however, is a corporate legal subject whose operations and obligations are primarily structured by state permits, land administration, plantation regulation, and private-law instruments. Unless the customary decision is accepted by the company, incorporated into a written settlement, recognized by an administrative decision, or supported by a court or other competent authority, the institution has no direct coercive mechanism to halt operations. The barrier is therefore not an absence of customary legitimacy, but the lack of a legal bridge between customary authority and state-enforceable obligations.

2. Incomplete Formal Recognition of the Bakati Riuk Community

Bengkayang Regency Regulation Number 4 of 2019 and Regent Regulation Number 18 of 2020 provide an institutional route for identification, verification, and determination of customary law communities. The available research record indicates that the Bakati Riuk community had not received a completed formal determination at the time covered by the study. This weakens its position when government agencies require an administrative act establishing the community and its territory before taking further action. The article does not conclude that substantive requirements have definitively been fulfilled, because such a conclusion requires examination of the full verification record and the competent authority's findings.



3. Incomplete Mapping and Administrative Recording of Ulayat Land

The difference between the reported 4,000-hectare survey area and the 117-hectare tract demanded for return illustrates the importance of precise spatial evidence. Participatory maps, boundary agreements, historical-use evidence, geographic coordinates, and administrative recording are necessary to identify the object of the dispute and avoid competing descriptions. Mapping is not a complete solution, but it can strengthen negotiation and evidentiary clarity (de Vos, 2018). The absence of finalized mapping and recording reduces the community's ability to challenge the spatial scope of administrative rights or licenses.

4. Unequal Resources and Bargaining Power

The dispute involves a customary institution with limited financial and technical resources and a corporate entity with access to legal advisers, administrative networks, and operational capital. This asymmetry affects the ability to obtain maps, access permit documents, maintain legal representation, and participate continuously in administrative or judicial processes. The broader Indonesian experience shows that unequal documentation and institutional access can facilitate the production of rightlessness even where communities have longstanding land relations (Berenschot & Dhiaulhaq, 2025).

5. Limited Government Facilitation and Competing Legalities

The available records show several attempts at facilitation, including the 2016 meeting and the 2017 boundary process. Those processes did not produce a settlement accepted and implemented by all parties. Community accounts state that the company continued to rely on official authorization, but the study did not obtain and examine the relevant permit instrument, its number, spatial annex, term, or conditions. Without those documents, the article cannot determine the exact relationship between the company's administrative legality and the community's claimed ulayat rights. This evidentiary gap should be addressed in further research and in any government-led settlement process.

6. Plantation-Law Obligations and Temporal Application

Law Number 39 of 2014 on Plantations, as amended, requires plantation business actors to respect relevant land rights and provides a deliberative framework where land needed for plantation business constitutes ulayat land. The dispute began in 1993, before the 2014 statute, so the law should not be applied retroactively to characterize the legality of the company's initial entry. It is nevertheless relevant to continuing plantation activities, later negotiations, and current compliance after the law came into force. A definitive finding of statutory violation would require proof of the land status, the company's legal instruments, the timing and content of negotiations, and any transfer or compensation documents. The present evidence supports an indication of possible non-compliance, not a final adjudication of liability.

A Coordinated Settlement Framework

The findings indicate that an effective settlement requires coordination among customary, administrative, spatial, and plantation-law mechanisms. First, the Bengkayang Regency Government should complete a transparent identification and verification process under the regional framework. Second, the land office and relevant technical agencies should facilitate participatory mapping that distinguishes the reported historical survey area from the



specific disputed tract. Third, the plantation authority should disclose and examine the company's permits, spatial annexes, and compliance records. Fourth, a structured multiparty mediation should convert any agreement into a written instrument with responsibilities, boundaries, timelines, monitoring, and consequences for non-performance. The customary institution should remain a principal representative of the community, but the settlement should be connected to competent state institutions so that its results are externally enforceable.

Research Limitations

The study is limited by the available field record. The analysis relies primarily on community interviews and documents, and the manuscript does not contain a verified account from PT Ceria Prima or a complete set of government and land-administration records. The company's permit or land-right documents were not available for examination in the material supplied for this article. Consequently, statements concerning company conduct are presented as community accounts or indications requiring further verification. These limitations do not eliminate the value of the community evidence, but they restrict any conclusive determination of administrative or corporate liability.

Conclusion

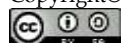
The Sebalos Customary Institution performs three demonstrable roles in the Bakati Riuk ulayat land dispute: representing collective claims, organizing customary deliberation, and enforcing customary norms through sanctions and rituals. These functions show that the institution operates as living law, embodies the community's *volksgeist*, and mobilizes social capital for community-based conflict resolution. Its internal social legitimacy has enabled the community to preserve a collective claim over more than three decades.

The effectiveness of those roles against external actors remains limited. The principal barriers are the absence of a direct mechanism for enforcing customary decisions against a corporation, incomplete formal recognition of the community, incomplete mapping and administrative recording of the claimed territory, unequal bargaining resources, inconclusive government facilitation, and unresolved tension between customary legitimacy and administrative authorization. Thus, the case demonstrates that recognition of a customary role is not equivalent to the legal capacity to produce and enforce a final settlement.

The dispute requires an integrated process that links customary representation with formal recognition, participatory mapping, permit review, and multiparty mediation. Such a process should preserve the community's authority to define its customary interests while ensuring that the final agreement is documented and enforceable within the state legal system.

Recommendations

1. The Bengkayang Regency Government should accelerate an evidence-based identification, verification, and determination process for the Bakati Riuk customary law community under Regency Regulation Number 4 of 2019 and Regent Regulation Number 18 of 2020.
2. The Bengkayang Land Office and relevant technical agencies should facilitate participatory mapping, verification of historical boundaries, and administrative recording of the disputed ulayat territory.



3. The plantation authority should examine and disclose the relevant company authorization, spatial annexes, land-right documents, and compliance history to the parties participating in a lawful settlement process.
4. PT Ceria Prima and the community should participate in structured mediation resulting in a written, time-bound, and monitorable agreement. The agreement should clarify boundaries, land use, compensation or restoration where legally justified, and procedures for implementation.
5. The Sebalos Customary Institution should continue documenting customary decisions, attendance, evidence, maps, and communications so that customary legitimacy is supported by a traceable evidentiary record.
6. Future research should include the company, local government, land office, plantation office, police, and civil-society perspectives and should examine the complete permit and spatial documentation.

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