



AGRARIAN CONFLICT AND CIVIL LAW IN MANAGEMENT OF C OIL MINING IN THE BATANG TORU PROTECTED FOREST AREA SOUTH TAPANULI

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Article Info	Abstract
Article History Received : 2024-09-03 Revised: 2024-09-05 Published: 2024-10-01 Keywords: Agrarian, Batang Toru, C Mining, Civil Law, Customary Law Community	<i>Management of Class C Mining in the Batang Toru protected forest area, South Tapanuli, is one of the crucial issues that triggers agrarian conflicts, especially related to the rights of customary law communities (MHA). This study aims to examine the civil law aspects in the management of Class C Mining and its implications for agrarian conflicts involving MHA. The agrarian conflict case in Batang Toru shows violations of civil regulations related to forest area use permits, business use rights, and utilization of natural resources. A descriptive qualitative approach is used in this study with a document analysis method of the National Inquiry report of the National Human Rights Commission and related government policies. The findings of this study indicate that agrarian conflicts in this area are driven by weak government supervision of the issuance of business permits, as well as rampant violations of MHA rights due to exploitation of natural resources that do not comply with legal procedures. The cases of PT. Gemala Borneo Utama and PT. Selantai Agro Lestari are real illustrations of how weak cross-sectoral government coordination has an impact on the sustainability of agrarian conflicts. In addition, the implementation of civil law in dispute resolution is still minimal due to the absence of cross-sectoral institutions that have full authority to handle agrarian conflicts comprehensively.</i>

I. INTRODUCTION

Natural resource management in Indonesia, including forest areas, has become a major concern in various studies and public policies. Forest areas play an important role as ecosystem supporters, sources of livelihoods for indigenous peoples, and as part of the strategic natural resources for national development. However, the complexity of forest governance often gives rise to agrarian conflicts involving various parties, including indigenous peoples (MHA), the government, and private companies (Eko, 2016). These conflicts not only impact the environment but also human rights, which are often neglected in the management process. Indigenous peoples, whose numbers reach around 70 million, or around 20% of the total population of Indonesia, have a high dependence on resources in forest areas (Eko, 2016). Most of them live in forest areas which are their main source of life. However, the weak recognition of their rights is often the main source of agrarian conflict. A study by Komnas HAM shows that human rights violations against MHA in forest areas are systematic and chronic, involving neglect of rights, criminalization, and violence legitimized by state policy (Eko, 2016).

RootThe main problem of this conflict is the lack of legal certainty that fully recognizes the rights of indigenous peoples to their territories in forest areas. This is exacerbated by the existence of concessions and permits granted to sectors such as forestry, plantations, and mining, which often ignore the interests of indigenous peoples (Eko, 2016). The presence of security forces supporting these concessions has also exacerbated the exclusion of indigenous peoples from the land that has been part of their lives for centuries. The National Inquiry of the National Human Rights Commission in 2014-2015, which covered 40 cases in various regions of Indonesia, provided strong evidence of the scale of violations experienced by indigenous peoples. The neglect of rights and human rights violations against indigenous peoples occurred widely and repeatedly (Eko, 2016). This agrarian conflict is not only about land ownership disputes, but also reflects structural inequalities that require fundamental changes in natural resource management policies.

The conflict in the Batang Toru forest area, South Tapanuli, is a concrete example of an agrarian conflict that has occurred in Indonesia. This protected forest area not only has high

ecological value but is also a living space for local indigenous communities. However, the exploitation of resources such as C mining often conflicts with the principles of conservation and the rights of indigenous peoples, which causes tension between interested parties. Research shows that agrarian conflicts involving the exploitation of resources in forest areas have wide-ranging impacts, ranging from environmental damage to social disintegration (Eko, 2016). These conflicts are often rooted in injustice in the distribution of benefits from natural resources. Without clear recognition of the rights of indigenous peoples, these conflicts have the potential to continue and damage the socio-ecological order.

The Indigenous Peoples Alliance of the Archipelago (AMAN) as a representative of the indigenous peoples' struggle voiced the need for full recognition of their rights. Statements such as "If the State Doesn't Want to Recognize Us, Then We Don't Want to Recognize the State" reflect deep disappointment over the long history of neglect of their rights (Eko, 2016). This shows that agrarian conflicts are not only about land disputes, but also related to the identity and dignity of indigenous peoples. This conflict raises challenges related to fair and inclusive dispute resolution mechanisms. The existing legal system is often inadequate to handle the complexity of agrarian conflicts in forest areas. A paradigm shift in natural resource management is an urgent need. This new paradigm must include recognition of indigenous peoples' rights, just conflict resolution, and ecological sustainability. In addition, national policy reforms related to natural resources and agrarian matters are needed to ensure fair access for all parties (Eko, 2016). The management of C mining in the Batang Toru protected forest area will be a case study to examine the dynamics of agrarian conflict and its implications in civil law.

II. RESEARCH METHODS

The type of research used in writing this journal is normative juridical, namely "legal research on norms and legal provisions that have existed or have been in effect both in writing and unwritten." The nature of the research used in this study is analytical descriptive, "intended to provide data that is as accurate as possible about humans, conditions, or other symptoms with the aim of obtaining data on the relationship between one symptom and another."

III. RESULTS AND DISCUSSION

A. Dynamics of Agrarian Conflict in the Batang Toru Protected Forest Area

Natural resource management in the Batang Toru protected forest area has given rise to various dynamics of agrarian conflict. This area is located in the Batang Toru River Basin (DAS) which includes Tarutung District, North Tapanuli Regency. Research by Sidabukke and Harmain (2024) shows that the suitability of the area's function with the North Tapanuli Regional Spatial Plan (RTRW) 2017-2037 is one of the important factors influencing agrarian conflict. A total of 1304.76 hectares of the area in the Batang Toru DAS does not comply with the specified function. This discrepancy occurs due to uncontrolled changes in land use. This condition indicates a conflict between the regional spatial plan and activities in the field. The slope of the land in the Batang Toru DAS area varies from flat to very steep. Flat areas dominate this area with an area of 5370.18 hectares. Sidabukke and Harmain (2024) noted that the water catchment area in the Batang Toru DAS was disturbed by C excavation activities. This activity causes the loss of ecological land functions which results in a decrease in environmental quality. Land conflicts are increasingly complex because local communities have lost access to productive land that has been converted into mining areas. This condition emphasizes the importance of more effective land use evaluation in the Batang Toru watershed area.

The presence of the North Sumatra Natural Resources Conservation Center (BBKSDA) has a role in handling conflicts in the Batang Toru forest area. Veronika and Ginting (2024) showed that BBKSDA acts as a regulator, dynamizer, and facilitator in managing natural resource conflicts. As a regulator, BBKSDA strives to ensure compliance with applicable regulations, including protection of protected forest areas. Conflicts involving local communities and C mining activities are a major challenge for BBKSDA. The absence of alternative livelihoods for local communities worsens the conflict situation. This shows the need to develop collaborative strategies between the government, community, and private parties. The Batang Toru forest area is also an important habitat for endemic animals such as the Tapanuli orangutan. Veronika and Ginting (2024) noted that C mining activities have an impact on wildlife habitats,

including orangutans. Changes in land use trigger an increase in conflict between humans and wildlife. BBKSDA monitors and mediates conflicts in affected villages. However, limited resources and infrastructure are obstacles in efforts to resolve conflicts. This condition shows an urgent need to strengthen the institutional capacity of BBKSDA in managing natural resource conflicts.

Agrarian conflicts are also influenced by the role of local governments in managing forest areas. Simamora and Sinaga (2016) noted that local governments have a strategic role in maintaining the sustainability of protected forests and protected forests in North Tapanuli. However, the implementation of conservation strategies is often hampered by minimal coordination between institutions and economic pressures. Local governments also face challenges in integrating environmental conservation policies with local economic development needs. This condition triggers a dilemma between environmental conservation and exploitation of natural resources. C mining activities in the Batang Toru protected forest area exacerbate the ecological damage that occurs. Sidabukke and Harmain (2024) noted that inappropriate land use causes significant environmental degradation. Critical and very critical areas cover 1215.70 hectares and 1029.89 hectares, respectively. This degradation reduces the environmental carrying capacity in the Batang Toru watershed area. The loss of ecological land functions has an impact on the decline in the productivity of local communities who depend on natural resources.

The imbalance between the interests of local communities and the exploitation of C mining activities is the main trigger for agrarian conflict. Veronika and Ginting (2024) show that local communities are often not involved in the decision-making process related to land use. The lack of community involvement creates tension between the government, the community, and mining companies. A more inclusive approach is needed to reduce the escalation of agrarian conflict in this area. The presence of tourism activities in the Batang Toru forest area is also a factor influencing agrarian conflict. Simamora and Sinaga (2016) noted that this area has natural and cultural tourism potential that has not been optimally utilized. The development of conservation-based tourism can be a solution to reduce community dependence on mining activities. This strategy requires support from local governments to integrate environmental conservation with local economic development.

Watershed area Batang Toru shows the dynamics of agrarian conflict involving various interests. Sidabukke and Harmain (2024) noted that conflict mitigation efforts require a multi-sectoral approach that integrates spatial, environmental, and social aspects. Evaluation of the suitability of the area's function with the North Tapanuli RTRW can be an initial step to reduce the conflict that occurs. A spatial data-based approach can provide a more accurate picture of the dynamics of land use. The role of BBKSDA in managing conflicts in the Batang Toru protected forest area needs to be improved. Veronika and Ginting (2024) noted that the involvement of the private sector and non-governmental organizations can strengthen the institutional capacity of BBKSDA. Collaboration between stakeholders is key to creating sustainable natural resource management in this area. This approach requires commitment from all parties to achieve a balance between environmental conservation and the needs of local communities. Agrarian conflicts in the Batang Toru watershed area reflect the complexity of natural resource governance in Indonesia. Simamora and Sinaga (2016) showed that the role of local governments is very crucial in integrating environmental conservation policies with economic development. A more comprehensive and participatory approach is needed to create sustainable solutions. The Batang Toru protected forest area can be an example of how good natural resource management can reduce agrarian conflicts.

B. Civil Law Aspects in the Management of Class C Quarries in Protected Forest Areas

Management of C mining in protected forest areas involves complex civil law issues. This management process often intersects with the rights of indigenous peoples (MHA) living around the area. Eko (2016) stated that agrarian conflicts related to claims to state forest areas often arise due to forest stateization. In this context, management of C mining in protected forest areas often involves violations of the ownership rights of indigenous peoples that were previously not legally recognized. This leads to legal disputes related to land control and use. Forest stateization, according to Vandergeest (1996), is an attempt by the state to control geographic space by setting certain boundaries. The state often claims land that does not have legal ownership as state land. In the management of C

mining, these boundaries often do not involve the participation of local communities, resulting in conflict. This process is the root of the problem in many cases of natural resource management in forest areas, including C mining activities.

Komnas HAM through the National Inquiry report identified many cases of violations of MHA rights in forest areas involving natural resource extraction activities. One of the case studies in the report noted that indigenous peoples lost their land management rights due to permits granted to companies for mining exploitation. This shows that the management of C mining in protected forest areas is often colored by legal conflicts between the state, companies, and indigenous peoples. Siregar, Zaitunah, and Patana (2015) revealed that conflicts between indigenous peoples and parties who receive concessions from the state often involve violations of human rights. This conflict is not only rooted in the elimination of land rights but also causes major ecological losses. In the case of the Dolok Sibual-Buali Nature Reserve, the management of C mining and other activities damaged the natural habitat of the Sumatran orangutan, which is one of the focuses of environmental conservation.

Constitutional Court Decision Number 35/PUU-X/2012 is an important milestone in recognizing MHA rights over customary areas. However, the implementation of this decision still encounters many obstacles in practice. In many cases, the management of C mining in protected forest areas is still carried out without considering the rights of indigenous peoples. Peluso and Vandergeest (2001) refer to this situation as a "political forest," where economic and political interests often dominate the management of natural resources. According to Eko (2016), one of the main challenges in the management of C mining is the lack of participation of local communities in the planning and management process. This process is often carried out in a top-down manner, where decisions only involve certain parties without involving indigenous peoples who have historical ties to the area. Policies like this often trigger legal and social conflicts.

The National Inquiry noted that violations of MHA rights occurred chronically and systematically in various regions. These conflicts were often triggered by the lack of harmonization between natural resource management policies and regulations protecting customary rights. This indicates the need for a more inclusive approach

in managing C mining in protected forest areas to minimize the potential for conflict. According to Sack (1986), the territorialization process is an effort to control an area by establishing geographical boundaries. In the context of C mining management, this process often involves eliminating indigenous peoples' access to natural resources that were previously part of their lives. The impact is increasing tensions between local communities and parties who receive concessions from the state.

Concessions granted to companies for C mining activities are often carried out without considering their impact on the environment and indigenous communities. Siregar, Zaitunah, and Patana (2015) noted that conflicts between humans and wildlife often occur around mining areas due to the loss of natural habitat. This shows that the management of C mining not only impacts indigenous communities but also environmental sustainability. Peluso and Vandergeest (2001) stated that the management of natural resources in forest areas is often based more on economic interests than on the principle of social justice. In the case of C mining, this can be seen from the granting of mining permits that often ignore their impact on local communities. This kind of policy not only raises legal issues but also triggers social conflict.

Komnas HAM in the National Inquiry report emphasized the importance of a human rights-based approach in resolving conflicts in forest areas. This means recognizing and protecting MHA rights over their customary territories. This process requires cooperation between the government, companies, and local communities to create equitable solutions. The management of C mining in protected forest areas shows the need for more inclusive policy reforms based on the principles of social justice.

Processgranting permits to companies often includes indigenous peoples' land into concessions without clear consent. This results in agrarian conflicts involving various parties, including indigenous peoples (MHA). A study by Eko (2016) shows that granting concessions without respecting the rights of indigenous peoples is the root of the problem. Case examples such as the MHA Malind Anim who lost their living area due to the MIFEE project in Papua emphasize the importance of legal protection for indigenous peoples' land rights. The application of civil law in the management of C Mining is often accompanied by acts of manipulation, violence, and fraud in the land acquisition process. In the case of the MHA

Pandumaan Sipituhuta in the concession area of PT. Toba Pulp Lestari, the community experienced forced eviction of land that threatened their survival. Eko (2016) emphasized that this kind of action shows the weakness of legal protection in guaranteeing justice for indigenous peoples. This process also has social impacts in the form of tension between indigenous peoples and the government and companies.

Ecosystem damage due to the management of Class C Mining has a direct impact on the loss of livelihoods for indigenous peoples. In the MHA Malind Anim area, large-scale extraction activities have caused forest degradation, which is the main source of life. Eko (2016) noted that the community lost the ability to meet basic needs due to this damage. This condition also causes a decline in the health of indigenous peoples, as seen in cases of malnutrition in toddlers in the area. The involvement of companies in the management of Class C Mining in protected forest areas often exacerbates horizontal conflicts among indigenous peoples. The case of the Cek Bocek community in Sumbawa which clashed with the Tanah Samawa Community is one example. This conflict was triggered by efforts by the government or third parties to form new indigenous groups to support mining interests. Eko (2016) shows that this type of conflict leads to divisions at the local community level.

Process natural resource extraction also affects the social structure of indigenous communities. Loss of land often forces indigenous communities to transform from traditional farmers to industrial workers. In the case of MHA Golo Lebo in NTT, the community lost the ability to manage their customary territory due to the mining exploration permit granted to PT. Manggarai Manganise. Eko (2016) stated that this situation causes the dependence of indigenous communities on the mining industry which threatens their independence. Agrarian conflicts also exacerbate the socio-ecological crisis which has an impact on the migration of people from villages to cities. Loss of land due to concessions often forces rural communities to look for new land or become part of the urban poor. Eko's study (2016) noted that this kind of migration exacerbates social and economic inequality. This situation also shows that the existing legal system has not been able to provide effective solutions for affected communities. The impact of the management of Class C Mining on indigenous women is heavier than other groups. The case of

MHA Malind Anim due to the MIFEE project is a real example of how women face a double burden. Eko (2016) noted that indigenous women often lose their role as primary managers of natural resources, which causes their social and economic burdens to increase. This shows that gender aspects are often ignored in natural resource management.

Natural resource damage due to C Mining extraction also has an impact on the wider environment. In the Kasepuhan Cisitu customary forest area, gold mining activities have caused chronic environmental degradation. Eko (2016) noted that this environmental damage not only affects indigenous peoples, but also threatens the sustainability of protected forest ecosystems. This situation shows the need for stricter regulations in the management of natural resources. Conflicts in the management of C Mining also trigger injustice in the distribution of economic benefits. In many cases, indigenous peoples only receive negative impacts without getting benefits from mining activities. Eko (2016) shows that this inequality is often the root of indigenous peoples' resistance to mining companies. This condition also reflects the imbalance between economic and social interests.

The civil law aspect in the management of Class C Mining should protect the rights of indigenous peoples to land and natural resources. However, in reality, the law often does not side with indigenous peoples. Eko (2016) noted that weak law enforcement is one of the main causes of the marginalization of indigenous peoples. This shows that the legal system needs to be changed to ensure justice for all parties. The weakness of the law in protecting indigenous peoples is also seen in the lack of recognition of traditional rights. The case of the Talang Mamak MHA in Riau shows that indigenous peoples lose access to their land due to plantation concessions. Eko (2016) noted that the government and companies often ignore traditional rights in the licensing process. This situation shows the need for a more inclusive approach to natural resource management. Agrarian conflicts in the management of Class C Mining in protected forest areas reflect the failure of the legal system to guarantee justice. This conflict not only harms indigenous peoples, but also causes severe environmental damage. Eko's study (2016) shows that the existing legal system needs to be improved to address this problem.

Eko (2016) explains that agrarian conflicts in customary law communities (MHA) are often triggered by violations of indigenous peoples'

rights due to exploitation of natural resources without adequate permits. In the case of PT. Gemala Borneo Utama in Southwest Maluku, the company did not have a forest area use permit but continued to exploit it. A similar condition also occurred in PT. Selantai Agro Lestari in Riau, where the company operated without a Cultivation Rights (HGU). This situation reflects how companies that violate civil law provisions continue to operate, often with negative impacts on the surrounding community. These cases show a pattern of ignoring MHA rights which has an impact on the loss of public trust in the government. Eko (2016) stated that criminalization and violence against indigenous peoples, such as those that occurred in Papua, Kalimantan, and Sulawesi, caused deep trauma. This gave rise to widespread conflicts, including ethnic and inter-population conflicts. In the Batang Toru area, this problem is relevant, considering the many Class C mining activities that ignore the rights of indigenous peoples. Management involving companies without clear permits can exacerbate legal and social tensions in the area.

Violations of civil law are often exacerbated by the lack of transparency in the issuance of permits by the government. Eko (2016) emphasized that government institutions tend to be defensive when community protests arise. The case of PT. Ledo Lestari in Kalimantan shows that the company did not have a HGU but continued to operate without hindrance. In Batang Toru, a similar situation could occur if the government does not control the issuance of permits and ignores the rights of local communities. This reinforces the urgency of stricter law enforcement against violations in protected forest areas. Agrarian conflicts in forest areas often do not have effective resolution institutions. Eko (2016) stated that these conflicts require cross-sector coordination, but policies that support resolution are often inadequate. A relevant example is the proposal to establish a National Committee for the Resolution of Agrarian Conflicts (KNUPKA) which has not yet been realized. In Batang Toru, the establishment of such an institution could help resolve conflicts arising from the management of C-Galian. However, the lack of seriousness of the government is a major obstacle in realizing an effective solution.

The neglect of indigenous peoples' rights is also related to state policies that are not responsive to the needs of the grassroots. Eko

(2016) explains that policies are often formulated based on "elite reasoning," without considering the socio-ecological impacts on the community. In the case of Batang Toru, this can result in the exploitation of natural resources without regard to environmental sustainability and the rights of indigenous peoples. A fair civil law approach is needed to address this inequality. The impact of unresolved agrarian conflicts creates marginalization for indigenous peoples. Eko (2016) shows that communities often lose access to their own land and natural resources. Cases in Maluku and Riau show how companies that do not have valid permits can still operate, while local communities become victims. In Batang Toru, this kind of practice can worsen socio-economic inequality and strengthen the sense of injustice among indigenous peoples.

Eko (2016) toonoted that the government often prioritizes administrative approaches rather than seeking fundamental solutions. In the management of Galian C in Batang Toru, a weak administrative approach can lead to ongoing agrarian conflicts. Strict enforcement of civil law is needed to ensure that mining activities comply with applicable regulations and do not harm indigenous peoples or the environment. The issue of transparency in issuing permits is also a major concern in forest area management. Eko (2016) showed that government agencies rarely disclose information to the public, making it difficult for the public to monitor company activities. In the case of Batang Toru, this lack of transparency can exacerbate agrarian conflicts, especially if permits are given to companies that violate the rules.

Criminalization Indigenous peoples are one of the most serious impacts of agrarian conflicts in forest areas. Eko (2016) describes how community protests are often met with intimidation and violence. In the case of Batang Toru, this can happen if the community tries to defend its rights against mining that damages the environment and their lives. A settlement based on civil law must consider protecting indigenous peoples from criminalization. Management of protected forest areas requires an inclusive approach to involve indigenous peoples. Eko (2016) notes that policies that ignore grassroots communities are often ineffective in resolving conflicts. In Batang Toru, involving indigenous peoples in decision-making related to C Mining can be an important step in creating sustainable solutions.

Exploitation of natural resources in forest areas is often influenced by global economic

pressures. Eko (2016) states that the expansion of global capitalism drives the commodification of natural resources, often ignoring the rights of local communities. In Batang Toru, this kind of pressure could worsen agrarian conflicts if the government does not take firm steps to protect protected forest areas. Agrarian conflicts in the Batang Toru forest area demonstrate the need for comprehensive legal reform. Eko (2016) emphasizes that the civil law approach must pay attention to social and ecological justice. Legal reforms that involve indigenous communities and ensure transparency in issuing permits can be important steps to resolve existing conflicts.

Eko's (2016) research shows that natural resource management policies often ignore the principles of social justice and equity. In this case, the Batang Toru protected forest becomes the object of exploitation that not only harms the environment, but also marginalizes the rights of indigenous peoples (MHA) who traditionally manage the area. The civil law aspect in the management of C-Galing is related to the inconsistency between land management by MHA and government policies that are more oriented towards economic profit. The problem faced in the management of C-Galing in Batang Toru is the reduction of human relations with land to purely economic relations, as explained by Eko (2016). Development policies that prioritize profit often ignore the rights of MHA who prioritize socio-cultural and ecological aspects in managing their land. This is a legal issue that is not only related to unequal compensation, but also to the fulfillment of legitimate land rights and recognition of the historical relationship of the community with their land.

StudiesThe case reported by Eko (2016) shows how natural resource management often ignores justice for indigenous peoples. In the case of the management of C-type mining in Batang Toru, the problem was exacerbated by the emergence of agrarian conflicts involving the exploitation of natural resources that were not based on valid permits. The management of C-type mining that does not refer to civil law creates social injustice for indigenous peoples whose rights should be protected. The sustainability of this agrarian conflict is also influenced by the development paradigm that prioritizes economic profit and management that does not consider social and ecological aspects. Eko's research (2016) identified that the developmentalist paradigm that dominates natural resource management policies has led to the neglect of the

sustainability of the ecosystem that is the right to manage indigenous peoples. When development policies are more oriented towards the exploitation of natural resources, the civil law aspect, which should protect the rights of indigenous peoples, becomes irrelevant or neglected.

This phenomenon of ignoring civil law not only has an impact on the management of Galian C, but also on the management of protected forests as a whole. Eko (2016) noted that policies that ignore the participation of indigenous peoples in forest management cause ecological damage that can affect their social and cultural lives. From a civil law perspective, the management of Galian C in Batang Toru must prioritize the principle of justice that involves recognizing the rights of indigenous peoples as the legal owners of their land. In the study of civil law, one of the main problems faced in the Galian C case is the unclear status of land ownership and management in protected forest areas. Eko's research (2016) describes how government policies in land management often conflict with customary laws that apply in the community. The disharmony between state law and customary law often worsens the situation, especially when large-scale development projects are managed without considering the needs of the affected communities.

The agrarian conflict that occurred in Batang Toru also shows how poor natural resource management leads to injustice for indigenous peoples. Eko (2016) noted that indigenous peoples are often faced with difficulties in obtaining rights to their land, while the management of Class C Mining and exploitation of other natural resources is prioritized for the interests of economic development. The civil law aspect that protects the land rights of indigenous peoples needs to be strengthened so that agrarian conflicts do not continue. Based on Eko's study (2016), the management of Class C Mining that is not based on fair civil law can cause long-term damage to the relationship between the community and their land. Civil law that should protect the basic rights of indigenous peoples in managing their land is often ignored in the interests of development that does not take into account its impact on local communities. This shows the importance of stricter regulations and a monitoring system that involves indigenous peoples in decision-making related to natural resources.

Protection of indigenous peoples' rights in the management of C-Mining in Batang Toru requires stronger law enforcement and policies that are more responsive to the needs of local communities. Eko (2016) suggests that legal protection should be based on the recognition of indigenous peoples' land rights that have been neglected in development policies. In this case, civil law must ensure that the interests of local communities and environmental sustainability can go hand in hand with existing development policies. Resolving agrarian conflicts involving C-Mining in Batang Toru requires a more holistic approach, prioritizing social justice and recognition of indigenous peoples' rights. Eko (2016) shows that development policies that do not accommodate the interests of indigenous peoples will continue to produce social injustice and damage the relationship between humans and the land.

IV. CONCLUSIONS AND RECOMMENDATIONS

The agrarian conflict in the management of Class C Mining in the Batang Toru protected forest area, South Tapanuli, reflects the complexity between economic, social, and environmental interests. This protected forest area has a strategic role in ecosystem conservation, but the existence of Class C Mining has become a point of conflict due to natural resource exploitation activities that clash with the principles of environmental protection. This conflict often involves various parties, including local governments, mining companies, and indigenous and local communities who feel that their land rights have been neglected. Civil law in dispute resolution is often not strong enough to protect the rights of indigenous peoples, resulting in unequal access to legal justice. From a civil law perspective, the management of Class C Mining in the Batang Toru protected forest area is a challenge in implementing agreements based on the principles of justice and sustainability. Issues such as the legality of mining permits, land ownership status, and environmental impacts are at the heart of this conflict, which requires synergy between legal regulations and sustainable development policies. Without an approach that integrates the interests of all parties, this conflict has the potential to worsen environmental degradation, damage the social order of society, and trigger prolonged legal tensions.

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