



Legal Review of Song Copyright Protection for the Realization of Legal Certainty

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ABSTRACT

Digital technology has made it easier to access music and digital platforms. Still, this development has made it easier to infringe on song copyright, preventing the protection of Song Copyright from running optimally. This research examines the relationship between legal provisions on Copyright and the legal protection afforded to song creation under Law No. 28 of 2014 respecting Copyright. This study employs normative juridical research methods utilizing legal and comparative approaches. The results of the study found that although Copyright protection has regulated various rights of copyright owners to protect their rights, in practice Copyright infringement still occurs frequently, this is because the current Law still does not provide a clear legal framework for parties who provide space so that it allows Copyright infringement to occur, such as the digital platform Youtube, and lacks strict enforcement of the law against copyright infringers, therefore to achieve legal certainty in providing copyright protection to copyright owners. The legislation must establish a definitive legal framework delineating the responsibilities of digital platforms concerning the content hosted on their sites, alongside the necessity for organized oversight by the Collective Management Institution to serve the public utilizing the song for commercial purposes in relation to their obligation to remit royalties. Furthermore, rigorous enforcement of the law against copyright infringers is essential to achieve legal certainty in the safeguarding of copyright.

INTRODUCTION

The digital age has transformed individuals' use of entertainment services from physical to digital formats. Individuals favor digital entertainment services for various reasons, including enhanced storage accessibility, competitive pricing, and virtually limitless choices (Silfiani, 2020).

Among the various forms of entertainment, music is one of the most popular. This is because music is a form of art that can directly affect the feelings of its listeners. Besides that, music can also be enjoyed as entertainment while doing other activities.

In this digital era, there are numerous ways to access the music we want, ranging from attending live music concerts to streaming it on various internet platforms, such as YouTube, Joox, Spotify, and others. As the means to access music become easier, there is also an increasing number of copyright violations against music (Rahmanda et al., 2021). Violations that occur range from piracy and plagiarism to using music for commercial purposes without the creator's permission and/or failing to pay royalties.

Using songs without permission from the Creator is one of the most frequent phenomena in Indonesia. Various songs from famous musicians and songwriters can be easily played at parties in various activities, such as business actors who play music in restaurants or cafes, songs in seminars, and even songs played in shopping centers. Additionally, songs without permission continue to appear in song covers uploaded to various social media sites, including YouTube, Instagram, TikTok, and other platforms (Indradewi & Dewi, 2022).

The problem of Copyright infringement of songs is a serious problem that has occurred for a long time in Indonesia, Copyright Infringement that occurs against songs results in Copyright owners not being able to get maximum benefits from their works, this can result in a decline in the creative industry market, especially music, therefore legal protection is necessary to protect the Copyright Owner's Rights against Copyright infringement that occurs.

Law Number 28 of 2014 regarding Copyright establishes a foundation for legal protection and certainty for the economic rights of Creators, Copyright Holders, and related rights owners of songs and/or music, thereby enhancing national creativity, particularly in this domain. Musical works possess economic rights for commercial utilization in the form of royalties, which are exchanged for the economic rights of a work or Related Rights product received by the Creator and the owner of the Related Rights (Ariani, 2021). Nonetheless, copyright infringements frequently arise in the execution of song copyrights.

Royalty arrangements are governed by the Collective Management Institution (LMK), which holds legal status under Law Number 28 of 2014 regarding Copyright, specifically Articles 87 to 94. LMK is empowered to represent copyright holders in the administration of economic rights, particularly in collecting and distributing royalties for copyrighted materials. LMK acts as an intermediary between the rights owner and the user of the work, ensuring that creators receive a fair and equitable economic reward for using their work in the public space. The existence of LMK also enables the collective licensing system

to operate in an orderly and efficient manner, including supervising and reporting the use of works by both commercial and public users.

In practice, song copyright infringement still occurs even though its protection has been regulated by law, in a verification meeting of the TikTok application Blocking Application conducted by the Directorate of IP Investigation on a sample of 100 copyrighted works taken randomly, there were 32,903,377 uploads of Copyright infringement content (Directorate General of Intellectual Property, 2024). This suggests that the legal protection of copyright, particularly the protection of digital song copyrights for copyright holders, remains suboptimal.

For example, music copyright infringement that occurs on digital platforms is the case experienced by Indonesian musician Nadin Amizah in his song "Rayuan Perempuan Gila." The song was modified using the Speed Up format and commercialized on several platforms, including YouTube and TikTok, by an individual whose identity is unknown and who lacks clear permission from the creator (Junaidi & Fidhayanti, 2025).

Technological developments have contributed to some of these negative impacts, and the current Copyright Law is considered inadequate in addressing various problems in the field of copyrighted artworks, particularly in the context of Copyright protection (Agustina et al., 2024).

Copyright protection for songs exists to ensure the safeguarding of both the economic and moral rights of the author or copyright holder. Nonetheless, the enforcement of copyright protection continues to encounter numerous challenges, particularly inside social media and digital platforms. This is evident from the widespread unauthorized use of music on sites like YouTube, TikTok, and Instagram, which often lack effective enforcement measures. The unauthorized use of music is often facilitated by insufficient oversight and enforcement by authorities, including the Ministry of Law and Human Rights, the Ministry of Communication and Informatics, and the Collective Management Institution (LMK). Digital platforms often fail to proactively address copyright infringement related to license agreements and user-uploaded content monitoring systems.

The primary issue at hand is the efficacy of the legal provisions concerning copyright protection for song creation, as stipulated in Law No. 28 of 2014 on Copyright, particularly in light of the numerous copyright infringements occurring in the music industry, which has led authors to question the law's ability to safeguard the rights of copyright holders.

LITERATURE REVIEW

Song Copyright

The art of music and songs has a vast economic potential in Indonesia. Music is often regarded as a form of art that is highly popular among the public. The popularity of music among the public is directly proportional to the increase in the purchasing power of the community towards a work of music. This increase in purchasing power certainly brings many economic benefits to its creators. According to Gatot Soepramono, someone who creates something does so not only for personal use but also for reproduction so that others can utilize it.

Others can usually reproduce a work of creation because the creator's capacity is limited, and thus unable to produce it in large quantities according to public demand. According to Purwacaraka (a music observer) in a dialogue discussing the Indonesian music industry held by the Ministry of Tourism on Sunday, April 6, 2016, there are several issues frequently encountered in developing the creative industry, particularly music, in Indonesia, including: 1) Piracy, 2). The phenomenon of music performances that do not prioritize quality, 3). The compensation for musicians is sometimes inadequate, and 4). A lack of appreciation for musicians who work behind the scenes. These problems necessitate a greater maximization of copyright protection for artistic works, especially music or songs, as they are very detrimental. The rapid development of information technology has both positive and negative impacts on the enforcement of copyright law. The positive impact is that with technological advancements, especially the internet, it has become easy to purchase original music or songs through online shopping facilities. Whereas the negative impact is the increasing number of links for illegal music downloads online, as well as the ease of piracy of sound recording works in the real world. (Utama et al., 2019).

Copyright Protection

Along with the rapid development of technology and information, which certainly brings both positive and negative impacts. One of them is the piracy of songs and music, both in the real world in the form of pirated Compact Discs (CDs) or Video Compact Discs (VCDs), as well as in the virtual world in the form of illegal song or music download links that are spread across websites. This constitutes a form of copyright infringement in the field of songs or music. Several factors contribute to the increase in copyright piracy of songs or music in Indonesia, including public awareness, economic factors, societal attitudes, technological advancements, low purchasing power, and a lack of legal action. The lack of knowledge among the majority of the public regarding the protection of Intellectual Property Rights (IPR), especially concerning the copyright of songs or music, is significant. Therefore, socialization regarding the importance of Intellectual Property Rights (IPR) is greatly needed, especially in the field of music for the community (Utama et al., 2019).

Copyright piracy due to low purchasing power. According to Abdul Bari, former Director General of Intellectual Property at the Ministry of Law and Human Rights, the prevalence of piracy of someone's work is due to the low purchasing power of the public. He cited the rampant circulation of pirated Video Compact Discs in Indonesia. This is because people's purchasing power is low. If they have to buy original Video Compact Discs priced at tens of thousands of rupiah, the public cannot afford it. As a result, they choose pirated goods that are very cheap. In addition, there is a lack of serious legal action against offenders or pirates. If this situation continues unchecked, it will create an attitude that piracy has become commonplace and no longer constitutes a law-breaking act.

METHODOLOGY

The normative juridical research approach is a literature-based legal inquiry that exclusively examines literary sources or secondary evidence. Normative juridical research seeks to investigate and evaluate legal norms about legal protection (Choeirunnissa et al., 2024)

The normative juridical method in this study examines regulations and literature related to Copyright Protection Laws. This research will examine Law Number 28 of 2014 concerning Copyright and court decisions related to disputes involving copyrighted songs in Indonesia. The secondary data used includes the opinions of legal experts and scientific journals relevant to the Copyright protection of Songs.

This study employs a normative juridical approach, utilizing a statutory method that involves analyzing all relevant laws and regulations pertaining to the legal issue at hand, as well as a comparative approach that entails juxtaposing the legal system or laws of one country with those of one or more other countries concerning the same matter. (Widiarty, 2024)

The statute *approach* is carried out by examining all laws and regulations related to Copyright protection, especially regarding the protection of song copyright against piracy and modification in the digital realm, such as User-Generated Content platforms (UGC) YouTube and TikTok, as well as in the physical realm, such as cafes, restaurants, or entertainment venues that play songs without a license.

A comparative analysis is conducted by juxtaposing the copyright protection legal framework in Indonesia, governed by Law Number 28 of 2014 on Copyright, with the copyright regulations of other nations, notably the Digital Millennium Copyright Act (DMCA) in the United States. This technique seeks to discern variations in legal regulations, the reliability of legal protection, and the processes for conflict settlement utilized in each nation.

RESEARCH RESULT AND DISCUSSION

According to Law Number 28 of 2014 regarding Copyright (UUHC), Copyright is the exclusive right of the creator that arises automatically under the declarative principle once a work is manifested in a tangible form, without diminishing the limitations set forth by applicable laws and regulations. Exclusive rights encompass economic rights and moral rights. Economic rights refer to the entitlement to utilize a work for commercial purposes in order to derive financial gains from it (Ariani, 2021).

Moral rights are inalienable rights associated with the creator, including the right to attribute or withhold their name on copies of the work during public usage, the right to utilize their real name or pseudonym, the right to modify their work in accordance with societal ethics, the right to alter the title and subtitle of their work, and the right to preserve their rights against distortion, mutilation, or alterations that could harm their honor and reputation (Ariani, 2021).

To safeguard Song Copyright, the copyright holder may file an application to register their work with the Minister, which also serves the purpose of registering songs and/or music related to the issuance of licenses to third parties for designated purposes. The issuance of licenses is accompanied by the payment

of royalties to the creator, as stipulated in Article 9, Paragraph 1 of the Copyright Law of 2014 (Handayani, et al., 2023). Nonetheless, the Registration of Works is not a prerequisite for acquiring Copyright; rather, it serves to enhance legal protection and the administration of licenses and payments. Utilizing musical compositions for commercial purposes requires a license. The entity desiring to utilize the musical composition must secure authorization from the copyright holder or the copyright management organization representing them. The Copyright Owner or the Copyright management entity typically receives royalties from the commercial use of the musical piece. Royalties are compensatory payments provided by the entity utilizing the musical work to the copyright holder (Erniyanti, 2023).

Copyright infringement refers to any action that contravenes the exclusive rights of the creator and/or copyright holder, encompassing both economic and moral rights, as outlined in Law Number 28 of 2014 regarding copyright (Mayana et al., 2024). In the realm of copyright infringement within music, violations often impact the economic and moral rights of creators.

The infringement of copyright through the unauthorized use of songs on various digital platforms and in public spaces is prevalent, despite the fact that songs, as creative works, are protected under copyright law. According to Article 40, paragraph 1 of the Copyright Law, songs, which comprise musical compositions and/or lyrics, fall within the scope of copyright protection. Infringements of this song's copyright frequently arise, affecting both economic and moral rights. Moral rights violations manifest as unauthorized modifications, such as remixes, typically uploaded on digital platforms like YouTube, without the copyright owner's or their representative's consent. Additionally, copyright infringements include covering songs for commercial gain without the creator's permission, as well as the widespread uploading of music recordings on platforms like YouTube. Furthermore, music is often played in cafes, restaurants, or entertainment venues without compensating the creator or copyright holder through royalties.

Copyright holders who suffer economic losses due to copyright infringement may initiate a lawsuit in the District Court against the infringer to obtain restitution for their damages. An instance of copyright infringement involves the renowned YouTube channel of Gen Halilintar's family over the song "Lagi Syantik," composed by Yogi RPH and Donall Kinan Sammy, and popularized by Siti Badriah. This case began when Gen Halilintar uploaded the cover video of the song to Gen Halilintar's YouTube channel without permission and changed the lyrics to the song "Lagi Syantik". This action is considered to violate the economic rights and moral rights of the Copyright holder, namely PT Nagaswara. The Central Jakarta District Court rejected the lawsuit, which was finally resubmitted to the Supreme Court through Review (PK). In the PK decision Number 41 PK/Pdt.Sus-HKI/2021 dated December 23, 2021, the Supreme Court stated that Gen Halilintar was proven to have violated Copyright and was sentenced to pay compensation of IDR 300 million to PT Nagaswara for his losses for violating the economic and moral rights of the copyright owner (Supreme Court Decision, 2021).

This case example is just one example of the many Copyright violations that occur, especially in digital media, the case was successfully declared an act of Copyright infringement after going through a lengthy trial process, so it can be understood that there are several reasons why there are still many acts of Copyright infringement, especially in digital media that are still left and not sued by the Copyright owner, Among them is because the effort that needs to be expended is not proportional to the results, especially if the copyright infringement is committed by an unknown person, so that if he has been found guilty, it is doubtful about his ability to compensate for the damages caused which can reach up to hundreds of millions.

Confronted with widespread copyright infringements, particularly in digital media, existing legislation has failed to offer optimal protection for copyright, notably in relation to musical works. Law Number 28 of 2014 regarding Copyright has been submitted to the Constitutional Court due to its perceived inadequacy in safeguarding the copyright of music owners in the digital age. The Constitutional Court partially granted Melly Goeslaw's appeal for a material review based on the lawsuit's outcomes. PT Aquarius Pustaka Musik and PT Aquarius Musikindo against Article 10 of Law Number 28 of 2014 concerning Copyright in case No. 50/PUU-XXI/2023. The petitioners sued against this provision because it was considered that it had not provided sufficient protection for Copyright, especially in the context of managing Copyright infringement on *user-generated content* (UGC)-based digital platforms. The Constitutional Court ruled that Article 10 contravenes the 1945 Constitution unless it is taken to mean that the managers of the UGC digital platform are not permitted to permit copyright infringement within the system they oversee. This verdict imposes a legal obligation on digital platform operators to address copyright infringement in the digital realm (Constitutional Court Decision, 2023).

According to the Constitutional Court's ruling, while digital platform administrators are now obligated to address content that infringes on copyright, particularly in relation to musical works, violations of song copyright persist on these platforms. This is attributable to Law Number 28 of 2014 regarding Copyright, which fails to delineate explicit penalties for digital platforms that permit ongoing copyright infringements within their systems. The absence of government enforcement against individuals committing music copyright infringement, including the criminal act of copyright violation, underscores that enforcement actions will only occur following complaints or allegations from the victim.

The enforcement of copyright law aims to fulfill the objective of copyright protection, specifically safeguarding economic rights through regulations on reproduction, giving exhibition permissions, disseminating works, and upholding the creator's moral rights. Comprehensive copyright protection is anticipated to significantly enhance economic growth and community well-being (Destyarini et al., 2022).

Satjipto Raharjo posits that legal protection constitutes an endeavor to manage diverse societal interests to prevent conflicts and ensure that all individuals can access the rights afforded by law. Arrangements are executed by

constraining specific interests and allocating authority to other entities in a quantifiable manner (Sahrul et al., 2023).

The music industry has various interests ranging from songwriters, singers, producers, to users of works, such as café owners or content creators. In order for all parties to enjoy their rights fairly, the law must provide clear responsibilities, limits and mechanisms, such as the need for digital platforms to supervise content spread in the places they manage, and provide clear and firm sanctions to parties who neglect these responsibilities, in addition to that the law must also be able to provide an easier and more precise mechanism for Copyright owners to report Copyright infringement that occurs in their works. This arrangement safeguards the creator's rights as the legal owner of the work while allowing other parties to utilize the song legally, so establishing balance and certainty in the usage of musical compositions.

Legal protection is defined as the safeguarding of human rights that have been violated by others, as well as the protection of the community so that they can enjoy all the rights granted by the law. In other words, legal protection is various legal remedies that law enforcement officials must provide to provide a sense of security, both mentally and physically, from disturbances and various threats from any party (Lastini et al., 2020).

Concerning measures to address copyright infringement in digital media, one can consider the actions implemented by the United States to safeguard copyright via a technological framework, specifically through the Digital Millennium Copyright Act (DMCA) of 1998. The rule delineates the legal remedies available to copyright owners against service providers (Mayana et al., 2024).

The Digital Millennium Copyright Act (DMCA) clearly governs digital platform activities concerning user-generated content (UGC) that may infringe copyright, including piracy and unauthorized use of musical works. This legislation mandates that all digital platforms, including YouTube, TikTok, and Facebook, establish a notice and takedown system, enabling copyright proprietors to report infringing material and request its removal from the platform.

The Digital Millennium Copyright Act provides legal protection to service providers (*safe harbor*) as long as digital platforms act quickly and cooperatively on reports of copyright infringement. With a *safe harbor*, platforms like YouTube will not be held directly responsible for copyright infringement committed by their users as long as they have a policy of removing infringing content, an easily accessible reporting system, and effective follow-up on infringement reports.

With the availability of an easy, and quick to act on Copyright infringement reporting method, it will help Copyright owners to protect their rights, this gives more options for copyright owners to protect their rights, so that filing a lawsuit to the District Court which takes a long time until the issuance of a lawsuit decision is not the only way for copyright owners to protect their rights, the method of reporting to digital platforms to remove content that infringes the copyright owner's copyright can help to achieve legal certainty.

In addition to the problem of song copyright infringement that occurs in digital, using songs for commercial purposes carried out by public services such as cafes and karaoke venues without paying royalties is also a common practice.

Marcel Siahaan, as the commissioner of the National Collective Management Institute, the institution that has the authority to manage royalties, stated that of the various commercial public services, not all have paid royalties optimally. If they consistently pay royalties, the potential royalty income in Indonesia can touch Rp 2.5 trillion per year. "The reality is that because there are still various commercial public service sectors that do not pay or do not consistently pay, the total royalty income has not reached around IDR 100 billion annually" (Mediana, 2024).

Another report also states that business owners in Maluku's hotel, café, restaurant, and karaoke sectors were reported by the National Collective Management Institute (LMKN) to the Maluku Police for allegedly not paying music royalties throughout 2024. This report was submitted in December 2024 through LMKN's legal representative. This firm step was taken after LMKN found that around 50 business actors did not meet their royalty payment obligations despite various socializations (Saputra & Riantrisnanto, 2025).

To achieve maximum copyright protection for copyright owners, LMKN needs to carry out more structured supervision of every business that uses music for commercial purposes and file lawsuits against parties who violate the copyright of the song's copyright owner to cause a legal deterrent effect and achieve legal certainty.

The theory of legal certainty highlights the importance of compliance and law enforcement in maintaining order and justice in a legal system (Khan et al., 2024). To achieve this legal certainty, the law must provide a clear legal framework so that law enforcement can carry out its duties directly against the perpetrator who causes losses to the copyright owner.

In order to build legal certainty concerning Copyright protection, a legal framework is needed. Effective law enforcement against Copyright infringers, both of these things are needed so that the law can function as a deterrent to the occurrence of legal violations, especially Copyright violations, and sanction the perpetrators of Copyright infringement, which is expected to provide a deterrent effect so that they do not repeat Copyright infringement.

The law must be able to protect the rights of every legal subject, in this case, the copyright owner. The legal certainty in question is the law's ability to protect the rights of every legal subject and the law's ability to take action against every legal subject that violates the law without exception, by the set of regulations that have been enacted as a law.

CONCLUSION AND RECOMMENDATIONS

This study identified multiple copyright protections in Song Copyright, encompassing both economic and moral rights. The economic rights of the creator refer to the entitlements acquired by the copyright holder to exploit their work for financial gain. These rights encompass licensing rights and royalty rights. The copyright owner grants licensing rights to third parties, permitting them to utilize the work for commercial purposes under specific conditions,

typically involving royalties, which are payments made for the economic value conferred to the copyright owner.

To facilitate the protection of Copyright, the copyright owner can register to record his work against Minister, in addition, the registration of a work can facilitate the management of licenses and royalties so that the economic rights of the creator are easier to obtain, The In the event of a violation of economic rights against the copyright owner, the copyright owner can file a lawsuit against the perpetrator to the District Court to request a decision so that the perpetrator compensates for the economic losses received by the copyright owner. However, even though the arrangements for the protection of Song Copyright have been regulated as described, violations of Song Copyright continue to occur both in the digital realm such as Youtube, as well as the physical realm such as cafes, and karaoke venues, violations that occur in the form of modifications or *Cover Songs* without the creator's permission, and the use of songs for commercial purposes without paying royalties is still everyday.

ADVANCED RESEARCH

Future research should focus to overcome these problems, the law must provide a clear legal framework, and strict law enforcement against the infringing party, because to protect the copyright owner's copyright, legal certainty is needed, the law must be able to protect the rights of copyright owners, and take action against perpetrators who violate copyright without exception to achieve legal certainty.

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