

Settlement of Song Copyright Disputes in Yogyakarta Mayor Regulation in the Perspective of Pancasila Justice as a Form of Legal Protection

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ABSTRACT

Song copyright protection requires legal certainty, accessible dispute resolution mechanisms, and equitable recognition of creators' rights. However, ambiguities in regional regulations and limited public understanding of royalty payment procedures may undermine these objectives in Yogyakarta. This study aimed to examine the adequacy of song copyright dispute resolution from the perspective of Pancasila-based justice, particularly in relation to Yogyakarta Mayor Regulation Number 77 of 2020. The study employed a normative legal research method incorporating statutory, case, and conceptual approaches. Primary and secondary legal materials were collected through library research and analyzed qualitatively using legal interpretation and systematic comparison. Observations and interviews were used to provide contextual support. The findings indicated that Indonesia's national copyright framework established legal protection mechanisms for song creators through royalty management, litigation, and alternative dispute resolution. However, Yogyakarta Mayor Regulation Number 77 of 2020 did not explicitly address mechanisms for resolving song copyright disputes. Contextual findings further revealed uncertainty regarding official royalty payment procedures and continued reliance on informal practices. These findings highlighted the need for stronger institutional coordination, public legal education, and transparent regulatory implementation to uphold the principles of justice embodied in Pancasila. The study concluded that strengthening legal protection for song creators required regional measures consistent with national copyright legislation, accessible dispute resolution mechanisms, and effective regulatory guidance and oversight to promote legal certainty, fairness, and equitable treatment of stakeholders.

INTRODUCTION

The resolution of copyright infringement disputes in Indonesia has remained relatively slow, with dispute resolution mechanisms often perceived as costly, time-consuming, and insufficiently aligned with the principles of justice embodied in Pancasila (Prasetyo, 2015; Wijaya et al., 2026). Establishing legal certainty and ensuring equitable treatment of song creators are essential to strengthening copyright protection in Indonesia (Kelsen, 1970). Such protection should also reflect the country's commitment to adapting its legal framework to developments in science, technology, and international intellectual property standards (Siregar, 2023). Law Number 28 of 2014 concerning Copyright recognizes works in the fields

of science, art, and literature as protected subject matter. Specifically, Article 40, paragraph (1), letter (d), identifies songs and/or music, with or without lyrics, as copyright-protected works.

Nevertheless, copyright infringement disputes have frequently received inadequate attention within the legal system, particularly in judicial proceedings. Several factors have contributed to weaknesses in the resolution of song copyright disputes. First, uncertainty in the interpretation and application of copyright provisions may affect the consistency of judicial decisions. Second, although copyright disputes may be resolved through litigation or alternative dispute resolution mechanisms, procedural limitations and inconsistent enforcement may prevent copyright holders from obtaining effective legal remedies (Basarah, 2022; De Fila Asmara et al., 2023). Third, existing regulatory and institutional arrangements require further improvement to ensure adequate protection of creators' economic and moral rights (Silfiani, 2026; Usfunan et al., 2025). Strengthening judicial competence, regulatory clarity, and enforcement mechanisms is therefore essential to improving the effectiveness of copyright dispute resolution.

Article 9, paragraph (2), of Law Number 28 of 2014 requires authorization from creators or copyright holders for the exercise of specified economic rights, while Article 113 establishes criminal sanctions for certain unauthorized commercial uses of copyrighted works. Civil remedies are addressed separately under the Copyright Law. These provisions are relevant to the dispute involving the unauthorized cover version of Siti Badriah's song "Lagi Syantik" by Gen Halilintar, as examined in Central Jakarta Commercial Court Decision Number 82/Pdt.Sus-Copyright/2019/PN.Niaga.Jkt.Pst in conjunction with Supreme Court Decision Number 910 K/Pdt.Sus-HKI/2020. The dispute arose after Gen Halilintar uploaded a cover version of the song to YouTube in late 2018 without obtaining authorization from the relevant rights holder, Nagaswara. Another dispute involved the unauthorized commercial performance of the song "Bilang Saja," composed by Ari Bias, by Agnez Mo. In Case Number 92/Pdt.Sus-HKI/Cipta/2024/PN.Niaga.Jkt.Pst, the Central Jakarta Commercial Court found that the song had been performed at three commercial concerts without the required authorization, constituting an infringement of the economic rights protected under Article 9, paragraph (1), of Law Number 28 of 2014 (Wijaya et al., 2026).

The widespread use of copyrighted musical works, whether through live performances or electronic media, presents challenges for law enforcement authorities in identifying, assessing, and establishing copyright infringement. According to Hulman Panjaitan (Indonesia Voice, n.d.), the unauthorized exploitation of copyrighted works may constitute an infringement subject to criminal sanctions and civil remedies, depending on the applicable legal requirements. Copyright law recognizes several categories of economic rights, including public performance rights, which concern the performance of musical works before an audience, such as in cafés, restaurants, and concerts, and mechanical reproduction rights, which concern the reproduction of musical compositions through recordings or other forms of duplication. Despite the enactment of copyright legislation, concerns have persisted within Indonesia's music industry regarding inconsistent enforcement and insufficient regulatory commitment by central and regional government authorities (Situmorang & Michael, 2025; Usfunan et al., 2025).

Recent controversies surrounding music royalties have also attracted attention from legal scholars. Trisno, a criminal law expert at Universitas Muhammadiyah Yogyakarta (UMY), stated on August 19, 2025 (LINGKAR, 2025), that musical works entering the public domain may generally be used without obtaining copyright authorization or paying royalties for expired economic rights. However, determining whether a musical work has entered the public domain requires an assessment of the applicable statutory protection period, the relevant dates associated with the creator's death or publication, and the specific rights involved. Copyright registration is not necessarily the determining factor in calculating the duration of protection. In practice, copyright disputes in various regions have sometimes been resolved through informal or amicable arrangements without sufficient consideration of these legal requirements.

Government authorities have also expressed concern regarding the protection of songwriters' economic rights. On July 28, 2025, the Regional Office of the Ministry of Law in the Special Region of Yogyakarta urged restaurant and café operators to respect copyright obligations when playing commercially protected music. The statement emphasized the importance of obtaining the necessary authorization, fulfilling applicable royalty obligations, and respecting the rights of creators and copyright holders. This initiative reflected growing institutional attention to copyright compliance within Yogyakarta's hospitality and entertainment sectors (IDN Times Jogja, 2025; Sondakh, 2026). Nevertheless, persistent challenges in copyright dispute resolution suggest that public awareness initiatives must be accompanied by consistent enforcement, transparent royalty administration, and accessible legal remedies. Inadequate enforcement may undermine legal certainty and weaken respect for the economic rights of songwriters and other copyright holders whose works are used in hotels, restaurants, cafés, and entertainment establishments (Ilham & Ticoalu, 2026; Situmorang & Michael, 2025).

Previous judicial decisions have illustrated the challenges associated with imposing proportionate and effective sanctions for copyright infringement. In one case, the Semarang District Court imposed a fine of IDR 30,000,000, with a subsidiary sentence of one year's imprisonment, for the unauthorized commercial reproduction of computer software. Similarly, in Criminal Case Number 368/Pid.B/2005/PN.Bdg, the Bandung District Court imposed a six-month suspended sentence on a billiards business operator for using copyrighted music without authorization. In civil proceedings, the Central Jakarta Commercial Court, through Decision Number 17/Hak Cipta/2005/PN.Niaga.Jkt.Pst, dated June 18, 2005, ordered a hospitality business operator to pay compensation of IDR 10,000,000 annually for the unauthorized use of copyrighted musical works at its business premises. These decisions raise questions about the proportionality, consistency, and deterrent effects of sanctions imposed for copyright infringement. Assessing their effectiveness requires consideration of the applicable statutory provisions, the circumstances of each case, and the broader objectives of copyright enforcement.

Indonesia's copyright protection framework has also attracted international scrutiny. Reports issued by the Office of the United States Trade Representative (USTR), together with recommendations from the International Intellectual Property Alliance (IIPA), have historically identified concerns regarding intellectual property enforcement in Indonesia. Before 2000, Indonesia was included on the USTR's Priority Watch List because of concerns

regarding intellectual property protection and enforcement. In 2000, Indonesia was moved to the Watch List, but subsequent recommendations in 2001 and 2002 called for its return to the Priority Watch List because of continuing concerns about copyright piracy and trademark counterfeiting. These developments highlighted the importance of strengthening intellectual property enforcement to support compliance with international standards and improve legal protection for rights holders.

Copyright disputes have also emerged within Yogyakarta's independent music community. Reported incidents have involved allegations that musical compositions created by independent bands were subsequently used by other performers or record labels without appropriate licensing agreements or royalty payments. In some instances, creators reportedly encountered difficulties pursuing legal remedies because of insufficient evidence establishing authorship or ownership of the disputed works. These circumstances highlight the importance of documenting copyright ownership and ensuring accessible dispute resolution mechanisms. Yogyakarta Mayor Regulation Number 77 of 2020 concerning Regional Innovation addresses intellectual property rights associated with regional innovations. Article 23, paragraphs (3) and (4), provides that intellectual property rights arising from regional innovations belong to the regional government, are subject to restrictions on commercialization, and are managed in accordance with a mayoral decree. However, the regulation does not explicitly establish procedures for resolving song copyright disputes. Another relevant development occurred on August 28, 2025, when Yogyakarta and Lempuyangan railway stations temporarily discontinued playing the song "Sepasang Mata Bola" because of unresolved royalty administration issues. Feni Novida Saragih, Public Relations Manager of PT Kereta Api Indonesia's Operational Region 6 Yogyakarta, explained that the decision was temporary pending completion of the necessary licensing and royalty administration procedures (Kompas.com, 2025b). This incident demonstrated the practical implications of copyright compliance requirements for public service operators and commercial music users.

The legal framework established under Law Number 28 of 2014 has also generated debate regarding the effectiveness of criminal enforcement in copyright infringement cases. Article 120 classifies criminal copyright offenses under the law as complaint-based offenses (*delik aduan*), requiring a complaint from an authorized party before criminal proceedings can be initiated. This approach differs from the treatment of copyright infringement as an ordinary offense (*delik biasa*) under certain earlier legislative frameworks, including Law Number 7 of 1987 and its subsequent amendments. However, Law Number 6 of 1982 had previously adopted a complaint-based approach, indicating that the classification of copyright offenses has changed throughout Indonesia's legislative history. The current framework may present enforcement challenges when rights holders are unwilling or unable to submit formal complaints. Furthermore, unlike Article 72 of Law Number 19 of 2002, which prescribed minimum criminal penalties for certain copyright offenses, Law Number 28 of 2014 generally establishes maximum penalties without equivalent statutory minimums. Nevertheless, the maximum penalties under the current law vary according to the nature and severity of the offense, with certain violations, including piracy, carrying substantially higher penalties. Accordingly, evaluating the effectiveness of the current copyright regime requires a comprehensive assessment of criminal sanctions, complaint requirements, civil remedies, and

alternative dispute resolution mechanisms rather than relying solely on comparisons of imprisonment terms.

Based on these legal and practical considerations, this study examined whether existing mechanisms for resolving song copyright infringement disputes in Indonesia adequately reflect the principles of justice embodied in Pancasila, particularly in relation to legal certainty, fairness, and protection of creators' rights. The research specifically considered the relevance and limitations of Yogyakarta Mayor Regulation Number 77 of 2020 within the broader national copyright framework. A normative legal research method was employed, using statutory, case, and conceptual approaches. Primary and secondary legal materials were examined through qualitative legal analysis to assess the adequacy of existing regulatory provisions and identify opportunities to strengthen copyright dispute resolution and legal protection for song creators.

METHOD

This study employed a normative legal research method to examine the legal framework governing song copyright protection and dispute resolution in Indonesia, particularly from the perspective of Pancasila-based justice. The analysis focused on the consistency between national copyright legislation and the regulatory framework applicable in the Special Region of Yogyakarta.

The study adopted statutory, case, and conceptual approaches. The statutory approach examined Law Number 28 of 2014 concerning Copyright, Yogyakarta Mayor Regulation Number 77 of 2020 concerning Regional Innovation, Government Regulation Number 56 of 2021 concerning the Management of Song and/or Music Copyright Royalties, and Minister of Law and Human Rights Regulation Number 20 of 2021 concerning the Implementation of Government Regulation Number 56 of 2021. The case approach examined relevant judicial decisions involving song copyright infringement and dispute resolution, while the conceptual approach explored legal protection, legal certainty, copyright, and Pancasila-based justice.

The research utilized primary and secondary legal materials. Primary legal materials comprised relevant legislation, regulations, and judicial decisions concerning copyright protection, royalty management, and dispute resolution. Secondary legal materials included scholarly books, journal articles, legal doctrines, and academic opinions. Observations and interviews concerning royalty payment practices in Yogyakarta business establishments provided supplementary contextual information without serving as the primary basis for normative legal conclusions.

Legal materials were collected through library research and systematically identified, classified, and compared according to their relevance to the research objectives. The collected materials were analyzed using qualitative legal interpretation and systematic examination of statutory provisions, judicial decisions, and relevant legal principles. A prescriptive legal analysis was subsequently conducted to assess regulatory adequacy and formulate recommendations for strengthening copyright protection and dispute resolution mechanisms in accordance with Pancasila-based justice.

The methodological framework enabled an assessment of the adequacy of existing copyright regulations in providing legal certainty and protection for song creators and copyright holders, particularly within Yogyakarta's regulatory context. The analysis also

informed recommendations for improving legal consistency, institutional coordination, and dispute resolution mechanisms in accordance with the principles of justice and legal protection.

RESULTS AND DISCUSSION

Song copyright includes rights arising from the creator's ideas or ideas, the right to reproduce or announce the creation (exclusive rights), and exclusive rights that can be transferred to other parties, with two inherent rights that cannot be separated from the creator, namely moral rights and economic rights. Settlement of copyright disputes can basically be pursued normatively through familial efforts and Alternative Dispute Resolution (APS) in the form of arbitration, which in Indonesia has been known since the Dutch colonial period through Articles 615-651 of the *Reglement op de Burgerlijke Rechtsvordering* (Rv) and then strengthened by Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution (Faculty of Law UPN Veteran Jakarta, n.d.). The management of song copyright royalties is further strengthened through the Regulation of the Minister of Law and Human Rights Number 20 of 2021 concerning the Implementation Regulation of Government Regulation Number 56 of 2021, which in Article 3 letter (h) regulates the mediation mechanism for disputes over royalty distribution disputes by collective management institutions.

Legal protection of song copyright cannot be separated from Pancasila as the source of all legal sources in Indonesia. Prof. John Pieris emphasized that every legal product, from the highest to the lowest level, must be in harmony with Pancasila, while Prof. Notonegoro (1975) explained the origin of Pancasila through the theory of causality, where the *causa materialis* Pancasila comes from the customs, culture, and religion of the Indonesian nation. Pancasila thus functions as a philosophical foundation for the creation of justice and legal certainty in the regulation and enforcement of copyright, both at the central and regional levels. The protection of song copyright in principle has been guaranteed automatically once the creation is realized in a tangible form, in accordance with the declarative principle of copyright, so that the recording or registration of works is optional.

On the practical side, royalty rates for the musical culinary business sector have been regulated through the Decree of the Ministry of Law and Human Rights on Intellectual Property Rights Number 2 of 2016, as summarized in Table 1.

Table 1. Song Copyright Royalty Rates for the Musical Culinary Business Sector

Type of Business	Creator Royalties	Related Rights Royalties
Restaurants and Cafes	IDR 60,000 per seat/year	IDR 60,000 per seat/year
Pub, Bar, Bistro	IDR 180,000 per square meter/year	IDR 180,000 per square meter/year
Discos and Nightclubs	IDR 250,000 per square meter/year	IDR 180,000 per square meter/year

Source: Decree of the Ministry of Law and Human Rights on IPR Number 2 of 2016

The royalty payment scheme is carried out at least once a year through an online application on the National Collective Management Institute (LMKN) website, including filling out forms, calculating the value of royalties according to business capacity, payment,

and issuance of music utilization permits, with tariff waivers and even royalty exemption for MSME actors. However, the results of the author's observations and interviews at the café "Desa Palangan", Sleman, Special Region of Yogyakarta, show that singers and music players do not understand the royalty mechanism and tend to leave all matters to café managers, who in practice only deposit a certain amount of money according to agreements and customs to local officers without following official LMKN procedures. Similar confusion was also experienced by other business actors, such as Rifkyanto Putro, the owner of Wheelsaid Coffee (Kompas.com, 2025a), amid concerns over a criminal case that had ensnared Mie Gacoan restaurant in Bali related to similar royalty issues, while Yogyakarta and Lempuyangan Stations even stopped playing the song "Sepasang Mata Bola" due to royalty issues in August 2025 (Kompas.com, 2025b).

Broadly speaking, the settlement of song copyright disputes can be pursued in two ways, namely litigation (through the court) and non-litigation (out of court), where the litigation route generally takes longer due to the formalistic and rigid procedure. According to Saidin (2004), the unauthorized use of works in the form of public performances is a violation of the creator's economic rights that can be sued for damages, because every party who derives economic benefits from the use of a work has a legal responsibility to ensure that the use has obtained legal permission from the copyright holder. However, Yogyakarta Mayor Regulation Number 77 of 2020 concerning Regional Innovation does not contain a clause that clearly and completely regulates the settlement of Intellectual Property Rights disputes, especially the settlement of song copyright disputes, so that in the future it is necessary to strengthen socialization and control functions periodically so that legal certainty and justice for song creators and a sense of security for local business actors in the city of Yogyakarta can be truly realized.

CONCLUSION

This study concluded that Indonesia's existing legal framework provided a foundation for protecting song creators through copyright recognition, royalty management, and judicial and nonjudicial dispute resolution mechanisms. However, the normative legal analysis revealed limitations in ensuring legal certainty and substantive justice in accordance with Pancasila values. Specifically, Yogyakarta Mayor Regulation Number 77 of 2020 did not explicitly regulate mechanisms for resolving song copyright disputes. Contextual observations further indicated uncertainty regarding royalty obligations and official payment procedures, highlighting a gap between regulatory provisions and their practical implementation. These findings emphasized the need for stronger coordination between national copyright legislation and regional regulatory measures within the respective authorities' legal mandates. Strengthening copyright protection also required accessible dispute resolution mechanisms, transparent royalty administration, and continuous public legal education to promote legal certainty, fairness, and equitable protection of creators' rights.

Future research should incorporate empirical investigations involving song creators, copyright holders, collective management organizations, business operators, and relevant government authorities to examine the practical effectiveness of copyright protection mechanisms. Particular attention should be given to licensing procedures, royalty collection and distribution, dispute resolution practices, and the enforcement of creators' economic and

moral rights. Comparative studies across Indonesian regions could identify effective regulatory and institutional practices applicable to Yogyakarta. Furthermore, future research should establish measurable indicators of Pancasila-based justice, including procedural accessibility, transparency, fairness, accountability, and balanced stakeholder protection, to evaluate the effectiveness of mediation and other dispute resolution mechanisms. Such investigations would provide stronger empirical evidence for regulatory reform and support the development of a more equitable, transparent, and effective copyright protection framework.

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AUTHOR CONTRIBUTIONS

The author fully contributes to the formulation of the main idea, collects library data, analyzes and interprets the primary text of the figure, and prepares the manuscript. All authors have agreed on the final version of the manuscript.

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