



THE ROLE OF WAROPEN TRIBAL CHIEF RISEI SAYATI IN THE PROCESS OF RESOLVING CUSTOMARY LAND DISPUTES IN WAROPEN REGENCY

Daniel Tanati¹, James Yoseph Palenewen^{2*}

University of Cenderawasih, Indonesia

Email: danieltanati3@gmail.com¹, jamesyosephpalenewen82@gmail.com^{2*}

Abstract

The research, entitled "The Role of Waropen Tribal Chief Risei Sayati in the Customary Land Dispute Resolution Process in Waropen Regency," aims to determine the role of Waropen Tribal Chief Risei Sayati in the customary land dispute resolution process in Waropen Regency and to identify the obstacles encountered by Waropen Tribal Chief Risei Sayati in the customary land dispute resolution process in Waropen Regency. The method used in this research is empirical juridical, namely identifying and conceptualizing law as a real and functional social institution in the real life system. The output of this research is to contribute to legal thought and knowledge for the people of Waropen Regency regarding the role of Waropen Tribal Chief Risei Sayati in the customary land dispute resolution process. This will enable the local indigenous community to seek the assistance of the Tribal Chief as a leader and neutral party in resolving the dispute.

Keywords: Role, Waropen Tribal Chief Risei Sayati, Dispute Resolution, Customary Land, Waropen Regency.

INTRODUCTION

Article 18B paragraph (2) of the 1945 Constitution states that the state recognizes and respects customary law communities and their traditional rights. Article 28I paragraph (3) further emphasizes the state's recognition of the cultural identity and rights of traditional communities. Based on this, customary law and the rights associated with it have a central place in the Indonesian legal system. In principle, the recognition of customary law is necessarily linked to the recognition of all existing customary rights.

Customary law is law formed by the psychological patterns and thought structures of indigenous communities, traditionally passed down from generation to generation. The thought structures underlying the formation of customary legal norms vary from region to region. The thought structures involved in the formation of customary legal norms, known as "local wisdom" (indigenous knowledge), are a distinctive characteristic of the laws applied to indigenous communities in a particular region. Customary law is the original law of the Indonesian nation because its spirit and patterns of formation are adapted to Indonesian culture. According to Soepomo, the uniqueness is due to the diversity of the population, and uniformity need not be based on a Western legal system (Soepomo, 1993).

With the recognition of customary law in the constitution, customary law stands on an equal footing with other sources of law, which must be respected and obeyed. Although customary law is not written law, it has the same power to impose sanctions as written law. Therefore, customary sanctions bind every Indonesian citizen, both criminal and civil. Customary rights remain recognized as long as they do not conflict with rights established under positive law. This also applies to customary land ownership rights. Recognition and respect for customary law communities and their traditional rights, as long as they still exist,

must be in accordance with societal developments and the principles of a unitary state.

Customary Law Communities are communities that arise spontaneously in certain areas and their establishment is not determined or ordered by a higher authority or other authority with very great solidarity among the members, viewing those who are not members of the community as outsiders and using their territory as a source of natural resources used entirely for members of customary law communities is not permanent in nature regarding the existence of customary communities and several opinions of experts regarding the definition of legal communities. With the right for members of the association to utilize customary land, customary rights are attached to individual rights, which are rights given to members of the association over customary land.

Customary law communities adhere to a system of joint ownership and control by one or more clans, from a single family group originating from the same household. This can also be granted to individuals in the form of ownership rights and use rights, which are individual rights.

Land ownership rights, as referred to here, are granted to an individual or family who continuously controls and uses the land for farming and building houses. In other words, the village administrator distributes land to its members for agricultural and residential purposes, which can be passed down to the next generation. For example, the legal relationship between Papuans and land is generally institutional, not concrete. This means that the average Papuan has direct legal relationships with the land, such as joint ownership rights, individual ownership rights, and use rights. They do not cultivate land owned by others under a profit-sharing agreement, or act as farm laborers on other people's land, as in other regions, where people generally only control land under an agreement for one or two harvests, after which the land is returned to the original owner.

This is different from the use right, which contains both public and civil elements. This public element includes land used for public purposes, such as public fields, war zones, cemeteries or public graves, and land used for religious or belief purposes in God Almighty, as well as other social purposes. This differs from civil rights of use, which are granted to individuals within their own tribe who desperately need the use of the land. They can also be granted to outsiders or newcomers who wish to settle or temporarily occupy land owned by others, with the provision that there is a time limit that can be determined through an oral agreement containing the rights and obligations of the parties.

Article 3 of Law Number 5 of 1960 concerning Basic Agrarian Regulations stipulates: "Considering the provisions of Articles 1 and 2, the implementation of customary rights and similar rights of customary law communities, to the extent that they actually exist, must be carried out in accordance with national and state interests, which are based on national unity and must not conflict with other laws and regulations of a higher order." Based on Article 3 above, the recognition of customary rights is limited to two matters: their existence and their implementation. Likewise, Article 3 of UUPA Number 5 of 1960 states that customary rights are recognized as existing to the extent that they actually exist. If they still exist, the implementation of customary rights must be carried out in accordance with national and state

interests, which are based on national unity and must not conflict with other laws or regulations of a higher order. If the implementation of customary rights hinders and obstructs national and state interests, then national and state interests will be prioritized over the interests of the customary law community concerned (Suhaily Syam, 2014).

Land disputes are differences in values, interests, opinions, and perceptions between individuals and between legal entities (private and public) regarding the status of control and/or ownership (Nasrun Hipan, 2018). Disputes arising from social interactions of customary law communities will be resolved quickly without allowing the problems they experience to be buried for a long time which will cause the crystallization of the problem into a more complex problem (Riska Fitriani, 2012). Often when problems are encountered or discovered, they are immediately resolved, either by the disputing parties themselves peacefully or through the intermediary of the head of the local customary institution.

Land rights held by indigenous communities are known as "Ulayat Rights," rights held or inherent in indigenous communities by virtue of their laws and culture, granting them the authority to control all land, or "Ulayat Land," within their control, for use in accordance with its function for the survival of the indigenous community.

In almost every region where land disputes arise, the relevant parties authorized to handle these issues resolve them in various ways, including through the courts (litigation) and out-of-court (non-litigation) dispute resolution. According to Soepomo, the definition of a Customary Head is as follows: "The Customary Head is the father of the community; he presides over the community as the head of an extended family; he is the leader of social life within the community." Thus, the customary head is tasked with maintaining the legal life within the community, ensuring that the law operates properly. The daily activities of the Customary Chief encompass all aspects of society (Soepomo, 1979). No social sphere within the community is closed to the Customary Chief's intervention when necessary to maintain peace, tranquility, and physical and spiritual balance, as well as to uphold the law.

When examining the role of the Customary Chief in society, many people request his involvement in resolving problems, both those concerning life and death. However, the more important role of the Customary Chief is to maintain the balance between the environment and other aspects of life, ensuring harmony and peace within the community. Therefore, any disturbances to this balance must be prevented and restored, either through material or non-material payments. Ultimate sovereignty over customary land ownership rests with the legal community. "Community rights to land" refer to the rights of the community (community rights) under customary law to the land; for example, the right to control the land, utilize it, collect crops from the plants growing on it, or hunt the animals that live on it. These customary community rights to land are also known as "ownership rights." According to C. Van Vollenhoven, (Merry Kalalo, 2012) is called "beschikking", while the land as its territory is called "beschikkingkring". Regarding the customary rights area or customary environment in each region of Indonesia, there are different terms, for example in Ambon (patuan), Kalimantan (panyampeto), Java (wawengkon), Bali (prabumian pajar), Angkola (torluk), South Sulawesi (limpo), Lombok (paer), Batak (golat) and Minangkabau (ulayat).

This research was conducted by the author because until now, the people in Waropen Regency often have customary land disputes, both between fellow customary communities or between customary communities and the local government. Therefore, the researcher is interested in conducting research in Waropen Regency regarding the role of the Tribal Chief in resolving customary land disputes.

LITERATURE REVIEW

Article 3 of the UUPA does not directly mention "Customary Land." Instead, it refers to "customary law communities," which is closely related to the definition of "Customary Land" in Article 3 of the UUPA. The wording of "customary law communities" in Article 2 paragraph (4) of the UUPA is as follows: "The implementation of the aforementioned state control rights may be delegated to autonomous regions and customary law communities, as necessary and not in conflict with other higher laws and regulations." The concept of customary law is formulated as a "Religious Communalistic" concept, which allows for individual land control, with private land rights, while also containing elements of togetherness and being related to magical/religious values. Communal nature refers to the collective rights of members of customary law communities to land, which are then referred to in legal literature as Customary Rights.

Customs have strong ties and influence in society. Their binding power depends on the community that supports these customs, especially those based on a sense of togetherness, idealism, and justice. It is difficult to imagine that customs, even if continuously maintained, will automatically create legal certainty. Legal certainty can be achieved if there are binding rules to regulate life today and in the future.

According to Ter Haar, renowned for his Beslissingenleer (Customary Law), customary law is what is embodied in decisions by customary rulers that have a structural relationship with the values and order of the community concerned. The National Seminar on customary law, held by the National Legal Development Agency (BPHN) and the Faculty of Law, Gadjah Mada University, on January 15-17, 1975, defined customary law as the original Indonesian law, unwritten in the form of Republic of Indonesia legislation, which sometimes contains religious elements. Customary law, as unwritten law, is derived from formulations based on a series of realities regarding the attitudes and behavior of members of customary law communities in applying legal concepts and principles, which are a manifestation of the legal awareness of these customary law communities in resolving concrete cases faced in community life.

Sanctions are not always imposed by an authority or institution in power; some are also imposed directly by the community through restrictions on social interaction. Thus, it can be concluded that customary law contains elements that shape it, such as customs, values that have been institutionalized in society through community actions, norms that are mutually agreed upon unwritten, institutions or organizations that enforce them, sanctions, and are influenced by the religion practiced by the community. Ultimately, the author believes that, in substance, customary law is a law that is always alive and developing in

society, always keeping pace with the times, guaranteeing order for society, and capable of delivering justice. Customary law aims to provide protection, create peace and just order, and support community efforts to achieve prosperity.

Meanwhile, the rights of customary law communities are both individual and communal rights. One of the communal rights contained in the UUPA is the Hak Ulayat (territory) right, which refers to the land that constitutes the legal community's territory.

According to Soepomo, the definition of a Customary Chief is as follows: "The Customary Chief is the father of the community; he presides over the community as the head of an extended family; he is the leader of social life within the community." Therefore, the Customary Chief is tasked with maintaining the legal life within the community, ensuring that the law runs properly. The daily activities of the Customary Chief encompass the entire community. The activities of the Customary Chief can be divided into three parts: (Kusumah, 1980):

1. Actions regarding land matters related to the close ties between the land community (group of people) that control the land.
2. Legal resolution as an effort to prevent legal violations (Preventive Rechtzorg) so that the law can run properly.
3. Law enforcement as a correction of law after the law has been violated (Repseive Reshtszorg).

Thus, in all his actions and upholding the customs, the Traditional Chief always pays attention to changes. The development of law, under the leadership and supervision of the Traditional Chief, is crucial in his work in the field or as a village justice of the peace. If there is a dispute or actions that violate customary law, the Traditional Chief acts to restore customary peace, maintain balance within the village atmosphere, and restore law.

A Traditional Chief is defined as a leader who upholds normative customs and has established rules of conduct that apply within the customary law region or area, consistently upholding them.

According to the Big Indonesian Dictionary, the term "dispute" is defined as a dispute or disagreement. In English, the term is used interchangeably, meaning "conflict" and "dispute." Both of these terms imply differing interests between two or more parties, but they can be distinguished. The term "conflict" has been incorporated into Indonesian as "konflik," while the term "dispute" can be translated as "pertulisan" (Nia Kurniati, 2016). Land disputes consist of two syllables: "land" and "dispute." In the language of conflict, land disputes are categorized as manifest conflicts and emerging conflicts. In a dispute, the parties have been identified, confronted directly in an ongoing or ongoing dispute, and a mutually satisfactory resolution has not been reached (deadlock). Furthermore, a land dispute is an agrarian dispute between individuals, groups, organizations, legal entities, or institutions that has the potential for or has already had widespread social, political, economic, defense, or cultural impacts (Mudakir Iskandar Syah, 2019).

METHOD

The research employed an empirical juridical approach, identifying and conceptualizing law as a real and functional social institution within the real-life system. This research utilizes primary legal materials, which are a number of statements or facts directly obtained through observation and interviews with respondents related to the research problem formulation identified by the author above. Secondary legal materials are also used, consisting of legal regulations contained in statutory regulations or various legal instruments, such as the 1945 Constitution of the Republic of Indonesia, the Basic Agrarian Law Number 5 of 1960, Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution, and Regulation of the Minister of State for Agrarian Affairs/Head of the National Land Agency Number 5 of 1999 concerning Guidelines for the Settlement of Customary Rights Issues of Indigenous Communities.

RESULT AND DISCUSSION

Overview of Waropen Regency

Waropen Regency in Papua province was formed as a result of the division of Yapen Waropen Regency around 2003. The regency capital is located in Botawa. The term "Waropen" is closely related to the word "Oropong," first used by Jacob Weyland (in 1705). According to the Waropen natives, "Waropen" means "people from the interior," specifically from Mount Tonater, Wamusopedai. This may be justified, because when connected to the myths living in the Lower Waropen customary law community, the Waropen people are those who migrated to the coast due to the Ampuhan waters. The Waropen people were swept away to Waropen Ambumi and Roon in Nabire and Manokwari Regencies to the west, and Waropen Ronari to the east, while those who remained lived on the coast of Waropen Kai. The Waropen people officially inhabit the Waropen Atas, Masirei, and Lower Waropen Districts under government administration. Examined from a socio-cultural historical perspective, Held (1974) has divided the Upper Waropen region into 3 (three) customary law areas reflected in the differences in the use of everyday language.

These areas are the Waropen Ambumi Region, the Waropen Kai Region and the Waropen Ronari Region. The Waropen Ambumi Customary Law Community is divided into 2 (two) groups, namely the group that entered the Nabire Regency Area which inhabits the villages of Napan, Wenami, Masipawa, Makimi, Moor, Mambor and Ambumi. As well as the group that entered the Manukwari Regency Area and inhabits the villages of Yendeman, Saybes, War, Kayob and Menarbu. The Waropen Kai Customary Law Community, namely the community that inhabits the villages of Semanui, Wapoga, Desawa, Waren, while the villages of Paradoi, Sanggei, Mambui and Nubuai are now combined into one settlement called Urei Faisei, Risei Sayati, Wonti, Bokaro, and Koweda. These Waropen are considered the original Waropen people. The Waropen Kai Customary Law Community, inhabiting the villages of Barapasi, Sosora, Sorabi, Kerema, Tamakuri, Teba, Janke, and Baitanisa, extends from the Waropen hinterland to the east, extending to the Van Ress Mountains.

Villages in the coastal Waropen area are generally built along rivers in mangrove

forests, while others are built on sandbars and river estuaries. Several villages have also been built or landed on dry land. These landed villages are mostly located in the Upper Waropen area. Efforts to land these villages began in 1969. This effort was realized in 1970 when the Regent of Yapen Waropen officially authorized the landing of several settlements into one, Urei Faisei Village. This large village consists of 50-75 houses and is generally a permanent settlement.

The role of Waropen Tribal Chief Risei Sayati in the process of resolving customary land disputes in Waropen Regency

A customary law community is also a unity of interconnected human beings with a consistent, recurring pattern. It is a society with shared behavioral patterns, where these behaviors develop and are manifested by the community, from which rules are formed to govern social interaction. A shared social interaction pattern can only exist if there is a community of relationships with a consistent, recurring pattern.

The concept of customary law is formulated as a concept of "religious communalism" values, which allows for individual land ownership, with private land rights, while also containing elements of togetherness and connected with magical/religious values. This communalism refers to the collective rights of members of a customary law community to land, which is then referred to in legal literature as Hak Ulayat (Ulayat Rights). Therefore, in customary law, land issues relate not only to ownership but also to the values of togetherness and kinship inherent in the use/ownership of that land.

Society is a social system that serves as a forum for patterns of social interaction, interpersonal relationships, and relationships between social groups. Therefore, in customary law, it can be concluded that a customary law community can exist within a regional framework known as territorial and genealogical principles, or a combination of territorial and genealogical principles. Customary law communities can be categorized based on territoriality, namely, a structure based on blood relations. Members of the community feel united and, therefore, constitute a unified customary law community, due to the bond between each of them and the land where they reside. Therefore, the unifying element of a community is the bond between individuals and the land they have inhabited since birth, the land they have inhabited, and even their ancestors, for generations.

A Customary Chief is defined as a leader who enforces normative customs and has embodied the rules of conduct that apply within a customary law region or territory, which are continuously maintained. Within the customary law community of Waropen Regency, the Customary Chief/Tribal Chief is referred to as "SERA." The role of Waropen Tribal Chief Risei Sayati in the customary land dispute resolution process in Waropen Regency is as follows:

- a) The Customary Chief acts as a peace judge, authorizing the appropriate sanctions to be imposed on disputing community members. The Customary Chief is responsible for fostering peace, thereby fostering community harmony.
- b) Correcting customary law that has been violated by the community. This correction aims

to restore the image of customary law so that its integrity can be upheld. For example, if a land dispute results in a damaged relationship, the Customary Chief's role is to restore the balance and restore reconciliation.

- c) Deciding on and establishing customary law regulations as the foundation for community life. These decisions aim to ensure that the community always adheres to established regulations.
- d) Providing guidance to community members on appropriate behavior in community life, based on normative customs and customary law.
- e) Maintaining the integrity of the community, ensuring that it remains intact and is not damaged by actions by community members that violate customs and customary law.
- f) Providing community members with a basis for implementing a social control system. This social control is more of a supervisory approach to community behavior so that community life can be optimally maintained.
- g) Paying attention to every decision established in customary law, so that these decisions have authority and can provide legal certainty that binds all community members.
- h) Serving as a place for community members to rely on to resolve, protect, and ensure peace. Therefore, whenever a dispute arises, the Traditional Chief is the sole source of community support for resolving the problem.

In this case, the author observes that the role of traditional leaders or traditional figures is crucial in resolving disputes within their traditional communities. In accordance with their function, traditional leaders or traditional figures must ensure that their communities do not experience disputes or conflicts within them. If a dispute does occur, they are obligated to resolve it or reconcile the disputing communities.

Obstacles encountered by Waropen Tribal Chief Risei Sayati in the process of resolving customary land disputes in Waropen Regency

This study revealed that factors contributing to customary land disputes in Waropen Regency, particularly among the Waropen Risei Sayati Tribe, include unclear customary land boundaries, unjust practices, government claims, the loss of witnesses and historical actors, the increasing economic value of land, maintaining social status, misunderstandings of customary law, and a lack of outreach. The role of the Customary Chief in resolving customary land disputes is as a peace judge in customary courts and as a customary decision-maker, binding the parties to the disputed decision. Obstacles identified by the Waropen Risei Sayati Tribe in resolving customary land disputes in Waropen Regency include internal factors such as unwilling witnesses, unclear land boundaries, and unclear landowners. External factors stem from third parties who emerge during dispute deliberations. A solution has been found, and the parties have agreed, but then another party raises an objection, creating new problems. According to the author, there are various reasons why disputing parties prefer to resolve their land disputes through non-litigation methods (mediation). These can be explained as follows:

- 1) Non-litigation dispute resolution is preferred by the community because it is relatively

inexpensive. They recognize that resolving their disputes through legal channels is impossible due to the high costs.

- 2) What drives them to choose alternative methods is that this method has become customary in their environment, where every dispute within the customary community is resolved through deliberation. This method has been in place for years and has even been passed down from their ancestors.
- 3) The relatively short timeframe for resolution is also a reason that encourages indigenous communities to choose alternative resolution. Non-litigation dispute resolution prioritizes harmony in the customary law community in Sawai Village. Besides that, the resolution in this way also prioritizes the family aspect by considering the aspects of interests that exist in a heterogeneous society, which is identical to village society which is described as a society that prioritizes the emotional side without prioritizing the rational side, communalistic nature (togetherness).

CONCLUSION

The role of the Waropen Tribe Chief Risei Sayati in the process of resolving customary land disputes in Waropen Regency is as a peace judge who has the right to weigh the severity of sanctions that must be imposed on members of the community in dispute, provide guidance to members of his customary community, maintain the integrity of the association in the customary law community and is a place for members of the customary law community to rely on to resolve, protect, and guarantee peace. Meanwhile, the obstacles found by the Waropen Tribe Chief Risei Sayati in the process of resolving customary land disputes in Waropen Regency are internal and external factors, internal factors caused by witnesses not wanting to be witnesses, unclear land boundaries and unclear land owners. While the external factors come from third parties who appear during the dispute deliberations have found a solution the parties have also agreed then there are other parties submitting objections so that new problems arise.

The suggestion that the author can convey is that the Regional Government, the Traditional Heads/traditional figures, and the police must continue to cooperate in handling customary land disputes that occur now and in the future for the sake of establishing harmony in the customary law community in Waropen Regency. In addition, for the customary law community in Waropen Regency, especially the Waropen Risei Sayati Tribe, if a customary land dispute occurs either now or in the future, it must still be resolved through deliberation and the Traditional Head/Tribal Chief as the Peace Judge while maintaining the existing moral values, which are the characteristics of the local customary community while also relying on the applicable laws and regulations.

REFERENCES

Fakultas Hukum UGM. (1978), *Laporan Penelitian Integrasi Hak Ulayat ke dalam Yuridiksi UUPA*, Depdagri-FH UGM.

Merry Kalalo. (2012), Jemmy Sondakh, *Bahan Ajar Hukum Adat*, Manado, Fakultas Hukum Universitas Sam Ratulangi.

Nia Kurniati. (2016), *Hukum Agraria Sengketa Pertanahan Penyelesaian Melalui Arbitrase dalam Teori dan Praktik*, Bandung, Refika Aditama.

Palenewen, J. Y. (2022). Hukum Agraria Dan Pendaftaran Tanah Di Indonesia.

Palenewen, J. Y. (2024). Hak-Hak Atas Tanah Dan Kekayaan Alam.

Palenewen, J. Y., Tanati, D., & Solossa, M. (2022). Peranan Kepala Kampung Dalam Penyelesaian Sengketa Tanah Adat Di Kampung Lugom Distrik Yugungwi Kabupaten Lanny Jaya. *BULLET: Jurnal Multidisiplin Ilmu*, 1(06), 1351-1357.

Palenewen, J. Y. (2024). Resolution Of Ulayat Land Disputes Between The Traditional Legal Communities Of The Upper Tor District And The Regional Government Sarmi District, Papua Province. *Russian Law Journal*, 12(1).

Palenewen, J. Y., & Reumi, T. A. S. (2024). Settlement of Customary Law Community Land Disputes Regarding the Construction of the Lukas Enembe Stadium in Kampung Harapan Jayapura Regency. *Journal of Law, Politic and Humanities*, 4(5), 1295-1304.

Soepomo. (1979), *Bab-bab Tentang Hukum Adat*, Jakarta, Pradnya Paramita.

Tanati, D., & Palenewen, J. Y. (2024). Penyelesaian Konflik Agraria Pada Masyarakat Adat Papua.

Tanati, D., Rongalaha, J., & Palenewen, J. Y. (2022). Penerapan IPTEKS Tentang Penyelesaian Sengketa Tanah Ulayat Pada Masyarakat Hukum Adat Melalui Jalur Non Litigasi Di Kampung Asei Besar Distrik Sentani Timur Kabupaten Jayapura. *Jompa Abdi: Jurnal Pengabdian Masyarakat*, 1(4), 42-51.

Tanati, D., & Palenewen, J. Y. (2022). Penerapan IPTEKS Tentang Penyelesaian Sengketa Batas Tanah Ulayat Melalui Jalur Litigasi Dan Non Litigasi Pada Masyarakat Hukum Adat Di Kampung Nendali. *AMMA: Jurnal Pengabdian Masyarakat*, 1(09), 1133-1138.

Tanati, D. (2023). Land Ownership Rights According to Indigenous Peoples in Kwadeware Village, Waibu District Jayapura Regency. *International Journal of Multicultural and Multireligious Understanding*, 10(1), 629-634.

Tanati, D., Palenewen, J. Y., Pondayar, Y., Thesia, E. H., Solossa, M., & Rongalaha, J. (2023). Legal Counseling Law Number 30 of 1999 About Arbitration And Alternative Dispute Resolution In Nendali Village, East Sentani District Jayapura Regency. *Jurnal Pengabdian Masyarakat Bangsa*, 1(8), 1331-1337.

Tanati, D. (2023). Membuka Jendela Nilai Dan Norma Masyarakat Adat Kabupaten Waropen.

Tanati, D. (2024). Patterns Of Resolution Of Customary Rights Disputes For Traditional Law Communities In Waropen District Papua Province. *Russian Law Journal*, 12(1).

Tanati, D. (2023). The Role of Customary Institutions in Settlement of Customary Land Disputes between Wonatorey and Watopa Clans in Waropen Regency. *International Journal of Multicultural and Multireligious Understanding*, 10(3), 278-283.

Tanati, D. (2024). Several Customary Violations in the Waropen Customary Law Community of Papua Province. *Contemp. Readings L. & Soc. Just.*, 16, 19.