



Legal Implications of the Territorial Principle on Cross-Border Insolvency in Indonesian Bankruptcy Law

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ABSTRACT

Economic development across countries plays a crucial role in shaping an economic system that adapts to changing times. However, economic activities are inherently linked to various transactions, which may result in companies facing challenges, losses, or even bankruptcy. In Indonesia, bankruptcy regulations are governed by Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations. Indonesia adheres to a territorial principle in handling cross-border insolvency cases, which affects the authority of the trustee and the rights of creditors. This study aims to analyze the legal framework and implications of applying the territorial principle in cross-border insolvency. The findings suggest that the application of the territorial principle exacerbates difficulties and complexities for the trustee in managing the debtor's bankrupt assets. Furthermore, creditors experience more significant losses. Thus, the territorial principle in cross-border insolvency tends to complicate the trustee's responsibilities and place creditors at a disadvantage.

A. INTRODUCTION

The global economic system has undergone a long and complex evolution throughout the history of human civilization. Economic development between nations plays a fundamental role in shaping economic systems that align with the dynamics of the times. Cross-border economic relationships have now become a cornerstone in fostering stability and progress across various regions of the world, encompassing many key aspects. The development and acceleration of the global economy have directly encouraged Indonesia to actively participate in economic activities both domestically and internationally. As national borders become more open to economic activities, business actors can now engage in cross-border transactions with greater ease. This offers broader opportunities for businesses to expand and develop their reach. However, within these economic activities, various types of transactions are inevitable, which can, in turn, lead companies to face challenges, losses, or even bankruptcy. This issue becomes even more complex when a bankrupt debtor holds assets in multiple countries, necessitating the resolution of cross-border insolvency matters (Hasni et al., 2024).

Cross-border insolvency refers to insolvency cases that involve more than one country. In jurisdictions with Anglo-Saxon legal systems, this is often referred to as transnational insolvency (Adolf, 2009). Cross-border insolvency is defined as insolvency

arising from an international business transaction that involves foreign elements. In such cases, each country with an applicable insolvency legal system will enforce its relevant laws to resolve the insolvency according to its domestic regulations. Cross-border insolvency can occur under several circumstances, such as when a debtor has assets abroad, creditors located in other countries, engages in cross-border business activities, or operates companies in multiple countries (Sjahdeini, 2018).

In Indonesia, bankruptcy is governed by Law No. 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (UU KPKPU). However, this law does not specifically address issues arising when a bankruptcy case involves assets located outside the territorial boundaries or jurisdiction of Indonesia. This creates complications in cross-border insolvency cases, where a bankrupt company holds assets abroad. In such situations, the trustee responsible for managing or liquidating the debtor's assets may face significant challenges in gaining control over those assets. One of the main factors contributing to this issue is the principle of territoriality, which limits the trustee's authority to access assets located outside of Indonesia.

The principle of territoriality is a fundamental concept in bankruptcy law, which significantly influences the authority of the trustee in managing the debtor's assets located abroad or in a cross-border context. This principle also limits the legal effects of a bankruptcy judgment, as such a judgment is only enforceable within the jurisdiction of the country that issued it. This aligns with the nature of bankruptcy law, which, on a national level, applies solely within the legal boundaries of the issuing country. Consequently, the bankruptcy laws of one country cannot be directly applied to bankruptcies occurring in another country.

This discussion will provide a general overview of the legal framework and implications of applying the territoriality principle in Law Number 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations (the Bankruptcy Law) concerning cross-border insolvency in Indonesia's bankruptcy law. Therefore, the objective of this paper is to analyze the legal framework and the implications of the territoriality principle in the context of cross-border insolvency in Indonesia.

B. METHOD

The research method used in this study is normative juridical research, which aims to examine the legal construction and the implications of applying the territorial principle in Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (Bankruptcy Law) in relation to cross-border insolvency within Indonesian bankruptcy law. This study also employs a statutory approach and a conceptual approach to analyze the issue from a normative juridical perspective.

For legal materials collection, this research relies on library research by referring to relevant legislation, books, legal journals, and related articles. The technique for analyzing legal materials used in this paper is descriptive-analytic analysis, tailored to the issues discussed in this study.

C. RESULTS AND DISCUSSION

The Construction of Territorial Principles in Bankruptcy Law in Indonesia

Bankruptcy refers to a condition in which a debtor is unable to fulfill their obligations to repay debts to creditors. In such cases, the court will declare bankruptcy and impose a general seizure on the debtor's assets. The provisions regarding bankruptcy are regulated by Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations (UU KPKPU). The UU KPKPU defines bankruptcy in Article 1, paragraph 1, as follows:

“Bankruptcy is a general seizure of all assets of the bankrupt Debtor, the management and settlement of which is carried out by a Trustee under the supervision of a Supervisory Judge as regulated in this Law.”

Based on the definition provided, it can be understood that when a debtor is declared bankrupt by the court, all of their assets will be seized and liquidated through an auction process. This process is managed by a trustee with the aim of ensuring that the proceeds from the auction can be distributed to creditors. According to M. Hadi Subhan, bankruptcy is defined as a condition in which all the debtor's assets—both existing and future—are seized in order to settle the debts owed to creditors (Yanuarsi, 2020).

From this definition, it is evident that bankruptcy plays a crucial role in the debt repayment process between a debtor and creditors, as regulated by applicable laws. However, issues arise when the debtor is located outside the jurisdiction of Indonesia. In such cases, the resolution or seizure of the debtor's assets, particularly in the context of cross-border insolvency, becomes increasingly difficult to execute (Suryana, 2007).

Cross-border insolvency refers to bankruptcy that arises from international business transactions involving foreign elements or cross-border aspects. In this context, bankruptcy does not only occur in the country where the insolvency process is carried out, but also involves assets spread across other countries. A further issue related to cross-border insolvency in Indonesia is the lack of clear norms or regulations specifically addressing this matter. To date, Indonesia continues to face difficulties in handling insolvencies that involve cross-border elements due to the absence of regulations that specifically govern cross-border insolvency.

According to Marek Porzycki, cross-border insolvency can occur in various situations, such as when a debtor engages in cross-border economic activities or owns businesses operating in other countries. These situations can add complexity to debt resolution, as they involve different legal jurisdictions. In practice, this requires regulation and cooperation between countries to manage and resolve insolvency cases effectively. An important aspect of this process is the recognition of court decisions from other countries and the execution of debt resolution involving assets or parties located internationally (Yanuarsi, 2020).

The regulation of cross-border insolvency in Indonesia, particularly in Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations, has not been extensively detailed. However, at the international level, the issue of cross-border insolvency has been addressed. One key instrument regulating this matter is the European Community Regulation on Insolvency Proceedings, as well as the UNCITRAL Model

Law on Cross-Border Insolvency, which was adopted in 1997. The adoption of this model law marked an important milestone in the effort to harmonize bankruptcy regulations internationally.

The provisions within the UNCITRAL Model Law are designed to provide a legal framework that can be applied by each country when dealing with cross-border insolvency. It is expected that this regulation can be implemented when a company faces insolvency and possesses assets in countries that are members of UNCITRAL. Thus, the provisions outlined in the model law can be used to resolve insolvency issues that involve multiple countries (Rahman et al., 2023).

Cross-border insolvency is inherently linked to international legal principles, as it involves jurisdictions that extend beyond national borders. One relevant international principle in the context of cross-border insolvency is the principle of territoriality or territorial jurisdiction. This principle asserts that each country has jurisdiction over matters and events that occur within its territory (Assalmani & Priyono, 2018).

In Indonesia, this territorial principle is not explicitly regulated or stated in Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations. However, Article 436 of the *Reglement van de Rechtsvordering* (RV) stipulates that foreign court decisions or judgments cannot be enforced in Indonesia, except in certain circumstances outlined in Article 724 of the *Commercial Code* (KUHD) or other applicable regulations.

Based on this, there are several provisions that regulate the conditions under which foreign court decisions cannot be recognized or enforced by Indonesian courts, except under certain circumstances, which are as follows:

- (1) Outside the conditions specified in Article 724 of the Indonesian Civil Code (KUHD) and other applicable laws, foreign court decisions cannot be enforced within the jurisdiction of Indonesia.
- (2) The cases in question may be brought, examined, and decided upon by Indonesian courts.
- (3) In the exceptional circumstances mentioned in paragraph (1), foreign court decisions can only be enforced after a request has been submitted and permission has been granted by an Indonesian judge to execute the decision.
- (4) In the case of this request and approval process, the case will not be re-examined.

This is further reinforced by Article 431 of the Indonesian Civil Code, which explicitly states that Indonesian court decisions are only enforceable within the territory of Indonesia. Conversely, foreign court rulings cannot be enforced outside their country of origin and are neither recognized nor binding in Indonesia. As a result of this provision, the authority of a bankruptcy trustee in managing the debtor's assets becomes limited due to the territorial principle that applies in Indonesia. The enforcement of foreign court decisions in this context would violate the principle of state sovereignty.

Based on this, the territorial principle establishes that the bankruptcy process only applies within the jurisdictional boundaries of the country where the bankruptcy is declared. This principle also implies that bankruptcy rulings from one country are only

applicable and legally effective regarding the debtor's assets located within that country's jurisdiction. Furthermore, the courts of each country only have authority over assets situated within their territorial boundaries.

At the international level, there are regulations regarding cross-border insolvency, such as the UNCITRAL Model Law on Cross-Border Insolvency. However, Indonesia has not yet implemented this regulation. Given the increasing volume of international transactions, there is a pressing need for Indonesia to adopt such regulations in handling cross-border insolvency cases. Nonetheless, because Indonesia continues to adhere to the territorial principle, the provisions of the UNCITRAL Model Law have not been adopted or implemented in the country.

Implications of the Territoriality Principle on Cross-Border Insolvency in Indonesian Bankruptcy Law

Cross-border insolvency, as defined by Roman Tomasic, occurs when a debtor who is bankrupt has assets in multiple countries, or when a creditor originates from a country different from the jurisdiction in which the bankruptcy proceedings are taking place. In this regard, international bankruptcy resolution law must cover both individuals and legal entities (corporations) to minimize obstacles in the enforcement of bankruptcy judgments across different jurisdictions ([Harahap, 2012](#)).

The territoriality principle can be understood as a principle stating that the declaration of bankruptcy, its execution, and its resolution are only applicable within the jurisdiction of the country where the court that reviews, adjudicates, and issues the bankruptcy declaration is located. In other words, a bankruptcy judgment is only valid within the country where the decision is made or announced. This principle also emphasizes the importance of jurisdictional sovereignty in handling bankruptcy cases, assuming that the laws and courts of a country have exclusive authority over the assets and legal entities within the territory or jurisdiction of that country ([Suryana, 2007](#)).

This issue arises from the fact that, in Indonesia, there is currently no legislative framework for the recognition and enforcement of foreign court judgments related to cross-border insolvency. As a result, foreign court rulings to execute bankruptcy assets within Indonesia's jurisdiction cannot be enforced. In the context of cross-border insolvency, the application of the territoriality principle can create its own set of complexities and challenges. For example, when a multinational corporation goes bankrupt, its assets and liabilities are likely distributed across multiple countries. In such cases, strictly applying the territoriality principle can lead to a fragmented insolvency process, where each country manages the assets and liabilities within its jurisdiction separately. Consequently, this can result in inefficiencies in the insolvency resolution process and may potentially cause legal conflicts, given the differences in insolvency legal systems across countries. These challenges are amplified when the involved countries adopt divergent legal approaches to handling insolvency matters ([Suparji, 2017](#)).

Among the various issues in insolvency law, cross-border insolvency has emerged as a compelling topic for discussion. As previously mentioned, the adoption of the Model Law can serve as a solution to facilitate cross-border insolvency proceedings. The primary

objective of the Model Law is to establish synergy between the authorities of different countries in managing and resolving insolvency cases that span national borders. Additionally, the Model Law encourages the recognition and enforcement of foreign court decisions and strengthens cooperation among courts and governments of the countries involved. Thus, it is expected that the insolvency process can be more coordinated and consistent in handling assets and liabilities spread across various jurisdictions ([United Nations, 1997](#)).

In the international insolvency legal system, in addition to the principle of territoriality, the principle of universality is also recognized. Essentially, the universality principle is the opposite of the territoriality principle. According to the universality principle, the enforcement of an insolvency judgment can be requested directly in another country. Furthermore, this principle allows for claims against the debtor's assets, declared insolvent by a court in one country, such as Indonesia's commercial court, to be pursued wherever the assets are located, without jurisdictional limitations. However, the universality principle is not adopted in Indonesia's positive law.

The enforcement of foreign judgments in Indonesia is consistently constrained by the concept of national sovereignty, which is encapsulated in the principle of territoriality. This territorial principle leads to the inability of Indonesian commercial courts to enforce bankruptcy rulings against the assets of debtors located outside Indonesia. Consequently, this principle also applies to foreign bankruptcy judgments, which cannot be executed by Indonesian Commercial Courts. Similarly, a bankruptcy ruling issued by an Indonesian commercial court cannot enforce claims against assets located abroad, as doing so would violate the territoriality principle itself ([Damardjati et al., 2017](#)).

Referring to the provisions of International Civil Law, bankruptcy rulings that adhere to the principle of territoriality may result in foreign bankruptcy judgments having no legal effect in Indonesia. This occurs because, under the territoriality principle, foreign court decisions cannot be executed directly in another country without consent or recognition from that country. Furthermore, without an international agreement between the countries involved, such judgments cannot be enforced in Indonesia. As a consequence of the application of this territoriality principle, an individual declared bankrupt abroad may be declared bankrupt again in Indonesia. In other words, a bankruptcy ruling made in Indonesia has legal consequences only for assets located within Indonesian territory ([Gautama, 2008](#)).

The liquidation of a bankrupt debtor's assets is the responsibility of a curator, who operates under the supervision of a supervisory judge, as stipulated in Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations. All assets belonging to the debtor, commonly referred to as the bankruptcy estate, are to be managed by the curator. As the party appointed to handle the bankruptcy estate, the curator is authorized to execute actions related to the estate, including assets located outside the jurisdiction of a particular country.

However, this authority becomes challenging to implement if the involved country does not adhere to the principle of universality. This is due to the fact that each country has its own legal sovereignty, which is difficult, if not impossible, for foreign laws to

reach or challenge (sovereignty principle). This issue also arises in Indonesia, where the territorial principle imposes limitations on the application of foreign laws. As a result, the curator may encounter difficulties in performing their duties and exercising their authority, particularly when dealing with assets located abroad.

The difficulties faced by the curator due to the implementation of territorial principles can have repercussions for creditors, ultimately putting them at risk of suffering financial losses. In this context, creditors are considered the parties entitled to the settlement of debts arising from the assets of a bankrupt debtor. The inability to execute the bankruptcy estate assets that are located abroad or outside the jurisdiction of Indonesia results in a reduced bankruptcy estate. Consequently, the process of debt repayment to creditors is delayed ([Ganindha & Indira, 2020](#)).

However, with regard to the curator's authority in managing the bankrupt debtor's estate, there are inconsistencies in its regulation. As stated in Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations, specifically in Article 21, it is mentioned that: "The assets of the debtor that are to be executed can include those within Indonesia's jurisdiction as well as those outside the territory of Indonesia."

This provision raises the expectation that the trustee should have the authority to execute the debtor's assets located abroad. However, this faces a limitation due to the territorial principle, which dictates that execution against assets outside of Indonesia's jurisdiction cannot be carried out directly. With the provision in Article 21 of Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations, all assets of the debtor declared bankrupt must be included in the bankruptcy estate. This provision also indicates that the law adopts the principle of universality, which allows the trustee to execute the bankruptcy estate against all of the debtor's assets, including those located outside of Indonesia's jurisdiction.

In practice, however, the principle of universality contained in this law conflicts with the principle of territoriality that applies under Indonesian positive law concerning the execution of bankruptcy judgments. The misalignment between the universality principle and the territoriality principle leads to difficulties for the bankruptcy trustee in executing claims on assets held by the debtor abroad. Furthermore, this discrepancy has implications for potential losses that creditors may face due to the limited number of assets that the trustee can access during the bankruptcy resolution process.

Bankruptcy not only aims to protect the rights of creditors but also to regulate the fair distribution of assets from a debtor who has been declared bankrupt. Therefore, the trustee's authority in assisting creditors to secure their rights is crucial in the bankruptcy process. In practice, clear regulations are needed to ensure legal certainty for creditors and to prevent undesirable actions, such as individual seizures by creditors that could lead to the pillaging of the debtor's assets.

To ensure that all creditors receive an appropriate share of their entitled assets, a joint sequestration or consolidation process of the debtor's assets is necessary. The consolidated assets will then be distributed to the creditors based on fair and proportional calculations. This approach ensures that proper and transparent arrangements are in place, preventing injustice and safeguarding the rights of creditors equitably ([Frederica, 2022](#)).

The application of multiple legal systems in cross-border insolvency cases is a consequence of the interconnected legal principles between the parties involved, each referring to the implementation of law within their respective jurisdictions. As previously discussed in Law Number 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations, there are no specific provisions regarding international matters related to the recognition and enforcement of foreign court rulings in the context of cross-border insolvency. As a result, foreign court decisions for executing bankruptcy assets within the jurisdiction of Indonesia cannot be enforced.

Additionally, Indonesian bankruptcy law does not yet regulate the authority of a curator in executing a bankruptcy estate that is located outside of Indonesia's jurisdiction. This lack of regulation further complicates the legal process concerning cross-border insolvency, considering the limitations on the curator's powers in handling the debtor's assets located abroad.

The uncertainty regarding the curator's authority to manage bankruptcy decisions involving assets outside of Indonesia results in difficulties in the administration of the debtor's estate located overseas. This issue is exacerbated by the duality of principles in cross-border insolvency, specifically the application of the territorial principle adopted by Indonesia. Although Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations embraces the principle of universality, in practice, the execution of a bankruptcy estate located outside Indonesia's jurisdiction cannot be carried out automatically.

Based on these issues, it is clear that the lack of clarity regarding the curator's authority has led to uncertainty in the execution of their duties. This also affects creditors, who must bear the losses related to debts owed by the debtor. The unclear regulations in Indonesia further worsen this situation. Therefore, it is crucial for Indonesia to further regulate the principles that should be adopted in resolving cross-border insolvency issues in order to provide legal certainty for all parties involved.

D. CONCLUSION

The economic development between countries plays a fundamental role in shaping an economic system that is adaptable to changing times. Cross-border economic relations have become a main pillar in creating stability and progress across various regions of the world, encompassing many important aspects. However, during this process, a company may face issues, even losses, that could lead to bankruptcy. This issue becomes more complicated when a bankrupt debtor holds assets spread across multiple countries. Cross-border insolvency is defined as bankruptcy arising from international business transactions that involve foreign elements. In Indonesia, bankruptcy is regulated under Law Number 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations (UU KPKPU). However, this law does not provide detailed provisions regarding issues that arise when bankruptcy involves assets located outside Indonesia's jurisdiction.

A primary issue emerges when a bankrupt company holds assets abroad, leading to the concept of cross-border insolvency. This cross-border insolvency is closely tied to principles of international law, one of which is the territorial principle. The application of

the territorial principle in this situation can result in a fragmented bankruptcy process, where each country manages assets and liabilities within its jurisdiction separately. This may lead to inefficiencies and potential legal conflicts, given the differences in bankruptcy legal systems across countries.

In addition to the territorial principle adopted in Indonesia, which has specific implications for curators and creditors, there is also a duality in the application of principles within bankruptcy law. On one hand, Indonesia adheres to the territorial principle, while on the other hand, Law No. 37 of 2004 on Bankruptcy and Suspension of Debt Payment Obligations (UU KPKPU) follows the principle of universality. This dualism in the context of cross-border insolvency creates challenges, as although Indonesia adopts the territorial principle, the UU KPKPU is intended to follow the principle of universality, which requires the execution of a bankruptcy estate located outside of Indonesia's jurisdiction. Consequently, the enforcement of bankruptcy estates abroad cannot be carried out automatically, impeding the resolution of cross-border insolvency. This issue not only affects the curator's authority, rendering it uncertain, but also burdens creditors who must bear the losses from the debtor's outstanding debts. Given these challenges, it is crucial for Indonesia to improve its regulations on cross-border insolvency and provide legal certainty regarding the application of principles within existing legislation, ensuring that the cross-border insolvency process is more effective and equitable.

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