

## Legal Challenges in Marine Governance in the North Natuna Marine Dispute Area

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### Abstract

**Introduction:** The North Natuna Sea is rich in natural resources but remains a disputed area due to China's nine-dash line claim, which overlaps with Indonesia's EEZ under UNCLOS 1982.

**Purposes of the Research:** The purpose of this study is to analyze Indonesia's legal position and dispute resolution strategies in the North Natuna Sea.

**Methods of the Research:** This research uses a normative juridical method by analyzing international legal instruments and national regulations related to EEZ and the law of the sea.

**Results of the Research:** The findings show that Indonesia has a strong legal standing over its EEZ in the North Natuna Sea based on UNCLOS 1982. However, enforcement faces challenges such as unilateral claims, illegal foreign vessel activities, limited surveillance capacity, and weak dispute resolution mechanisms. A comprehensive strategy combining legal action, diplomacy, and strengthened economic presence is needed to uphold sovereignty and sustainably manage marine resources.

**Keywords:** North Natuna Sea; Exclusive Economic Zone; Nine-Dash Line; UNCLOS 1982; Maritime Dispute.

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## INTRODUCTION

The sea is one of the most important natural resources for coastal countries, not only as a route of transportation and international trade, but also as a source of biological and non-biological wealth. The regulation of the rights and obligations of states in the context of international law, over the territory of the sea is comprehensively regulated in the 1982 United Nations Convention on the Law of the Sea (UNCLOS). One of the crucial aspects of this convention is the recognition of the Exclusive Economic Zone (EEZ), under which coastal states have a sovereign right to explore, exploit, manage and conserve marine natural resources as far as 200 nautical miles from their coastline.<sup>1</sup>

Indonesia, as the largest archipelagic country in Southeast Asia with an area of about 1,904,569 km<sup>2</sup>, has a very large EEZ area, including the area around the North Natuna Sea.<sup>2</sup> The region is not only rich in natural resources such as fisheries and petroleum, but is also located on strategic international shipping lanes. Legally, this area has been designated as

<sup>1</sup> Chairul Anwar, *Zona Ekonomi Eksklusif Di Dalam Hukum Internasional: Dilengkapi Dengan Analisis Zona Ekonomi Eksklusif Indonesia dan ZEE di Asia-Pasifik* (Jakarta: Sinar Grafika, 1995), p. 20.

<sup>2</sup> Anatasia Anjani, "10 Negara Kepulauan Terbesar Di Dunia, Salah satunya Indonesia", "10 Negara Kepulauan Terbesar Di Dunia, Salah satunya Indonesia," *detikEdu*, <https://www.detik.com/edu/detikpedia/d-5679064/10-negara-kepulauan-terbesar-di-dunia-salah-satunya-indonesia>.

part of Indonesia's EEZ in accordance with the provisions of UNCLOS 1982 and strengthened by Law Number 5 of 1983 concerning Indonesia's EEZ and ratification of UNCLOS through Law Number 17 of 1985. Based on this regulation, Indonesia has the right to draw the EEZ line as far as 200 miles, the withdrawal of the line reaches the North Natuna Sea which is at the position of 10016'-7019' North Latitude and 105000'-110000' East Longitude and borders the South China Sea.<sup>3</sup>

The North Natuna Sea is a sea that has extraordinary potential. In this region, various natural resources and minerals are stored that are very valuable for the surrounding countries. Until now, the North Natuna Sea has been a source of dispute among Southeast Asian countries.<sup>4</sup> One of them is the dispute that occurred between Indonesia and China related to the fight for the North Natuna Sea. China unilaterally claims the nine-dash line even though the claimed area is Indonesia's EEZ.<sup>5</sup> These claims create jurisdictional overlap and often lead to incidents of Chinese vessels entering Indonesia's EEZ territory, which is legally a violation of Indonesia's sovereign rights.<sup>6</sup>

The dispute reflects a major challenge in maritime governance in disputed areas, where international law often clashes with the geopolitical interests and military power of major powers. Although Indonesia's legal position is very strong under UNCLOS, the effectiveness of law enforcement and protection of natural resources in the region is still faced with various obstacles, ranging from the limitations of dispute resolution instruments to the risk of increased conflicts. Therefore, it is important to examine the legal challenges faced by Indonesia in managing marine resources in the North Natuna Sea EEZ area which is still the object of dispute. In addition, this paper is also important to analyze legal strategies that can be taken to defend sovereign rights and create a just maritime governance based on international law. This paper also has strategic relevance to encourage a peaceful approach to maritime dispute resolution and strengthen Indonesia's position in the global maritime arena.

Based on the above description, there are two formulations of problems that will be studied in this paper, namely: 1) What is Indonesia's *legal standing* over the Exclusive Economic Zone in the North Natuna Sea according to UNCLOS 1982 and to what extent does China's nine-dash line claim contradict the applicable provisions?; 2) What are the legal challenges faced by Indonesia in upholding sovereign rights in managing marine resources in the North Natuna Sea EEZ area and what strategies can be used to resolve these disputes?

## METHODS OF THE RESEARCH

This research uses normative legal research methods, which focus on the study of positive legal norms and relevant principles of international law. The approach used is a statute *approach* and a *case approach*, by examining various national regulations such as Law Number 5 of 1983 concerning Indonesia's EEZ, Law Number 17 of 1985 concerning the Ratification of UNCLOS 1982, and the Permanent Court of Arbitration (PCA) decision in 2016. The source of legal materials consists of primary legal materials in the form of

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<sup>3</sup> Ririn Ardila and Akbar Kurnia Putra, "Sengketa Wilayah Zona Ekonomi Eksklusif Indonesia (Studi Kasus Klaim Cina Atas Laut Natuna Utara)," *Uti Possidetis: Journal of International Law* 1, no. 3 (2021): 358-77, <https://doi.org/10.22437/up.v1i3.10895>, p. 360

<sup>4</sup> Rizal Dwi Novianto, Dimas Agung Firmansyah, and Naufal Adi Pratama, "Penyelesaian Sengketa Di Laut Natuna Utara," *Jurnal Hukum Bisnis Bonum Commune* 3, no. 1 (2020).

<sup>5</sup> Faisal Ahmad, "Diplomasi Indonesia Dengan Tiongkok Dalam Penyelesaian Sengketa Laut Natuna Utara," 2022.

<sup>6</sup> Rizal Dwi Novianto, Dimas Agung Firmansyah, and Naufal Adi Pratama, "Penyelesaian Sengketa Di Laut Natuna Utara," *Jurnal Hukum Bisnis Bonum Commune* 3, no. 1 (2020): 69-78.

international treaties and laws, as well as secondary legal materials such as legal literature, scientific journals, and official government documents. The technique of collecting legal materials was carried out through a literature study, while the analysis was carried out qualitative-descriptive to assess Indonesia's legal standing as well as the challenges and strategies for dispute resolution in the North Natuna Sea EEZ area.

## RESULTS AND DISCUSSION

### A. Indonesia's Legal Standing on the EEZ in the North Natuna Sea

The concept of the Exclusive Economic Zone was first introduced by a representative from Kenya at the annual session of the Asian-African Legal Consultative Committee held in Lagos in January 1972.<sup>7</sup> Njenga stated: *The exclusive economic zone concept is an attempt at creating a framework to resolve the conflict of interest between the developed and developing countries in the utilization of the sea. It is an attempt to formulate a new jurisdictional basis which will ensure a fair balance between the coastal state and other users of the neighboring waters.*<sup>8</sup> In a nutshell, Njenga asserted that the Concept of Exclusive Economic Zones (EEZs) aims to create a fair new legal framework to address conflicts of interest between developed and developing countries in the use of the sea, by balancing the rights of coastal states and other ocean users. The concept of EEZ continued to develop until it was finally agreed at UNCLOS 1982. Indonesia's legal position on the EEZ in the North Natuna Sea has a strong basis in international law, especially in the 1982 UNCLOS. Article 57 of the UNCLOS states that: *The exclusive economic zone shall not extend beyond 200 nautical miles from the baselines from which the breadth of the territorial sea is measured.*

This provision expressly grants sovereign rights to coastal states, including Indonesia, over the EEZ as far as 200 nautical miles from its coastline. There are three ways of drawing the base line regulated in UNCLOS, these three bases are arranged based on the geographical characteristics of each Coastal country and provide an opportunity for the Coastal country to determine the way of drawing the base line that is most in line with the interests of the Coastal country concerned.<sup>9</sup> Indonesia has ratified UNCLOS through Law Number 17 of 1985 and legally made the convention part of the positive legal system in Indonesia. In addition, sovereign rights in Indonesia are regulated in the 1983 Law on Indonesia's Exclusive Economic Zone, which gives the state full authority for the exploration, exploitation, conservation, and management of natural resources in the EEZ.<sup>10</sup> On this basis, the North Natuna Sea area which is included in the 200 nautical miles from the base of the Natuna Islands is legally Indonesia's EEZ. The concept of EEZ has gained great support and thus has become part of international practice and in fact large or small, developed or developing countries from various corners of the world have followed.<sup>11</sup>

### B. Chronology of China's Claim to the Nine-dash Line

China's claim to the South China Sea through the *nine-dash line* is rooted in a long history that began during the Kuomintang Party (KMT) rule in China in 1947.<sup>12</sup> At that time, the

<sup>7</sup> Anwar, *Zona Ekonomi Eksklusif Di Dalam Hukum Internasional*.

<sup>8</sup> (Kenya) Njenga, "Asian-African Legal Consultative Committee Report of the 13th." (Session at Lagos, January 1972).

<sup>9</sup> Jessica Johanna Chirsty and Anto Ismu Budianto, "Sengketa Zona Ekonomi Eksklusif Indonesia Dengan Vietnam Di Wilayah Laut Natuna Utara," *Reformasi Hukum Trisakti* 4, no. 1 (2022): 201-10, <https://doi.org/10.25105/refor.v4i1.13428>.

<sup>10</sup> Anwar, *Zona Ekonomi Eksklusif Di Dalam Hukum Internasional*, p. 161

<sup>11</sup> *Ibid.*

<sup>12</sup> Novianto, Firmansyah, and Pratama, "Penyelesaian Sengketa Di Laut Natuna Utara." *Jurnal Hukum Bisnis Bonum Commune* 3, no. 1 (2020).

KMT government created a map of the demarcation line known as the *eleven-dash line*, which covered almost the entire South China Sea, including the Pratas Islands, Macclesfield Bank, Spratly, and Paracel islands. This claim is based on historical rights arguments, especially after Japan ceded the territory to China after World War II. After the founding of the People's Republic of China (PRC) in 1949, the new government maintained the claim. However, in 1953, two lines in the Gulf of Tonkin were removed so the map changed to the *nine-dash line* known today.<sup>13</sup>

This nine-dashed line is unilaterally depicted by China on official maps and is used to claim nearly 90% of the South China Sea, including areas that overlap with the Exclusive Economic Zones (EEZs) of other countries such as Indonesia (especially in Natuna), the Philippines, Vietnam, Malaysia, and Brunei.<sup>14</sup> China asserts that it has "historical rights" to the territories, including rights to the waters, seabed and natural resources within them. These claims are also used to justify the activities of Chinese fishermen and coast guards in the claimed territories, as well as the construction of artificial islands and military facilities on some of the disputed islands.

**Table 1. Escalation of International Claims and Denials (1990-2016)**

Year	Claims and Disclaimers
1992	China issued the Law on the Territorial Sea and Contiguous Zone which officially adopted the nine-dash line as its maritime boundary <sup>15</sup>
2009	China submitted a diplomatic memorandum to the UN declaring the nine-dash line claim a "historical right". This memorandum sparked protests from the Philippines, Vietnam, Malaysia, Brunei, and Indonesia <sup>16</sup>
2013	China issued a passport containing a nine-dash line map, thus confirming its unilateral claim to large parts of the South China Sea. This led the Philippines to formally file a lawsuit against China's claims to the Permanent Court of Arbitration (PCA) under UNCLOS 1982. <sup>17</sup>
2016	Tionfkok reaffirmed the claim of the nine-dash line in the Natuna waters which is included in Indonesia's Exclusive Economic Zone. The PCA issued a ruling stating that China's nine-dash-line claim had no basis in international law but China rejected the ruling. <sup>18</sup>

China's *nine-dash line* claims have drawn widespread rejection from neighboring countries and the international community. One of the important milestones was the decision of the Permanent Court of Arbitration in 2016 in a case brought by the Philippines.<sup>19</sup> The court stated that China's claim to the South China Sea under the *nine-dash line* has no basis in international law, particularly the 1982 United Nations Convention on the Law of

<sup>13</sup> Berlinda Nefertiti Goldy Salaki, "Klaim Nine-dash Line China: Pendekatan Pertahanan Indonesia" (Skripsi, Bandung, Universitas Katolik Parahyangan, 2018).

<sup>14</sup> "Sembilan Garis Putus Tiongkok - Fakultas Hukum Universitas Indonesia," <https://law.ui.ac.id/sembilan-garis-putus-tiongkok/>.

<sup>15</sup> Raden Florentinus Bagus Adhi Pradana, "Akibat Hukum Klaim Nine Dash Line Cina Terhadap Hak Berdaulat Indonesia Di Perairan Kepulauan Natuna (Khususnya Kabupaten Natuna) Menurut UNCLOS 1982," *Fakultas Hukum, Universitas Atma Jaya Yogyakarta*.

<sup>16</sup> "Sembilan Garis Putus Tiongkok - Fakultas Hukum Universitas Indonesia."

<sup>17</sup> Febriyansyah Rahmat Maulana and Rahayu Repindowaty, "Analisis Putusan Permanent Court of Arbitration Terhadap Klaim Nine Dash Line: Studi Kasus Klaim Wilayah Natuna Utara," *Ulti Possidetis: Journal of International Law* (Faculty of Education and Teacher Training, Jambi University, 2021), <https://doi.org/10.22437/up.v1i2.10452>.

<sup>18</sup> *Ibid.*

<sup>19</sup> Muhar Junef, "Sengketa Wilayah Maritim di Laut Tiongkok Selatan," *Jurnal Penelitian Hukum De Jure* 18, no. 2 (2018): 219, <https://doi.org/10.30641/dejure.2018.V18.219-240>.

the Sea (UNCLOS), which has also been ratified by China. Indonesia categorically rejects China's claims, especially since part of the *nine-dash line* overlaps with Indonesia's EEZ in the North Natuna Sea. The Indonesian government adheres to the 1982 UNCLOS as the basis for determining maritime boundaries and has consistently submitted diplomatic protest memorandums against China.

Based on the above description, it can be concluded that actually China's claim to *the nine-dash line* began with the Kuomintang's *eleven-dash line* map in 1947, simplified to nine lines in 1953, and is still maintained by the Chinese government until now. This claim is based on historical arguments that are not recognized by international law and have been rejected by international arbitration decisions as well as countries in the region. This dispute is still a source of tension in Southeast Asia, especially in the North Natuna Sea.

### C. Legal Challenges in Upholding Sovereign Rights in Managing Marine Resources in the North Natuna Sea EEZ

The North Natuna Sea Exclusive Economic Zone (EEZ) is an area rich in marine natural resources and has a geopolitical strategic position for Indonesia.<sup>20</sup> In international law, Indonesia's sovereign rights over this territory are based on the United Nations Convention on the Law of the Sea (UNCLOS) 1982 which has been ratified through Law Number 17 of 1985, so that legally the North Natuna Sea area is included in Indonesia's EEZ with exclusive rights to explore and exploit natural resources.<sup>21</sup> However, the enforcement of these sovereign rights faces significant legal challenges, especially due to overlapping claims with other countries, particularly China, which claims the territory based on the concept of the "Nine Dash Line" which is not recognized by international maritime law and is contrary to the provisions of UNCLOS.<sup>22</sup> China's unilateral claim raises a complex dispute because it contradicts the principles of international maritime law that govern the boundaries of the EEZ and the sovereign rights of coastal states.

In addition, law enforcement in the North Natuna Sea is also constrained by illegal activities carried out by foreign vessels, such as illegal fishing and exploitation of natural resources without Indonesian consent. The vast area of the EEZ and the limited monitoring resources make enforcement of these violations difficult and not optimal.<sup>23</sup> This poses practical challenges in maintaining sovereignty and managing marine resources effectively.

The difference in legal status between the territorial sea and the EEZ also adds complexity in the enforcement of sovereign rights. The territorial sea gives full sovereignty to the state, while in the EEZ the state only has limited sovereign rights to exploit natural resources without full sovereignty over the water column and the seabed. The other party's ignorance or refusal of these differences often leads to violations and disputes.<sup>24</sup> Furthermore, dispute resolution mechanisms through international law, such as arbitration under UNCLOS, face obstacles due to unrecognized unilateral claims and a lack of diplomatic agreement. Therefore, the enforcement of sovereign rights does not only depend on legal aspects, but

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<sup>20</sup> Juliet N A Ahmad, "Pengaturan Zona Ekonomi Eksklusif Indonesia Di Laut Natuna Utara Menurut Konvensi Hukum Laut 1982" (Skripsi, Ambon, Indonesia, Universitas Pattimura, n.d.).

<sup>21</sup> Oktriyanto Maatiri, Djoly A Sualang, and Thor Bangsaradja Sinaga, "Tinjauan Yuridis Terhadap Sengketa Laut Natuna Antara Indonesia Dan Cina," *Lex Administratum* 12, no. 5 (2023).

<sup>22</sup> Ririn Ardila and Akbar Kurnia Putra, "Sengketa Wilayah Zona Ekonomi Eksklusif Indonesia (Studi Kasus Klaim Cina Atas Laut Natuna Utara)," *Uti Possidetis: Journal of International Law* 1, no. 3 (2021): 358-77, <https://doi.org/10.22437/up.v1i3.10895>.

<sup>23</sup> Sannet Febriyanti, "Penegakan Hukum Di Undelimited Area Yang Berbatasan Dengan Vietnam Guna Mempertahankan Hak Berdaulat Di ZEEI." *Jurnal Maritim Indonesia (Indonesian Maritime Journal)* 8, no. 2 (2020).

<sup>24</sup> Ahmad, "Pengaturan Zona Ekonomi Eksklusif Indonesia Di Laut Natuna Utara Menurut Konvensi Hukum Laut 1982."

also requires preventive diplomacy approaches, bilateral negotiations, and strengthening national defense to maintain regional stability.

The strategic and economic value of the North Natuna Sea, which is rich in natural resources and is an international shipping route, adds pressure to the enforcement of sovereign rights. This condition requires Indonesia to increase legal capacity, supervision, and international cooperation so that the management of marine resources can be carried out in a sovereign and sustainable manner for the sake of national interests.<sup>25</sup> Based on the description above, it can be concluded that legal challenges in upholding sovereign rights in the North Natuna Sea EEZ include territorial claim disputes that clash with unilateral claims, violations by foreign ships, differences in the legal status of maritime areas, limitations in international dispute resolution mechanisms, and geopolitical and economic pressures. Addressing these challenges requires synergy between strengthening national laws, increasing oversight capacity, and effective diplomacy and international cooperation.

#### **D. Dispute Resolution Strategy in the North Natuna Sea**

Dispute resolution strategies in the North Natuna Sea are very important for the management of natural resources in the region because this area is part of Indonesia's Exclusive Economic Zone (EEZ) which gives sovereign rights to the state to manage and utilize natural resources in it, including fish resources and other marine products.<sup>26</sup> The existence of illegal vessels that catch illegal fish in the North Natuna Sea causes environmental damage, decreases fisheries potential, and has the potential to cause regional instability, so strict law enforcement and comprehensive dispute resolution strategies are crucial to ensure the preservation and sustainability of natural resources and maintain national sovereignty. Resolving disputes in the North Natuna Sea requires a multidimensional approach that combines aspects of law, diplomacy, defense, and international cooperation. Here are comprehensive strategies that can be implemented to address conflicts in the region:

##### **1. An International Law Approach Based on UNCLOS 1982**

Indonesia asserts its sovereign rights in the North Natuna Sea Exclusive Economic Zone (EEZ) based on the 1982 United Nations Convention on the Law of the Sea (UNCLOS), which grants the exclusive right to manage natural resources up to 200 nautical miles from the baseline.<sup>27</sup> China's unilateral claims under the "Nine Dash Line" are contrary to the principles of UNCLOS and have no legal basis, so Indonesia needs to strengthen its legal arguments through arbitration mechanisms or international courts if bilateral negotiations fail.<sup>28</sup> In addition, increasing national law enforcement capacity, such as strengthening Law Number 45 of 2009 concerning Fisheries, is key to preventing illegal exploitation by foreign vessels.

##### **2. Preventive Diplomacy and Bilateral Negotiations**

The Indonesian government has initiated dialogue with China through diplomatic channels, including a meeting between the Maritime Security Agency (Bakamla) and the

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<sup>25</sup> Salira Niti Sara et al., "Perspekif Hukum Intenasional Dalam Sengketa Laut Natuna: Kasus Indonesia Dan China," *Jurnal Ilmiah Wahana Pendidikan* 9, no. 17 (2023): 584-91, <https://doi.org/10.5281/zenodo.8320611>.

<sup>26</sup> Boy Anugerah, "Penguatan Strategi Penangkalan Dalam Merespons Aksi Koersif Cina di Laut Natuna Utara," *Jurnal Dinamika Global* 6, no. 2 (2021): 286-307, <https://doi.org/10.36859/jdg.v6i2.701>.

<sup>27</sup> Nuans Asa Septari B et al., "Respon Indonesia Menghadapi Ancaman Cina Di Laut Natuna Utara di Masa Kepemimpinan Presiden Joko Widodo," *Jurnal Lemhannas RI (Lembaga Ketahanan Nasional Republik Indonesia, 2022)*, <https://doi.org/10.55960/jlri.v10i1.267>.

<sup>28</sup> Novianto, Firmansyah, and Pratama, "Penyelesaian Sengketa Di Laut Natuna Utara."

China Coast Guard to reduce tensions and prevent an escalation of the conflict.<sup>29</sup> This preventive diplomacy aims to affirm Indonesia's position without sacrificing bilateral relations, while still prioritizing national interests. A memorandum of consistent protest against sovereign violations is an important step to create political pressure and international law.<sup>30</sup>

### 3. Increased Economic Activity and Resource Exploitation

Increasing economic activities, such as oil and gas exploration and the development of the fishing industry in the North Natuna Sea, is a practical way to assert Indonesia's de facto sovereignty.<sup>31</sup> The increase in the number of local fishermen and national fishing fleets in the region not only supports the economy but also strengthens Indonesia's physical presence.<sup>32</sup> The construction of marine infrastructure and fish processing plants with China within the framework of *strategic partnership* is also proposed as a win-win solution to reduce tensions.

### 4. Dispute Resolution Mechanism through Third Parties

If bilateral efforts and diplomacy do not reach a resolution, Indonesia can take advantage of international arbitration mechanisms or mediation by the International Court of Justice (ICJ) as a neutral third party. The Philippines' experience in submitting the South China Sea dispute to the *Permanent Court of Arbitration* (PCA) in 2016 is an important precedent that Indonesia can adopt to strengthen its legal position.<sup>33</sup> However, this step must be balanced with consideration of the political impact on bilateral relations with China.

The dispute resolution strategy in the North Natuna Sea combines international law enforcement, active diplomacy, defense strengthening, multilateral cooperation, and the use of economic resources. This approach not only aims to resolve conflicts peacefully but also ensures that Indonesia's sovereignty is maintained through legitimate and measurable mechanisms.

## CONCLUSION

Indonesia's position on the Exclusive Economic Zone (EEZ) in the North Natuna Sea has a strong basis in the 1982 United Nations Convention on the Law of the Sea (UNCLOS) which has been ratified through Law Number 17 of 1985. China's unilateral claims through the *nine-dash line* have no basis in international law and have been rejected by the *Permanent Court of Arbitration* (PCA) ruling in 2016. However, in practice, Indonesia faces various legal challenges in upholding sovereign rights in the region. These challenges include: overlapping claims from China, illegal fishing activities by foreign vessels, limited supervision and law enforcement, and limited effectiveness of international dispute resolution mechanisms. Thus, the settlement strategies that can be pursued include an international legal approach based on UNCLOS, preventive diplomacy and bilateral

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<sup>29</sup> "Diplomasi Dan Kedaulatan Di Laut China Selatan - ANTARA News," accessed June 9, 2025, <https://www.antaranews.com/berita/4471313/diplomasi-dan-kedaulatan-di-laut-china-selatan?page=all>.

<sup>30</sup> anugerah, "Penguatan Strategi Penangkalan Dalam Merespons Aksi Koersif Cina di Laut Natuna Utara."

<sup>31</sup> Yayat Ruyat, "Peran Indonesia Dalam Menjaga Wilayah Laut Natuna Dan Menyelesaikan Konflik Laut Tiongkok Selatan," *Jurnal Kajian Lemhannas RI*, Edisi 29, March 2017, 67-75.

<sup>32</sup> S. Wahyuni, "Strategi Pemerintah Indonesia Dalam Penyelesaian Konflik Klaim Traditional Fishing Ground Pada Zona Ekonomi Eksklusif Indonesia Di Perairan Natuna Oleh ...," *Sosiolegius: Jurnal Ilmiah ...*, 2019, <https://journal3.uin-alauddin.ac.id/index.php/Sosiolegius/article/view/13321>.

<sup>33</sup> Maulana and Repindowaty, "Analisis Putusan Permanent Court of Arbitration Terhadap Klaim Nine Dash Line: Studi Kasus Klaim Wilayah Natuna Utara."

negotiations, increasing national economic activities in dispute areas, and the possibility of using dispute resolution mechanisms through third parties such as international arbitration. The combination of legal, diplomatic, and strengthening Indonesia's physical presence in the North Natuna Sea area is key to maintaining sovereignty and managing marine resources in a fair and sustainable manner.

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