



The legal review of the refusal of forensic autopsy in cases of environmental crimes resulting in death

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Abstract

Forensic autopsy is a scientific procedure to determine the cause of death, especially in unnatural cases such as environmental crimes. However, its implementation in Indonesia often faces obstacles, particularly due to family rejections grounded in religious, cultural, or emotional reasons. This study uses a normative (doctrinal) approach by examining primary to tertiary legal sources. The legal basis for autopsies lies in the Criminal Procedure Code (KUHAP), the Health Law, and technical guidelines like the Minister of Health's circular letters. Articles 133 and 134 KUHAP authorize investigators to request an autopsy with an obligation to inform the victim's family. Nonetheless, KUHAP does not specify the legal consequences of a refusal, potentially hampering investigations and weakening law enforcement. Reformulation is thus needed to assert that an autopsy may still proceed despite objections, provided it is officially requested by investigators for investigative purposes. Without an autopsy, establishing the cause of death becomes difficult, especially when linking it to environmental crime, thereby risking impunity for perpetrators. This is critical as suspects can be charged under Article 359 of the Criminal Code and Article 98(3) jo. Article 116 of the Environmental Law. Family refusal may undermine the victim's legal standing and reduce the chance of holding perpetrators accountable. Therefore, harmonizing KUHAP with sectoral regulations is crucial to strengthen evidentiary effectiveness and uphold justice for victims in environmental crime cases resulting in death.

Keywords: Forensic autopsy, juridical review, environmental crime

Introduction

The right to a good and healthy environment is a part of the constitutional rights of citizens as stipulated in the Article 28H paragraph (1) of the 1945 Constitution. One of the important contents in the environmental law system is the regulation of the environmental crimes, especially those with the serious impacts such as causing the human death. The environmental crimes can be defined as unlawful acts of pollution or destruction of the environment that pose a risk or danger to human life, ecosystems, and the sustainability of natural resources. These actions not only violate national provisions in Law No. 32/2009 on Environmental Protection and Management, but also potentially violate international legal norms regarding environmental conservation and the right to a decent life. According to Interpol, environmental crimes are "all forms of violations of environmental law, both national and international, as well as violations of legal norms or provisions aimed at ensuring the conservation and sustainability of the global environment, biodiversity and natural resources." (Investigation, 2011)

In environmental crime cases resulting in death, evidence is crucial, as unnatural deaths often raise questions and suspicion. In the context of criminal procedure law, the disclosure of the cause of death by investigators is very important to uphold justice. One way to reveal the cause of death is through an autopsy. However, in practice, there is often resistance from the victim's family to this forensic autopsy. This rejection can be caused by various factors, such as religious beliefs, customs, or emotional trauma. (Suryadi *et al.*, 2020) ^[19] Several examples of forensic autopsy refusals due to environmental crimes include, first, there was a work accident which caused the death of a

manual miner named Agus Supriadi at an illegal (non-mechanized) C excavation mine site in Grogol, Kepuhpandak Village, Kutorejo District, Mojokerto Regency. The victim was buried by the landslide material in the form of the rocks and sand while conducting the traditional mining activities without adequate safety protection. Although this incident caused legal consequences in the form of the loss of a person's life which should be suspected of being the result of negligence or violation of work safety standards, the family refused an autopsy, and the body was immediately buried. (Vadetya, 2024) ^[20]

Secondly, there was a death of a man named Syafridi (59) on his land in Bukit Timbulun, Pesisir Selatan, West Sumatra, which is allegedly due to asphyxiation and exhaustion while trying to extinguish a land fire which he set himself. The exact cause of the death could not be medically confirmed as the family refused an autopsy. Based on the results of the initial examination, no signs of violence were found, and the death was estimated to be due to dense smoke and high fire intensity. The victim was known to have a history of mental illness. (Dapur Rakyat News, 2023) ^[6] Both cases show that in the absence of the further action from the law enforcement, this has the potential to cause the perpetrators of criminal acts not to be revealed or free from the clutches of the law. . (Yovanda, 2016) ^[22]

A forensic autopsy is a medical procedure performed to determine the cause of death of a person, especially in the cases of the unnatural death. This procedure has a crucial role in the law enforcement process, because the forensic autopsy results can be important evidence in the criminal investigations. (MT *et al.*, 2024) The results of the autopsy

are outlined in a *visum et repertum*, which can then be used as written evidence and has the strength of expert testimony in the criminal justice process. (Mulyadi, 2012) ^[9] Thus, forensic autopsy in environmental crime cases that result in death is not just a medical procedure, but an important part of the law enforcement process. Therefore, an in-depth study of the legal consequences of the rejection of a forensic autopsy by the victim's family in cases of environmental crimes resulting in death is needed. This research is important to find out how legal arrangements in Indonesia regarding the implementation of the forensic autopsies in cases of the environmental crimes resulting in death, and also to find out how the legal implications of the rejection of forensic autopsies by the victim's family in cases of environmental crimes resulting in death.

Method Type of Research

This type of the research is normative legal research, a legal research which is conducted by examining library materials or secondary data (Soekanto and Mamuji 2013) ^[16], also known as doctrinal research, where the *law* is often conceptualized as what is written in *laws* and regulations (*law in books*) or conceptualized as rules or norms which are benchmarks for human behavior which are considered appropriate. (Amiruddin *et al.*, 2006) ^[3] The method of collecting the legal materials is done through the documentation method, namely by collecting the results of literature studies contained in secondary legal materials. Furthermore, the information collected is analyzed qualitatively, supported by deductive reasoning as a means to address all legal issues found within this regulatory framework. (Cahyaningtyas, 2020) ^[4] The data analysis technique is the entire data consisting of the primary data and secondary data will be processed and analyzed qualitatively then will be done inductively, revealing various facts or phenomena obtained through field observations, then analyzing them.

Results and Discussion

1. The Legal Regulations in Indonesia Regarding the Implementation of Forensic Autopsy in the Case of Environmental Crime Resulting in Death.

In the context of the positive law, the principle of legality is a fundamental principle which cannot be ignored in determining whether or not an act is categorized as unlawful. This principle emphasizes that an action can only be declared unlawful if it has been expressly determined in the prevailing laws and regulations. This view is in line with the opinions of experts such as Simons, van Hamel, and van Hattum who state that the principle of legality serves to ensure legal certainty. Meanwhile, Vos emphasized that the principle also has a general preventive value through criminal threats, in order to create legal certainty. (Alviolita, 2018) ^[1]

To assess whether a criminal law provision has provided the legal protection to the victims, it cannot be separated from the regulation of criminal sanctions. Criminal sanctions are an integral element of the criminal law system which consists of criminal offenses, criminal responsibility (guilt), and punishment. In Hulsman's view, *the sentencing system* refers to all *statutory* norms that regulate criminal sanctions and *the implementation of punishment (the statutory rules*

relating to penal sanctions and punishment). (Setyowati, 2019) ^[15] Therefore, the criminal sanction system needs to be continuously updated to increase the effectiveness of victim protection.

The provisions In the Criminal Code, Criminal Procedure Code, Health Law, and the technical regulations are positive legal instruments that regulate autopsy procedures, while ensuring the principle of legality and legal certainty in proving death cases. In cases of environmental crimes that result in death, the implementation of forensic autopsies often faces obstacles, especially the rejection of the victim's family, even though legally an autopsy is needed for investigation purposes. Indonesia adheres to a negative system of statutory proof (*Negative Wettelijk Stelsel*), as stipulated in the Article 183 of KUHAP Code which states that the judge can only impose a criminal verdict if there are at least two valid means of evidence and the judge believes that the criminal act actually occurred and was committed by the defendant. The evidence referred to is limited as stated in Article 184 paragraph (1) of KUHAP. Based on these provisions, the proof in a criminal case requires a minimum of two valid pieces of evidence to form the basis for a decision. (Sukinta, 2021) ^[18] Terminologically, a forensic autopsy or post-mortem is a scientific examination procedure of a corpse, including all organs and internal structures of the body, with the main purpose of identifying the cause of a death of a person. This procedure is carried out both for the benefit of medical science and in the context of disclosing related criminal offenses (Kastubi, 2016). The Circular Letter of the Minister of Health (Menkes) Number 1342/MENKES/SE/XII/2001 explains that the forensic autopsy is an examination of the corpse by opening the entire body cavity, including the head, neck, chest, abdomen and pelvis, accompanied by the necessary further examination. This is done in order to obtain certainty about the cause of death and collect important information that can support the investigation and proof process in the judicial forum.

The results of a forensic autopsy examination are outlined In the form of a medical document known as a *visum et repertum*. However, (KUHAP) does not explicitly include the term *visum et repertum* as a separate evidence, but functionally *visum et repertum* is included in the category of letter evidence as referred to in Article 184 paragraph (1) letter c of KUHAP. (Ohoiwutun, 2016) ^[12] Historically, the provisions regarding *visum et repertum* were previously regulated in *Staatsblad* 1937 Number 350, which is now normatively considered irrelevant and replaced by more recent national legal provisions. In that document, *visum et repertum* is understood as a medical report made based on the results of a doctor's examination of the victim, where the evidentiary value is limited to what the doctor directly sees or finds during the examination. (Widowati *et al.*, 2021) ^[21]

Until now, the provisions regarding the procedures for requesting and making a *visum et repertum* still refer to the Circular Letter of the Minister of Health (SE Menkes) Number 1342/MENKES/SE/XII/2001, as well as the technical policies of the Indonesian National Police that apply. In this case, to be considered valid and have evidentiary power, a *visum et repertum* must be made by authorized medical personnel (doctors), who have met the

professional requirements, including the oath of office as a legal medical personnel. Law. In addition, a formal request for a *visum et repertum* must be submitted in writing by a police investigator, as stipulated in Article 133 paragraph (2) of KUHAP and strengthened by internal police policies that are still in effect today. This written request becomes the legal basis for forensic doctors in carrying out the task of examining the corpse in the context of criminal investigations.

Based on the provisions of the Article 133 paragraph (2) of KUHAP, requests for the expert testimony for the benefit of the investigation process must be submitted in writing by the investigator and must explicitly contain the type of examination requested, namely whether in the form of wound examination, corpse examination, or post-mortem examination. In line with this, the 2001 Circular Letter of the Minister of Health of the Republic of Indonesia emphasizes that forensic autopsies can only be performed if there is a written request from the investigator that explicitly states the type of examination desired. In the event that the request only includes an examination of the corpse without an order for cadaver surgery, the examination by the doctor is limited to an external examination and cannot be followed up with a forensic autopsy. Conversely, a request for a post-mortem examination normatively provides a legal basis for the forensic doctors to perform an autopsy. Furthermore, Article 133 paragraph (3) of KUHAP mandates that the bodies which are examined for the purposes of forensic medicine must be treated with respect and erogate with the clear identity.

In practice, in the case of environmental crime which result in death and suspected to be the result of the criminal events, the implementation of the forensic autopsy rests entirely on the existence of written requests from investigators to health service facilities, both health centers and hospitals. Doctors as parties authorized to conduct medical examinations in making *visum et repertum* do not have initiative authority, but only act based on the written order which is issued by the investigators. Thus, the continuation of the forensic autopsy action or vice versa, the absence of an autopsy is entirely determined by the content and form of the investigator's request.

An earlier legal Instrument, the National Police Chief Instruction of 1975, had made an mandatory autopsy in every request for a *visum et repertum* on a corpse. The instruction stated that the external examination alone was not permitted and that a forensic autopsy was a mandatory form of examination. In addition, if there is an objection from the victim's family, police officers are required to provide a persuasive explanation of the importance of an autopsy, and under the certain conditions, it is possible to apply Article 222 KUHAP on obstruction of investigation. However, the relevance of the National Police Chief Instruction has diminished normatively because it is not a formally applicable and hierarchical legislation in today's national legal system.

Further regulation is found in Article 134 KUHAP which regulates the procedure for notifying the victim's family before an autopsy is performed. Paragraph (1) states the obligation of the investigator to notify the family in advance of the autopsy action plan. Paragraph (2) stipulates that if there is an objection from the family, then the investigator is

obliged to provide an explanation of the purpose and objectives of the forensic autopsy. Furthermore, paragraph (3) states that if within two days there is no response or no party worth notifying is found, the investigator may continue the examination as stipulated in Article 133 paragraph (3). However, the provisions of KUHAP, particularly Article 134, do not provide an adequate legal mechanism. In the event that there is a refusal of autopsy by the victim's family. The norm does not explicitly state that the family's objection can be overridden in the interest of the investigation. In other words, there is no imperative norm stating that an autopsy can still be carried out even if the family refuses, resulting in normative ambiguity and potential stagnation in the law enforcement process.

From the perspective of criminal procedural law, the consent requested from the victim's family for the execution of an autopsy should not be considered a mandatory requirement that limits the investigator's authority to uncover the cause of a suspicious death. Notifying the family constitutes a form of respect for victims' rights and humanitarian values, but such notification should not result in legal consequences that obstruct the law enforcement process. Therefore, it is essential to reformulate legal norms that affirm the autopsy may still be carried out despite opposition from the family, as long as there is an official request from the investigator based on investigative interests. This aligns with the principle of due process of law and the maxim *lex superior erogate legi inferiori*, whereby the public interest in the criminal justice process cannot be overruled by sectoral norms or the subjective values of particular individuals. It is necessary to reformulate KUHAP and update sectoral regulations to emphasize that family rejection cannot prevent autopsies in criminal cases that involve the public interest. Strengthening the discretion of the investigators also needs to be supported by the technical regulations from the Police and the Attorney General's Office to ensure uniformity of procedures, legal certainty, and effectiveness of law enforcement for the sake of justice for victims and society.

2. The Legal Implications of the Refusal of the Forensic Autopsy by the Victim's Family in the Environmental Crime Cases Resulting in Death

The forensic autopsy is an integral part of the criminal justice system, especially in the investigation of deaths suspected to have occurred as a result of criminal acts. Normatively, the regulation regarding autopsy has been emphasized in Article 134 paragraphs (1) to (3) of KUHAP which stipulates that the investigator is obliged to notify the victim's family of the corpse dissection plan. If within 2x24 hours there is no response, or the family cannot be found, then the autopsy can still be carried out. The phrase "notify" in this provision must be interpreted as an obligation to convey information, not to obtain consent. This grammatical interpretation is reinforced by a systematic approach to other regulations such as the National Police Chief Instruction No. Pol: INS/E/20/IX/75 which states that if the family refuses, the authorities are obliged to provide a persuasive explanation, and if the refusal continues, the Article 222 KUHAP can be applied to those who obstruct the forensic autopsy.

In addition, the Circular Letter of the Minister of Health Number 1342/MENKES/SE/XII/2001 emphasizes that in the exceptional circumstances, autopsies can still be performed without family consent, based on a statement letter from the investigator, as long as the safety of medical personnel and supporting facilities can be guaranteed. This regulation gives investigators the discretion to continue carrying out autopsies in the interests of the investigation. In fact, the doctrine developed in legal education institutions and forensic medicine supports this position. The official module of the Indonesian Attorney General's Training Agency states that requests for autopsies from investigators are binding (obligatory) and cannot be refused (R.I., 2019), and the literature from the Medical School of Universitas Indonesia states that the family permission is not a condition for carrying out an autopsy, and actions that obstruct the implementation of an autopsy can be subject to legal sanctions (Teaching Staff of Judicial Medicine, 1981) ^[17]. Nevertheless, the victim's family basically still has the right to express the objections. This reflects the relationship of the rights and obligations between the victim's family, investigators, and medical personnel. (Firmansyah, 2024) ^[7] The investigators are obliged to ensure that the autopsies are carried out according to the procedures, subject to the principles of legality and forensic medical ethics. Medical personnel, especially forensic doctors, have a professional responsibility to carry out autopsies ethically and objectively, as well as maintaining the confidentiality of the results and respecting family rights. On the other hand, the international law through the *International Covenant on Civil and Political Rights* (ICCPR), which has been ratified by Indonesia, also protects bodily integrity and privacy, but this principle can be limited when it conflicts with the public interest in law enforcement. (Nations, 1966) ^[10] The legal implications of refusing a forensic autopsy become apparent when looking at practice in the field. The several cases show that such refusals have resulted in investigators being unable to establish a definitive cause of death. For example, in the case of Agus Supriadi's death in Mojokerto and the death of a man named Syafriadi (59) on his land in *Bukit Timbulun, Pesisir Selatan*, West Sumatra. The exact cause of death could not be medically confirmed as the family refused an autopsy. Based on the results of the initial examination, no signs of violence were found, and the death was estimated to be due to the dense smoke and high fire intensity. The victim was known to have a history of mental illness. (Dapur Rakyat News, 2023) ^[6] The case raises legal issues regarding the liability of the corporation and supervisory officials for the victim's death. The family's refusal to allow a forensic autopsy has hindered the investigation, whereas if proven, the business operator could be held accountable for the worker's death. In the environmental and labor criminal law, the death of mine workers or communities due to mining activities and forest fires reflects a serious violation of the legal obligations of business actors. If it is proven that there is negligence that causes loss of life, the perpetrator can be charged with Article 359 KUHP and Article 98 paragraph (1) jo. Article 116 paragraph (1) of Law No. 32/2009 on Environmental Protection and Management. Article 98 paragraph (3) threatens imprisonment of 5 to 15 years and a fine of Rp5 to 15 billion if environmental pollution or

destruction results in death. In addition, the Article 112 also allows the criminal liability for the state apparatus who are negligent in supervision.

Not only that, if the mine workers die due to the negligence of business actors in providing work safety equipment, they can be subject to sanctions based on Article 190 of Law Number 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law (Perppu) on Job Creation (*Cipta Kerja*) into Law, which regulates criminal sanctions for violations of labor norms that result in fatal work accidents. (Amin, 2018) ^[2] In the context of mining, violations of work safety standards can also be charged with the provisions in the Article 158 and Article 161 of Law No. 3/2020^[4] concerning Minerba, especially if the activity is carried out without a license or not in accordance with the stipulated mining technical provisions. Therefore, criminal liability against business actors does not only cover administrative aspects, but also reflects substantive legal protection of the right to life and a healthy environment as a constitutional right of every citizen. However, without a forensic autopsy, the proof of the element "resulting in loss of human life" is weak because there is no objective medical data available regarding the cause of death.

The poorly managed rejection can undermine the principles of substantive justice. The studies from the *National Institute of Justice* state that not performing an autopsy reduces the effectiveness of investigations and the accuracy of legal decision-making (Nations, 1966) ^[10]. Therefore, the systematic efforts are needed to increase the public awareness, both through the education and strengthening regulations. The Indonesian government through the Ministry of Law and Human Rights has revised around 70% of the autopsy-related regulations to ensure transparency and accountability in their implementation. (Law and Human Rights of the Republic of Indonesia, 2020) ^[5] In environmental crime cases, the rejection of autopsies has a direct impact on the non-fulfillment of valid evidence according to Article 184 of KUHP, without objective medical evidence, the process of determining criminal elements can be hampered, which leads to the non-accusation of business actors who commit crimes against the environment.

General principles in the medical world need to be adjusted in the context of judicial medicine, especially regarding the approval of medical actions, the authority of investigators, the validity of examination results, and training of the Human Resources (SDM). The technical aspects such as making a *post mortem*, conducting an autopsy, and involving supporting institutions such as medical examiners also need to be strengthened. The Article 98 paragraph (3) of Law No. 32/2009 on the Environmental Protection and Management (UU PPLH) states that if environmental pollution or destruction results in the loss of human life, the perpetrator may be subject to imprisonment for a minimum of five years and a maximum of fifteen years and a fine of at least Rp5 billion and a maximum of Rp15 billion. However, without a forensic autopsy, the proof of the element "resulting in loss of human life" is weak because there is no objective medical data available regarding the cause of death.

In the context of the environmental crimes which result in death, the forensic autopsy process becomes very important

to reveal whether the victim's death was caused by the exposure to the hazardous materials, systemic environmental pollution, or other causes that have a legal link to criminal responsibility. Therefore, the regulative affirmation is needed that gives clear authority to investigators to continue carrying out the forensic autopsies in the environmental cases that cause fatalities, in order to ensure the effectiveness of the law enforcement and protection of the right to a healthy environment. The regulatory reform is expected to strengthen the law enforcement in cases of unnatural death, especially murder, and provide legal clarity for the investigators and medical personnel. (Naufal *et al.*, 2021) ^[11]

Conclusion

The regulation of the forensic autopsy implementation in the environmental crime cases resulting in death in Indonesia is based on KUHAP, the Health Law, and the technical regulations such as the Circular Letter (SE) of the Minister of Health. Normatively, Articles 133 and 134 of (KUHAP) provide a legal basis for investigators to submit a request for autopsy, with the obligation to notify the victim's family. However, KUHAP does not explicitly regulate the legal consequences of a family's refusal, thereby creating a normative gap that may hinder the investigation process. An autopsy can only be conducted based on a written request from the investigator, and the forensic doctor does not have the authority to act on their own initiative. This provision affirms the dominance of investigator discretion, but it is not yet supported by an imperative norm that ensures the autopsy can still proceed despite objections from the victim's family. Therefore, it is necessary to reformulate the legal norms to affirm that an autopsy may still be conducted even in the face of family refusal, as long as there is an official request from the investigator based on the interests of the investigation.

The rejection of a forensic autopsy by the victim's family in the environmental crime cases can hinder the proof of the causal link between the act and the death. Although KUHAP only requires notification, not the family consent, an autopsy is still necessary for the validity of the investigation. Without an autopsy, the criminal proof becomes difficult, especially in the environmental cases. The perpetrator can be charged with the Article 359 KUHP and Article 98 paragraph (3) jo. The rejection of autopsy risks weakening the victim's legal position and minimizing the possibility of the perpetrator being punished, so there needs to be firmer regulations and public legal education.

References

1. Alviolita FP. Pertanggungjawaban Pidana Oleh Pengurus Korporasi Dikaitkan Dengan Asas Geen Straf Zonder Schuld. *Refleksi Hukum: Jurnal Ilmu Hukum*, 2018;3(1):1–16.
2. Amin I. Pertanggungjawaban korporasi dalam tindak pidana lingkungan hidup. *Jurnal Ius Kajian Hukum Dan Keadilan*, 2018;6(2):259–263.
3. Amiruddin, Asikin Z. *Pengantar Metode Penelitian Hukum*. Jakarta: Raja Grafindo Persada, 2006.
4. Cahyaningtyas I. *Criminal Justice System Toward Children With Legal Conflict Seen In Justice*

- Restorative Presfective. *Jurnal Hukum Prasada*, 2020;7(1):14–26.
5. dan HAM Republik Indonesia KH. *Evaluasi Peraturan Terkait Autopsi Forensik*. Jakarta, 2020.
6. Dapur Rakyat News I. *Ini Penyebab Pria Paruh Baya yang Ditemukan Meninggal di lokasi Kebakaran Lahan*. <https://DapurRakyatnews.Com/Ini-Penyebab-Pria-Paruh-Baya-Yang-Ditemukan-Meninggal-Di-Lokasi-Kebakaran-Lahan/>, 2023.
7. Firmansyah W. *TINJAUAN YURIDIS PENGATURAN OTOPSI JENAZAH DALAM PROSES PEMBUKTIAN PERKARA PIDANA*, 2024.
8. MT E, Delmiati S. Akibat Hukum Atas Penolakan Dilakukannya Autopsi Pada Penyidikan Tindak Pidana Penganiayaan. *Jurnal Sakato Ekasakti Law Review*, 2024, 3(3).
9. Mulyadi L. *Hukum Acara Pidana: Normatif, Teoretis, Praktik dan Permasalahannya*, 2012.
10. Nations U. *International Covenant on Civil and Political Rights*, 1966.
11. Naufal RS, Rusmiati E, Ramdan A. Urgensi Pembaharuan Hukum Autopsi Dalam Proses Penyidikan Tindak Pidana Pembunuhan Untuk Mencapai Kebenaran Materiil. *Jurnal Legislasi Indonesia*, 2021;18(3):351–363.
12. Ohoiwutun YA. *Ilmu kedokteran forensik (interaksi dan dependensi hukum pada ilmu kedokteran)*, 2016.
13. Penyidikan D. *Kejahatan Lingkungan (Illegal Logging dan Perambahan Hutan)*. Makalah Disampaikan Pada Acara Loklatih Peningkatan Kapasitas SDM UPT Ditjen PHKA. Samarinda, 2011, 18–19.
14. RI TPMBDK. *Modul Kedokteran Forensik*. Jakarta, 2019.
15. Setyowati D. *PENDEKATAN VIKTIMOLOGI KONSEP RESTORATIVE JUSTICE ATAS PENETAPAN SANKSI DAN MANFAATNYA BAGI KORBAN KEJAHATAN LINGKUNGAN*. *Jurnal Komunikasi Hukum (JKH)*, 2019, 5, 49. doi: 10.23887/jkh.v5i2.18312
16. Soekanto S, Mamuji S. *Penelitian Hukum Normatif: Suatu Tinjauan Singkat*. Jakarta: Raja Grafindo Persada, 2013.
17. Staf Pengajar Kedokteran Kehakiman FKUI. *Teknik Autopsi Forensik*. Jakarta, 1981.
18. Sukinta S. *Konsep dan Praktik Pelaksanaan Amicus Curiae Dalam Sistem Peradilan Pidana Indonesia*. *Administrative Law and Governance Journal*, 2021;4(1):89–98.
19. Suryadi T, Kulsum K. *Forensic Autopsy Is Reviewed from the Aspects of Ethics, Medicolegal and Humanities*. *Budapest International Research and Critics Institute (BIRCI-Journal): Humanities and Social Sciences*, 2020, 3(3).
20. Vadetya M. *Seorang Penambang Galian C di Mojokerto Tewas, Tertimbun Tebing Setinggi 9 Meter - Radar Mojokerto*. <https://Radarmojokerto.Jawapos.Com/Berita-Terbaru/824682837/Seorang-Penambang-Galian-c-Di-Mojokerto-Tewas-Tertimbun-Tebing-Setinggi-9-Meter>, 2024.
21. Widowati W, Ohoiwutun YAT, Nugroho FM, Samsudi S, Suyudi GA. *Peranan Autopsi Forensik dan Korelasinya dengan Kasus Kematian Tidak Wajar*.

Refleksi Hukum: Jurnal Ilmu Hukum,2021:6(1):1–18.
doi: 10.24246/jrh.2021.v6.i1.p1-18

22. Yovanda. Dua Pelajar Ini Meninggal di Lubang Area Konsesi Tambang, Jelang Hari Pahlawan. <https://www.mongabay.co.id/2016/11/10/dua-pelajar-ini-meninggal-di-lubang-area-konsesi-tambang-jelang-hari-pahlawan/>, 2016.