

## **The Existence Of Customary Leaders in Land Dispute Resolution**

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**Abstrak:** Penelitian ini bertujuan, Untuk mengetahui dan menganalisis Eksistensi tokoh adat Tu'a Golo dalam penyelesaian sengketa Tanah pada masyarakat adat Kecamatan Boleng, Kabupaten Manggarai Bara, Nusa Tenggara Timur. Untuk mengetahui dan memahami Faktor-faktor yang memengaruhi penyelesaian sengketa Tanah di tokoh adat Tu'a Golo pada masyarakat adat Kecamatan Boleng. Penelitian ini menggunakan tipe penelitian Hukum empiris. Lokasi penelitian di wilayah Hukum Adat Kecamatan Boleng, Kabupaten Manggarai Barat, Provinsi Nusa Tenggara Timur. Jenis dan sumber data yaitu Data Primer dan Sekunder yang diperoleh melalui Teknik wawancara dan Dokumentasi, selanjutnya dilakukan analisis secara kualitatif. Hasil penelitian menunjukkan, eksistensi tokoh adat Tu'a Golo dalam proses penyelesaian sengketa Tanah pada masyarakat adat Kecamatan Boleng, Kabupaten Manggarai Barat, Nusa Tenggara Timur di selesaikan oleh Tu'a Golo sebagai tokoh adat. faktor-faktor yang memengaruhi proses penyelesaian sengketa Tanah di tokoh adat Tu'a Golo pada masyarakat adat Kecamatan Boleng adalah faktor internal dari Tu'a Golo sendiri dan faktor eksternal dari masyarakat tersebut. Rekomendasi penelitian ini, Agar Tua Golo melakukan sosialisasi terhadap hukum adat yang berlaku supaya masyarakat memprioritaskan penyelesaian masalah sosial dan budaya melalui musyawarah mufakat. sebagai ketua adat atau Hatoe kampoh, Tu'a Golo selalu memperhatikan masyarakat adatnya dengan menjadi penengah yang adil sehingga tidak dipengaruhi oleh pihak manapun.

**Kata Kunci :** Penyelesaian Sengketa Tanah, Komunitas Tradisional, Hukum Adat

**Abstract:** This study aims to determine and analyze the existence of the Tu'a Golo traditional figure in resolving land disputes in the indigenous people of Boleng District, Manggarai Bara Regency, East Nusa Tenggara. To determine and understand the factors that influence the resolution of land disputes in the Tu'a Golo traditional figure in the indigenous people of Boleng District. This study uses an empirical legal research type. The location of the research is in the Customary Law area of Boleng District, West Manggarai Regency, East Nusa Tenggara Province. The types and sources of data are Primary and Secondary Data obtained through interview and documentation techniques, then qualitative analysis is carried out. The results of the study show that the existence of the traditional figure Tu'a Golo in the process of resolving land disputes in the traditional community of Boleng District, West Manggarai Regency, East Nusa Tenggara was resolved by Tu'a Golo as a traditional figure. The factors that influence the process of resolving land disputes in the traditional figure Tu'a Golo in the traditional community of Boleng District are internal factors from Tu'a Golo himself and external factors from the community. The recommendation of this study is that Tua Golo conduct socialization of the applicable customary law so that the community prioritizes resolving social and cultural problems through deliberation and consensus. As the

*customary leader or Hatoe Kampoh, Tu'a Golo always pays attention to his traditional community by being a fair mediator so that he is not influenced by any party.*

**Keywords:** *Land Dispute Resolution, Traditional Community, Customary Law*

## **INTRODUCTION**

Agrarian affairs, based on the Basic Agrarian Law (UUPA), are not limited merely to land, but also encompass the earth, water, and the natural resources contained within them. Furthermore, according to Prof. Boedi Harsono, outer space is also included, as the space above the earth and water contains energy and elements that can be utilized for efforts to maintain and enhance the fertility of the earth, water, and natural resources, as well as other matters related to them.[1]

Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia states that the land, water, space, and natural resources contained therein shall be controlled by the state at the highest level, as an organization of the people's power, and shall be utilized for the greatest prosperity of the people — in the sense of national welfare, well-being, and freedom within an independent, sovereign, just, and prosperous Indonesian state governed by law. Likewise, Law Number 5 of 1960 concerning the Basic Agrarian Law (UUPA) declares that the state guarantees the rights of the people over the land, water, and space, including the natural resources contained therein. This means that the state has the mandate to manage agrarian resources and to protect citizens' land rights in order to promote the welfare of all Indonesian people.

Land rights may be held by anyone — not only by individuals but also by groups of people or legal entities. However, according to Article 4 paragraph (2) of the Basic Agrarian Law (UUPA), all parties who possess land rights are obliged to administer, use, and utilize those rights within the limits prescribed by the laws and regulations in force in Indonesia.[2] Pengakuan terhadap hak-hak masyarakat hukum adat di Indonesia diatur dalam Pasal 18 B ayat (2) dan Pasal 28 I UUD NRI 1945. Dalam Pasal 18 B ayat (2) UUD NRI 1945 diatur bahwa:

“The state recognizes and respects the existence of customary law communities along with their traditional rights as long as they remain alive and are in accordance with the development of society and the principles of the Unitary State of the Republic of Indonesia, as regulated by law.” Article 28I paragraph (3) also states, “The cultural identities and rights of traditional communities shall be respected in accordance with the development of times and civilization.”

In addition to providing legal certainty, state law also offers legal protection for the rights of its citizens. Article 19 of Law Number 5 of 1960 concerning the Basic Agrarian Law (UUPA) mandates land registration, as stated in Article 19 paragraph (1) of the UUPA, which provides that, in order to ensure legal certainty, the Government must carry out land registration in

accordance with the provisions regulated by Government Regulations throughout the territory of the Republic of Indonesia.

The Minister of Agrarian Affairs and Spatial Planning appointed the Land Deed Making Officer/ *Pejabat Pembuat Akta Tanah* (PPAT) to represent the state's duties in making civil law documents related to land and property, as implicitly regulated in Law Number 5 of 1960.[3]

Meanwhile, the Regional Regulation of West Manggarai Regency concerning Customary-Based Dispute Resolution, Regional Regulation No. 1 of 2018, also recognizes customary law as a means of resolving disputes and cases within the West Manggarai Regency area. This regulation grants customary leaders the authority to resolve disputes based on prevailing customary laws and community traditions.

In customary law, land controlled by an indigenous community is referred to as *ulayat land* or *communal land*, which constitutes a living area under the legitimate authority of the customary law community. This land may include ponds, rice fields, vacant land, forests, beaches, and others. There exists a very close relationship between the customary law community as a collective entity and the land they inhabit — a relationship rooted in religio-magical beliefs. This close and religio-magical connection grants the community the right to control the land, utilize it, harvest the plants growing on it, and hunt the wild animals living within it.[4]

In West Manggarai, particularly in Boleng District, Batu Tiga Village, the community still upholds ancestral traditions known as *Tu'a Golo* or *anak riang*. The *Tu'a Golo* or *anak riang* play an important role in the distribution of land, and any land that is distributed must be accompanied by a document issued and signed by the *Tu'a Golo*.

Within customary law communities, land disputes often occur, including disputes over *ulayat* (communal) land. The causes of such land disputes include the following:

1. The unclear boundaries of *ulayat* or customary land.
2. Lack of community awareness of customary law.

In West Manggarai Regency, East Nusa Tenggara Province, there are still *ulayat* or customary lands that often give rise to disputes, which tend to increase from year to year. Land disputes can be found in almost every area of this region. Various parties have made efforts to address these issues through different approaches. The methods of dispute resolution that have been pursued so far include litigation through the courts and alternative dispute resolution, such as mediation outside the court.[5]

The customary community prefers to resolve disputes through mediation. Why do the customary people in Boleng District, West Manggarai Regency, East Nusa Tenggara Province,

prefer mediation as their method of dispute resolution? And what is the role of the customary leader (*Tu'a Golo* or *anak riang*) in resolving such land disputes?[5]

Mediation is a form of alternative dispute resolution, commonly known as Alternative Dispute Resolution (ADR). This mechanism of resolving disputes is categorized as a non-litigation approach and represents a cooperative concept of settlement aimed at achieving a *win-win* solution.

Based on the background described above, the problems formulated as the scope of discussion in this study are as follows, What is the existence or role of the customary leader (*Tu'a Golo*) in the process of land dispute resolution among the customary community in Boleng District, West Manggarai Regency, East Nusa Tenggara? What are the factors that influence the process of land dispute resolution handled by the customary leader (*Tu'a Golo*) within the customary community of Boleng District?

## **METHOD**

This type of research is empirical legal research, which relies on field data as the primary source of information, such as interviews and analyses. Empirical research is used to understand and analyze land disputes in depth.

The location of this research was in one of the customary law areas of Boleng District, West Manggarai Regency, East Nusa Tenggara Province. The population in this study consists of all customary leaders and members of the customary community in Boleng District, with a sample of five individuals: customary leaders (*Tu'a Golo*), *anak riang*, and members of the customary community of Medang Island. The research utilizes both primary and secondary data.

## **RESULT AND DISCUSSION**

### **A. The Existence of the Customary Leader *Tu'a Golo* in the Process of Land Dispute Resolution within the Customary Community of Boleng District, West Manggarai Regency, East Nusa Tenggara.**

The *Tu'a Golo* (*hatoe kampoh*) plays an important role in encouraging the community to preserve the local wisdom found within their region. As stipulated in Article 18B paragraph (2) of the 1945 Constitution of the Republic of Indonesia: "The state recognizes and respects the existence of customary law communities along with their traditional rights as long as they remain alive and are in accordance with the development of society and the principles of the Unitary State of the Republic of Indonesia, as regulated by law."

Furthermore, Article 28I paragraph (3) also states, “The cultural identities and rights of traditional communities shall be respected in accordance with the development of times and civilization.”

A role represents the dynamic aspect of a position (status). When a person exercises their rights and fulfills their obligations in accordance with their position, they are performing a role. The distinction between position and role exists for the purpose of academic understanding. However, the two cannot be separated, as each depends on and complements the other.

The *Tu'a Golo* also holds a structural role as a customary leader or elder who serves as the head of the village, providing solutions to the community for resolving land and social conflicts. The customary leadership structure of the *Tu'a Golo* in Boleng District, Batu Tiga Village, West Manggarai Regency is as follows:

### 1. Structure Diagram 1 Pemangkuh Adat



Source of data: interview with the *Tu'a Golo* on November 29, 2024  
Explanation:

#### a) *Tu'a Golo*

*Tu'a Golo* is the title given to the customary leader in the community of West Manggarai Regency. The *Tu'a Golo* is trusted by the community for their role in addressing social issues within the village. The *Tu'a Golo* is also often referred to as *Hatoe Kampoh*. When problems arise, they should be brought to the village head for resolution. This illustrates the dual role of the *Tu'a Golo* — serving both as a judicial and an executive leader.

According to *Anak Riang*, in West Manggarai, particularly in Boleng District, Batu Tiga Village, the community still upholds ancestral traditions known as *Tu'a Golo* or *Hatoe Kampoh*. The *Tu'a Golo* plays a significant role in land distribution, and any land that is distributed must be accompanied by an official document issued and signed by the *Tu'a Golo*.

#### b) *Anak Riang*

*Anak Riang* is a person appointed by the *Tu'a Golo* who is trusted to have knowledge of the land's history and is responsible for distributing land based on the instructions of the *Tu'a Golo*, with the approval of the customary community in the village where the *Anak Riang* resides.

*Anak Riang* also serves as an intermediary between the customary community and the *Tu'a Golo* in the process of land dispute resolution. Therefore, any land dispute that arises in Boleng District, West Manggarai Regency, must be within the knowledge of the *Anak Riang*, who acts as a customary leader and plays a crucial role as the person who understands the land's history and distributes the land based on the mandate of the *Tu'a Golo*. Masyarakat adat kecamatan boleng.

The customary community of Boleng District, Batu Tiga Village, is spread across several different areas — namely Medang Island, Boleng Island, and Pisang Village — all of which are part of Boleng District, Batu Tiga Village. Specifically, the community of Boleng District, Batu Tiga Village, resides permanently along the coastal islands, located approximately 58 kilometers from the city by sea route.

The community of Batu Tiga Village, Boleng District, who live in coastal areas, generally earn their livelihood as fishermen (sailors). They use boats as their means of transportation as well as for fishing activities. They catch fish using traditional methods such as hook and line fishing, netting, and spearfishing. In addition to fishing, the community also cultivates other marine commodities such as lobsters and groupers.

## **2. Land Acquisition**

The concept of land holds great significance in Indonesian customary law. In general, “land” is defined as land controlled by an indigenous community based on customary law, which includes communal ownership of natural resources and *ulayat* rights, as well as the social, cultural, and spiritual values attached to the land by the indigenous community as an integral part of their *ulayat* rights.

The land obtained by the customary community of Boleng District is land granted by the *Tu'a Golo* to the community, which originally belonged to *ulayat* (communal) land. Therefore, *ulayat* land cannot be converted into private ownership unless it still exists, as proven by the respective customary law community or the customary leader. Conversely, if the *ulayat* land no longer exists or its status has changed, it may be converted into private ownership by the customary community as land granted by the *Tu'a Golo*.

If *ulayat* land has been converted into “state land,” its status may then be changed into private ownership. According to the Basic Agrarian Law, former *ulayat* land automatically falls under the direct authority of the state, as it is no longer possessed by the customary law community. The administration uses the term “state land.” As previously mentioned, *ulayat* land may be converted into private ownership if the land was formerly classified as state land.

Ownership rights over land are stated in Article 20 paragraph (1) of the Basic Agrarian Law (UUPA) as follows: “Ownership Right is a hereditary, strongest, and fullest right that a person can have over land, subject to the provisions of Article 6.” From this, it can be seen that ownership rights contain the following elements:

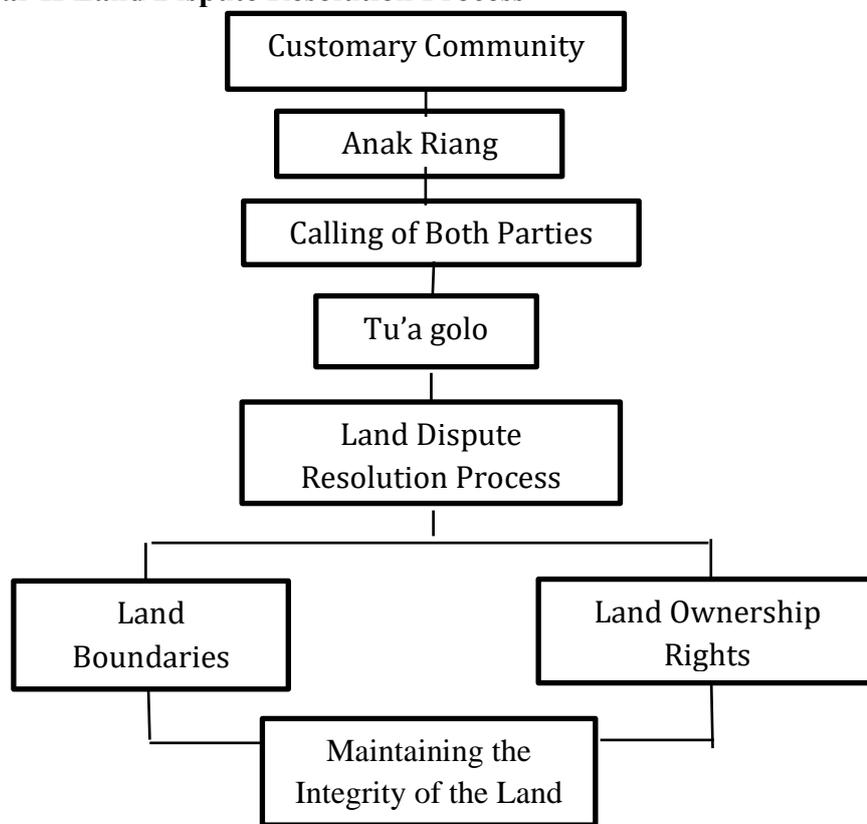
- a) Strongest, referring to its duration (the period is indefinite or has no time limit).

- b) Fullest, referring to the extent of authority in utilizing the land (the authority is not restricted or burdened).
- c) Hereditary, meaning it can be inherited or transferred from one generation to the next.[4]

According to one member of the customary community in Boleng District, the land we obtain from the *Tu'a Golo* is granted by the *Tu'a Golo* himself, and one of the requirements to acquire it is to meet and report to the *Anak Riang*. The *Anak Riang* will then bring us to the *Tu'a Golo* (*pore tuak ka Tu'a Golo*).

Based on the explanation above, the structure of the customary dispute resolution process is as follows:

**3. Gambar II Land Dispute Resolution Process**



Source of data: Interview with the *Tu'a Golo* on November 29, 2024

Based on the two images above related to the land dispute resolution process, it can be stated that:

- a. Process at the stage of anak riang

At the *Anak Riang* stage, the community reports land dispute issues to the *Anak Riang*, who will then summon both parties to provide statements in accordance with the applicable customary law.

If the explanation provided by the *Anak Riang* does not satisfy both parties, the *Anak Riang* will report the land dispute to the *Tu'a Golo*, bringing both parties to receive a statement from the *Tu'a Golo* as the customary leader (*Hatoe Kampoh*).

According to the *Anak Riang*, land disputes often occur due to unclear boundaries and excessive claims over land, which result in conflicts. In addition, conflicts arise from overlapping land certificates, where the process of certifying land by the rightful owner is delayed in measuring and defining the boundaries. Consequently, neighboring landowners may measure beyond their actual ownership.

b. *Tu'a Golo Stages*

In his position as a motivator for the customary community, the *Tu'a Golo* ensures that dispute resolution provides understanding and clarity to both conflicting parties regarding the issues underlying their conflict. This is done so that both parties can better comprehend the problem and determine whether their actions align with the applicable customary law.

The role of the *Tu'a Golo* in the land dispute resolution process is to act as a neutral party or as a mediating judge, observing the issues from both sides and then finding the best way to resolve the dispute. The *Tu'a Golo* also functions as a mediator, serving as a peacemaker who makes fair and appropriate decisions for the community involved in the land conflict.

In the conflict resolution process, no party is considered a winner or loser. The goal of fairness is to resolve land disputes, with the customary leader acting as a facilitator to prevent disagreements and conflicts between the two parties after a decision is made. An unjust decision can lead to conflicts that may damage familial relationships, even though in customary communities, kinship strengthens the bonds among members.

The mediation process conducted by the *Tu'a Golo* greatly assists the community in taking action, because before signing the land ownership certificate, the *Tu'a Golo* personally visits the land site to observe and measure the land boundaries in accordance with the limits, witnessed by the *Anak Riang*, the village head, and the National Land Agency (BPN) as the official land surveyor.

The steps taken by the *Tu'a Golo* are in accordance with Regional Regulation No. 1 of 2018 on land dispute resolution, which also recognizes customary law as a means of resolving cases in West Manggarai Regency. This regulation grants customary leaders the authority to resolve disputes based on prevailing customary laws, grounded in the traditions and practices of the indigenous community.

From the process described above, we can see that in the mediation pathway, the person acting as the mediator in the land dispute resolution, the *Tu'a Golo* (*Hatoe Kampoh*), must remain neutral in giving advice. As stated in Article (3) concerning Customary-Based Dispute Resolution:

The regulation of customary-based dispute resolution aims to strengthen customary institutions and provide guidance for the parties involved regarding the resolution of ongoing and past disputes, thereby fostering peace and order within the community.

The table of land dispute cases resolved through mediation and litigation by the *Tu'a Golo* in 2023–2024 is as follows:

**Table**

No	Dispute Description	Road	Description
1	The Toroh Besi Land Issue	Mediation (at <i>Tu'a Golo</i> )	Finished
2	Mbo Keca Land Issue	Mediation (at <i>Tu'a Golo</i> )	Finished
3	Sibusi Land Issue	Mediation (at <i>Tu'a Golo</i> )	Finished
4	Tanah Toko Land Issue	Mediation (at <i>Tu'a Golo</i> )	Finished
5	Tanah toroh bangkau issued	Mediation (at <i>Tu'a Golo</i> )	On Process
6	Sebabi Island Land Issue	Mediation (at <i>Tu'a Golo</i> )	Finished
7	Loho cambe land issue	Litigation	On Process
8	Tanah rangko kecil issue	Mediation (at <i>Tu'a Golo</i> )	Finished
9	Tanah toroh galampah issue	Mediation (at <i>Tu'a Golo</i> )	Finished

Source of data: Interview with the *Tu'a Golo* on November 29, 2024

Based on Table I above, regarding land dispute cases resolved through mediation and litigation in 2023–2024, out of 9 cases, 8 were resolved at the mediation stage by the *Tu'a Golo*.

Disputes resolved through alternative methods by the *Tu'a Golo* constitute dispute resolution, defined as resolving conflicts outside the court through consultation, negotiation, mediation, conciliation, or expert assessment.

Article 7 of the Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency of the Republic of Indonesia Number 11 of 2016 concerning Land Dispute Resolution explains that mediation is a method of resolving disputes and conflicts through a negotiation process to reach an agreement between the parties, assisted by a mediator.

Of the 8 land dispute cases resolved through mediation, 5 involved land granted by the *Tu'a Golo*, which were settled by evenly dividing both the length and area of the land. These include Toroh Besi land, Mbo Keca land, Sibusi land, Toroh Galampah land, and Koko Tuku land.

In addition, 3 of the cases involved inherited land, which were resolved by the *Tu'a Golo* through mediation and equally dividing both the length and area, so that both parties accepted the customary-based settlement. These lands include Toroh Bangkau land, Pulau Sehabi land, and Rangko Kecil land. The disputing parties worked together to find a solution that could be peacefully accepted by all parties.

Meanwhile, there is one case that proceeded to the litigation stage because it was not resolved during the mediation conducted by *Tu'a Golo*. This concerns the Loho Cambe land, where in 2019, the indigenous community of Boleng District began clearing the land, and in 2020, it was recognized that Loho Cambe land falls within the Longos village area. Consequently, Longos village imposed a restriction on the land. Following this, the customary leaders and the village head were called together to discuss the matter of the land.

As a result of the deliberation, it was agreed by the customary leaders and the heads of Longos and Boleng villages that the Loho Cambe land would be incorporated into the territory of the merged village. This is because Boleng and Longos villages were undergoing a village expansion process, which resulted in the land being included within Longos village.

However, in 2023, it was reported that the Loho Cambe land, with an area of 190,000 square meters, falls within a protected forest area along a 14-meter-wide section on the eastern side.

There are other factors beyond the authority of *Tu'a Golo* in resolving the matter, as it involves the government based on the applicable regulations regarding the protection of the protected forest. However, if the dispute occurs within the jurisdiction of *Tu'a Golo*, it can be resolved through the customary legal processes in place.

At the litigation stage, the resolution of the land dispute by *Tu'a Golo* was transferred, as both parties had not yet reached clarity regarding the explanations provided by *Tu'a Golo*.

Thus, at the examination stage in the Labuan Bajo District Court, it will be asked whether the land dispute has been processed through customary law according to the role of *Tu'a Golo*. If it has not, the court will return the case to the customary law process. If the dispute has already been brought before *Tu'a Golo*, the Labuan Bajo District Court will summon *Tu'a Golo* to

provide testimony regarding the matter. The testimony of Tu'a Golo becomes one of the considerations for the judge in deciding the case, as it is considered objective and in accordance with regional regulations governing the resolution of land disputes based on customary law.

Based on the explanations above, the role of Tu'a Golo (Customary Leader) in resolving land disputes in Batu Tiga Village, Boleng District, West Manggarai Regency, East Nusa Tenggara, is very important. In accordance with their role and position, Tu'a Golo (Hatoe Kampoh) must provide guidance, maintain the unity of the community, and offer a reference for community members based on the applicable customary law. Their authority must be recognized by the local community for their methods and ability to resolve issues, uphold justice, and remain impartial, without favoring any individual or group.

However, there are certain cases that cannot be resolved through the mediation process of Tu'a Golo, and therefore proceed to the applicable legal process. Nevertheless, this does not diminish the existence of Tu'a Golo as a customary leader within the indigenous community of Batu Tiga Village, Boleng District.

## **B. Factors Influencing the Land Dispute Resolution Process by the Customary Leader Tu'a Golo in the Indigenous Community of Boleng District.**

### **1. Internal Factor**

- a. The customary leader serves as the main factor in resolving land disputes within the indigenous community of Boleng District.

The customary leader referred to is Tu'a Golo. Every land dispute that occurs within the indigenous community of Boleng District must first be resolved by Tu'a Golo before proceeding to the general court, because Tu'a Golo's decision letter in resolving a dispute serves as one of the pieces of evidence allowing the case to be brought to court.

The issue arises when a dispute occurred during the tenure of a previous Tu'a Golo and its resolution was handled by the subsequent Tu'a Golo.

Based on this, there is a possibility that Tu'a Golo's decision may not fully correspond to the actual dispute, as Tu'a Golo's ruling is based solely on the principle of communal order.

### **1. External Factor**

- a. The community's knowledge of the customary leader Tu'a Golo

In cases of land disputes, Tu'a Golo, as the senior customary leader, conducts mediation or resolves disputes based on customary law through deliberation. In resolving these land disputes, discussions focus on land ownership rights and boundaries, where Tu'a Golo takes a direct role in handling the matter.

If a land dispute handled through mediation cannot be resolved, Tu'a Golo will proceed to the legal litigation process, provided that there is a referral letter from Tu'a Golo to the authorized authorities.

Based on the findings, it is known that the majority of respondents (indigenous community members), who are the disputing parties, have relatively low levels of education. As a result, they sometimes experience difficulty in understanding the issues at the center of the dispute being deliberated, which makes the dispute increasingly complicated to resolve.

#### **b. Community Culture**

The culture of the community in Boleng District sometimes reaches an agreement, yet there are still parties who reject it due to their emotions. Their temperaments can sometimes become a factor that hinders the deliberation process. The feelings of the indigenous community members have a significant influence on the deliberation process.

The discipline of the parties involved in the dispute resolution process also becomes a hindering factor. It is not uncommon that, when an agreement is about to be signed, one party refuses to do so, claiming that they do not understand its meaning because they were unable to read what had previously been agreed upon by both parties.

Furthermore, for indigenous community members involved in land disputes, if they do not have a referral letter from the customary leader Tu'a Golo to proceed through the legal litigation process, the authorities will return the matter to Tu'a Golo. This is because the referral letter and decision from Tu'a Golo serve as an objective basis for the authorities to issue a ruling to the disputing parties.

Among the factors mentioned above, the factor that most significantly influences the existence of land dispute resolution is the community's knowledge of Tu'a Golo, as the decisions he provides serve as a consideration in resolving land disputes in the Labuan Bajo District Court.

## **2. Conclusion and Recommendation**

The existence of the customary leader Tu'a Golo in the process of resolving land disputes within the indigenous community of Boleng District, West Manggarai Regency, East Nusa Tenggara, is upheld through Tu'a Golo as the customary authority. The land dispute resolution process under Tu'a Golo in the indigenous community of Boleng District involves internal factors from Tu'a Golo himself and external factors from the community.

Tu'a Golo should conduct socialization of the applicable customary law so that the community prioritizes resolving social and cultural issues through consensus deliberation. As the customary leader or Hatoe Kampoh, Tu'a Golo always pays attention to his indigenous community by acting as a fair mediator, ensuring that he is not influenced by any party.

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