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Implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Indonesia Related to Protected Wildlife Trade Cases

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ABSTRACT
Indonesia is one of the countries that has ratified the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which serves as the main international instrument regulating trade in endangered animals and plants. As a consequence of this ratification, Indonesia is legally obligated to harmonize its domestic legal framework—currently embodied in Law Number 32 of 2024 concerning Amendments to Law Number 5 of 1990 on the Conservation of Biological Natural Resources and Their Ecosystems—with the principles of animal protection outlined under CITES. This article examines the implementation of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in Indonesia related to protected wildlife trade cases. It aims to identify the challenges faced in law enforcement and to propose policy recommendations that could strengthen national efforts in biodiversity protection. The research employs literature review, regulatory analysis, and case study methods to provide a comprehensive understanding of how CITES obligations are operationalized within Indonesia's legal and institutional framework. Findings reveal that, despite the existence of an adequate legal foundation, operational barriers, weak inter-agency coordination, limited forensic capacity, and socio-economic pressures have undermined the overall effectiveness of CITES implementation. Therefore, this study recommends enhancing law enforcement capacity, regulatory harmonization, international collaboration, and public education campaigns to achieve more effective biodiversity conservation outcomes.

INTRODUCTION

Indonesia is one of the mega-biodiversity countries with a wealth of endemic fauna and flora. Pressures from international and domestic trade put several species at risk of extinction (Nugroho et al., 2022). CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora) plays an important role in international efforts to curb unsustainable trade. Many wildlife species have been routinely captured from nature and shipped to all corners of the world. Conservation experts suggest that some species of wildlife that are traded have begun to experience scarcity (Soehartono, 2003). In general, the causes of species extinction can occur in two ways: habitat damage caused by natural habitat conversion and the destructive use of natural resources; and the unsustainable use of species, namely hunting, illegal trade, and ineffective regulations (Samedi, 2021).

The State of Indonesia is one of the countries that ratified the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) through Presidential Decree No. 43 of 1978 to protect and preserve animals whose existence is on the verge of extinction (Padang, 2023; Lubis & colleagues, 2024). Indonesia, as a country rich in animal diversity—including endangered species—was driven to ratify CITES because the main concern of the convention focuses on species conservation from the threat of extinction (Margulies, 2022; Biggs et al., 2023; Eryan, 2024).

With the ratification of CITES into Indonesian laws and regulations, the government designated the Directorate General of Natural Resources and Ecosystem Conservation of the Ministry of Environment and Forestry (*Dirjen KSDAE KLHK*) as the management authority regulating the export-import scheme for animals and plants in the Appendix II category of CITES (Hafidzah, 2022), and the Indonesian Institute of Sciences (*LIPI*), which holds the authority to determine the quotas of traded animal and plant species through scientific studies and considerations (Zakariya, 2021). At the regional level, the establishment of the ASEAN-WEN (ASEAN Wildlife Enforcement Network) on October 11, 2004, in Bangkok represented efforts to counter illegal wildlife and plant trafficking, with participation from the Police, Customs, Prosecutor's Office, and CITES Management Authority, in this case, the Directorate General of Forest Protection and Nature Conservation (*PHKA*) (Aditya, 2016). In the marine sector, the government has also established institutions with specific authority for law enforcement at sea, as regulated under the applicable laws and regulations governing Ministries/Institutions (*K/L*) (Kartika, 2014).

Article 33 paragraph (3) of the 1945 Constitution of the Republic of Indonesia states that "The earth, water, and the natural resources contained therein are controlled by the state and utilized for the greatest prosperity of the people." This provision demonstrates that the constitution guarantees environmental protection and management for the maximum benefit of the people over time. The formulation of this article is then reflected in various environmental protection and management policies, one of which is animal protection through Law Number 32 of 2024 concerning Amendments to Law Number 5 of 1990 on the Conservation of Biological Natural Resources and Ecosystems (*KSDAHE*) (Naomi, 2023).

In cases involving the criminal act of "capturing, injuring, killing, storing, possessing, maintaining, transporting, and trading protected animals in a living state," offenders are subject to criminal penalties as stipulated in Article 21 paragraph (2) letter a jo. Article 40 paragraph (2) of the Criminal Code. Based on these provisions, trading or storing/possessing turtle eggs constitutes a prohibited act. Therefore, legal protection—both preventive and repressive—is necessary, with government and community involvement to safeguard turtle populations (Tarigan, 2020). This study examines how CITES provisions are implemented within Indonesia's national legal framework while analyzing several wildlife trade cases as empirical studies to identify challenges and opportunities for improvement.

Despite Indonesia's formal commitment to CITES through ratification and institutional framework development, enforcement outcomes reveal significant disparities when compared to other CITES member states in Southeast Asia. Malaysia, for instance, has demonstrated more consistent enforcement success through its centralized wildlife crime monitoring system and stringent penalties, resulting in a 40% reduction in reported wildlife trafficking incidents between 2018 and 2022 (TRAFFIC Southeast Asia, 2023). Thailand has strengthened its

CITES implementation through enhanced inter-agency coordination, specialized wildlife forensic laboratories, and mandatory capacity-building programs for enforcement officers, leading to higher prosecution rates and more severe sentencing outcomes (Shepherd & Nijman, 2022). In contrast, Indonesia faces persistent challenges, including limited forensic capacity for species identification, weak inter-institutional coordination among enforcement agencies, inadequate penalties that fail to deter offenders, and significant gaps between legal provisions and judicial application (Nijman & Shepherd, 2021). While Indonesia has established comprehensive legal frameworks through *UUKKHE* and various implementing regulations, empirical evidence from court decisions shows that judges often impose minimal sanctions, prosecutorial approaches remain inconsistent, and enforcement agencies struggle with resource constraints and technical expertise deficiencies (Stengel et al., 2021). These enforcement failures have resulted in Indonesia consistently ranking among the top five countries globally in terms of illegal wildlife trade volume, with Appendix I species—those subject to the strictest protection—continuing to be traded openly in domestic markets (UNODC, 2020). This comparative assessment highlights the critical need to examine not merely the existence of legal frameworks but the substantive effectiveness of CITES implementation at both enforcement and adjudication levels.

This research addresses a critical gap in CITES implementation scholarship by conducting an integrated normative-empirical analysis that bridges legal doctrine with enforcement realities in Indonesia. The novelty of this study lies in its systematic examination of judicial reasoning in wildlife trade cases, specifically analyzing how Indonesian courts interpret and apply the doctrine of material unlawfulness (*materiële wederrechtelijkheid*) in environmental criminal proceedings—an analytical dimension largely absent from prior *CITES* implementation studies that have predominantly focused on regulatory frameworks rather than adjudication outcomes. By examining court decisions alongside institutional enforcement barriers, this research provides empirical evidence of the disconnect between Indonesia's legal commitments under CITES and actual judicial practice, revealing how doctrinal ambiguities and judicial discretion undermine conservation objectives. The urgency of this research is underscored by Indonesia's dual status as a mega-biodiversity hotspot and a major hub for illegal wildlife trafficking. Continued enforcement failures not only jeopardize critically endangered species but also breach Indonesia's international legal obligations under CITES, potentially triggering trade sanctions and diplomatic consequences.

This study benefits multiple stakeholders. Theoretically, it contributes to environmental criminal law scholarship by elucidating how international treaty obligations translate into domestic adjudication practices. Practically, it provides evidence-based recommendations for strengthening prosecutorial strategies, judicial training programs, and inter-agency coordination mechanisms. From a policy perspective, it offers concrete reform proposals for harmonizing legal frameworks, enhancing forensic capacity, and closing enforcement gaps. For enforcement practitioners, prosecutors, and judges, this research clarifies the application of the material unlawfulness doctrine in wildlife crime cases, thereby promoting more consistent and effective adjudication. For policymakers, it identifies systemic barriers requiring legislative and institutional interventions to 1278mplem Indonesia's conservation commitments and international treaty obligations.

METHOD

The type of research used is normative-empirical research, which the author will carry out, namely digging up information in the field (Field Research). Normative-empirical research is used to analyze or find out the extent to which regulations or laws and laws are running effectively (Hanitijo, 1990). To support the approach, primary data and secondary data are needed, the results of this approach are expected to produce an understanding of the reality in implementing normative legal provisions that are reviewed whether the process has been carried out properly or not (Muhammad, 2004). This study uses 4 (four) approach methods, namely the Statue Approach (Marzuki, 2008), the Case Approach, the Conceptual Approach, and the sociological approach.

This study uses a normative-empirical design that integrates legal doctrinal analysis with empirical investigations of the implementation of CITES in Indonesian judicial practice. This approach allows for a systematic examination of the extent to which legal regulations and conventions are effectively operationalized in law enforcement. The research design combines analysis of legal norms, court rulings, and field data to produce a comprehensive understanding of the realities of the implementation of normative legal provisions as well as identify gaps between the legal framework and its enforcement outcomes.

Data analysis uses qualitative content analysis methodologies to identify law enforcement patterns, themes, and barriers across various data sources. The integration of empirical and normative findings was achieved through a triangulation methodology that systematically cross-validated evidence from various sources, allowing this study to shed light on why the CITES implementation gap persists and what kind of legal and institutional strengthening combination is needed to address it.

RESULTS

The Application of CITES in Indonesia related to the Case of Trade in Protected Animals

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a framework that must be upheld by the parties that make laws for the implementation of CITES at the national level (wwf.or.id, 2025). Wita Wardani, explained that one of the forms of CITES implementation in Indonesia is the formation of the UUKKHE. However, the law on plant and wildlife protection at the national level is still not optimal in applying punishments, which is not balanced with the crime rate, and the lack of law enforcement against wildlife trade (Wardani, 2017).

Due to CITES, it has become a driver for the Government of Indonesia in shaping wildlife trade regulations. The regulations that have been formed are contained, among others, in the Law of the Constitution, Law No. 32 of 2009 concerning Environmental Protection and Management, Law No. 31 of 2004 concerning Fisheries, Government Regulation No. 7 of 1999 concerning the Preservation of Plant and Animal Species, Government Regulation No. 8 of 1999 concerning the Utilization of Plant and Wildlife Species, Article 23 of Government Regulation No. 60 of 2007 concerning Fish Resources Conservation, Presidential Decree No. 43 of 1978 concerning CITES, Decree of the Minister of Forestry and Plantation No.: 104/Kpts-II/2007 concerning How to Take Wild Plants and Catch Wildlife, and Decree of the Minister of Forestry No.: 447/Kpts-II/2003 concerning the Administration of Taking or Catching and Circulating Plants and Wildlife.

However, in reality, CITES is not optimal to be applied in Indonesia. Factors that make the implementation of CITES less than optimal include:

1. The country's economic condition is not yet in a good position to regulate the sustainable use of resources to meet the needs and welfare of the Indonesian population.
2. The level of education of the Indonesian people.
3. Law enforcement is not optimal.
   Law enforcement to stop the illegal trade in plants and wildlife is still not optimal, so there are still violations of the plant and wildlife trade in a mode that continues to develop. One of the reasons is the lack of national regulations that can be used to address illegal trade in unprotected plant and wildlife species. Various types of animals included in Appendix I, including those entering Indonesia, are still easy to find traded freely and openly.
4. The relevant officers have limitations in identifying the types of plants and animals that are traded, including their protection status.
5. People who do not know the regulations for the protection of plants and animals, especially those included in Appendix I of CITES, namely types of plants and animals that are strictly prohibited for trade because it is feared that it will cause the extinction of these species.
   The use of plant and animal species included in Appendix I is only for special interests, for example research with strict rules for captivity.
6. Weak commitment.

The commitment of plant and wildlife entrepreneurs to support conservation programs for traded plant and wildlife species is still low. There is a tendency that plant and animal entrepreneurs only prioritize the economic interests of the plants and animals that are traded, but have not paid much attention to their sustainability aspects to ensure sustainable use. In fact, in reality various types of plants and animals continue to be threatened, not only by exploitation for trade, but by habitat shrinkage by various causes such as illegal logging, conversion of natural forests for plantations, encroachment and so on. If one type of plant and animal is increasingly difficult to trade, then the tendency chosen by plant and animal entrepreneurs is to switch to other types of plants and animals. This is contrary to the government's desire to increase captive efforts as an alternative to reduce pressure on populations in the wild.

The mechan'sm in the plant and animal entrepreneurs' association has also not been optimal to bind its members not to carry out illegal trade acts, which is also a concern for plant and animal entrepreneurs because it can threaten legal trade.

Weak commitment is also shown by NGOs, especially in terms of taking a role in seeking scientific data on various types of plants and animals that are traded, as well as in terms of improving the ability of officers, especially in identifying types of plants and wildlife that are traded by publishing guidebooks. Improving the ability of officers can also be done by supporting CITES training which is carried out periodically by the managing authorities.

To overcome the problems mentioned above, plant and wildlife entrepreneurs and NGOs together with scientific authorities and managing authorities can increase cooperation according to their respective capacities based on a common understanding to support the implementation of CITES in Indonesia in order to obtain sustainable use of plants and wildlife.

In adjudicating cases regarding the trade in protected animals, in addition to considering whether the defendant's actions constitute a criminal act, must also consider the elements of

the criminal act charged. As is known, an act is said to be a criminal offense if it meets formal and material requirements. The fulfillment of formal requirements if the act in question is declared by law as a criminal act, this is based on the reading of article 1 paragraph (1) of the Criminal Code which states that "No act can be punished except based on the criminal rules in the law that existed before the act was Id." In criminal law, it is called the principle of legality.

The material condition is that the act must be really felt by the community as an act that is not appropriate to be done, commonly referred to as the unlawful nature of the act (*wederrechtelijk*).

The two conditions (formal and material) must always be proven by a judge in adjudicating a criminal case. In its Decision, the Panel of Judges who examine and adjudicate cases of trade/use of protected animals cannot be used as a justification and/or excuse for the defendant's mistakes.

The Panel of Judges in addition to seeing the fact that the act committed by the defendant is required as a formal unlawful act, namely an unlawful act declared by law, but also has further examined whether the defendant's act is also materially unlawful. The Panel of Judges needs to pay attention to and consider the defendant's actions in trading (utilizing) the protected animals even though they are felt to be harmless to the community, especially for those who buy animals, but must also examine that the defendant's actions will threaten the preservation of endangered animals.

In terms of the provisions enshrined in doctrine and jurisprudence in Indonesia, the doctrine of material unlawfulness is adhered to as stated in the Supreme Court's decision:

1. Supreme Court Decision No. 30 K/Kr/1969 dated June 6, 1970 which in its verdict stated: In every criminal act there is always an element of "unlawful nature" of the act accused, although in the formulation of the offense it is not always included.
   Although the formulation of the offence of confiscation does not include the element of unlawful nature, it does not mean that the act accused does not constitute an offence of imprisonment even though there is no unlawful nature at all.
2. Supreme Court Decision No. 72 K/Kr/1970 dated May 27, 1972 Against the Law
   a. At present, jurisprudence adheres to "*materiele wederrechtelijkheid*" (Supreme Court No. 42 K/Kr/1965 dated January 8, 1966)
   b. Although the accused is a formal offence, materially it is necessary to consider the possible circumstances of the defendants based on which they cannot be punished (*materiele wederrechtelijk*).

Thus, whether there is an element of unlawfulness in the formulation of the offense must always be proven. In the case of defendant Ita Susanti in Decision No. 20/Pid.Sus/2016/PN.Pdg and the defendant David John George Camplin in Decision No. 75/Pid.Sus/2016/PN. Nga, even though the indicted offense does not clearly include elements of unlawful nature, it must still be proven at trial. Because in addition to meeting the formal requirements, namely that the act in question is unlawful and prohibited and declared to have violated the law, but also the act committed by the defendant must also be proven materially, namely really felt by the community as an act that is not allowed or should not be done because it is contrary to the values that apply in society, especially because the defendant's actions have been destructive and disrupting natural ecosystems that can lead to the extinction of animal diversity.

Even though the examination carried out by the Panel of Judges not only stopped at the provisions of the prohibition of the law as an unlawful act, but also considered further the material unlawful nature. However, it is also necessary to pay attention to whether the defendant's actions will threaten the survival of animals.

The Panel of Judges still considers the general principles, both written and unwritten, as contained in Article 5 paragraph (1) of Law Number 48 of 2009 concerning Judicial Power, that: "Judges and Constitutional Judges are obliged to explore, follow, and understand the legal values and sense of justice that lives in society."

Therefore, the problem of the doctrine of unlawful nature materially will really play an important role in implementing a criminal provision in the Criminal Code (Pradja, 1983). In accordance with the opinion of Mr. J.M. Van Bemmelen as follows (Groningen, 1975):

"There are still two things where it must be decided to be released from lawsuits. These things occur when the parts of an act as indicted, are also stated and can be proven and have also fulfilled all parts of the formulation of the crime, but neither the act nor the perpetrator for some reason cannot be punished. For the prohibition of an act and the threat of criminal punishment from the perpetrator, not only the parts of an act as formulated in the delicacy painting are also taken into account, but also the conditions arising from the generally accepted principles of law apply. We call these conditions elements of a criminal act. The term elements here is used in a narrow sense."

According to the teachings of against the law materially, in the sense of law, it also includes unwritten laws because "law" has a broad meaning and cannot only be interpreted as a law (Pradja, 1983). Hamel states that:

"The unlawful nature of a crime is one part of the general definition of a criminal act so that, in his opinion, in the case in question it is not contained in the formulation of the crime, the part is considered to always exist" (Pradja, 1983).

The issue of "unlawful" really plays an important role, especially in determining the existence of a "criminal act" so that in the case of "unlawful" it is not mentioned in the formulation of the deli, the element in question is considered to have existed.

Likewise, in the case of the defendant Ita Susanti and the defendant David John George Camplin, although the element of material unlawfulness is not clearly included in the indicted offense, it cannot abolish the criminal offense for both. Because materially, disturbing and utilizing endangered animals protected by law can result in the extinction of animal species, damage the balance of natural ecosystems, and ultimately harm future generations and descendants of humans.

The handling of cases of animal trafficking as stated in Decision No. 20/Pid.Sus/2016/PN.Pdg and Decision No. 75/Pid.Sus/2016/PN. The Panel of Judges in examining and adjudicating cases related to the environment, must first understand the principles of environmental policy which include (Riyono, 2016):

1. Principles of Substantive Legal Principles
2. Principles of Process
3. Equitable Principles

One of the principles of the substance of environmental law (Substantive Legal Principles) applied in handling cases of the crime of trafficking in protected animals is the principle of cautionary (Precautionary Principles). This principle is contained in Article 2 of

the UUPPLH and is adopted from the 15th Principle of the Rio Declaration of 1992. The 1992 Rio Declaration states:

"In order to protect the environment, the precautionary approach shall be widely applied by states according to capabilities. Where there are threats of serious or irreversible damage, lack of full scientific uncertainty shall not be used as a reason for postponing cost-effective measure to prevent environmental degradation". That is to protect the environment, a precautionary approach must be applied by countries. If there is a serious or serious threat or irreparable loss, the absence of scientific certainty cannot be used as an excuse not to make a decision that prevents the deterioration of environmental quality.

The1283mplementtation of the provisions of the UUKKHE is a legal provision that is the basis for the implementation of the conservation of biological natural resources and their ecosystems related to the case of trade in protected animals. However, the Panel of Judges must see that there are currently many changes in the national strategic environment such as changes in the political and governance system from centralization to decentralization and democratization, as well as changes at the global level in the form of shifts in several international policies in conservation activities as stated in the results of conventions related to biodiversity, or the results of bilateral, regional and multilateral agreements. So the content of the UUKKHE needs to be developed to save biodiversity in Indonesia. In fact, it has been felt that the provision of sanctions contained in the UUKKHE does not provide a deterrent effect for the perpetrators of the crime of trade in protected animals.

The Panel of Judges should have seen the fact that the rampant wildlife trade in Indonesia has made biodiversity even worse, especially due to illegal animal trafficking. Moreover, these animals are included in the type of animals in the Appendix I category of CITES, which things should not be taken advantage of at all, including trade.

CONCLUSION

The implementation of CITES in Indonesia positioned the country within the framework of international compliance for regulating the trade of protected species, yet its effectiveness remained constrained by technical, institutional, and socio-economic challenges. Strengthening forensic capacity, harmonizing policies, improving inter-agency coordination, and promoting alternative livelihood opportunities were necessary to enhance enforcement and sustainability outcomes. Future research should focus on assessing the long-term impact of these integrated measures on reducing illegal wildlife trade and strengthening community-based conservation initiatives.

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