

Normative Legal Analysis of Corporate Legal Responsibility for Greenwashing Practices and Environmental Damage: Case of Dayak Kanayat'n

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Abstract: - This study investigates corporate legal liability for greenwashing practices that cause environmental harm in Indonesia. Growing global pressure for sustainable business practices has prompted many corporations to publicly commit to protecting the environment, but such narratives often serve as public relations efforts rather than genuine ecological responsibility. Using a normative juridical method with statutory and conceptual approaches, this research identifies the patterns and defining features of greenwashing while assessing the sufficiency of Indonesia's existing legal framework. Drawing on the cases of PT Bumi Mekar Hijau and PT Dairi Prima Mineral, the analysis shows that greenwashing occurs through deceptive environmental claims and forms of administrative legitimization. The analysis further shows that regulatory greenwashing in forest management may threaten customary ecological spaces such as Panyugu of the Dayak Kanayat'n community when environmental protection narratives are inconsistent with their implementation. While environmental, consumer protection, and corporate legislation offer partial grounds for accountability, the absence of dedicated anti-greenwashing rules and weak enforcement continue to limit legal protection. Harmonized legal reform is therefore essential to strengthen corporate accountability and protect the public's right to a healthy environment.

Key-Words: - Greenwashing; Corporate Legal Responsibility; Environmental Damage; Good Environmental Governance; Good Corporate Governance; Consumer Protection; Environmental Law

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1 Introduction

The issues of the green economy and sustainable business have become critical aspects of business activities on a global scale. In the modern business era, the global environmental crisis has reached a scale that threatens not only the sustainability of ecosystems but also the sustainability of social and economic foundations [1]. When formulating a policy on sustainable environmental development, it is necessary to take into account the protection of natural resource functions in order to ensure law enforcement

that is consistent with the nation's aspirations and national objectives [2].

Growing global awareness of the importance of protecting the Earth in the context of multinational business activities has led to a demand that every corporation commit to the principles of sustainable development. ESG governance covering environmental and social aspects has become a key factor in fulfilling corporate social responsibility [3].

With the growing global community initiatives on the green economy and sustainable business,

corporations are faced with the expectation of aligning the interests of stakeholders across economic, social, and environmental dimensions, which must operate in harmony [4].

Environmental sustainability claims made by corporations have become a tool used to attract consumer attention and gain legitimacy in an era of ecological urgency [5]. The phenomenon of greenwashing is known as a manipulative practice [6]. Greenwashing is mostly carried out by corporations that project an image of being environmentally friendly, even though this does not align with the reality of their production activities [7].

Conceptually, greenwashing is a portmanteau of “green”—symbolizing environmental concern—and “whitewashing” [8]. This term was first coined by Jay Westerveld in 1986 to criticize corporate behavior that “pretends to be green” in order to win the sympathy of the public and investors [9].

This practice is also carried out through advertising strategies, product labeling, or corporate campaigns that claim their products are environmentally friendly, even though this is not actually the case [10]. This practice also occurs in Indonesia and has serious implications for environmental management and consumer protection in society [11].

When corporations use false green claims to cover up the negative impacts of their production activities, they are essentially violating the principles of Good Environmental Governance (GEG) and Good Corporate Governance (GCG) that call for transparency, accountability [12], and social responsibility in environmental management [13]. The withholding or manipulation of information by corporations results in consumers’ rights to accurate information not being fulfilled [14]. Meanwhile, the environment continues to suffer from production activities that damage ecosystems [15].



Fig. 1: Deforestation on Indonesia’s major islands from 2021 to 2025 (in hectares)

Source: [16]

As shown in Figure 1, data from Auriga Nusantara reveals that deforestation in Indonesia is projected to

surge to 433,751 hectares by 2025. This highlights the greenwashing practices of corporations that claim to be committed to sustainability; in fact, 44% of forest destruction occurs within their officially licensed concession areas.

The environmentally friendly narratives promoted by palm oil, nickel mining, and pulpwood corporations have proven to be misleading to the public and investors. This situation calls for a fundamental review of corporate legal accountability mechanisms to ensure that unfounded claims are subject to strict penalties.

This practice is not merely a matter of business ethics; it has entered the realm of corporate legal responsibility. The paradigm of environmental ethics theory serves as a crucial foundation for explaining the moral and ethical dimensions underlying greenwashing practices [17].

Corporations often portray themselves as stewards of the environment, where perceptions of the management and use of natural resources are inherently cultural in nature and can be influenced by environmental ethics [18], but in fact, this is not the case. Violations of the principles of information integrity and environmental responsibility simultaneously violate both positive law and the principles of environmental ethics, which form the moral foundation of environmental law and sustainable business practices [19].

The reality is that free trade by both national and international corporations continues to exploit the environment and natural resources [20]. As a result, the issues faced have become increasingly complex because the national legal system lacks explicit regulations on greenwashing [21].

Greenwashing runs counter to the principles of environmental justice and the public’s right to a clean and healthy environment as provided in the Environmental Protection and Management Law (UUPPLH) [22], [23].

The public has the right to obtain accurate information about the environmental realities behind green campaigns [24]; therefore, the public’s constitutional right in this regard is being violated [25]. The absence of specific provisions governing sanctions or accountability mechanisms for corporations engaged in greenwashing makes it difficult to enforce the law against this practice in Indonesia.

This study offers a new perspective by conceptualizing greenwashing not only as an ethical violation or a violation of sector-specific laws, but also as a violation of a multi-regime framework that encompasses environmental law and consumer protection law. Unlike previous studies, which mostly

address greenwashing in isolation as consumer fraud, environmental damage, and corporate governance failures.

This study develops an integrative legal policy framework based on the principles of good corporate governance (GCG). The study advances the discourse by identifying corporate fragmentation and legal vacuums in the Indonesian legal system.

Recommendations for normative harmonization offer a systemic solution to strengthen corporate legal accountability regarding greenwashing practices. The urgency of this research lies in conducting an in-depth examination of the forms and characteristics of greenwashing practices carried out by corporations within the Indonesian legal context, as well as how the Indonesian legal system regulates and enforces the legal accountability of corporations engaged in greenwashing practices that harm the environment. Furthermore, this study examines how greenwashing practices in forest management may affect the protection of Panyugu as a customary ecological space of the Dayak Kanayat'n community.

2 Methodology

This is a normative legal study that analyzes corporate legal liability for greenwashing practices and environmental damage. In this study, the researchers used secondary data to examine several legal provisions related to corporate liability for greenwashing practices, drawing on both primary and secondary legal sources.

Primary legal sources were obtained by identifying relevant Indonesian legislation, supplemented by books, journals, and articles related to the research topic. In this study, the data were analyzed using qualitative analysis techniques.

3 Results and Discussion

3.1 The Forms and Characteristics of Greenwashing Practices Carried Out by Corporations in the Context of Positive Law in Indonesia

The modern environmental movement, which emerged in the 1960s, prompted corporations to begin integrating environmental considerations into their business strategies in the 1970s [26]. Growing public concern over climate change and ecosystem damage [27], subsequently sparked public resistance to misleading greenwashing practices, particularly to protect consumers from corporate claims that lack scientific validity [28].

Greenwashing is on the rise in Indonesia as global pressure on companies to adhere to the principles of sustainable development and environmental protection intensifies [29]. In reality, many corporations use “green” narratives not as a sign of substantive commitment, but as a tool to bolster their public image and cope with increasing regulatory pressure [30].

Conceptually, greenwashing is used as a strategy to make it appear as though a corporation cares about the environment [31], when in reality the corporation’s activities actually contribute to ecological damage [32]. The practice of greenwashing is a relatively new issue and is rarely discussed in the Indonesian legal sphere. This practice is increasingly being carried out by large corporations, particularly in the energy, textile, food, and plantation sectors [33].

Corporations are increasingly capitalizing on the green market trend to boost their brand value by using terms like “eco-friendly,” “organic,” “biodegradable,” or “carbon neutral” without clear, verifiable scientific evidence [34].

The national deforestation data recorded in the STADI 2025 [35] report cannot be separated from indications of greenwashing practices systematically carried out by corporations in Indonesia.

Pulau	Deforestation (ha)			Expansion (2025 vs 2024)	
	2023	2024	2025	Hectares	Percentage
Kalimantan	124,611	129,896	158,283	28,387	22
Sumatera	33,311	91,248	144,150	52,902	58
Papua	55,981	17,341	77,678	60,337	348
Sulawesi	36,814	17,361	39,685	22,324	129
Maluku	4,034	3,537	7,527	3,990	113
Bali & Nusa Tenggara	2,052	1,780	4,209	2,429	136
Jawa	582	411	2,221	1,810	440
Total	257,385	261,575	433,751	172,177	66

Fig. 2: Indonesia's large islands experienced expansions in deforestation
Source: [35]

As shown in Figure 2, an analysis of national deforestation data for the period from 2023 to 2025 shows a progressive increase, from 257,385 hectares in 2023 to 261,575 hectares in 2024, then surging significantly to 433,751 hectares in 2025—an increase of 172,122 hectares, equivalent to 66% compared to the previous year.

This phenomenon indicates that the acceleration of deforestation in 2025 is occurring uniformly across nearly the entire Indonesian archipelago. This explains the ecological issues at play and serves as a

clear manifestation of the failure of national legal governance resulting from corporate activities.

According to data from the University of Maryland's GLAD Lab published via the Global Forest Watch platform, Indonesia succeeded in reducing primary forest loss by 11% in 2024 [36]. However, available data for 2025 indicates that primary forest loss in Indonesia increased by 14% from 2024 to 2025, although the rate remains well below the peak reached in the mid-2010s [37].

Corporations found to be engaging in greenwashing not only violate business ethics in society but also breach the principle of truthfulness in information as stipulated in Law No. 8 of 1999 on Consumer Protection. Furthermore, the GEG theory explains that environmental management must be based on the principles of transparency, accountability, participation, and the rule of law [38].

Similarly, the GCG theory emphasizes the importance of transparency, accountability, independence, and fairness in all corporate actions [39]. The principles of accountability and transparency serve as the primary basis for assessing whether a corporation, in its business activities and operations, acts in a manner that takes into account the interests of both shareholders and stakeholders.

If a corporation is found to be engaging in greenwashing, it is indirectly violating the principles of corporate accountability and transparency [40]. This results in a distortion of information that obscures the reality of the corporation's environmental performance.

The forms and characteristics of corporate behavior that indicate greenwashing practices in Indonesia can be analyzed through several environmental court rulings in the country [41]. Although the courts have not explicitly used the term "greenwashing," the substance of these practices can be identified through patterns of corporate behavior in these rulings.

First, the ruling in the case of PT Bumi Mekar Hijau (BMH), a supplier to Asia Pulp and Paper (APP) [42], serves as the clearest example of how a corporation's image can be manipulated to conceal environmental damage [43]. Greenwashing practices focus on factors that contribute to deforestation or logging activities [44].

PT BMH promotes an image of sustainable forestry, zero deforestation, and responsible pulp production within the industry chain [45]. However, in practice, large-scale peatland fires have occurred. The findings of the investigation reveal characteristics of greenwashing, highlighting a disconnect between sustainability claims and the actual ecological reality. Greenpeace's investigation found that several of

APP's timber suppliers continue to engage in the logging of natural forests and the clearing of peatlands in the Riau and Kalimantan regions [46].

From the perspective of corporate governance theory, PT BMH exemplifies a corporate failure to implement the principle of transparency, which requires companies to disclose accurate environmental information. Greenwashing often occurs when corporations seek to gain public legitimacy through sustainability communications without making substantive changes to their business practices [47].

Corporations should be held accountable for the ecological impacts resulting from business activities that damage peatlands and cause cross-regional haze. This runs counter to the principle of accountability, as evidenced by the corporations' defense strategies, which reveal a tendency to shirk environmental responsibility.

The GEG's perspective on the PT BMH case reveals a failure to integrate corporate governance with ecological protection. This theory emphasizes that environmental management must be based on the principles of ecological transparency, sustainability, and intergenerational equity [48]. The case involving the peatland fires demonstrates that the principle of ecological sustainability has not been upheld.

A corporation with sound environmental governance must be able to prevent the exploitation of natural resources that sacrifices ecological sustainability for the sake of short-term economic interests [49]. In the case of PT BMH, the economic focus of the pulp and paper industry has actually led to the degradation of peatlands, which serve a strategic function as carbon sinks and environmental buffers.

In the context of Indonesian law, this case violates Article 9(1) and Article 10 of the Consumer Protection Act (UUPK) by providing misleading information to the public and contravenes the provisions of Article 65(1) of the UUPPLH, which requires business entities—whether individuals or corporations—to provide accurate environmental information [50].

The case of PT Bumi Mekar Hijau, which promotes a narrative of sustainability through claims of sustainable forestry and zero deforestation, not only misleads consumers but also potentially violates the public's right to a healthy and sustainable living environment.

Second, PT Dairi Prima Mineral (DPM), as outlined in Supreme Court Decision No. 277K/TUN/LH/2024, exemplifies the form and characteristics of greenwashing practices. PT DPM highlights serious issues regarding ecological legitimacy in mining activities. The company

obtained environmental permits, administrative legitimacy, and claims of environmental compliance; however, the court ruling found that it posed serious ecological risks by using formal legitimacy as a tool for projecting an image of sustainability [51].

From a corporate governance perspective, corporations should uphold the principles of accountability and independence to ensure that their business activities do not pose significant environmental and social risks. In fact, the Supreme Court has revoked a corporation's environmental permit due to regulatory greenwashing. Regulatory greenwashing refers to the use of legal and administrative instruments to project an image of sustainability without implementing meaningful safeguards [52].

Corporations with high environmental risks tend to use sustainability disclosures as a means of maintaining social legitimacy, even though their operational practices do not necessarily reflect good environmental performance [53]. This situation is evident in the case of PT DPM, where administrative legitimacy has been used as a justification for a mining project that has been contested by the community [54].

From a GEG perspective, this case actually highlights weaknesses in environmental governance regarding public participation and the precautionary principle. The public is positioned as the primary stakeholder in environmental decision-making, particularly in projects with the potential for significant ecological impacts.

The case of PT DPM demonstrates that greenwashing in the mining sector occurs not only through corporate communications but also through administrative legitimization and weaknesses in environmental governance [55]. PT DPM's actions constitute a form of misleading the public, violating Article 10(1) of the Public Information Act (UUPK) and potentially violating Article 97(3) of the Company Law (UUPT), which mandates that the board of directors must earnestly fulfill its social and environmental responsibilities. This violation demonstrates that greenwashing not only affects a corporation's reputation but also its potential legal liability.

These two cases demonstrate that Indonesia's positive law system still has weaknesses and loopholes that need to be addressed. The absence of clear legal provisions defining and regulating greenwashing practices means that law enforcement against corporations suspected of engaging in such practices depends on three different legal frameworks.

As a result, this practice often cannot be directly prosecuted and does not receive appropriate legal

consequences. Although it is clear that these actions have a tangible negative impact on the environment and the public as consumers

3.2 The Indonesian Legal System Regulates and Enforces the Legal Accountability of Corporations Engaging in Greenwashing Practices that Damage the Environment

The legal framework governing greenwashing practices remains scattered across numerous laws and regulations, including both national and international laws, without any harmonization [56]. Although greenwashing practices have emerged as a problem for public rights and environmental damage [57], most legal systems have not yet comprehensively addressed this issue in either civil or criminal law.

A small portion of the legal policies governing this practice falls under the purview of consumer protection policies, advertising law, and environmental policies. The scope of enforcement for each of these policy mechanisms is often limited [58].

Legally speaking, there are still no regulations explicitly establishing legal standards and penalties for greenwashing practices as unlawful acts [59]. The absence of legal provisions explicitly addressing greenwashing practices makes it difficult to hold perpetrators directly legally accountable.

In essence, greenwashing constitutes a violation of the principles of information transparency, corporate social responsibility, and corporate obligations to protect the environment. Under applicable laws and regulations, Indonesia recognizes corporations as legal entities. Consequently, corporations can be held accountable for their actions under administrative, civil, and criminal law.

Article 65(1) of the Environmental Protection and Management Law (UUPPLH) affirms that the public has a constitutional right to a high quality of the environment, as well as to health and well-being [60], while Article 67 of the UUPPLH symmetrically requires every individual and corporation to preserve the sustainability of environmental functions [61]. These two provisions form a fundamental dialectic of rights and obligations within the framework of environmental law in Indonesia.

The fulfillment of the constitutional right to a healthy environment for the Indonesian people depends on the extent to which corporations' normative obligations are implemented in substance, rather than merely at the formal administrative level [62]. Greenwashing practices by extractive industry corporations have systematically undermined this normative balance by creating a false appearance of legal compliance.

Corporations in the mining, plantation, or energy sectors often present themselves as complying with existing laws and demonstrating sound environmental responsibility, yet such compliance is merely formal or superficial [63]. The cases of PT BMH and PT DPM serve as two of the most representative legal precedents for gauging the extent to which Indonesia's legal system is capable of addressing greenwashing as a civil law violation.

These two cases together demonstrate that Indonesia's legal system actually already possesses sufficient legal instruments to address corporate greenwashing. These range from the doctrine of tort under Article 1365 of the Civil Code, the substantive obligations under Article 67 of the Environmental Protection and Management Law, to the mechanism for administrative lawsuits regarding defective permits.

Three recurring structural weaknesses in both cases consistently undermine the effectiveness of law enforcement. First, there are weaknesses in the mechanisms for enforcing court decisions because requests for asset seizure were not included from the outset of the litigation, allowing corporations to evade their obligation to pay damages.

Second, the executive branch's delayed response in enforcing final court rulings, which allowed corporations to continue their destructive operations for months after the rulings were issued; and third, the lack of a civil liability mechanism that specifically addresses corporate environmental misrepresentation as a standalone basis for a lawsuit outside the general tort framework.

Collectively, these three weaknesses create a situation in which greenwashing remains an economically rational strategy for corporations, as the costs of enforceable legal sanctions are far lower than the profits derived from environmentally damaging operations; consequently, the public's constitutional right to a clean and healthy environment, as guaranteed by Article 65(1) of the Environmental Protection and Management Law, remains a right that is structurally difficult to fulfill.

In the context of GEG, the implementation of the Environmental Protection and Management Law (UUPPLH) still faces obstacles in terms of enforcement. Environmental law enforcement in Indonesia is often hampered by a lack of scientific evidence, overlapping regulations, and conflicts of interest between government agencies and large corporations [64], which means that greenwashing is more often subject to reputational risks than to substantive legal sanctions.

Another provision that explicitly addresses greenwashing involves the misleading of consumers

through false information provided regarding the environmental aspects of a product or corporation [65]. The Consumer Protection Act (UUPK) serves as the most relevant legal instrument for regulating corporate responsibility toward the public [66].

Article 9(1)(K) of the UUPK explicitly prohibits any business entity from making offers, promotions, advertisements, or statements containing false information [67]. This provision explicitly covers false environmental claims, such as "eco-friendly," "carbon neutral," or "sustainable product," if not accompanied by verifiable scientific evidence.

Current Indonesian law stipulates that any individual or corporation found to have violated the provisions of Articles 9 and 10 of the UUPK may be subject to criminal penalties as set forth in Article 62(1) of the UUPPLH [68], namely imprisonment for up to five years or a fine of up to two billion rupiah. The absence of comprehensive and explicit regulations on greenwashing in Indonesia becomes even more apparent when compared with the development of legal frameworks in other countries, which have gone further in establishing structured and enforceable legal instruments.

Table 1. The most cited anti-greenwashing policies in several countries

Jurisdiction	Instruments	Source
European Union	Directive (EU) 2024/825	European Commission, [69]
Germany	UWG/Implementasi EMpCo	[70]
United Kingdom	CMA Green Claims Code; DMCCA 2024	GOV.UK [71]
Indonesia	Environmental Protection and Management Law, The Consumer Protection Act	[72]; [73]

Source: Created by the authors.

Table 1. shows the most cited greenwashing policies, the European Union is the most progressive jurisdiction in developing legal policies against greenwashing. Directive (EU) 2024/825, adopted by the European Union, has the strategic objective of empowering consumers in the green economic transition through robust protection against unfair commercial practices, as well as the provision of clearer and verifiable information regarding the environmental characteristics of goods and services

Enforcement of greenwashing laws in Germany is based on civil law, which has been optimized to address corporate liability. Competitors, consumer associations, and chambers of commerce actively file

cease-and-desist orders and claims for damages in civil court. The German Federal Court of Justice requires that “climate-neutral” claims be clear and accurate by mandating that corporate advertising specify whether climate neutrality is achieved through emission reductions or carbon offsets.

The UK is establishing a regulatory framework to combat greenwashing through various instruments that are just as ambitious as those of other countries. The UK’s Competition and Markets Authority (CMA) has issued the Green Claims Code, which is based on the principles of honest and accurate claims, no concealment of important information, and the use of fair and meaningful comparisons. Corporations that violate these rules will be subject to a fine of 10% of their global turnover.

Similarly, Australia has established the most structured and principle-based legal enforcement framework. The Australian Competition and Consumer Commission (ACCC), through its final guidance for businesses titled “Making Environmental Claims,” has outlined eight principles regarding the credibility of environmental claims, designed to help businesses determine which environmental claims constitute greenwashing under the Australian Consumer Law (ACL).

Compared to the legal landscape in Indonesia, there are fundamental differences that cannot be ignored. [74] Each of the countries under comparison has legal mechanisms in place to identify greenwashing as a legal violation that can be enforced through administrative, civil, or criminal sanctions.

However, the effectiveness of Indonesian law in addressing greenwashing cases is hampered by indirect legal norms, [75] as there are no independent mechanisms for verifying environmental claims or harmonized national standards. In comparison, other countries require that environmental claims and eco-labels be accompanied by requirements verified by independent, accredited third parties.

This normative framework can serve as a guide for Indonesia’s legal system in drafting regulations on greenwashing not merely as a response to global pressure, but also to address legal loopholes that have long allowed corporations to hide behind environmental claims without scientific accountability.

Difficulties in establishing a causal link between corporate claims and environmental impacts. Weaknesses in the capacity of oversight agencies to assess the validity of sustainability reports, as well as conflicts of interest between regulatory agencies and large businesses that wield significant economic influence.

3.3 Greenwashing Practices in Forest Management and the Protection of Panyugu of the Dayak Kanayat’n Community

Greenwashing practices are not only related to the management of state-owned forests but can also intersect with sacred forests or customary forests in Indonesia. One area that may be affected by these practices is the customary forest held sacred by the Dayak Kanayat’n indigenous community in West Kalimantan Province. The customary forest, also known as Panyugu, is a forest held sacred by the Dayak Kanayat’n indigenous community and serves as a space for the community to carry out traditional activities [32].

Traditional activities carried out in Panyugu include rituals for clearing agricultural land, rituals for observing taboos, and rituals for harvesting crops, among others. Today, the function of Panyugu has been disrupted by massive plantation development, which encroaches on customary territories, as well as by the emergence of a state-formed task force for forest area enforcement [32]. In reality, particularly regarding the forest area enforcement task force, although its objective is to halt illegal activities within state forest areas, its application to customary territories raises issues when it fails to take into account the existence and functions of the forests that have long been safeguarded by indigenous communities.

One such example can be seen in the resistance mounted by indigenous communities, particularly the Dayak Kanayat’n, who oppose the sealing off of their customary forests [76]. This is because the customary forest is the heart of the Dayak Kanayat’n community’s way of life. The indigenous community views the sealing as lacking a basis consistent with the area’s function, as it targets a customary forest that has never been designated for profit-making purposes but rather as a space for performing traditional rituals—a space whose existence must be protected [77].

The greenwashing practice that can be analyzed in this case is that the state uses the arguments of cracking down on illegal activities and protecting ecological sustainability as the basis for its policy. In practice, management of the sealed-off forest was subsequently transferred to PT Agrinas Palma Nusantara, and the area was then utilized for industrial purposes [78]. This reflects a paradox between the ecological protection goals underpinning government policy and the indigenous communities’ goals of maintaining the sustainability of their customary forests. Based on this, the discrepancy between the narrative of environmental protection and the actual use of the area following the crackdown may indicate characteristics of regulatory greenwashing if policies

purporting to promote ecological sustainability actually result in changes to the function of customary forests that were previously maintained by the communities.

In line with this, protecting Panyugu from regulatory greenwashing practices cannot rely solely on administrative legitimacy in the regulation and management of forest areas. Such protection must take into account the ecological and customary functions that have been preserved by the Dayak Kanayat'n community, including community involvement in any policies that impact their customary territory [79]. Transparency regarding the objectives of regulation, changes in area management, and the interests underlying forest utilization is essential to ensure that the narrative of environmental protection does not stop at formal legitimacy. This demonstrates that the sustainability of forest management must be assessed based on the alignment between ecological protection goals and actual conditions after policies are implemented, so that environmental protection does not, in fact, eliminate the functions of Panyugu that have long been safeguarded by indigenous communities.

4 Conclusion

Practices of greenwashing in Indonesia reflect corporations' misuse of sustainability narratives to build an eco-friendly image without any actual implementation. These practices not only contradict the principles of GCG and GEC but also potentially violate the provisions set forth in the UUPK and UUPPLH.

The case involving PT Bumi Mekar Hijau and PT Dairi Prima Mineral demonstrates that this practice occurs through false claims and administrative legitimization that mislead the public. The case of Panyugu further demonstrates that regulatory greenwashing may also emerge when environmental protection and forest enforcement narratives are implemented in ways that disregard the ecological and customary functions of forests maintained by indigenous communities. Although legal instruments are in place, law enforcement remains weak due to the absence of specific regulations.

Ineffective enforcement mechanisms, as well as the lack of independent standards for verifying environmental claims. These conditions underscore the urgent need for comprehensive and harmonized anti-greenwashing regulations to ensure legal certainty and effective environmental protection.

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