



 sciendo

## **BALTIC JOURNAL OF LAW & POLITICS**

A Journal of Vytautas Magnus University

VOLUME 15, NUMBER 4 (2022)

ISSN 2029-0454

Cite: *Baltic Journal of Law & Politics* 15:4 (2022): 1277-1297

DOI: 10.2478/bjlp-2022-004110

### **Legal Protection of Copyright Content in Digital Technology-Based Creative Economy Business in the Industrial Revolution 5.0 Era in Indonesia**

**Eddy Arifin Layndra**

Universitas Padjadjaran Bandung, Indonesia

**Ahmad M. Ramli**

Universitas Padjadjaran Bandung, Indonesia

**Eddy Damian**

Universitas Padjadjaran Bandung, Indonesia

**Insan Budi Maulana**

Universitas Padjadjaran Bandung, Indonesia

Email: [ed.layndra@gmail.com](mailto:ed.layndra@gmail.com)

Received: August 15, 2022; reviews: 2; accepted: November 20, 2022.

#### **Abstract**

Indonesia has just been named the giant of the digital economy in the Southeast Asia so this digital economy can become a pillar of the Indonesian economy in the future, especially since the Covid-19 disaster. Therefore, it is necessary to take policy strategies regarding the digital economy, especially copyright protection. Hence, this study aimed to formulate the concept and implementation of Copyright Law for developing Copyright Content as a Creative Economy based on Digital Technology in the Industrial Revolution 5.0 Era. This study used normative legal research by examining legal principles and rules from primary data sources as preliminary data and secondary data as supporting or complementary data. The study results show that Indonesia, one of the countries with the most significant creative economy, requires copyright content protection. It remains extremely weak that Indonesia is included in one of the Priority Watch List countries. Regarding this decision or policy, Indonesia had protested to the USTR (United State Trade Representative). Legal basis for copyright protection, which consists of the legal basis for economic, moral, and economic rights, should be built internationally and within the permitted period. This research concluded that the protection of Copyright content and the application of the integrated principles of good faith; precautionary; transparency;

trustworthiness; accountability; proportionality; and fair and healthy development of a digital technology-based creative economy is expected to create a conducive business climate to spur the growth of a competitive and equitable creative economy.

### **Keywords**

Legal Protection, Copyright Content, Creative Economy, Digital Technology.

### **Introduction**

Creative Economy in Indonesian legal jurisdiction has recently emerged as one of the economic activities. The Creative Economy emerged in early 1990s, precisely in Australia, as a result of problems regarding funding mechanisms related to arts and cultural sector policies, which were later termed "*Creative Nation*". When the United Kingdom's Department of Culture, Media, and Sport (DCMS) established the Creative Industries Task Force in 1997, the term grew in popularity (Barrowclough, & Kozul-Wright, 2008; Cunningham et al., 2005). According to DCMS, the Creative Economy encompasses advertising, architecture, the art and antique market, crafts, design, fashion designers, film, interactive leisure software, music, performing arts, publishing, software, television, and radio (Van der Pol, 2007; Martinaitytė & Kregždaitė, 2015). Many countries in the world have adopted the concept of the Creative Economy which was introduced by the UK, including Norway, New Zealand, Singapore, Sweden, and Indonesia under the terminology of Creative Economy or Creative Industry (Bui Hoai, 2021; Klimczuk, 2015).

On the other hand, in early January 2019, new idea emerged from Japan. It is, society 5.0 which was presented at the 2019 World Economic Forum in Davos, Switzerland. This idea emerged in response to the Industrial revolution 4.0 as a significant technological development, but the role of the community is very much a consideration for the occurrence of this industrial revolution 4.0. Society 5.0 offers a people-centred society that balances economic progress with solving social problems through a highly connected system between the virtual world and real world. Japan's prime minister, Shinzo Abe explained at the World Economic Forum (WEF), "In society 5.0 it is no longer capital, but data that connects and drives everything, helping to fill the gap between the rich and the disadvantaged. Medical and educational services, from primary to tertiary level will reach small villages. The Society 5.0 concept refinement of the previous concepts and resolution of the industrial 4.0 resolution."

The Creative Economy regulation in Indonesia was enacted on October 24, 2019, namely Law Number 24 of 2019 on Creative Economy (henceforth referred to as the Eco-Craft Law) (Firdausy, 2018; Ginting et al., 2018). This constitution asserts that Indonesia's rich cultural heritage must be incorporated into products that create added value through the development of the Creative Economy in order to advance the public good. The Government and/or Regional Governments are responsible for developing the Creative Economy ecosystem so that it can

contribute to the national economy and increase the people's influence and global competitiveness for achieving sustainability objectives (Purnomo et al., 2016; Sari et al., 2020).

Along and in line with the creation of the Creative Economy, there is also an economic activity that uses technology and digital information in its production process, which is recently known as the Digital Economy (Mao, 2020; Snowball et al., 2021). According to a report by Google, Temasek, and Bain Company (2009), Indonesia has become the king of the Digital Economy in the Southeast Asia. Indonesia's Digital Economy has the potential to become a solid backbone for Indonesia's economic recovery in 2021, which is affected by the Covid-19 pandemic. Therefore, it is necessary to have an accurate and optimal Digital Economy policy and strategy to ensure the Digital Economy ecosystem's existence in the coming years after 2020.

Data from the Creative Economy Agency (Bekraf) shows that in 2016, there were three Creative Economy subsectors with the highest income. They are culinary of IDR 382 trillion (41.4%), fashion-style IDR 166 trillion (18.01%), and craft of IDR 142 trillion (15.4%). However, the subsector that experienced the highest growth are not such three subsectors above, but the television and radio (10.33%), film, animation, and video (10.09%), performing arts (9.54%), visual communication design (8.98%), and application/game developer (8.06%) (Bekraf, 2016). The five subsectors with the highest growth are related to contents and works protected by copyright law. Except for the performing arts, the other four subsectors are closely related to the Digital world because they have Intellectual Property Rights, which are in the future abbreviated as IPR and result from creativity. Their content is an intellectual creation or creation by human intellectual fiction that is protected by Copyright Law (Ramli, 2021).

Copyright is a legal object, namely everything useful for legal subjects (humans or legal entities) which can be the subject of a legal relationship as it can be controlled by legal subjects (Supramono, 2008). The legal object in the context of IPR is an object that has value or can be valued in money. Following the nature of IPRs, they are grouped as intangible individual property rights (Howkins, 2007). Intellectual Property Rights are very abstract compared to rights to movable objects, such as ownership rights to land, vehicles, and other tangible and tangible property. The current phenomenon regarding the Creative Economy that has arisen in Indonesia is that the Creative Economy is closely related to IPR (Nasution, 2020). IPR is considered the main criterion in the development of the Creative Economy, especially with the involvement of *Artificial Intelligence* (AI), which makes machines (computers) able to work together and even exceed human intelligence in operation (Sutanto, 2021).

Copyright protection is intended to provide creative freedom in the fields of art, literature, and science in addition to legal protection, provided that the copyright does not conflict with government policies in the areas of religion, state defence and security, decency, and public order (Maulana, 2009). The development

of the Creative Economy, which is one of Indonesia and other nations' pillars, and the rapid advancement of information and communication technology necessitate a revision of the Copyright Law, as copyright is the foundation of the National Creative Economy. With the protection-oriented Copyright Law and the development of the Creative Economy, it is hoped that the Copyright and Related Rights sector's contribution to the nation's economy can be maximized (Amin, 2018).

The development of information and communication technology has become a variable in this Copyright Law, as information and communication technology plays a strategic role in the evolution of copyright. In this field, however, it is also a tool for law violations (Kilanta, 2017). A symmetrical arrangement is required in order to optimize the positive function and minimize the negative impact. This study focuses on Copyrighted content, particularly copyrighted works in the form of Digital content. Copyrights in digital form are extremely simple to replicate, and the results of these actions are nearly identical to the original (Madison, 1998). Not only that, people can then modify the copy and distribute it worldwide at almost no cost. On the one hand, this certainly makes it easy for almost anyone to infringe the Copyrights of others on an enormous scale. However, on the other hand, it is challenging for Copyright owners to find out if the infringement has occurred, identify, or take legal action afterward (Lipton, 2001). According to Ramli (2010), copyright and trademark infringement cases often occur through the internet and other communication media.

In accordance with Articles 54, 55, and 56 of the Copyright Act, Law Number 28 of 2014 on Copyright has regulated the protection of copyright regarding the development of technology and information. Nonetheless, since the implementation of Copyright Act, numerous websites continue to emerge. For downloading songs without cost. Creators are disadvantaged by the actions of many individuals who illegally download songs which are their copyrighted works (Kusno, 2016). Copyright protection only applies to the "Expression" of the author and not to the "Idea" or information derived from the work. This is the case with song cover activities; other parties are free to express the same ideas or reuse information obtained from protected works or works in subsequent works as long as the ideas are expressed differently (Dewi & Mirah, 2017).

In addition to songs, film content is often spread in the digital world, for example, through *streaming*. According to Stefano et al. (2016), in the process of realizing the idea of a film story into a simple form, a producer must spend capital to support the manufacturing of a film consisting of natural resources, human resources, science and technology, and funds, so it should get protection. Using the internet, many parties put the film on a streaming movie service provider site for free. This violates the Creator or Copyright holder's exclusive rights to the film, resulting in economic and moral losses. The Copyright owner can mediate civil lawsuits, criminal complaints, and the closure of content and/or access rights to sites that violate Copyright in response to such infringement (Roselvia et al., 2021).

In addition to the digital content listed above, copyright violations frequently involve the content of electronic books (e-books). Reza's (2017) research demonstrated that Electronic books or e-books are protected by Copyright Law no. 28 of 2014 regarding copyright, which states if parties violate exclusive rights, the Copyright holder may sue the infringing party in a commercial court. In addition, the Information and Electronic Transaction Law (hereinafter referred to as ITE Law) no. 11 of 2016 on Information and Electronic Transactions also offers protection by law enforcement by state officials in the event of a law violation. The Copyright Law has provided creators and publishers with legal protection by means other than criminal as well as through civil channels.

In the context of game *software*, Dilaga's research (2016) showed that there remains many groups of hackers and computer code writers (*coding*) who try to duplicate *video games* that creators have produced in the form of software. This led to rampant piracy with a motive for financial gain, causing losses among video game software creators. Regulations on game software in Indonesia still consider such game software the same as other software, e.g. regulations related to information technology and Intellectual Property, such as Law Number 28 of 2014 on Copyright and Law Number 11 of 2008 on Information and Electronic Transactions. For this reason, legal protection is still weak, namely in the form of preventive measures through prevention of disputes and prosecution through criminal and civil actions, and civil channels are opened for mediation efforts.

Furthermore, in order to protect contents related to Intellectual Property Rights in the development of the government's creative economy through Government Regulation No. 24 of 2022 on Implementing Regulations of Law number 24 of 2019 on Creative Economy, precisely Article 29 mentions several legal assistances and assistance service facilities as referred to in Article 19 paragraph (1) letter j which includes several aspects as follows: a) legal counselling; b) legal consultation; c) mediation; d) preparation of legal documents; and e) legal assistance before court proceeding.

Furthermore, article 39 regarding community participation states that the community can also play an active role in the development of the Creative Economy, e.g.: a) awarding Intellectual Property produced by Creative Economy Actors and b) protecting Intellectual Property produced by Creative Economists

Based on the background and literature review above, we were interested in researching various issues regarding Creative Economy content on digital platforms to formulate the concept and implementation of Copyright Law for the development of Copyrighted Content as a Creative Economy based on Digital Technology in the Industrial Revolution Era 5.0. We hope that this research formulations the concept and implementation of Copyright Law for the development of Copyrighted Content as a Creative Economy based on Digital Technology, in the Industrial Revolution Era 5.0 and it may be valuable for the legal science and practitioners regarding the strategic role of Copyright Law in developing a Creative Economy based on Digital Technology.

## **Method**

This dissertation is a normative legal research, i.e. a legal research commonly conducted in legal science development activities, which is known as legal dogmatics in Western countries (Soekanto & Mamudji, 2001). Normative legal research is more concerned with investigating legal principles and rules (Sidharta, 2009). It is sought as study material to solve real legal problems confronting society, so there is no alternative but to become acquainted with normative law as a normative practical science and rely on normative legal research. Primary data sources were used as primary data in this study, with secondary data serving as supporting or complementary data. Law No. 28 of 2014 on Copyright, Law No. 24 of 2019 on Creative Economy, Government Regulation No. 24 of 2022 on Implementing Regulations of Law number 24 of 2019 on Creative Economy, and Law No. 19 of 2016 on amendment to Law No. 11 of 2008 on Information and Electronic Transactions are the primary data sources. Secondary legal materials include writings by experts in law and fields related to the problems being studied, as well as journals and papers on copyright obtained through literature research.

## **Results and Discussion**

### **Development of Copyright Content Protection in the Digital Creative Economy**

The development of the digital world or what is known as digital disruption that is happening today makes Copyrights faced with a big challenge. It is easy for Copyrights to be violated in the digital world, even at a minimal cost; thanks to digital technology, it is straightforward to reproduce and distribute. These violations will have a destructive effect on the development of the creative economy business. Etymologically, disruption is a fundamental or underlying change by ruffling and breaking down old order patterns to create a new order (Ramli, 2021).

As it is known, Indonesia ranks the third in the world as a country with the most significant creative economy in terms of GDP compared to the United States and South Korea. For this reason, micro, small and medium enterprises (MSMEs) in the creative economy sector must continue to innovate, among others, by Increasing the utilization of research results and high technology in the production process. The goal is to become a leading region in Southeast Asia to produce unique knick-knacks based on research and technology. The creative economy is not foreign to the community, and this effort has become one of the United Nations programs.

Given the enormous potential of the digital creative economy, it is fitting that the copyrighted content of creative economy products needs to be strictly protected by repressive law enforcement. A comparison is efforts carried out in several countries, such as the United States and Singapore. What is protected by copyright are ideas which are tangible and original. Without any regulation on

copyright protection, digital creative economy business interactions in *Cyber Space* have also expanded the problem of copyright infringement in the community, in this case, for example, fixing, duplicating it in electronic/digital form, publishing works of creation, and distributing the results of infringement. Copyrighted works through social media without rights and permission have caused material losses to the creator.

Therefore, problems in the Legal System is undeniable in Indonesian copyright. Copyright as part of Intellectual Property is a series of legitimate rights and interests related to products resulting from human intellectual activities. IP rights are derived from creative activities of ability, the power of human thought that is expressed to the general public in various forms, are functional, helpful in supporting life, and have economic value (Djumhana & Djubaedilah, 2003).

IPR violations are handled by the Directorate General of Intellectual Property of the Ministry of Law and Human Rights (DJKI Kemenkumham). Of the 226 cases handled by DJKI, 115 cases are in process, four are declared P-21, and 107 are issued SP3. P-21 means that the case file is declared complete and SP3 means that the case investigation is stopped. According to Agus, one of the challenges in handling IPR cases is the law which requires a complaint offense. Police investigators and other ministries require a complaint from the copyright holder before taking action. On the other hand, the investigation must be stopped when the complaint is withdrawn because the law is a complaint offense. Therefore, the National Police urges all parties experiencing problems related to IPR to report their intellectual property so the perpetrators get legal action. "The investigation of 656 cases was terminated, 68 percent due to the revocation of reports from the rights holders or their proxies. That is a consequence of the nature of the complaint." The Director General of Intellectual Property (Directorate General of Intellectual Property Rights) of the Ministry of Law and Human Rights stated that law enforcement related to IP is necessary to improve the investment climate in Indonesia. This is because enforcing IP law is one of the indicators for most investors who want to invest in Indonesia (Pratama, 2022).

### **Development of a Legal Basis for Copyright Protection in Harmony with International Conventions in Legislation**

#### **Development of the Legal Basis for Economic Rights Copyright**

In theory, according to Mochtar Kusumaatmadja's Law of Development, the law can manipulate the public to comply with the creator's financial protection for their creation. Economic rights include the right to announce (perform) rights as well as the right to reproduce (mechanical rights). Furthermore, the Copyright Law has established a number of legal bases for the creator's economic rights. Article 23 of the Copyright Law governs the economic rights of performers. Record producers have economic rights, which are governed by Article 24. Meanwhile, as outlined in Article 25, broadcasting institutions have economic rights.



## **Development of the Moral Rights Foundation, to Copyrighted Content**

Under international law, the legal basis for Moral Rights in Copyrighted Content is regulated in Article 6 of the Berne Convention, which states that the creator has the right to claim ownership of his work and object to distortions, mutilations, or changes, as well as other violations related to the work that could harm the creator's honour or reputation. The right of integrity, is one of two major moral rights. These rights encompass all forms of attitude and treatment relating to the creator's integrity or dignity. In practice, these rights are expressed as a prohibition on changing, reducing, or damaging the work in a way that jeopardizes the creator's integrity. In this case, the creation must be preserved in its original form. For example, changing the lyrics of a song that alters the meaning of the original poem is a violation of the Integrity Right (Soelistyo, 2011).

Development of the Foundation for the Protection of Moral Rights and Economic Rights Internationally

By referring to the theory of Natural Law, a Copyright is eternal as long as the creator is still alive. However, to honour the creator, after the creator dies, additional protection is added; for example, France is the first country to add up to 50 years and then adopted by various countries. Then, through the Berne Convention, he urged participating countries to provide more extended protection than what is determined by Article 7 paragraph (6) of the Berne Convention. Legal protection should be given to those concerned to foster creativity stimulation and provide recognition for their efforts through rewards and royalties.

### **Legal Basis for the Copyright Protection Term**

The establishment of laws and regulations on intellectual property rights is not based on the interests or needs of most of the population. The formation of IPR legislation is based more on the need to adapt to global trade trends. In this global era, developing countries such as Indonesia have no choice but to accommodate the interests of industrialized countries that have provided much assistance to developing countries. In Copyright Law Number 28 of 2014, the period of copyright protection (*copyright*) is divided into two forms of protection: the protection of moral rights and the protection of economic rights. The protection of moral rights is granted indefinitely. Meanwhile, for economic rights, protection is provided for the holder's life and continues for 70 years after the holder's death, starting from January 1 of the following year. Then, if a corporation owns the copyright, the protection period is 50 years, starting from when it is first announced.

### **Development of Legal Principles in Creative Economy Development**

Trade through electronic means (E-Commerce) has been regulated in Law Number 7 of 2014 on Indonesian Trade. As an implementation of the provisions of



Article 66 of the Trade Law, a Government Regulation on Trading through Electronic Systems (E-Commerce) has been stipulated, which includes the creative economy. Attention must be paid to the legal principles of Trade through electronic means (E-Commerce). 7 (seven) principles in developing the creative economy (integration principle) for actors to fulfil healthy corporate governance are:

#### The Principle of Good Faith in the Development of a Digital Technology-Based Creative Economy

The principle of good faith for business actors in carrying out their business and consumers being critical in buying creative economy products with copyright, aims for creative economy products which have Copyrights and are traded digitally through electronic means to get the protection of moral rights and economic rights as they should be, according to the Copyright Law. Electronics must have good faith because a violation of this principle can result in the cancellation of the agreement between the parties. Therefore, the parties must not reduce or ignore the rights of parties who have good faith in conducting Trading through the Electronic System (*Perdagangan melalui Sistem Elektronik*, hereinafter referred to as PMSE). Good faith is one of the principles known in contract law and is regulated in Article 1338 paragraph (3) of the Indonesian Civil Code.

The principle of good faith protects the creator from the actions of consumers and producers who do not have good intentions in digital technology-based creative economic business activities. The legal protection that can be applied to cases which violate the principle of good faith can be carried out as a last resort by repressive law enforcement using sanctions such as high fines, imprisonment, and other additional penalties (Prodjodikoro, 1992).

#### Precautionary Principle of the Digital Technology-Based Creative Economy Development

The precautionary principle is that Business Actors and Consumers are required to exercise caution in Trading through the Electronic System, where all electronic information relating to Business Actors, Consumers, Goods, and/or Services that are objects of Trade, as well as the terms and conditions of Trade in Goods or Services through Electronic Systems, must be well understood. The precautionary principle ensures that creative economy business actors always act in a state of *Good Corporate Governance* in their business, especially concerning creative economy products with copyrighted content. Banks also, in providing financing to digital creative economy actors, can use this principle as a reference in providing loans. Only business actors who carry out the precautionary principle, especially regarding copyright in the creative economy, can be disbursed.

#### Transparency Principle of the Digital Technology-Based Creative Economy Development

The principle of transparency, means that Creative Economy Business Actors and Consumers are required to transparently convey all electronic information regarding Business Actors, Consumers, Goods or Services that are objects of Trade as well as the terms and conditions of the Creative Economy Goods

and/or Services Trade through Electronic Systems must be well understood. The principle of transparency in the digital creative economy business must also be contained in clauses on the fulfilment of respect for copyrighted content in agreements between fellow creative economy business actors, including their consumers. Transparency is built based on freedom of information. Information relating to the public interest in copyright can be directly obtained by those who need it. This means that the public must be given access to obtain sufficient information about creative economic business activities that comply with copyright. Access to this information will ensure transparency in the creative economy business. Such information may contain the condition of creative economy actors regarding compliance with paying royalties and the inclusion of the creator's name in the creative economy products being traded. If such information is available or provided by the E-commerce Operator or creative economy business actors, the business actor is deemed to have implemented the transparency principle. Transparency of such information must be provided if business actors act as intermediaries, distributors, agents, or other forms of partnership.

#### Trustworthiness Principle of the Digital Technology-Based Creative Economy Development

The principle of trustworthiness is that the Business Actor must build a proper Electronic System which is worthy of being trusted to maintain the trust of system users in the Electronic System it administers. The principle of trust often referred to as trust, can be said to be a development and derivation of the principle of good faith. Trust in the creative economy business will arise when a person has good intentions in entering into agreements through electronic means; in general, good faith must always be inherent in every stage of the agreement so that the parties have trust (Miru, 2007). The digital engagement between sellers and buyers of creative economy products has given rise to rights and obligations that the parties must fulfil. In this case, the principle of consumer trust must be a severe concern in digital technology-based creative economy business transactions. Trust here will affect consumer's desire in buying and selling. The principle of trustworthiness is very supportive in the creative economy business process, and on both sides, it will benefit the parties significantly since the agreement also regulates copyright.

#### Accountability Principle of the Digital Technology-Based Creative Economy Development

The principle of accountability is one of the legal principles which can be used to develop a digital technology-based creative economy, together with the other principles afore mentioned. The principle of accountability in implementing the digital creative economy business is interpreted as a principle which requires the digital creative economy business, which has Copyrighted content and, is carried out by *E-Commerce stakeholders*, especially the government, to enforce Copyright laws responsibly to any relevant parties. Accountability is one of the essential principles of the creative economy business, both from the point of view

of the Copyright Act and in trading with electronic means (*e-commerce*). The "Accountability Principle" in the field of copyright law enforcement can be defined as the principle which determines that every activity and final result of a State Administrator's activities must be accountable to the community or people as the holder of the state's highest sovereignty, in accordance with the applicable laws and regulations.

#### Proportionality Principle of the Digital Technology-Based Creative Economy Development

The principle of proportionality aims to ensure that the legal protection of copyright and the copyright holder is reasonable, fair, and not excessive. The creator obtains economic and moral rights proportionally as a reward for the time, energy, and thought devoted to creating the creation. Therefore, the parties in the creative economy business must understand their rights and obligations in compliance with the copyright and related legislations. The principle of proportional seeks to balance the material and spiritual interests of consumers, business actors, and the government. This principle requires that consumers, producers-business actors, and the government all benefit equally from consumer protection legislation. Consumers', producers'-business actors', and the government's interests are all regulated. They must be realized in a proportional manner, in accordance with their respective rights and obligations in national and state life.

#### Fair and Healthy Principle of the Digital Technology-Based Creative Economy Development

The existence of equal opportunity and position in business activities between Trading through the Electronic System Business Actors to create a conducive business climate to ensure certainty and equal business opportunities is the fair and healthy principle. Compliance with the law and the portion, according to Jazim Hamidi, are indicators contained in the principle of justice. The principle of justice is intended to maximize the participation of all people while also providing opportunities for consumers and business actors to obtain their rights and carry out their obligations in a reasonable manner.. This principle requires that through the regulation and enforcement of this consumer protection law, consumers and business producers can act reasonably through the acquisition of rights and the fulfilment of obligations in a balanced way; therefore, this law regulates several rights and obligations of consumers and business producers (Pratiwi et al., 2016).

#### Implementation of Copyright Law on the Development of a Digital Technology-Based Creative Economy in the 5.0 Industrial Revolution Era

In the era of the Industrial Revolution 5.0, the implementation of digital technology-based creative economy law aims to regulate legal certainty and order in every interaction or activity of economic actors and trading Through Electronic Means (E-Commerce) so it complies with the provisions of the Copyright Law. As a result, in Articles 6 and 7 of the Copyright Law, the policy of using security technology to protect moral rights in copyright has been regulated in order to strengthen the development of a digital technology-based creative economy in the era of the industrial revolution 5.0.

Strengthening the development of a digital technology-based creative economy in the era of the Industrial Revolution 5.0 is also accomplished through the use of security technology as copyright protection for economic rights, which is further regulated in Articles 52 and 53 of the Copyright Act. Economic rights include the right to announce (perform) rights as well as the right to reproduce (mechanical rights). According to Article 52 of the Copyright Law, "everyone is prohibited from damaging, destroying, eliminating, or rendering inoperable technological control facilities used to protect Works or Related Rights products as well as Copyrights or Related Rights, except for the interests of state defence and security, as well as other reasons following the provisions of laws and regulations or agreed otherwise." Technological control entails preventing or restricting actions that are not permitted by creators, copyright holders, owners of related rights, and/or those that are prohibited by the Copyright Law and related regulations.

According to Eddy Damian (1999), the Convention, which was first issued in 1886 and then underwent several refinements and improvements from year to year, has three basic principles, namely: First, the principle of national treatment, namely creations originating from one of the contracting parties (i.e., creations of a citizen of the agreement). A country participating in Copyright Law is the same as the creation of a citizen of the creator himself. Second, the principle of automatic protection, namely the provision of legal protection, must be given directly without having to meet any conditions (must not be conditional upon compliance with any formality). Independence of protection is legal protection provided without depending on the legal protection arrangements of the creator's country of origin.

Meanwhile, in Law Number 28 of 2014 on copyright, the copyright protection (copyright) is divided into two types: moral rights protection and economic rights protection. The protection of moral rights is granted indefinitely. In contrast, economic rights are protected for the holder's lifetime and for 70 years after her/his death, beginning on January 1 of the following year. If a corporation owns the copyright, the protection period is 50 years, beginning with the first announcement date.

The creator's or rights owner's legal relationship is linked to the party doing it. The infringer of a copyright is a "private to private" (*privaatrechtelijk*) relationship. However, because copyright infringement tends to satisfy the element of crime where the act is carried out "deliberately," Law Number 28 of 2014 on Copyright has regulated Copyright crime and punishment. This is done with the goal of creating justice, legal certainty, and order in mind.

As a result, while legal politics in the formation of Copyright legislation has regulated Copyright crime and its sanctions, it is still not optimal in the political enforcement. Sudarto contended that implementing criminal law politics entails holding elections in order to achieve the best criminal legislation results in terms of justice and efficiency.

The goal of punishment is inextricably linked to criminal law policy. The state's criminal law policies in specific fields demonstrate the state's

implementation of the purpose of punishment. Policy in general can be interpreted as general principles that function to direct the government, particularly law enforcement officers, in managing, regulating, or resolving public affairs, community problems, or drafting statutory arrangements and enforcing law/regulations, with the (general) goal of achieving the welfare or prosperity of the community (citizens).

The justification for the criminal copyright policy is the idea that copyright which is an intangible object, must be treated equally to tangible assets or objects before the law (equality before the law). Thus, copyright is part of the law of objects in the form of intangible objects (immaterial objects), and it is proper that copyright infringement can be categorized as a crime against property as well. Therefore, in the event of a crime against copyright, the authorized party can directly enforce the law without having to require a report from the aggrieved party first.

It is only natural that the state fully guarantees the protection for all kinds of creations which are human intellectual works as products of thought, both in the fields of science and art, literature and technology (Damian, 2022).

In developing copyright protection in the digital creative economy, criminal law policy (penal policy) cannot be separated from policy (criminal policy), namely rational efforts to tackle crime. In criminal policy using penal means (criminal law), there are two central problems: a) what actions should be criminalized, and b) what sanctions should be used or imposed on violators.

### **Conclusion**

The theory of absolute justice which consists of the principles of the noble morality law is a legal theory which is the legal basis for the strategic role of copyright content. In developing the creative economy (integration principle), the actors fulfil healthy corporate governance, including good faith; precautionary; transparency; trustworthiness; accountability; proportionality; fair, and healthy are the principles in developing a digital technology-based creative economy business which complies with copyright law and respects copyrighted works. The concept of the integrated legal protection of Copyrighted content is needed to develop a digital technology-based creative economy. Awareness about respecting and honouring the work (copyrighted content) one needs to be raised in addition to applying the rule of law to protect copyrighted content and application of the integration of the principles: good faith; precautionary; transparency; trustworthiness; accountability; proportionality; fair and healthy development of a digital technology-based creative economy, are expected to create a conducive business climate to spur the growth of a competitive and equitable creative economy.

### **References**

1. Amin, Z. (2018). Penegakan Hukum terhadap Hak Cipta dalam Bidang

- Industri Kreatif di Negara Kesatuan Republik Indonesia. *Mimbar Keadilan*.
2. Barrowclough, D., & Kozul-Wright, Z. (2008). Creative industries and developing countries. *Voice, Choice and Economic Growth*. Abingdon: Routledge.
  3. Bekraf. (2016). *Infografis Ringkasan Data Statistik Ekonomi Kreatif Indonesia*. Jakarta: Badan Ekonomi Kreatif.
  4. Bui Hoai, S., Hoang Thi, B., Nguyen Lan, P., & Tran, T. (2021). A bibliometric Analysis of Cultural and Creative Industries in the Field of Arts and Humanities. *Digital Creativity*, 32(4), 307-322.
  5. Cunningham, S., Keane, M., & Ryan, M. D. (2005, February). Finance and Investment in Creative Industries in Developing Countries. In *Asia-Pacific Creative Communities: A Strategy for the 21st Century, Senior Expert Symposium, Jodhpur, India* (pp. 22-26).
  6. Damian, E. (1999). *Hukum Hak Cipta menurut Beberapa Konvensi Internasional: Undang-Undang Hak Cipta 1997 dan Perlindungannya terhadap Buku serta Perjanjian Penerbitannya*. Bandung: Alumni.
  7. Damian, E. (2005). Plagiat dan Pembajakan sebagai Pelanggaran Hukum Hak Cipta. *Indonesian J. Int'l L.*, 3, 195.
  8. Damian, E. (2022). *Hukum Hak Cipta*. Penerbit Alumni.
  9. Dewi, A. A. M. S., & Mirah, A. A. (2017). Perlindungan Hukum Hak Cipta terhadap Cover Version Lagu Di Youtube. *Jurnal Magister Hukum Udayana*, 6(4), 508-520.
  10. Dilaga, R. A. S. (2016). Perlindungan Hukum terhadap Pencipta Software Game dalam Perspektif Undang-undang Nomor 28 Tahun 2014 Tentang Hak Cipta. *Jurnal IUS Kajian Hukum dan Keadilan*, 4(2).
  11. Djumhana, & Djubaedilah, R. (2003). *Hak Milik Intelektual*. Bandung: Citra Aditya Bakti.
  12. Firdausy, C. (Ed.). (2018). *Strategi Pengembangan Ekonomi Kreatif di Indonesia*. Jakarta: Yayasan Pustaka Obor Indonesia.
  13. Gandapraja, P. (2004). *Dasar dan Prinsip Pengawasan Bank*. Jakarta: Gramedia Pustaka Utama.
  14. Ginting, A. M., Rivani, E., Saragih, J. P., & Wuryandani, D. (2018). *Strategi Pengembangan Ekonomi Kreatif di Indonesia*. Jakarta: Yayasan Pustaka Obor Indonesia.
  15. Google, Temasek, Bain & Company. (2009), e-Conomy SEA 2009.
  16. Government Regulation number 24 of 2022 concerning Implementing Regulations of Law Number 24 of 2019 concerning the Creative Economy.
  17. Howkins, J. (2002). *The Creative Economy: How People Make Money from Ideas*. Penguin UK.
  18. Isnaini, Y. (2010). *Buku Pintar HaKI*. Bogor: Ghalia Indonesia.
  19. Kilanta, D. R. (2017). Penegakan Hukum terhadap Hak Cipta Berdasarkan Undang-Undang Nomor 28 Tahun 2014 tentang Hak Cipta. *Lex Crimen*, 6(3).



20. Klimczuk, A. (2015). *Economic Foundations for Creative Ageing Policy: Volume I Context and Considerations* (Vol. 1). Springer.
21. Kusno, H. (2016). Perlindungan Hukum Hak Cipta terhadap Pencipta Lagu Yang Diunduh Melalui Internet. *Fiat Justisia: Jurnal Ilmu Hukum*, 10(3).
22. Law Number 11 of 2008 concerning Information and Electronic Transactions.
23. Law Number 28 of 2014 concerning Copyright.
24. Law Number 24 of 2019 regarding the Creative Economy (the Eco-Craft Law)
25. Lipton, J. (2001). Copyright in the Digital Age: A Comparative Survey. *Rutgers Computer & Tech. LJ*, 27, 333.
26. Madison, M. J. (1998). Legal-Ware: Contract and Copyright in the digital age. *Fordham L. Rev.*, 67, 1025.
27. Mao, L. (2020). Research on the Development Path of Cultural and Creative Industries in the Digital Economy Era. *American Journal of Industrial and Business Management*, 10(7), 1237-1249.
28. Martinaitytė, E., & Kregždaitė, R. (2015). The Factors of Creative Industries Development in Nowadays Stage. *Economics and Sociology*, 56-71.
29. Maulana, I. B. (2009). *Politik dan Manajemen Hak Kekayaan Intelektual*, Bandung: Alumni.
30. Miru, A. (2007). *Hukum Kontrak dan Perancangan Kontrak*. Jakarta: Raja Grafindo Persada.
31. Muis, L. S., Purwadi, A., & Subagiyo, D. T. (2017). Perlindungan Hukum Hak Cipta Fesyen terhadap Ekonomi Kreatif dalam Masyarakat Ekonomi ASEAN. *Perspektif*, 22(2), 172-179.
32. Nasution, L. (2020). Efektivitas HKI Sebagai Pelindung Industri Kreatif dan UMKM Di Tengah Pandemi Covid-19. *ADALAH*, 4(1), 238-250.
33. Nguyen, N., & Ngo, V. D. (2021). Digital finance and SMEs in Southeast Asia: An overview. *Entrepreneurial Finance, Innovation and Development*, 3-24.
34. Pratama, W. P. (2022). *Ada 1.184 Kasus Pelanggaran Haki Ditindak di RI Sejak 2015*. Retrieved from: <https://economy.bisnis.com/read/20211006/9/1451327/ada-1184-case-pelanggaran-haki-ditindak-di-ri-sejak-2015>. accessed 06/01/2022
35. Pratiwi, C. S., Purnamawati, S. A., & Purbawati, C. Y. (2016). Asas Asas Umum Pemerintahan yang Baik. *Jakarta: Leip*.
36. Prodjodikoro, R. W. (1992). *Asas-Asas Hukum Perdata*. Bandung: Sumur.
37. Purnomo, R. A. (2016). *Ekonomi Kreatif Pilar Pembangunan Indonesia*. Ziyad Visi Media.
38. Ramli, A. M. (2010). *Cyber Law dan HAKI: Dalam Sistem Hukum Indonesia*. Bandung: Refika Aditama.
39. Ramli, A. M. (2021). *Hak Cipta Disrupsi Digital Ekonomi Kreatif*. Penerbit Alumni.



40. Reza, Y. A. (2017). Hak Cipta Buku Elektronik (E-Book) Ditinjau dari Undang-Undang Nomor 28 Tahun 2014 tentang Hak Cipta. Thesis. Medan: Universitas Sumatera Utara.
41. Roselvia, R. S., Hidayat, M. R., & Disemadi, H. S. (2021). Pelanggaran Hak Cipta Sinematografi di Indonesia: Kajian Hukum Perspektif Bern Convention Dan Undang-Undang Hak Cipta. *Indonesia Law Reform Journal*, 1(1), 111-121.
42. Sari, A. P., Pelu, M. F. A., Dewi, I. K., Ismail, M., Siregar, R. T., Mistriani, N., ... & Sudarmanto, E. (2020). *Ekonomi Kreatif*. Yayasan Kita Menulis.
43. Sidharta, B. A. (2009). Penelitian Hukum Normatif: Analisis Penelitian Filosofikal dan Dogmatikal. *Mandar Maju, Bandung*.
44. Snowball, J., Tarentaal, D., & Sapsed, J. (2021). Innovation and Diversity in the Digital Cultural and Creative Industries. *Journal of Cultural Economics*, 45(4), 705-733.
45. Soekanto, S., & Mamudji, S. (2007). *Penelitian Hukum Normatif: Suatu Tinjauan Singkat*. Jakarta: Raja Grafindo Persada.
46. Soelistyo, H. (2011). *Hak Cipta Tanpa Hak Moral*. Jakarta: Raja Grafindo Persada.
47. Stefano, D. A., Saptono, H., & Mahmudah, S. (2016). Perlindungan Hukum Pemegang Hak Cipta Film Terhadap Pelanggaran Hak Cipta yang Dilakukan Situs Penyedia Layanan Film Streaming Gratis di Internet (Menurut Undang-undang Nomor 28 Tahun 2014 Tentang Hak Cipta). *Diponegoro Law Journal*, 5(3), 1-11.
48. Supramono, G. (2008). *Menyelesaikan Sengketa Merek Menurut Hukum Indonesia*. Jakarta: Rineka Cipta.
49. Sutanto, M. (2021). *Perlindungan Hukum Atas Ciptaan yang Dihasilkan oleh Kecerdasan Buatan* (Doctoral Dissertation, Universitas Hasanuddin).
50. Torremans, P. (2000). Moral Rights in the Digital Age. *Copyright in the New Digital Environment: The Need to Redesign Copyright*.
51. Van der Pol, H. (2007). Key Role of Cultural and Creative Industries in the Economy. *UNESCO Institute for Statistics, Canada*.
52. World Economic Forum. (2019). *Davos Switzerland*
53. Hicham Sadiki. (2022). Internationalization and Employability: Assessing the Effects of Study Abroad Programs on Participants' Employability. *Journal of Learning and Educational Policy(JLEP) ISSN : 2799-1121*, 2(03), 18-32. <https://doi.org/10.55529/jlep.23.18.32>
54. Aditya Prasad T. (2022). Jan Aushadi Scheme: A Crucial Step Towards Achieving Health Equity. *Journal of Learning and Educational Policy(JLEP) ISSN : 2799-1121*, 2(03), 33-40. <https://doi.org/10.55529/jlep.23.33.40>
55. Dr. Rana Abdalssatar Jassim, Dr. Almutasem Bellah W. Mahdi, & Dr. Mohammed W. Mahdi. (2022). Effect of Using Metacognitive Thinking Mechanism in Learning Some Artistic Gymnastics Skills for Students of the

- College of Physical Education and Sports Sciences Basic Skills on the Floor Exercises. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(03), 41–45. <https://doi.org/10.55529/jlep.23.41.45>
56. Rozaiman Mohd Noor, Mohd Zahuri Khairani, Punithavili a/p Mariappan, & Ria Eddie. (2022). Learning Visual Arts Language for Level One Students through Game -Based Learning Kit. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(04), 1–8. <https://doi.org/10.55529/jlep.24.1.8>
57. Assis. Prof. Dr. Rana Abdalssatar Jassim. (2022). Impact of Infographic Technology on Learning Some Basic Skills on the Floor Exercises. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(04), 9–14. <https://doi.org/10.55529/jlep.24.9.14>
58. Mabdar Mutalib Khalaf Hammadi. (2022). The Effect of Training Mask Exercises in the Development of Oxygen Ability And Some Physical Andfunctional Variables for the 200m Freestyle Runner. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(04), 15–21. <https://doi.org/10.55529/jlep.24.15.21>
59. AbdulMalek Mustafa Shafeeq. (2022). Training Curriculum According to the Pulse Indicator and its Impact on Some Physical and Worn-Out Variables Among Basketball Players. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(04), 22–34. <https://doi.org/10.55529/jlep.24.22.34>
60. Simeon Maile. (2022). Teachers’ Challenge of Using Own Expenses to Do the Employer’s Job in Selected Schools Located in Tshwane West District, Gauteng. *Journal of Learning and Educational Policy(JLEP)* ISSN : 2799-1121, 2(04), 35–53. <https://doi.org/10.55529/jlep.24.35.53>
61. M.D. Thamarai Selvi, & Dr. Aruna Arputha Malar. (2021). The Relationship Between Man And Nature Is A Ruling Theme In Robert Frost Poems. *Journal of Energy Engineering and Thermodynamics(JEET)* ISSN 2815-0945, 1(01), 1–5. <https://doi.org/10.55529/jeet11.1.5>
62. Saadu Umar Wali, Ibrahim Mustapha Dankani, Sheikh Danjuma Abubakar, Murtala Abubakar Gada, & Kabiru Jega Umar. (2021). Detailed hydrogeological and hydrochemical reassessment of the Niger Delta Basin, South-south Nigeria. *Journal of Energy Engineering and Thermodynamics (JEET)* ISSN 2815-0945, 1(01), 6–44. <https://doi.org/10.55529/jeet11.6.44>
63. Asha Kumari Roy. (2021). Role of electronic gadgets in removing inequalities. *Journal of Energy Engineering and Thermodynamics (JEET)* ISSN 2815-0945, 1(02), 1–5. <https://doi.org/10.55529/jeet12.1.5>
64. Rini Ariani, Achmad Irwan, & Kanti Rahayu. (2022). Acceleration of Clean Energy Use Based on The 2015 Paris Agreement. *Journal of Energy Engineering and Thermodynamics (JEET)* ISSN 2815-0945, 2(01), 1–11. <https://doi.org/10.55529/jeet21.1.11>
65. Rini Ariani, Achmad Irwan, & Kanti Rahayu. (2022). Acceleration of Clean

- Energy Use Based on The 2015 Paris Agreement. *Journal of Energy Engineering and Thermodynamics (JEET) ISSN 2815-0945*, 2(01), 1–11. <https://doi.org/10.55529/jeet21.1.11>
66. P.Leo Dominic, & Dr.S.Praveen Kumar. (2022). Compative Study Of Promotional Strategies Adopted By Automobile Retailers In Chennai. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(02), 1–8. <https://doi.org/10.55529/jeet22.1.8>
67. Hosen, M. I. ., Islam, S. ., Mia, M. A. ., & Al-Amin. (2022). Development of Solar Power Based Net-Metering System For Domestic Prosumers. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(02), 9–46. <https://doi.org/10.55529/jeet.22.9.46>
68. Jai Prakash, & Kalpana Meena. (2022). Simulation of Selective Radiation Anti-Reflection Coating for Improvement of Emissivity. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(03), 1–14. <https://doi.org/10.55529/jeet23.1.14>
69. M.K.Saravanan, & P.Rajalakshmi. (2022). Hybrid Energy Storage System Using Pv-Wind Source for Power Quality Management. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(04), 1–7. <https://doi.org/10.55529/jeet.24.1.7>
70. Ogwu D A, Molua, O C, Ighodalo, E.J, & Edobor. M. (2022). Hydrogeophysical Investigation of Aquifer Layers in Nkporo, Ohafia Local Government Area. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(04), 8–15. <https://doi.org/10.55529/jeet.24.8.15>
71. Collins O Molua, Kenneth Eseka, & Anthony O Ukpene. (2022). Investigating Background Ionizing Radiation in some selected locations in Agbor Metropolis. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(04), 16–23. <https://doi.org/10.55529/jeet.24.16.23>
72. Jai Prakash, & Kalpana Meena. (2022). Simulation of Anti Reflecting Coating for Improving External Quantum Efficiency of Photovoltaic Cell. *Journal of Energy Engineering and Thermodynamics(JEET) ISSN 2815-0945*, 2(04), 24–35. <https://doi.org/10.55529/jeet.24.24.35>
73. Oguche, C J., Dawam P. D., & Ebehikhalu O.N. (2021). Evaluation of Distance Cover to Access Services/Facilities in Informal Settlements in Federal Capital Territory, Abuja, Nigeria. *Journal of Environmental Impact and Management Policy(JEIMP) ISSN:2799-113X*, 1(01), 1–9. <https://doi.org/10.55529/jeimp11.1.9>
74. Mr. M. P. Parvez Ahmed, & Dr. A. Royal Edward Williams. (2021). Environmental Impact of leather Industrial Pollution on Agricultural Production in Vellore District. *Journal of Environmental Impact and Management Policy(JEIMP) ISSN:2799-113X*, 1(01), 10–19. <https://doi.org/10.55529/jeimp11.10.29>
75. Jamil Hassan Abdulkarim, & Ibrahim Friday Sule. (2021). Implications Of

- Lockdown On Failure To Continue With Monthly Environmental Sanitation Exercise With Emphasis On Residential Area In In Minna Metropolis, Niger State Nigeria. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 1(01), 20–24. <https://doi.org/10.55529/jeimp.11.20.24>
76. Saadu Umar Wali. (2021). The need for a multi-pollutant approach to model the movement of pollutants in surfacewater: A review of status and future challenges. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 1(01), 25–57. <https://doi.org/10.55529/jeimp11.25.57>
77. Kanu, Ikokwu Ezuma, & Akpan, Nobert Sunday. (2021). Oil Exploration and Underdevelopment: A Study Of Niger Delta Region Of Nigeria. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 1(01), 58–73. <https://doi.org/10.55529/jeimp11.58.73>
78. Darshan Goswami. (2021). Climate Crisis Solutions. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 1(02), 1–7. <https://doi.org/10.55529/jeimp12.1.7>
79. Vivek Thoutam. (2021). Iot Cloud Convergence, Emerging Economy And Development Issues. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 1(02), 8–13. <https://doi.org/10.55529/jeimp12.8.13>
80. Manaka M.J., & Maile S. (2021). Learners' knowledge of environmental education in selected primary schools of Tshwane North District, Gauteng Province. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(01), 1–12. <https://doi.org/10.55529/jeimp21.1.12>
81. Deassy Siska, Herman Fithra, Sofyan, & Ahmad Nayan. (2022). The Effects of Ammonia Leakage, Air Pollution, and Transportation on Climate Change in the Village Environment Around Pt. Iskandar Muda Fertilizer (Pt.Pim) Dewantara District. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(02), 1–6. <https://doi.org/10.55529/jeimp22.1.6>
82. Gupta, B. ., & Agasti, T. . (2022). The Curious Case of Article IX and Outer Space Environment. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(02), 7–25. <https://doi.org/10.55529/jeimp22.7.25>
83. Sembiring, J. C. . (2022). Effect of Environment Capital and Length of Business on Income of Traditional Traders in Berastagi Fruit Market Environment. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(02), 26–33. <https://doi.org/10.55529/jeimp.22.26.33>
84. Ishfaq Ahmad Mir. (2022). The Rajput Policy of the Mughal Emperors. *Journal of Environmental Impact and Management Policy (JEIMP)* ISSN:2799-113X, 2(02), 34–41. <https://doi.org/10.55529/jeimp22.34.41>

85. Patil, R. B. (2022). An Infrastructural Survey On Biomedical Waste Management In Nashik City. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(03), 1–18. <https://doi.org/10.55529/jeimp23.1.18>
86. Dr Rubaid Ashfaq. (2022). Communication, Education and Environment: Historical Scenarios of Relationship. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(03), 19–28. <https://doi.org/10.55529/jeimp23.19.28>
87. Queeny C. Fijo, Janie Mae T. Lorejo, Maryjane C. Nogalo, Rica Faye C. Plaza, & Medielyn M. Odtojan. (2022). Exposure Assessment of the Traffic Aides and Street Sweepers of Taganito Mining Corporation (TMC) to Noise Pollution. *Journal of Environmental Impact and Management Policy (JEIMP)* ISSN:2799-113X, 2(03), 29–36. <https://doi.org/10.55529/jeimp.23.29.36>
88. Abubakar Musa, & Veronica Nkeiru Vincen. (2022). School Plant Management in Public Universities in Nigeria: Challenges and the Way Forward. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(03), 37–42. <https://doi.org/10.55529/jeimp23.37.42>
89. Frances Aliah Grace M. Hinlog, Honey Jean P. Marbas, Ivy Riza D. Espejon, Mesela Loril Domagtoy, & Medielyn M. Odtojan. (2022). Contingent Valuation Study for Selected Beach Areas in San Francisco, Surigao Del Norte for its Environmental Conservation. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(04), 1–9. <https://doi.org/10.55529/jeimp24.1.9>
90. Abdal Ahmed, Chems Eddine Boukhedimi, Sumera Qureshi, & Shama Nargis. (2022). Covid-19 and Renewable Energy in BRICS Countries: An Opportunity or a Threat?. *Journal of Environmental Impact and Management Policy(JEIMP)* ISSN:2799-113X, 2(04), 10–24. <https://doi.org/10.55529/jeimp24.10.2>
91. Vagif Shadlinski, & Anar Abdullayev. (2021). Anatomical Peculiarities Of Mandibular Foramen. *Journal Healthcare Treatment Development(JHTD)* ISSN : 2799-1148, 1(01), 1–5. <https://doi.org/10.55529/jhtd11.1.5>
92. D.Beula Shiny, J.Vijila Jasmin, S. Sujithra, M.Jenifer Tamizharasi, & T. Kumaran. (2021). Nutraceutical Application, Bioactive Compounds And Health Benefits Of Seaweeds. *Journal Healthcare Treatment Development(JHTD)* ISSN : 2799-1148, 1(01), 6–13. <https://doi.org/10.55529/jhtd11.6.13>
93. Labordo, N. A. S. . (2021). Competencies and Values of Barangay Nutrition Scholars in Eastern Visayas: Basis for Program Development. *Journal Healthcare Treatment Development(JHTD)* ISSN : 2799-1148, 1(02), 1–11. Retrieved from <http://journal.hmjournals.com/index.php/JHTD/article/view/1302>
94. Noor Aziah Abu Bakar, Norhaninah A.Gani, & Nurisyal Muhamad. (2022).



- Social media usage among small enterprises during Covid-19 pandemic. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(02), 1–8.* <https://doi.org/10.55529/jhtd22.1.8>
95. Assis. Prof. Dr. Rana Abdalssatar Jassim, Assis. Prof. Dr. AlmutasemBellah W. Mahdi, & Dr. Mohammed W. Mahdi. (2022). Effectiveness of Using Mental Speed Exercises in Learning the Skill of Front Hands Jump on the Platform in the Artistic Gymnastics. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(02), 9–13.* <https://doi.org/10.55529/jhtd22.9.13>
96. Almhanna Mohanad Yahya, Mahdi Jawad Saeed, & Harba Alkhansaa Sabah. (2022). Spontaneous Activity In Abductor Digniti Minimi )Adm( As An Early Indicator Of The Irritation Of The Ulnar Nerve At The Elbow Joint. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(03), 1–5.* <https://doi.org/10.55529/jhtd23.1.5>
97. Aditya Prasad T. (2022). Jan Aushadi Scheme: A crucial step towards achieving health equity. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(03), 6–13.* <https://doi.org/10.55529/jhtd23.6.13>
98. Ghosh, S. ., Ahammed, M. T. ., Oion, M. S. R. ., & Debnath, S. . (2022). An Overview of Clinical Trials in Chinese Medicine. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(03), 14–18.* <https://doi.org/10.55529/jhtd23.14.18>
99. Sengar, A. ., Singh, A. P. ., Khare, A. ., Lal, A. B. ., & Singh, A. . (2022). Effect of Fat Replacers on the Multigrain Biscuits. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(03), 19–30.* <https://doi.org/10.55529/jhtd23.19.30>
100. Mabdar Mutalib Khalaf Hammadi. (2022). The Effect of Aerobic and Anaerobic Exercises in Some Functional Variables During Effort for Short- and Long-Distance Runners. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(04), 1–7.* <https://doi.org/10.55529/jhtd24.1.7>
101. Ime, I. M. ., Shuaibu, M. S. ., Dixit, S. ., Obong, L. B. ., & Bala, B. B. . (2022). The Effects Of Overcrowding On Students Living In University Of Calabar Female Hostel, Cross River State, Nigeria. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(04), 8–27.* <https://doi.org/10.55529/jhtd24.8.27>
102. Amenu, O. ., & Assefa, A. . (2022). Developing Expert System for Diagnosis and Treatment of Monkey Pox Outbreak. *Journal Healthcare Treatment Development(JHTD) ISSN : 2799-1148, 2(04), 28–35.* Retrieved from <http://journal.hmjournals.com/index.php/JHTD/article/view/1300>