The existence of customary court at Lembang Nanggala Sangpialalu, North Toraja, South Sulawesi, Indonesia

Henny Wiludjeng ^{(a)*} Feronica ^(b) Shannon Suryaatmadja ^(c)

^(a,b,c) Faculty of Law, Atma Jaya Catholic University of Indonesia, Jakarta, Indonesia

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ABSTRACT

The existence of customary courts in Indonesia is still prevalent. It had been erased and brought back again by national law. The present customary court is used by the Toraja Tribe. This article answers the questions of how is the execution of customary court in Lembang Nanggala Sangpialalu and whether or not Kombongan is still used. Both questions are answered through research using the socio-legal method. The authors conducted interviews with To Pareng traditional leaders and a few members of the Lembang Nanggala Sangpialalu society. The results show that the customary court still uses Kombongan and also musyawarah (discussion), but it is no longer obligatory to use the four levels of hierarchy Kombongan has. Parties involved in a dispute settled by Kombongan may choose to proceed with the higher levels of Kombongan or settle it through the district court..

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Introduction

Since long ago, disputes in various areas in Indonesia had been solved by customary courts. It carried on in the era of Dutch colonialism, but after Indonesia's independence it has been slowly erased. In 1951 Act No. 1 of 1951 about temporary actions to "carry out the organization, capacity, and affairs of the civil courts" was enacted. In Article 1 (2) point b it is stated that the customary court is to be erased. This is strengthened by Act No. 19 of 1964 on the "Basic Provisions of Judicial Power", renewed by Act No. 14 of 1970, and again by Act No. 48 of 2009. Article 2 (3) of this Act states that all courts in Indonesia are state courts regulated by the law. Thus, customary court was dispensed. However, five years later, Act No. 6 of 2014 on Villages (hereafter referred to as the Villages Act) was enacted (Rochaeti & Pujiyono, 2018; Ma'na et al., 2015; Sandabunga et al., 2015).

In its explanation there is a differentiation between "village" and "traditional village". A "village" has characteristics common throughout Indonesia while "traditional village" has a different characteristic marked by the strength of customs towards its governing system, resource management, and social-cultural life in the area (Timang et al., 2014; Kausar & Gunawan, 2018). A traditional village is principally an inheritance of a local community governance passed on throughout the generations which is still acknowledged and fought for by its leaders and society as to develop their welfare and social-cultural identity (Tobing & Paembonan, 2018; Manurung, 2017). Traditional villages have stronger rights of origin compared to usual villages since it is born as an indigenous community within society. Traditional villages are a unity of indigenous community with its own law system that historically has territorial boundaries and a cultural identity based on territory with authority to regulate and manage the society's interest based on rights of origin (Lullulangi et al., 2021; Yamashita, 1994; Unm & Sampebua, 2021).

* Corresponding author. ORCID ID:

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The customary law community is formed based on three principles: genealogy, territory, and/or a mix of both (Manullang, 2021). The communities regulated in this Act are the ones formed with the mix of genealogy and territorial principles (Haulussy et al., 2020). Thus, the state acknowledges and respects the customary law community and their traditional rights so long as they live according to the development of society and Indonesia's principles (Priambodo, 2018). The implementation of customary law exists and lives throughout Indonesia such as *huta/nagori* in Sumatera Utara, *gampong* in Aceh, *nagari* in Minangkabau, *marga* in the southern parts of Sumatera, *tiuhatau pekon* in Lampung, *desa pakraman/desa adat* in Bali, *lembang* in Toraja, *banua* and *wanua* in Kalimantan, and *negeri* in Maluku.

The villages act provides authority for the traditional villages, including:

- i. Regulation and implementation of governance based on its original structure;
- ii. Regulation and management of land and territory;
- iii. Preservation of social-cultural values;
- iv. Dispute settlement based on customary law applied in traditional villages in line with human rights principles, prioritizing *musyawarah* (discussion) methods;
- v. Peace trials of the traditional village according to prevailing laws;
- vi. Maintenance of order and peace in society according to customary laws applicable in the traditional village; and
- vii. Development of customary law according to the social-cultural conditions of the society of the traditional village.

This act thereby marks the Indonesia's government's recognition of dispute settlement through customary court. Although the recognition only came recently, in many parts of Indonesia the customary court is still in practice. In its forms, simple or organized, customary courts are a facility to solve various issues encountered by society. Thus, the authors would like to prove whether the practice of customary court is still practiced in Toraja.

Toraja is one of the oldest tribes in Indonesia, located in the Southern Sulawesi Province (Nur et al., 2021). It is known not only for its unique, original cultures and beautiful artistry but also for its natural landscapes and infamous graveyards located on cliffs. The tribe is dispersed in a few districts, one of which is North Toraja (Djabbari & Alwi, 2021). The Toraja Tribe still maintain their ancestors' customs well in marriage ceremonies, death ceremonies, adoptions, inheritance, and the resolvment of various issues through tradition.

Several studies have been conducted on customary courts in Indonesia. Rudy et al. (2021) presented the recognition of customary rights by Indonesian constitutional court. They analyzed how the Indonesian constitutional court deals with the recognition of customary rights as outlined in the constitution. Their statement is customary law and constitutionalism can co-exist in the same vision in Indonesia's pluralistic society. This co-existence is not without risk of tension, but with the possibility of success under the name of constitutionalism order to protect, rather than neglect, the national people living on the plural law.

The criminal cases are resolved through customary institutions. Settlement of criminal cases through customary institutions is considered more in accordance with existing local wisdom and can realize the values of justice desired by the parties in the case and restore the balance of the cosmos. One of them is the Dayak Customary Council's role, which passed Decision No. 01/SMAD-PA/I/2011 by basing the customary trial on the 1894 Tumbang Anoi Peace Agreement. Dayak Customary Institutions get legitimacy through the Regional Regulation of Palangka Raya City, which regulates Dayak Customary Institutions. Recognition of indigenous peoples' traditional rights can certainly not be separated from the customary laws that apply in the community and become the basis for the settlement of cases through customary institutions that exist as long as they have not been accommodated in state courts. The existence of Dayak customary council in settlement of criminal cases based on local awareness.

The research method used in this research is socio legal. This method is used to understand the practice of customary court in *Lembang Nanggala Sangpiasalu'*, North Toraja. The sociological research was done in December 2017 by interviewing 4 headmen in *Lembang Nanggala Sangpiasalu'*. Two of them are *To Pareng* and the other two are members of the society.

Lembang Nanggala Sangpiasalu' has six *To Pareng*: *To Pareng Kawasik*, *To Pareng Rante*, *To Pareng Basokan*, *To Pareng Nanna*, *To Pareng Alo*, and *To Pareng Barana'*. The interviewees were *To Pareng Basokan* (Mr. Yusuf Langsa) and *To Pareng Alo* (Mr. Jacob Tandipare). The *To Pareng Barana'* has passed away and no successor has been chosen. The other three *To Pareng* were not interviewed due to being sick or not being present in the area. Two members of society which were chosen fulfil the criteria of being genuine *Lembang Nanggala Sangpiasalu'* citizens and members of *Tongkonan*, being older than 60 years, and actively partake in customary events.

In the interviews, *To Pareng* were asked questions relating to these matters:

- i. The formation of customary court and its authority;
- ii. The court process;
- iii. Court decisions and its binding power in society;
- iv. Changes and developments of problems in society;
- v. The relation between customary court and national court.

Meanwhile, the two society members were asked about:

- i. The impact of customary court towards society;
- ii. Society's trust to customary court and national court.

The sources used in this research are from articles or academic writing related with Toraja and the Villages Act.

The main objective of this paper is analysis of the execution of customary court in Lembang Nanggala Sangpiasalu and whether or not Kombongan is still used.

Analysis of the execution of customary court in Lembang Nanggala Sangpiasalu

Toraja Tribe

The Toraja Tribe come from the protomelayu race. The indigenous belief of Torajans is Alu Todolo, but now most of the population subscribes to a certain religion, predominantly Christian/Catholic. Religion and custom go hand in hand. One cannot prevail without the other (Mustafa et al., 2019).

In the tribe there are four castes: 10% Tokapua, 10% Tomakaka, 20% Tobuda, and 60% To kaumang. Many of them reside outside the area. Usually they go home in December. Their houses use wooden posts. Torajans came from Indochina using boats, thus their traditional houses are also shaped similar to boats. On top of the house there is a picture of a chicken because the Toraja Tribe believes chickens never lie. Chickens will crow at the exact same hour and they become a symbol for a judge, giving justice and certainty.

The Torajans have many clans, it could be taken from their mother's or father's bloodline. To unite those different clans there is a tongkonan. There is a saying tongkonan lidonan nenek which means that the tongkonan is the face of our ancestors. From tongkonan we can see our true selves and the identity of our familial lineage and social status. Thus, the effort to maintain one's tongkonan is very great. From the tongkonan we can learn the family tree, traditions, and practices of customary law.

The Toraja Tribe is generally present in two districts: Tana Toraja and North Toraja. This research is done in North Toraja district. North Toraja has Rantepao as its capital and has spans 1.151,47 square kilometers, divided into 151 villages and 21 districts (torajautarakab.go.id). This research is done in Lembang Nanggala Sangpiasalu', known for its strong customary court.

Tongkonan

Life in Torajan society cannot be disassociated with tongkonan, its traditional house made of wooden piles decorated with red, black, white, and yellow carvings. It serves as a place to share troubles, but tongkonan is more than a house, it is the center of the Toraja Tribe's social life. Tongkonan is made up of a few buildings: Banua Sura' (the main house which has carvings), Alang Sura' (carved barn), Lemba (barn which has no carvings), and often there is another spacious house on stilts such as we often see today. Toraja's traditional house, other than serving as a place to live, also has a function and role with value and meaning for Torajan society. Tongkonan is considered as a heirloom and is passed on from the first person who built that particular tongkonan. Tongkonan is a symbol of the tribe's unity based on blood. A couple would build a tongkonan together, sometimes with their children and grandchildren. The tongkonan includes every house built by the descendants of the original builders (www.torajaparadise.com). Some people from Toraja can search through their family tree based on the tongkonan's name.

Customary Court

Customary court uses laws which regulate how to settle a dispute and/or how a judge should make a decision based on customary law. The process of executing the trial and decision of the dispute is called "customary court". The term "court" fundamentally discusses law and justice done by a trial system to solve disputes in and/or out of court. Customary courts can be done individually by family members, by neighbors, head relative or headman, village chief, or with an appointed person from an organization with the purpose of solving a customary offense with peaceful means to restore the balance of societal relations which has been disturbed.

In executing the job as a judge in a customary court, one bases oneself from customary criminal law (hukum adat delik) which are customary laws regulating an event or offense which results in the disturbance of balance in society, thus needing a solution (punishment) so the balance in society is no longer disturbed.

In many literatures it is mentioned that the customary court in Toraja is called Tarian Pitu or Ra'Pitu (seven forms of courts). The seven courts are Si-Pantetaan Tampo/Si'Ba'ta Tungga', Si-Ukkukan, Si-Pakoko, Si-Londongan, Si-Biangan or Si-Rektek, Si-Tempoan, and Si-Rari Sangmelambi'. The seven courts are ways to do trial between disputing parties without the use of living witnesses and existing written evidence.

Si Pantetaan Tampo/Siba'ta Tungga is a one-on-one battle using spears or swords in paddy fields. Usually a square-shaped enclosure with sturdy fencing so relatives are unable to burst in when the battle is in motion. Prior to the battle there is an oath to be taken: who is in the wrong will lose and nothing bad will fall upon who is right. When the battle begins, a fighter will usually fall or flee the enclosure. The Chairman will announce the decision and all parties involved are obliged to stand by it.

Si-Ukkunan is trial by having disputing parties dive into a deep river. Whoever surfaces first is declared as the loser. The decision is announced by the Chairman and is permanent.

Si-Pakoko is trial by having disputing parties dip their hand into boiling water. Whoever pulls their hand out first is declared as the loser. The decision is announced by the Chairman and is permanent.

Si-Londongan is trial by having each disputing parties choose a rooster which is handed to the Aluk Todolo headman to be cursed and prayed upon. Both chickens will be equipped with spurs and blades. The person whose chicken wins is in the right, and the person whose chicken dies is in the wrong. If both chickens die, both parties in the dispute are right or their case is of equal strength.

Si-Biangan is trial by a lottery system. The Aluk Todolo headman will take a piece of bamboo-like wood which grows in certain cliffs. One part is divided into equal sized portions, each marked for the parties in the dispute. Then the Aluk Todolo headman will say an oath and prayer so that the righteous party will win. The piece of wood is then thrown three times. The result can be 2-1 or 3-0. The one with more points is declared as the winning party.

Si-Tempoan is trial by way of oath. After the Aluk Todolo headman, the disputing parties also says an oath in front of their whole families and the headman. The contents of the oath are said by the headman and repeated by the representatives for each party. "Puang Matua, Deata To Tallu Esunganna Tomembali Puang Laun rimpi'na'lan Tangnga Padang sia tang laana pasitirona' kameloan sia kamanamanan sae lakona ketanggumpokadana' tang tongan anna...." meaning "God the creator, ... and the ancestors will destroy my life and curse forever if I do not say the truth, etc.". When saying the oath, the one who says it must name a timespan that has been agreed: 3 days, 5 days, 30 days, or a year (the timespan of a single harvest). When the time has come and the contents of the oath is proven, then the winner will be decided and declared.

Si-Rari Sang-Melambi' is a trial method used usually in deciding land borders. The parties gather as much followers as they can, then make an agreement on the boundaries of land that is in dispute. The two parties will start war from dawn to sunrise. There is a third party whose job is to witness and oversee the war. If someone has been wounded, the party he belongs to loses, even if there are still many soldiers left standing.

The seven methods mentioned above are no longer in use. People prefer musyawarah (discussion) with live witnesses and written evidence. Trial by musyawarah is also called kombongan. These Kombongans have a hierarchy system as follows:

- i. Kombongan Saroan
- ii. Kombongan Karopi
- iii. Kombongan Kalua Sang Lembangan
- iv. Kombongan Kalua Sang Lepongan Bulan

Kombongan Soroan is a kombongan which deals with local rules in small areas or groups or societal organizations such as churches, unions, or local areas. Kombongan Karopi is done annually or if there are specific violations of customary law. Kombongan is attended by the whole society and done democratically. Kombongan kalua sang lembangan is the highest level in a single territory such as Sang Nanggalan. It is held annually or on special occasions. It is attended by all the To Pareng nobelty along with the tribe chiefs and society. The mechanism in the trial is very free and open. Every participant may deliver their own opinion, but the decision maker is done by each Karopi through discussions and agreements. Kambongan kalua sang lepongan bulan (Musyawarah Agung or the Great Discussion) is a kombongan consisting of the entire Tana Toraja, formulating and discussing regulations between Lembangs. The kombongan, depending on its level of urgency and hierarchy, can be open to the entire Torajan society within Tana Toraja or from the outside. With considerations on efficiency, the kombongan is usually attended by a representative or appointed person from each group, so there is a representative democracy.

The four kombongans in practice is not followed by the order of hierarchy. An issue can be brought directly to Kombongan Karopi without first bringing it to Kombongan Saroan. If not satisfied with the To Pareng decision, the disputing parties can bring it directly to Indonesia's district court. Another way is by following the hierarchy and choosing Kombongan Kalua. Usually disputes are settled at the Kombongan Karopi level.

Lembang Nanggalan has six karopi, each led by a To Pareng, as follows:

- i. Karopi Kawasik with Tongkonan Langkanae led by To Pareng Kawasik,
- ii. Karopi Rante with Tongkonan Tondok Puang led by To Pareng Rante,
- iii. Karopi Basokan with Tongkonan Belolangi led by To Pareng Basokan,
- iv. Karopi Nanna with Tongkonan Buntu led by To Pareng Nanna,
- v. Karopi Alo with Tongkonan Dalonga led by To Pareng Alo, and
- vi. Karopi Barana with Tongkonan Sendana led by To Pareng Barana.

The traditional leader does the duties of To Pareng, which can be preventive or repressive. This can be preventing violations of customary law. To Pareng has the duty to remind society of their customs and not to violate them, deal with any and all issues in society; and as a judge, make decisions on disputes and punish the party that is guilty.

To Parengé in doing his duties to solve disputes is helped by members of the society, who are the elders of that village. The number of elders who can help To Parengé in solving the dispute can be 5 or more, depending on how heavy the problem is. If it is light, 3 people will be enough. The people chosen are those knowledgeable of customary laws and issues. They are selected based on *musyawarah* by the family from a *tongkonan*. Each *tongkonan* chooses one or two representatives from each generation according to what is needed.

To Parengé is chosen based on *musyawarah*. The person must fulfil these criteria: wise, knowledgeable, and brave. If a To Parengé passes, usually he will be succeeded by his offspring if the child fulfils the criteria. If not, then the *tongkonan* will choose the next To Parengé through *musyawarah*.

Customary Dispute Settlement

All problems in society are usually resolved through customs. The common issues are those of marriage, inheritance, and land.

i. Marriage

If a wife is left by her husband, she can report to To Parengé. To Parengé will ask about the matter. After sufficient information, To Parengé will make a decision. To Parengé usually decides that because the husband left the wife, thus the income in the household must be divided. If there are children, the money is managed by the wife for the family's interest. Because the husband is the one who left, he leaves the house bringing nothing. There are no cases where the wife leaves because she could be killed the husband.

ii. Inheritance

Inheritance can be heirloom passed down from *tongkonan* such as the house, fields, and gardens. So there are no issues, it is preferable for the inheritance to be distributed to the beneficiaries before the parent dies. If the parents die before the inheritance is distributed, usually disputes will rise.

iii. Divorce

If a couple has lived together for years and have no children and the husband wants a divorce, they go to To Parengé and ask him to settle the matter. Usually To Parengé reminds them that they are not expected to have the divorce because in Christianity the husband and wife have been united by God, so man must not separate them. If they insist on divorce, usually there will be inheritance issues. After To Parengé questions the couple, he makes a decision. Inherited property belongs to each person, while joint marital property is divided in half between the husband and wife. The division of wealth is similar to the national law.

iv. Land

National law states that land has to have certification to protect its ownership. Not so with customary law in *Lembang Nanggala Sangpialalu'*. Land in this *lembang* is dry and wet soil. Wet soil includes rice fields. Wet land can be certified. Meanwhile, all dry land belongs to the tribe, so it cannot be certified nor sold. Thus, each *tongkonan* has to protect their own land. If there is a dispute over dry land and there is a party claiming to have the certificate over that land, that certificate is invalid.

What does the society think of dispute settlements through customary court? As it turns out, they do not always rely on customary court. Some do not rely on To Parengé and prefer the district court. The distrust towards To Parengé is there because To Parengé is no longer chosen through *musyawarah*, rather the To Parengé appoints himself.

Dispute Settlement Process

Citizens who have problems they cannot solve themselves usually ask for help from the elders or To Parengé with these following steps: first, if someone has a problem, he will report to the tribe elders. If the cannot handle the problem then it is handed over to To Parengé. In the second stage, To Parengé will first study the problem. After that, the parties will be called for further questioning. After receiving complete information from both parties, then they are put on trial.

To Parengé, helped by a few elders, prepare the trial. Besides the parties, To Parengé also questions witnesses from both parties. Customary trials usually accrue a significant audience. The exception is for cases which bring shame, then the trial is closed for the public. If it is only a small case and not many people attend, sometimes it is done in the To Parengé's house. Nowadays many trials are done in their respective *lembang* office.

The dispute must be settled in a single day. The decision is made in writing, informing who is guilty along with the reasoning. In private matters, there is no punishment for the guilty party, but the object of dispute must be returned. For example, if land is the object of dispute, it must be returned to its rightful owner. If the guilty party has committed a crime, he will receive punishment according to the customs. For example, someone found guilty of inappropriate language must slaughter a pig. If the offense is of significance, then the guilty party must slaughter a bull. If the offense is between the same family and not serious, the punishment is to have a ceremony in front of the *tongkonan* by slaughtering a pig. If both parties are guilty, then each get the same punishment—a

pig split in half to be eaten together. If the party does not have the proper resources, then the punishment is to hold a fellowship prayer and call upon the church assembly.

If the To Pareng is unable to settle the dispute, it can be brought to the kombongan led by To Dua. To Dua is the coordinator of To Pareng. His position is not in the scope of a village, but in a district. If To Dua is unable to handle the case, it will be directed to the district court. There, To Pareng will be called upon by the district court judge to explain exactly the customary laws that are in place.

To Dua is the ruler of the Nanggala Tongkonan Layuk (the highest tongkonan). He regulates and enforces the customary law agreed upon by the kombongan. He settles disputes between two To Pareng. He evaluates the existing rules, revokes, changes, or formulates new rules. To Dua is responsible if there are practices of customary laws that are not in line with the results of musyawarah. He also leads the customary trials for cases unsolved by To Pareng.

Conclusion

There are two issues raised: how the customary court in Lembang Nanggala Sangpialalu' is executed and whether the Kombongan hierarchy is still applied. In the first issue, it is found that the customary court is divided into Tarian Pitu and Kombongan. Tarian Pitu does not use witnesses nor written evidence, rather it uses physical "battle". Kombongan is done by having witnesses and written evidence. Tarian Pitu is no longer used because of a shift in paradigm and the view that dispute settlement using Kombongan is better. The four hierarchies of Kombongan are not always applied.

The disputing parties are free to use just one (usually Kombongan Karopi). If unhappy with the decision made by To Pareng, it can be directed to the higher level Kombongan or to the district court.

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References

- Djabbari, M. H., & Alwi, S. L. (2021). Public Private Partnership Model in Tourism Development in North Toraja Regency. *Psychology and Education Journal*, 58(3), 3293-3299.
- Haulussy, R. H., Najamuddin, I. R., & Agustang, A. D. M. P. (2020). The sustainability of the Sasi Lola tradition and customary law (Case study in Masawoy Maluku, Indonesia). *Intl J Sci Technol Res*, 9(2), 5193-5195.
- Kausar, D. R. K., & Gunawan, M. P. (2018). Managing heritage tourism in Toraja: strengthening local values and improving tourists' experiences. *Journal of Heritage Tourism*, 13(6), 550-561.
- Lullulangi, M., Sampebua, O., Tawani, A., & Tenriola, R. (2021). The Traditional Function of Tongkonan in Sillanan Tana Toraja. *PalArch's Journal of Archaeology of Egypt/Egyptology*, 18(4), 3174-3185.
- Ma'na, P., Agustang, A., Salusu, J., Ikhsan, A., & Dirawan, G. D. (2015). Decision making strategic value based local wisdom Tongkonan North Toraja. *Man India*, 95(3), 633-639.
- Manullang, S. O. (2021). Understanding the sociology of customary law in the reformation era: complexity and diversity of society in Indonesia. *Linguistics and Culture Review*, 5(S3), 16-26.
- Manurung, P. (2017). Daylighting and architectural concept of traditional architecture: The Tongkonan in Toraja, Indonesia. *A/Z: ITU Journal of Faculty of Architecture*, 14(1), 111-26.
- Mustafa, A. E., Arman, A., & Saudi, N. S. (2019). Social status relationship to purchase of tedong bonga for the Community Toraja Tribes. *IOP Conference Series: Earth and Environmental Science*, 247(1), 012060.
- Nur, S. S., Patittingi, F., & Anindhita, A. B. (2021, October). Protecting tongkonan traditional areas in the cultural reserve area in Toraja. *IOP Conference Series: Earth and Environmental Science*, 870(1), 012005.
- Priambodo, B. B. (2018). Positioning adat law in the Indonesia's legal system: Historical discourse and current development on customary law. *Udayana Journal of Law and Culture*, 2(2), 140-164.
- Rochaeti, N., & Pujiyono, P. (2018). Implementation Study of Restorative Justice for Juvenile Criminal Justice System by Customary Court in Mainland Sulawesi. In *IOP Conference Series: Earth and Environmental Science*, 156(1), 012044.
- Rudy, R., Ryzal Perdana, R. P., & Rudi, W. (2021). The Recognition of Customary Rights by Indonesian Constitutional Court. *Academic Journal of Interdisciplinary Studies*, 10(3), 308-318.
- Sandabunga, R. M., Umar, A., Millang, S., Bachtar, B., Paembonan, S., Restu, M., & Larekeng, S. H. (2019). Land compliance of agroforestry compiler components evaluation in Pangli sub-district Desean district, North Toraja regency. In *IOP Conference Series: Earth and Environmental Sciences*, 343(1), 012053.

- Timang, V. V. S., Antariksa, A., & Ari, I. R. D. (2014). Tourism development strategy of Buntula'bi Balusu sub-village, North Toraja regency based on tourist perception. *Journal of Indonesian Tourism and Development Studies*, 2(3), 95-102.
- Tobing, M. M., & Paembonan, L. S. (2018). Building Tourism and Sociopetal Cultural Understanding Through Proxemics Sharing of Authentic Artefacts from the Tongkonan of North Toraja, Indonesia. *International Journal of Engineering & Technology*, 7(4), 548-554.
- Unm, M. L., & Sampebua, O. (2021). Tongkonan Ke'te'kesu' as a Traditional Architectural Tourist Attraction in Tana Toraja. *Journal of Building Material Science*, 3(1), 1-8.
- Yamashita, S. (1994). Manipulating ethnic tradition: the funeral ceremony, tourism, and television among the Toraja of Sulawesi. *Indonesia*, (58), 69-82.

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