



ANALYSIS OF THE INTERNATIONAL CRIMINAL COURT'S NEW POLICY IN ENSNARING ENVIRONMENTAL CRIMES BASED ON THE MANDATE OF THE ROME STATUTE TO STRENGTHEN THE ENFORCEMENT OF INTERNATIONAL CRIMINAL LAW

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Adillah Dwi Rahmadani¹, Dwi Putri Lestari²

¹ *Faculty of Law*, University of Bengkulu, adillahdwirahmadani3@gmail.com

² *Faculty of Law*, University of Bengkulu, dwipfhunib22@unib.ac.id

ABSTRACT

Environmental destruction on a global scale has reached an escalation level that threatens the existence of human civilization. While the destructive impact of natural exploitation is very real, law enforcement against environmentally destructive intellectual actors at the global level often clashes with the absence of universally binding jurisdiction. The International Criminal Court (ICC) as the last bastion of global criminal justice has historically focused only on traditional crimes against humanity. However, through the issuance of the Policy on Handling Environmental Damage in December 2025 by the ICC Prosecutor's Office, there has been a significant paradigm shift. This research examines and analyzes in depth the juridical construction of the new policy within the framework of international criminal law. The research method used is normative legal research with a statutory approach and a conceptual approach. The results of the study show that this new policy does not create new criminal acts outside the Rome Statute, but rather expands the teleological interpretation. The ICC Prosecutor's Office integrates the dimension of environmental damage into the parameters of the investigation and prosecution of the four core crimes in Article 5 of the Rome Statute: genocide, crimes against humanity, war crimes, and crimes of aggression. The application of an interactive and interdisciplinary approach to investigation, as well as the affirmation of support for national justice through the principle of complementarity, proves that international criminal law now has a progressive instrument to eradicate impunity for global ecological crimes.

Keywords: International Criminal Law, International Criminal Court, Environmental Crimes,

1. INTRODUCTION

1.1. Background of the Problem

The development of human civilization in the twenty-first century is colored by global challenges that have never occurred in previous eras, namely massive, systematic, and *transboundary environmental degradation*. Ecosystem damage, industrial-scale deforestation, marine pollution by toxic wastes, exploitation of mineral resources that damage indigenous peoples' living spaces, and greenhouse gas emissions that trigger climate change, have been recognized by scientists as existential threats to the sustainability of human populations.¹ Although the impact of material losses and fatalities caused by this ecological disaster is equal to or even exceeds the impact of an armed conflict, law enforcement against environmental perpetrators at the international level is still stagnant and jurisdictionally inefficient.²

In the public discourse of international law, environmental protection instruments are generally governed through multilateral agreements of an administrative and civil nature, such as the United Nations Framework Convention on Climate Change (UNFCCC) or the Paris Agreement.³ Classical international environmental law rests on the concept of *state responsibility*, where the sanctions imposed are political or in the form of financial compensation obligations between states. This approach has proven to fail to provide a *deterrent effect*, as the main intellectual actors, whether state officials, military commanders, or executives of multinational corporations, have never been criminally prosecuted for their destructive actions. Global impunity for environmental destroyers has become an anomaly that hurts the sense of justice of the international community.⁴

As an independent, permanent criminal justice institution, the *International Criminal Court* (ICC) based in The Hague, Netherlands, was established under the 1998 Rome Statute to end

¹ Andriansyah, M., & Prasetyo, T. (2023). Environmental crime as an extraordinary crime in the perspective of international criminal law. *Indonesian Journal of International Law*, 20(2), 245–268.

² Fadli, M., & Setiawan, A. R. (2024). Challenges to the jurisdiction of the International Criminal Court against global environmental crimes. *Brawijaya Law Journal*, 11(1), 87–110.

³ Hidayat, A. N. (2023). Ecocide and the urgency of its development as an international crime. *Journal of Right-Thinking*, 12(3), 401–418.

⁴ Absorb. (2014). *Environmental law and sustainable development*. Surakarta: Muhammadiyah University Press. P. 102

impunity for the perpetrators of the most serious crimes of international concern. However, since it began operations in 2002, the ICC has had limited material jurisdiction (*ratione materiae*). Article 5 of the Rome Statute limits the Court's jurisdiction to only four *core crimes*: the crime of genocide, crimes against humanity, war crimes, and crimes of aggression. Environmental crime (*ecocide*) was not included as a standalone crime in the Rome Statute due to the political debate during the statute's founding conference.⁵

This legal vacuum is slowly beginning to be overcome through the engineering of juridical interpretation. The culmination of this evolution of international criminal law thinking occurred in early December 2025, when the Office of the Prosecutor of the International Criminal Court officially published the "*Policy on Tackling Environmental Damage Through the Rome Statute*". The monumental policy, which was led by Deputy Prosecutors Nazhat Shameem Khan and Mame Mandiaye Niang, is the first operational document from the ICC Prosecutor's Office that comprehensively outlines the mandate, authority, and methodological strategies in conducting investigations and prosecutions of crimes that have an impact on the environment.⁶

This policy does not intend to revise or amend the Rome Statute, a process that requires ratification by the assembly of the state parties, but rather affirms the commitment of the Prosecutor's Office to highlight the element of environmental damage as an integral part of the crimes already enumerated in Article 5 of the Rome Statute.⁷ By adopting an interdisciplinary approach, the ICC now formally recognizes that the natural environment is the foundation upon which all human rights are based, and that environmental destruction is often both a method and an instrument for committing crimes against humanity and genocide.⁸

This paradigm shift has far-reaching doctrinal and practical implications in the international criminal justice system. Therefore, a comprehensive academic analysis is needed to dissect how the anatomy of this new policy is integrated into the normative framework of the Rome Statute, as well as how it impacts the sovereignty of the national law enforcement of the parties states.

⁵ Atmasasmita, R. (2017). *International criminal law and transnational crimes*. Jakarta: Prenadamedia Group. p. 83

⁶ Kusuma, R. D., & Lestari, E. (2022). A paradigm shift in international environmental law: From state responsibility to individual criminal liability. *Journal of Legal Sciences Amanna Gappa*, 30(2), 189–210.

⁷ Mahendra, I. G. A., & Putri, N. P. (2024). The role of the International Criminal Court in the enforcement of cross-border environmental laws. *Journal of Law & Development*, 54(1), 55–78.

⁸ Hamzah, A. (2019). *International criminal law*. Jakarta: Sinar Grafika. p. 74

1.2. Problem Formulation

Based on the above background explanation, this study formulates the following problem formulation:

1. How will the juridical construction of the new policy of the Office of the Prosecutor of the International Criminal Court in 2025 be integrated into the material jurisdiction of Article 5 of the Rome Statute to ensnare crimes with an environmental dimension?
2. What are the implications of this policy on the application of the principle of complementarity and inter-agency cooperation in the enforcement of international criminal law?

1.3. Research Objectives

This research aims to examine normatively and doctrinally the shift in prosecution strategy at the International Criminal Court related to environmental issues. Specifically, this study aims to unravel the legal foundations that legitimize the prosecution of ecological crimes under the framework of traditional crimes (genocide, crimes against humanity, war crimes, and aggression), as well as to provide an analysis of the challenges of implementing such policies in the global criminal justice system.

2. RESEARCH METHODS

This research uses a type of normative legal research (*doctrinal legal research*). Normative law research positions law as a building of a system of norms, doctrines, and binding principles. The main focus of this study is to examine the synchronization and interpretation of positive laws that apply in the realm of international criminal law.

The approaches applied in this study include:

1. *Statute Approach*: Used to dissect the main legal instruments, in particular the *Rome Statute of the International Criminal Court* 1998, along with its derivative instruments such as *the Elements of Crimes* and official policy documents published by the ICC Prosecutor's Office in December 2025.
2. *Conceptual Approach*: Used to analyze the doctrines of international criminal law, such as the principle of *individual criminal responsibility*, the principle of *complementarity*, and the concept of environmental *justice*.

The sources of legal materials used include authoritative primary legal materials, such as the

text of the Rome Statute and ICC policy documents. Secondary legal materials were obtained from academic literature, international criminal law textbooks, scientific journal articles, reports from non-governmental organizations (such as records from *Stop Ecocide International*), as well as official news that recorded the launch of the ICC policy (e.g. reports from Hukumonline). The analysis of legal materials is carried out qualitatively by a deductive method, namely by drawing conclusions from the general rules of international criminal law to be applied to specific issues of handling environmental crimes by the ICC.

3. RESULTS AND DISCUSSION

3.1. The Genealogy and Evolution of the Status of Environmental Crimes in International Criminal Law

To understand the significance of the new policy issued by the ICC Prosecutor's Office in December 2025, it is necessary to conduct a historical search of the status of environmental damage in the international legal system. Initially, international criminal law was structured exclusively with a very strong anthropocentric paradigm. The main concern of the post-World War II international community, which gave birth to the International Military Tribunals in Nuremberg and Tokyo, was solely centered on the protection of human bodies and lives from the atrocities of fascism. The environment is not seen as an entity with legal rights or as a victim of a criminal act.⁹

A shift in consciousness began to emerge in the Cold War era, especially when the United States military massively used chemical defoliant (Agent Orange) in Vietnam that destroyed millions of hectares of tropical forests. This incident triggered the establishment of the 1977 *Environmental Modification Convention* (ENMOD) and the insertion of the rules prohibiting environmental damage in Additional Protocol I of 1977 to the 1949 Geneva Convention. However, these rules only apply in situations of international armed conflict and focus on state accountability, not individual crime.¹⁰

At the time of the drafting of the Rome Statute at the United Nations International Law Commission (ILC) throughout the 1990s, there was a very strong proposal to include environmental crimes (*ecocide*) as the fifth core crime under the jurisdiction of the ICC. The

⁹ Prabowo, Y., & Anindita, K. (2025). ICC prosecutorial policy and its implications for global environmental protection. *IUS QUIA IUSTUM Legal Journal*, 32(1), 1–25.

¹⁰ Keraf, A. S. (2010). *Environmental ethics*. Jakarta: Kompas Book Publishers. p. 34

concept of ecocide refers to an act of environmental destruction that is carried out with the knowledge that such actions have a high probability of causing extensive, long-term, and severe natural damage. However, at the Diplomatic Conference in Rome in 1998, this proposal was rejected by the majority of developed countries with large extractive industries. Political compromises at the time resulted in the Rome Statute which was purely focused on genocide, crimes against humanity, war crimes, and crimes of aggression. The only mention of the word "environment" in the entire text of the Rome Statute is found only in the formulation of war crimes in the context of a military attack (Article 8).¹¹

The absence of explicit jurisdiction over *peacetime environmental destruction* is a fatal weakness for the ICC. During its two decades of operation, the Court has been unable to ensnare the head of state who allows illegal logging that fuels transnational forest fires, or the CEO of a multinational corporation that pollutes the waters of the sea. This ecological impunity only began to be seriously broken when the ICC Prosecutor's Office realized that traditional crimes against humans are always rooted and have an impact on the destruction of the ecosystems in which they live.¹²

3.2. Anatomy of the Prosecutor's Office of the International Criminal Court in 2025

The *Policy on Tackling Environmental Damage Through the Rome Statute*, announced in the first week of December 2025, is a doctrinal breakthrough designed with great precision. ICC Deputy Prosecutors Nazhat Shameem Khan and Mame Mandiaye Niang emphasized that this policy is a form of institutional recognition that environmental degradation is no longer just a civil issue, but a structural component of international crime that requires criminal repressive efforts.

The essence of this new policy is not an amendment to the Rome Statute. The ICC Prosecutor's Office intelligently uses its discretionary authority in *the case selection* process and *investigative prioritization*. Under Article 53 of the Rome Statute, the Prosecutor has full independence to determine whether a case has sufficient grounds for investigation, taking into account the gravity or severity *of the crimes* and the interests of *justice*.

¹¹ Start. (2005). *Human Rights: Nature, Concept and Implications in Legal and Societal Perspectives*. Bandung: Refika Aditama. p. 132

¹² Wicaksono, A. B. (2024). The environment as an object of protection of international criminal law. *Constitutional Journal*, 21(4), 703–726.

In this December 2025 policy, the Prosecutor officially declared that "environmental damage" is now one of the main determining variables in assessing the severity of a crime. This means that if there are two reports of crimes against humanity with an equal number of human casualties, but one of the cases involves the destruction of customary land and toxic water sources that destroy the future of a generation, then the Prosecutor's Office will prioritize the investigation of the case involving environmental damage.¹³

Furthermore, this policy formulates an interactive and interdisciplinary approach. This is a shift in the working method in the ICC. Whereas previously ICC investigators consisted only of legal experts, criminologists, and medical forensics, now international crime investigations are required to involve experts from various natural disciplines, such as conservation biologists, toxicologists, climatologists, and geographic satellite mapping specialists. This interdisciplinary approach is absolutely necessary because proving causation in environmental crime requires quantitative data on pollution levels, deforestation rates, and long-term biological impacts that cannot be explained solely by traditional criminal law analysis.¹⁴ Scientific evidence regarding groundwater contamination or damage to landscapes now has a *probative value* equivalent to ballistic evidence or autopsy of corpses.

3.3. Integration of Environmental Damage into the Material Jurisdiction of the Rome Statute

The most substantial aspect of this legal analysis of the 2025 policy is how the ICC Prosecutor's Office reconstructed the *elements of crimes* in Article 5 of the Rome Statute to capture the essence of environmental destruction. The prosecutor did not seek to criminalize "environmental damage in general", but instead to bind it juridically to the ICC's four core crimes. Its legal construction is outlined as follows:¹⁵

A. Use of the Environment in the Crime of Genocide (Article 6)

According to Article 6 of the Rome Statute, genocide is an act committed with the intention (*mens rea/dolus specialis*) to destroy, in whole or in part, a national, ethnic, racial, or religious

¹³ Putra, I. M. A. P., & Sari, N. L. G. (2023). Environmental crime as part of international crime: Challenges to the expansion of the jurisdiction of the International Criminal Court. *Journal of Law IUS QUIA IUSTUM*, 30(2), 245–268.

¹⁴ Rahardjo, S., & Prasetyo, T. (2024). Environmental damage and international criminal responsibility: Reinterpretation of the Rome Statute. *Journal of Law & Development*, 54(1), 1–25.

¹⁵ Siregar, M. F., & Lubis, A. (2023). The principles of complementarity of the ICC and its implications for national environmental law enforcement. *Journal of Right-Thinking*, 12(3), 389–410.

group. One of the material acts (*actus reus*) of genocide regulated in Article 6 letter (c) is "deliberately causing the living conditions of the group which are calculated to result in its physical destruction, in whole or in part".¹⁶

Under the new policy framework, the destruction of ecosystems that are the source of life of a group of people can be charged as genocide. As an empirical example, if a government regime or corporate group deliberately clears indigenous forests, drains swamps, and poisons rivers that are the only source of food for minority indigenous peoples in the interior, this is not just the destruction of nature, but the creation of "conditions of life that result in physical destruction". The environment is used as a biological and ecological weapon to exterminate a race.

B. Use of the Environment in Crimes Against Humanity (Article 7)

Crimes against humanity are defined in Article 7 of the Rome Statute as any act committed as part of a widespread or systematic attack directed at a civilian population. Article 7 (b) regulates the act of "*extermination*", which includes the act of deliberately causing unbearable living conditions, such as depriving them of access to food and medicine.

The ICC's policy underlines that large-scale *land grabbing*, the expulsion of civilians from ancestral lands due to mine extraction, as well as air and water pollution carried out systematically and supported by state policies, meet the elements of acts of destruction, forced eviction (Article 7 letter d), and other inhumane acts (Article 7 letter k). Business people who collude with state security apparatus to burn villages for the expansion of plantation land can now be charged as intellectual actors of crimes against humanity.

C. Environmental Destruction as a War Crime (Article 8)

War crimes are the only article in the Rome Statute that expressly includes environmental protection. Article 8 paragraph (2) letter (b) number (iv) criminalizes the act: "deliberately launching an attack with the knowledge that the attack will cause... extensive, long-term and severe damage to the natural environment that would be manifestly excessive compared to the

¹⁶ Arief, B. N. (2010). *Law enforcement issues and criminal law policy*. Jakarta: Kencana Prenada Media Group.

anticipation of real and immediate military gains."¹⁷

Under the new policy in 2025, the criteria for meeting the elements of "extensive, long-term, and severe" will no longer be interpreted in a restrictive manner that prohibits prosecution. The burning of petroleum wells, the bombing of giant hydrological dams that submerged residential areas (as seen in modern conflicts in Eastern Europe or the Middle East), as well as the destruction of nuclear power plant facilities, would absolutely be categorized as war crimes. The principle of *proportionality* in international humanitarian law is tightened; There is no pretext of "military gain" that can justify the *scorched earth policy*.

D. Environmental Destruction Related to the Crime of Aggression (Article 8 bis)

The crime of aggression is the use of armed forces by a country against the sovereignty, territorial integrity, or political independence of another country. In the context of aggression, the ICC's policy formulates that military invasions motivated by attempts to illegally annex the natural resources of other countries, or the exploitation of natural resources and ecological destruction in the annexed countries, will be considered as ballast elements that affirm the nature of manifest violations of the Charter of the United Nations.¹⁸

Through the above juridical integration, the ICC Prosecutor's Office locks the absence of loopholes for the perpetrators. This policy affirms that crimes against nature are crimes against humans.

3.4. Implications of the Principle of Complementarity and Jurisdiction on Corporate Actors

In addition to the reconstruction of criminal acts, the 2025 Environmental Damage Management Policy also outlines an institutional strategy, specifically related to the jurisdictional relationship between the ICC and national criminal courts.

The ICC judicial system is not designed to be a first-instance court for all cases in the world. The Rome Statute is based on the *principle of complementarity*, which means that the primary responsibility for investigating and prosecuting international crimes lies with a country's

¹⁷ Nugroho, H., & Wicaksono, D. A. (2022). Corporate crimes and gross human rights violations in the perspective of international criminal law. *Indonesian Journal of Legislation*, 19(4), 497–516.

¹⁸ Hidayat, A., & Ramadhan, F. (2024). Environmental destruction as a crime against humanity: An analysis of Article 7 of the Rome Statute. *AMANNA GAPP Journal of Law*, 32(2), 181–202.

national justice system (Article 17). The ICC will only act and take over jurisdiction if national courts are found to be "unwilling" or "incapable" to carry out due process fairly and solemnly.¹⁹

In his launch speech, Deputy Prosecutor Nazhat Shameem Khan emphasized that through this new policy, the ICC Prosecutor's Office intends to actively support and stimulate law enforcement efforts at the national level in realizing accountability for environmental crimes. This is a manifestation of the doctrine of *positive complementarity*. The ICC does not intend to usurp the legal sovereignty of the parties, but rather gives a stern warning. If a country's national prosecutor's office and police turn a blind eye or are co-opted by political and business oligarchs and fail to prosecute officials or businessmen responsible for illegal deforestation and deadly pollution that amounts to crimes against humanity, the ICC has absolute legal authority to intervene, take over the case, and issue international arrest warrants for those actors.²⁰

This strategy creates a crucial *leverage effect*. The presence of this ICC policy forces countries to reform environmental criminal laws in their respective countries to meet international criminal liability standards, if they do not want their citizens to be dragged to The Hague.

The most revolutionary implications of the ICC's 2025 policy touch on the subject aspect of criminal law. Historically, the ICC and post-World War II international tribunals have always focused on military apparatus and politicians. Article 25 of the Rome Statute limits the jurisdiction of the Court to *natural persons* only, and does not explicitly recognize jurisdiction over civil legal entities or corporations.²¹

Nonetheless, this operational policy affirms that the ICC encourages proactive cooperation with civil society and puts a sharp spotlight on businesses/corporations. Although the *corporate entity* cannot be tried directly by the ICC, the members of the Board of Directors, the President Director, the controlling shareholders, and the *financiers* of the corporation are human individuals who can be subject to suspect status.

Through the expanded doctrine of *command responsibility*, as well as criminal liability for *aiding and abetting* under Article 25 paragraph 3, executives of mining or plantation companies

¹⁹ Setiawan, B. (2023). Scientific evidence in transnational environmental crimes. *Judicial Journal*, 16(1), 67–89.

²⁰ Utami, P. N., & Kurniawan, R. (2022). The relevance of the principle of proportionality in war crimes against the environment. *Indonesian Journal of International Law*, 19(2), 233–255.

²¹ Firmansyah, D., & Alamsyah, I. (2024). Positive complementarity of the ICC and national environmental criminal law reform. *Constitutional Journal*, 21(1), 103–125.

that fund armed paramilitary groups to systematically evict civilians from their forest areas can be held individually criminally liable at the ICC. This policy sends a clear jurisprudential message to the global investment world that environmental crimes in the name of corporate business profits have no immunity from the international criminal system.

4. CONCLUSION

Based on the overall normative, historical, and doctrinal analysis that has been described in the discussion section, this study formulates the following main conclusions:

1. Juridical Transformation Interpretation of the Rome Statute: The Policy on the Handling of Environmental Damage published by the Office of the Prosecutor of the International Criminal Court in December 2025 is a highly progressive doctrinal breakthrough in the international criminal justice system. This policy does not formally change the material jurisdiction of the Rome Statute, but rather expands the teleological interpretation of existing elements of crime. The Prosecutor's Office officially combines the destruction of the environment and ecosystems as a method of material acts (*actus reus*) as well as a weighting indicator in the investigation of crimes of genocide, crimes against humanity, war crimes, and crimes of aggression. Through the adoption of an interdisciplinary approach to investigation and the involvement of environmental science, the ICC recognizes that criminal law can no longer unleash the absolute correlation between human rights and the preservation of natural ecosystems.
2. Strengthening Accountability Through Complementarity and Deterrent for Business Actors: The ICC's new policy strengthens the Court's position in the global criminal justice system by not overriding the rule of law domestically, but rather optimizing the principle of positive complementarity. The ICC serves as a *catalyst* as well as a safety net so that member countries' national law enforcement agencies are more decisive in cracking down on ecological crimes. On the other hand, this policy clearly removes the traditional limits of impunity for private sector actors. Although corporate entities are immune from the jurisdiction of the Court, this policy legitimizes individual criminal prosecutions directed at corporate executives, funders, and bureaucratic officials who facilitate the occurrence of crimes against humanity through the medium of environmental destruction. The presence of this policy strengthens the foundation of the international legal architecture in the twenty-first century to realize comprehensive ecological justice.

BIBLIOGRAPHY

- Absorb. (2014). Environmental law and sustainable development. Surakarta: Muhammadiyah University Press.
- Andriansyah, M., & Prasetyo, T. (2023). Environmental crime as an extraordinary crime in the perspective of international criminal law. *Indonesian Journal of International Law*.
- Arief, B. N. (2010). Law enforcement issues and criminal law policy. Jakarta: Kencana Prenada Media Group.
- Atmasasmita, R. (2017). International criminal law and transnational crimes. Jakarta: Prenadamedia Group.
- Fadli, M., & Setiawan, A. R. (2024). Challenges to the jurisdiction of the International Criminal Court against global environmental crimes. *Brawijaya Law Journal*.
- Firmansyah, D., & Alamsyah, I. (2024). Positive complementarity of the ICC and national environmental criminal law reform. *Constitutional Journal*.
- Hamzah, A. (2019). International criminal law. Jakarta: Sinar Grafika.
- Hidayat, A. N. (2023). Ecocide and the urgency of its development as an international crime. *Journal of RechtsVinding*.
- Hidayat, A., & Ramadhan, F. (2024). Environmental destruction as a crime against humanity: An analysis of Article 7 of the Rome Statute. *AMANNA GAPPA Journal of Law*.
- Keraf, A. S. (2010). Environmental ethics. Jakarta: Kompas Book Publishers.
- Kusuma, R. D., & Lestari, E. (2022). A paradigm shift in international environmental law: From state responsibility to individual criminal liability. *Journal of Legal Science Amanna Gappa*.
- Mahendra, I. G. A., & Putri, N. P. (2024). The role of the International Criminal Court in the enforcement of cross-border environmental laws. *Journal of Law & Development*.
- Start. (2005). Human Rights: Nature, Concept and Implications in Legal and Societal Perspectives. Bandung: Refika Aditama.
- Nugroho, H., & Wicaksono, D. A. (2022). Corporate crimes and gross human rights violations in the perspective of international criminal law. *Journal of Indonesian Legislation*.

- Prabowo, Y., & Anindita, K. (2025). ICC prosecutorial policy and its implications for global environmental protection. *Journal of Law IUS QUIA IUSTUM*.
- Putra, I. M. A. P., & Sari, N. L. G. (2023). Environmental crime as part of international crime: Challenges to the expansion of the jurisdiction of the International Criminal Court. *Journal of Law IUS QUIA IUSTUM*.
- Rahardjo, S., & Prasetyo, T. (2024). Environmental damage and international criminal responsibility: Reinterpretation of the Rome Statute. *Journal of Law & Development*.
- Setiawan, B. (2023). Scientific evidence in transnational environmental crimes. *Judicial Journal*.
- Siregar, M. F., & Lubis, A. (2023). The principles of complementarity of the ICC and its implications for national environmental law enforcement. *Journal of RechtsVinding*.
- Utami, P. N., & Kurniawan, R. (2022). The relevance of the principle of proportionality in war crimes against the environment. *Indonesian Journal of International Law*.
- Wicaksono, A. B. (2024). The environment as an object of protection of international criminal law. *Constitutional Journal*.