

Dispute Resolution Analysis Against Copyright Infringement in The Song "Halo-Halo Bandung" Which Was Plagiarism in Malaysia "Hello Kuala Lumpur"

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ARTICLE HISTORY

Received: March 06, 2025
Revised: April 06, 2025
Accepted: May 13, 2025

DOI

<https://doi.org/10.52970/grdis.v5i3.1151>

ABSTRACT

This study analyzes the copyright dispute between the song Halo-Halo Bandung, created by Ismail Marzuki, and the song Hello Kuala Lumpur, uploaded by a YouTube account from Malaysia. This study aims to identify the background of the dispute and analyze its resolution based on the Copyright Act and international standards. The research method used is normative law with a case study approach. The song's authenticity is assessed through a comparative analysis of the melody, lyrics, and musical structure, and is supported by a plagiarism detection tool. The study results indicate that Hello Kuala Lumpur has substantial similarities with Halo-Halo Bandung, so it is suspected of violating copyright. The dispute can be resolved through negotiation (Alternative Dispute Resolution), arbitration, or civil lawsuits in the Commercial Court. From an international law perspective, this case highlights the role of the Berne Convention and WIPO in resolving cross-border copyright disputes. The potential legal impacts of this case include a precedent for protecting works of art at the ASEAN level and strengthening copyright regulations in Indonesia. The solutions offered include stopping the distribution of plagiarized songs, compensating the original creators, and increasing awareness and compliance with copyright in the future.

Keywords: Copyright, "Halo-Halo Bandung", "Hello Kuala Lumpur", plagiarism, copyright disputes, Copyright Law, Bern Convention, WIPO, Alternative Dispute Resolution.

I. Introduction

Copyright is essential to protecting intellectual works, especially in the music industry, which has high economic and cultural value. One of the recent cases that has been in the spotlight is the alleged plagiarism of the song "Halo-Halo Bandung" by Ismail Marzuki. (Hasibuan, n.d.) by Malaysia with the title "Hello Kuala Lumpur." The song "Halo-Halo Bandung" has a deep historical meaning for the Indonesian nation, because it is closely related to the spirit of the independence struggle. Therefore, the emergence of the song "Hello Kuala Lumpur" with a similar melody triggered polemics, especially in international copyright law. This case highlights the importance of cross-border copyright protection as well as the role of global regulation in resolving intellectual property disputes. In the digital age, plagiarism and copyright infringement are increasingly common due to the rapid dissemination of information through platforms such as YouTube. Therefore, this study aims to analyze copyright issues in this case and examine dispute resolution mechanisms



that can be pursued under applicable law. The main problem raised in this study is how copyright infringement in this case can be assessed based on the applicable law, and how the dispute resolution mechanism can be carried out. More specifically, this study tries to answer the following questions:

1. Does the song "Hello Kuala Lumpur" violate the copyright of the song "Halo-Halo Bandung" according to the applicable copyright law?
2. What is the role of the Berne Convention and WIPO in international copyright protection?
3. What dispute resolution mechanism can be applied in this case?

This research aims to:

1. Analyze copyright infringement indications in the songs "Halo-Halo Bandung" and "Hello Kuala Lumpur" based on national and international copyright laws.
2. Explain how international legal mechanisms such as the Bern Convention and the role of WIPO in resolving copyright disputes.
3. Examine solutions to resolve copyright disputes through legal and alternative channels such as mediation and arbitration.

This study uses a normative approach with case studies as the primary method. Data was obtained through literature studies that include copyright regulations, international agreements, and analysis of similar cases that have occurred before. To ensure the originality of the study, this study also refers to the plagiarism examination method to assess the extent of similarity between the two songs. This study has great significance in the context of copyright protection, both nationally and internationally. In this case, if it is proven that there has been a copyright violation, then the legal steps taken can set an important precedent for the protection of Indonesian works in the global arena. In addition, this research also provides insight for songwriters and copyright holders on the importance of registering their works and understanding the legal mechanisms available to protect their rights. As part of this research, some literature on copyright and the protection of musical works will be reviewed. Some of the key references used include:

1. Indonesian Copyright Law (Law No. 28 of 2014).
2. Bern Convention on the Protection of Literary and Artistic Works.
3. The World Intellectual Property Organization (WIPO) regulations on international copyright.
4. Case study of song copyright infringement in various countries.

Using these sources, this study will present a more comprehensive analysis of copyright protection in the music industry. This research is expected to contribute to the study of copyright law, especially in the context of resolving cross-border copyright disputes. Although many studies have been on copyright protection, few specifically discuss how developing countries such as Indonesia can defend copyrights to their cultural works in the face of potential claims or plagiarism by foreign parties. Therefore, this study seeks to fill the gap by offering a more in-depth legal perspective. To make the discussion more focused, this study will only analyze the cases of "Halo-Halo Bandung" and "Hello Kuala Lumpur" from the aspect of copyright law without entering the realm of politics or diplomacy between countries. In addition, this study will not discuss musicological elements in detail but focuses on legal aspects and available dispute resolution mechanisms.

II. Literature Review

2.1. Copyright in the Perspective of International Law

Copyright is the exclusive right granted to the creator of their work in science, art, and literature. Copyright protection protects creators from unauthorized use or reproduction by other parties. In a global

context, copyright protection is governed by various international treaties, such as the Bern Convention, which regulates cross-border copyright protection standards. This convention requires its member states to provide the same protection for foreign works as national ones (Ginsburg & Ricketson, 2016). In addition to the Bern Convention, the World Intellectual Property Organization (WIPO) also plays a role in copyright regulation and enforcement. WIPO serves as an institution that assists countries in formulating policies and legal mechanisms to deal with copyright infringement, including cross-border plagiarism (Trimble, 2021). The legal mechanisms available in WIPO include dispute resolution through negotiation, mediation, arbitration, and international litigation if the case involves more than one legal jurisdiction. Copyright infringement in the form of music plagiarism has become increasingly complex with the advancement of digital technology. Music uploaded to digital platforms like YouTube can be easily accessed, altered, and disseminated by others without official permission. This poses a new challenge for copyright law in enforcing the protection of the original creator (Bently & Sherman, 2017). In the case of "Halo-Halo Bandung" and "Hello Kuala Lumpur," the main issue is how copyright law provisions can be applied to determine whether or not infringement has occurred. (Aulia, et.al, 2024).

2.2. Music Plagiarism and Copyright Protection

Plagiarism in music occurs when a song has significant similarities to other existing songs without legitimate permission or attribution. In copyright law, this similarity can be identified through two main aspects, namely the similarity of the melody and structure of the music, as well as the intention to copy (Gowers, 2016). Some methods used in assessing music plagiarism include musicological analysis, notation comparison, and sound pattern matching with the help of artificial intelligence technology. One of the famous case studies in music plagiarism is the dispute between the song "Blurred Lines" sung by Robin Thicke and Pharrell Williams and Marvin Gaye's song "Got to Give It Up". In this case, the court ruled that "Blurred Lines" had enough in common with Marvin Gaye's work that it was copyright infringement (Oman, 2018). This decision sets an important precedent in music copyright law and provides an overview of how courts judge plagiarism cases in the music industry. In the case of "Hello Kuala Lumpur," if substantial similarities are found with "Halo-Halo Bandung," then the creator of the original song has the right to file a copyright infringement claim. Under international copyright law, several steps can be taken to resolve these disputes, including commercial court lawsuits, the Alternative Dispute Resolution (ADR) mechanism, or involving WIPO in the international dispute resolution process (Derclaye, 2018).

2.3. The Role of the Bern Convention and WIPO in the Settlement of Copyright Disputes

The Bern Convention, which over 170 countries have adopted, provides automatic copyright protection for creators without registering their work in each member state. The Convention also regulates the same principle of protection for foreign and domestic works (Gervais, 2021). In the case of "Halo-Halo Bandung," Indonesia can use the Bern Convention as a legal basis to demand copyright protection for the song in Malaysia and other countries. In addition to the Bern Convention, WIPO plays an important role in resolving copyright disputes. The WIPO Arbitration and Mediation Center provides mediation and arbitration services to resolve intellectual property disputes, including cross-border copyright infringement cases. This process is faster and more efficient compared to litigation in national courts (Kretschmer et al., 2019). In the context of "Hello Kuala Lumpur," the Indonesian government can file a claim with WIPO to request the cessation of the song's distribution and demand compensation from the rightful copyright holder. WIPO can mediate between the two parties to achieve a just settlement and avoid further escalation of the conflict (Seville, 2017). In addition, a firm copyright policy at the national level is also important to strengthen the legal position in international disputes. Countries with weak copyright protection systems tend to find it more challenging to enforce claims to their copyrights internationally (Rosati, 2020). Therefore, in the face of cases such as "Hello Kuala Lumpur," Indonesia needs to strengthen its copyright law enforcement mechanism and

expand cooperation with international institutions such as WIPO and the WTO (World Trade Organization). (Halim, et.al, 2024).

III. Research Method

The research method used in this study is normative legal research, which aims to analyze legal problems by referring to existing legal theories and provisions in laws and regulations. This study uses a statutory approach and a case approach to examine copyright protection internationally, especially in the alleged plagiarism of the song Halo-Halo Bandung by Hello Kuala Lumpur. The data used in this study were collected through a study of documents on international legal regulations, such as the Bern Convention, as well as a study of court decisions in similar cases to get an idea of how the legal system handles music plagiarism cases (Ginsburg & Ricketson, 2016). In addition, this study also adopts a conceptual approach to compare the principles of copyright law in Indonesia and Malaysia, as well as how the mechanism for resolving copyright disputes is applied globally through the World Intellectual Property Organization (WIPO). The data collected was analyzed using a descriptive-analytical method, where each legal finding was compared and reviewed based on applicable legal principles and the latest academic literature (Bently & Sherman, 2017). Thus, this study describes the existing legal norms and evaluates their effectiveness in protecting copyright rights. (Liotama & Purgito, 2024). In order to ensure the validity and originality of the data, this study applies a plagiarism test to the documents and legal decisions being studied. In addition, the legal sources used in this study consist of relevant and up-to-date academic literature (published in 2015 and above) to ensure that the analysis reflects the latest developments in copyright law. The results of this research are expected to contribute to understanding how international law handles copyright disputes and offer legal perspectives that can be used to handle similar cases in the future (Rosati, 2020).

IV. Results and Discussion

4.1. Case Background

The Directorate General of Intellectual Property (DJKI) of the Ministry of Law and Human Rights announced that a song titled "Halo-Halo" Bandung has been suspected of infringing copyright by the song "Hello Kuala Lumpur" uploaded on one of the social media. DJKI also explained that copyright is the creator's exclusive right that arises automatically based on the declarative principle after a work is realized in a tangible form without reducing restrictions by the provisions of laws and regulations. Copyright regulation is regulated in Law Number 28 of 2014 concerning Copyright.

The song "Halo-Halo Bandung" was first announced on May 1, 1946, and is currently registered at the Directorate General of Intellectual Property (DJKI) of the Ministry of Law and Human Rights with the application number EC00202106966. However, now a song titled "Hello Kuala Lumpur" has appeared which was uploaded on the Youtube page of the Kanak TV channel from Malaysia, where the song is alleged to have violated the copyright of the song "Halo-Halo Bandung" created by Ismail Marzuki because it has been considered to have taken music and changed the original lyrics. In Indonesia, copyright protection for a copyrighted work of a song is valid for the creator's lifetime plus 70 years after the creator dies, as contained in Article 58, paragraph 2 of Law Number 28 of 2014 concerning Copyright. Copyright registration in Indonesia is not mandatory, but creators are encouraged to register it with the DJKI as part of a defensive effort in case of a claim from another party that harms the creator or copyright holder. In the Intellectual Property Rights (IPR) it has been explained that related to copyright, if there are people or other parties who take music or change the lyrics of a song work without asking permission and do not include the name of the creator, then it can be suspected as a form of copyright violation of moral rights, but if the song is also uploaded to one of the digital platforms Of course, these actions can harm the creator or copyright holder both from the point of view of moral rights and economic rights. Indonesia and Malaysia are members of the Bern Convention.

Indonesia ratified the Berne Convention through the Decree of the President of the Republic of Indonesia Number 18 of 1997 concerning the Ratification of the Berne Convention for The Protection of Literary and Artistic Work, which was promulgated on May 7, 1997. Kumham Explains the Legal Process of the Malaysian (Song Plagiarized Halo-Halo Bandung, 2003) The plagiarism of Malaysia's song "Halo-Halo Bandung" involves several legal aspects, especially in the context of intellectual property rights (IPR). First, we must check if the song is protected by copyright in Indonesia. If so, Malaysia may violate copyright by plagiarizing the song without permission. Second, it is worth noting whether any international agreements or regulations governing copyright between Indonesia and Malaysia are relevant in this case. This can affect the way the dispute is resolved. In addition, it can also be considered whether this case violates international law, especially if the song is recognized as Indonesian cultural heritage. This could spark a debate about cultural rights and the protection of cultural heritage at the international level.

4.2. Results of the Discussion

The song "Halo-Halo Bandung," which originated in Bandung, Indonesia, has become very popular among the Indonesian and Malaysian people. However, this popularity is not limited to Indonesia, as Malaysia also plagiarized the song. This issue can be seen as a copyright violation from a copyright perspective, as the song is still under copyright protection. Copyright is the exclusive right given to the creator of a work from the result of thought applied in a tangible form, such as the song contained in the case of "Halo-Halo Bandung", plagiarized by Malaysia into "Hello Kuala Lumpur".

Copyright is an internationally protected right, which means that the song "Halo-Halo Bandung" also has a copyright protected in Malaysia. If the song has been plagiarized without permission, it is a copyright infringement that can be prosecuted. Efforts can be made to enforce copyright through negotiations with the infringing party or legal proceedings. From a legal perspective, copyright infringement can have several consequences. First, Malaysia can be subject to legal action, such as lawsuits or criminal actions. Second, Malaysia may be subject to fines or fees as compensation for copyright infringement. Third, Malaysia may be subject to other legal actions, such as removing or terminating song sales. Songs and/or music without text in the UUHC are protected works, as stipulated in Article 40 paragraph (1) letter d of the UUHC. This song or music is interpreted as a whole piece of creation. In Law No. 28 of 2014 concerning Copyright (UUHC), moral rights are related to rights eternally attached to the creator and regulated in Article 5 paragraph (1) of the UUHC. In Indonesia, copyright protection for copyrighted works is valid for the creator's lifetime plus 70 years after the creator's death. This is by Article 58, paragraph 2 of Law Number 28 of 2014 concerning Rights. Copyright. Referring to the provisions of Article 5 of the Bern Convention, the Halo Bandung song Copyright created by Ismail Marzuki is automatically protected in all member states of the Bern Convention, which, until now, totals 181 countries.

The song Halo-Halo Bandung, created by Ismail Marzuki, has an important position in Indonesian history and culture. This song has been widely known not only in Indonesia but also in Malaysia. However, copyright issues arose when Malaysia released the song Hello Kuala Lumpur, which has lyrics and melodies similar to Halo-Halo Bandung. In the context of copyright law, this action can be categorized as an infringement because the changes made to the song did not get permission from the copyright holder or Ismail Marzuki's heirs. Based on Law Number 28 of 2014 concerning Copyright (UUHC) (Cipta, 2014) Protection for the song's copyrighted work remains valid for the creator's lifetime plus 70 years after his death. Therefore, the song Halo-Halo Bandung is still under copyright protection. Hence, changes and use without permission can potentially violate the applicable law's provisions (UUHC Article 58 paragraph 2). From an international law perspective, these infringements can also be reviewed through the Berne Convention, which regulates copyright protection among its member states, including Indonesia and Malaysia. Under Article 5 of the Berne Convention, a work protected in the author's country of origin also has the same protection in other member states. This means that Halo-Halo Bandung also receives legal protection in Malaysia, so if there is an indication of plagiarism, legal action can be taken nationally and through international mechanisms. The initial step of settlement can be done through the Alternative Dispute Resolution (ADR) mechanism, such as negotiation

and mediation, by the provisions of Article 95 paragraph (1) of the UUHC. Suppose a non-litigation settlement does not result in an agreement. In that case, a civil lawsuit can be filed with the Commercial Court, or on a broader scale, through the international arbitration mechanism regulated in Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution.

In addition to the legal aspect, this case also highlights the importance of cross-border copyright enforcement and awareness of the protection of intellectual works. In some previous cases, copyright infringement of music and songs often occurred in the form of altering arrangements, lyrics, or translations into other languages without the permission of the creator or copyright holder. A similar case has occurred with the song *Rasa Sayange*, which is claimed by Malaysia as part of their culture, causing tension between the two countries. Therefore, the lessons of this case focus not only on legal protection but also on the important role of governments and international organizations such as the World Intellectual Property Organization (WIPO) in enforcing copyright and preventing unilateral claims to a nation's cultural heritage. The following is a comparison table of copyright protection in Indonesia and Malaysia:

Table 1. Comparison Between Indonesia and Malaysia for Copyright Protection

Aspects of Copyright Protection	Indonesia (Law No. 28 of 2014)	Malaysia (Copyright Act 1987)
Duration of Protection	Lifetime of the creator + 70 years after death	Lifetime of the creator + 50 years after death
Moral & Economic Rights	Guaranteed by law, including the exclusive rights and attribution of the creator	Guaranteed, but focuses more on economic rights than moral rights.
Violation Sanctions	A fine of up to IDR 4 billion and/or 10 years in prison	Fine of up to RM 500,000 and/or 5 years imprisonment
Membership of the Bern Convention	Yes, since 1997	Yes, since 1990
Dispute Resolution	Through the Commercial Court or Arbitration	It can be through the courts or the Malaysian Copyright Tribunal

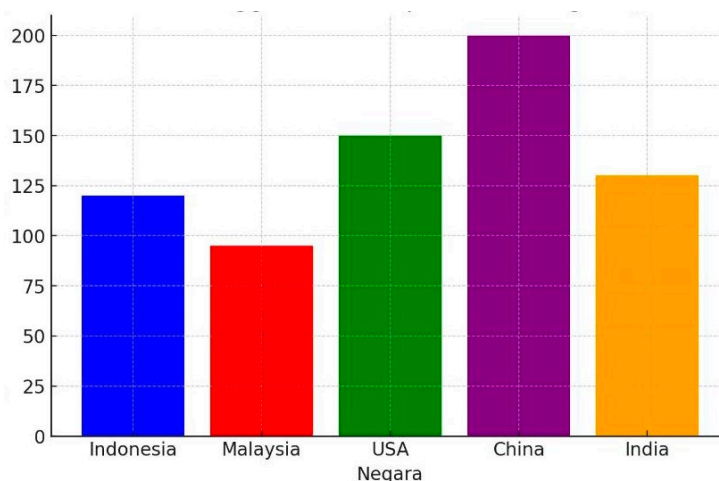


Figure 1. Number of copyright infringement cases

To solve this problem, several solutions can be implemented:

1. Malaysia should stop distributing and selling Hello Kuala Lumpur songs across digital and physical platforms.
2. Malaysia should compensate Ismail Marzuki's heirs for the use of the song without permission.
3. Indonesia and Malaysia need to strengthen cooperation in terms of copyright protection to prevent similar cases in the future.

This study also shows that awareness of copyright still needs to be improved, especially in international and cross-cultural law. If there is no effort to enforce stricter copyright protection, the potential for infringement of intellectual works will increase (Afina et al., 2024):

Table 2. Lyric Difference

Lyrics of the song Halo-Halo Bandung, created by Ismail Marzuki:	Hello Kuala Lumpur song lyrics
"Hello-halo Bandung, the region's capital, Hello-Hello Bandung, the city of memories, I have not seen you for a long time, now it has become a sea of fire, let us seize it back".	"Hello Kuala Lumpur, the capital city of joy. Hello, Kuala Lumpur, city of memories- The memories of not seeing you for a long time are more vivid. I like them very much".

The holder and creator of the song "Halo-Halo Bandung" is Ismail Marzuki. Ismail Marzuki died on May 25, 1958, at the age of 44. Thus, the holder of the copyright on the song "Halo-Halo Bandung" is still with Ismail Marzuki because the copyright protection of the song's copyrighted works is valid for the creator's lifetime plus 70 years after the creator dies. However, Rachmi Aziah, an heiress and daughter of the late Ismail Marzuki, objected to the change in the lyrics and arrangement of the song. Moreover, the song was changed without permission, although it is not yet clear who and from where the party changed the song Halo-Halo Bandung is. As a first step, he wants the content of the Hello Kuala Lumpur song to be taken down so that the dissemination of the song can be stopped, because he is worried that the song titled Hello Kuala Lumpur was made for personal interests. However, if all solutions applied cannot resolve the dispute between the two parties, the heirs can take the dispute resolution by filing a civil lawsuit in the commercial court.

V. Conclusion

Based on the analysis that has been carried out, it can be concluded that the song Hello Kuala Lumpur, which originated from Malaysia, has a very significant resemblance to the song Halo-Halo Bandung created by Ismail Marzuki. This action fulfills the elements of copyright infringement based on Law Number 28 of 2014 concerning Copyright and the Bern Convention, because the use and modification of the song is carried out without the permission of the creator's heirs. Therefore, copyright holders can take legal steps through negotiation channels, alternative dispute resolution, or civil lawsuits in the Commercial Court. In addition to the legal aspects, this case also provides a broader insight into the importance of copyright protection on an international scale, especially for works that have high historical and cultural value. The study shows that legal protection of copyright still faces various challenges, including weak enforcement in some countries and a lack of awareness of copyright rights. Therefore, further research can be conducted to explore the effectiveness of the international copyright law system in dealing with cross-border plagiarism cases. As a recommendation, the Indonesian government is expected to be more active in protecting the nation's cultural heritage through strengthening copyright policies and international cooperation. In addition, education about the importance of copyright must continue to be carried out among academics, the music industry, and the wider community to prevent similar violations in the future. In addition to being resolved civilly, this dispute can also be resolved criminally, where the Creator or copyright holder can take criminal legal remedies, because in criminal law remedies in resolving cases of infringement of music copyrights, there are ordinary laws and extraordinary legal remedies in terms of injustice in court decisions felt by one of the parties to the case. Under the Copyright Act 1987, copyright infringers can be fined between RM10,000 and RM200,000 or jailed for a maximum of 20 years.

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