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VOLUME 4 ISSUE 1, JANUARY-June 2026

ISSN (Print): xxxx-xxxx ISSN (Online): xxxx-xxxx

History of Article

Submitted: Februari 2026

Revised: Maret 2026

Accepted: April 2026

Asean Collectivism In Addressing China's Dominance Politics In The South China Sea Conflict: Indonesia's Perspective

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ABSTRACT

This study examines the complexities of the South China Sea (SCS) conflict, focusing on Indonesia's strategic approach to the Nine-Dash Line (NDL) dispute through ASEAN collectivism. Given Indonesia's geopolitical and economic stakes, this research explores diplomatic strategies that align with national interests and regional stability. A key challenge is the fragmented stance among ASEAN members, weakening collective diplomatic efforts. This study proposes a unified ASEAN strategy emphasizing collective bargaining, institutional cohesion, and maritime security cooperation. This research employs a juridical-normative method with a descriptive-analytical approach, drawing on secondary materials—including international legal instruments, peer-reviewed journals, diplomatic documents, and authoritative policy analyses—to assess the alignment between *das sollen* (legal norms) and *das sein* (state practice) in ASEAN's conflict-resolution mechanisms. The findings indicate that Indonesia plays a proactive role in

strengthening ASEAN's strategic autonomy and expediting the Code of Conduct (CoC) negotiations with China to secure North Natuna's sovereignty, economic stability, and security interests. The research concludes that fostering ASEAN collectivism through joint diplomatic and maritime security initiatives is crucial for establishing a rules-based order in the SCS. A coherent ASEAN position in CoC negotiations would deter unilateral actions, ensuring regional stability and safeguarding Indonesia's long-term national interests

Keywords: ASEAN Collectivism, Code of Conduct, Conflict Resolution, Nine-Dash Line, South China Sea, North Natuna Sea

INTRODUCTION

The bilateral relationship between Indonesia and China has continued to strengthen, reflecting their growing economic and political influence in East and Southeast Asia.¹ China's ambitious One Belt One Road (OBOR) initiative has positioned Indonesia as a key economic partner, facilitating resource circulation and providing markets for Chinese industrial products.² In 2023, China emerged as Indonesia's second-largest foreign investor, following Singapore, with investments totaling approximately US\$7.3 billion. This marked a significant increase from the previous year, underscoring the rapid enhancement of economic ties between the two nations since 2016.³ Trade between the two countries also saw substantial growth. In 2023, Indonesia exported goods worth \$70.7 billion to China, with major exports including ferroalloys, lignite, and coal briquettes. Over the past five years, Indonesian exports to China have grown at an annualized rate of 17.3%, rising from \$31.8 billion in 2018 to \$70.7 billion in 2023. Conversely, China exported \$62.7 billion worth of goods to Indonesia in 2023, with key exports comprising broadcasting equipment, telephones, and computers. This reflects an annualized growth rate of 6.57% over the past five years, up from \$45.6 billion in 2018.⁴

¹ Bama Andika Putra, 'The Rise of Paragonboat Diplomacy as a Maritime Diplomatic Instrument: Indonesia's Constabulary Forces and Tensions in the North Natuna Seas', *Asian Journal of Political Science* 31, no. 2 (4 May 2023): 106–24, <https://doi.org/10.1080/02185377.2023.2226879>.

² Christian Ploberger, 'One Belt, One Road – China's New Grand Strategy', *Journal of Chinese Economic and Business Studies* 15, no. 3 (2017), <https://doi.org/10.1080/14765284.2017.1346922>.

³ Nurul Fitri Ramadhani, 'China Enhances Investment Support for Indonesia's Industrialization', *Xinhua*, 2024, <https://english.news.cn/asiapacific/20240517/2cc1962382684f16ae09910279b75ebc/c.html?>

⁴ 'OEC Report', 2025, <https://oec.world/en/profile/bilateral-country/chn/partner/idn?utm>.

In September 2023, Indonesia secured a new investment commitment from China amounting to \$21 billion, further solidifying their economic partnership. Additionally, Chinese companies have significantly invested in Indonesia's nickel processing industry, with Chinese firms controlling approximately 75% of Indonesia's nickel refining capacity as of early 2025.⁵

The bilateral relationship between Indonesia and China, the world's fourth and most populous nations respectively, has continued to strengthen.⁶ Under President Joko Widodo's administrations (2014-2019 and 2019-2024), this partnership flourished, characterized by inclusive development policies and 'grounded diplomacy', as well seen in President Prabowo Subianto's administration.⁷ Aligned with Indonesia's doctrine of active free diplomacy, their cooperation is founded on principles of freedom, non-intervention, and mutual respect, attracting increased Chinese investment to Indonesia.⁸ In the first three years of President Widodo's tenure, from October 20, 2014, to the end of 2017, 36 Memoranda of Understanding (MoUs) were signed, encompassing various sectors such as the economy, culture, education, and tourism. In November 2024, President Prabowo Subianto's state visit to China resulted in the signing of multiple cooperation agreements, including those focusing on water conservation, maritime resources, and mining. The rapid development of both countries underscores the government's earnest efforts to facilitate long-term open economic cooperation with China.⁹

The primary interest of Indonesia towards China in the framework of bilateral cooperation during President Joko Widodo's administration is the projection of domestic infrastructure development.¹⁰ The gradual increase in Chinese investment consistently trends towards a positive peak in the realm of development. In 2015, Chinese investment closed at a value of US\$ 628 million,

⁵ Reuters, "Chinese Firms Control Around 75% Of Indonesian Nickel Capacity", *Report Finds*, <https://www.reuters.com/markets/commodities/chinese-firms-control-around-75-indonesian-nickel-capacity-report-finds-2025-02-05/>, 2025.

⁶ Andrias Darmayadi et al., 'The Indonesia – China Relations in the Natuna Sea Dispute Resolution: Struggle for Sovereignty', *Journal of Eastern European and Central Asian Research* 9, no. 1 (4 February 2022): 41–48, <https://doi.org/10.15549/jecar.v9i1.870>.

⁷ Bama Andika Putra, 'The Rise of Paragonboat Diplomacy as a Maritime Diplomatic Instrument: Indonesia's Constabulary Forces and Tensions in the North Natuna Seas'.

⁸ Binsar Simorangkir, Tri Legionosuko, and Surryanto Djoko Waluyo, 'Improvement Efforts Of Indonesia's Defense Diplomacy Performance Via Deterrence Strategy In Dealing North Natuna Sea Conflict (2016-2021)', *International Journal Of Humanities Education and Social Sciences (IJHES)* 2, no. 6 (15 June 2023), <https://doi.org/10.55227/ijhess.v2i6.519>.

⁹ Reuters, 'China and Indonesia Sign Multiple Cooperation Deals', *Reuters*, 2025, <https://www.reuters.com/world/asia-pacific/china-indonesia-sign-multiple-cooperation-deals-2024-11-09/>.

¹⁰ Fransiskus Radityo et al., 'Geopolitik Tiongkok Di Kawasan Asia Tenggara: Jalur Perdagangan (Obor)', *Jurnal Asia Pacific Studies* 3, no. 1 (24 July 2019): 84, <https://doi.org/10.33541/japs.v3i1.1073>.

escalated to US\$ 1 billion in 2016, and further increased to US\$ 2.7 billion in 2017. In 2016, there were 1,734 infrastructure development projects funded by foreign investors in Indonesia, with China ranking as the third-largest country. This position shifted again in 2022, with the investment value expanding to US\$ 5.8 billion and projected to increase in 2023.¹¹ In parallel with investment policies, Indonesia also forges close ties with the Asian Infrastructure Investment Bank (AIIB), an international financial institution led by China, with a vested interest in the development of the China Silk Road initiative, particularly in enhancing relationships in Asia, the Middle East, and Europe.¹²

From the perspective of the Chinese government, the strategic relationship built with Indonesia is an integral part of realizing the OBOR ambition.¹³ In the OBOR agenda, China plans to revitalize the Silk Road, a trade route connecting Asia to Europe, through the construction of the Silk Economic Road for the land route and the 21st Century Maritime Silk Road for the maritime route.¹⁴ In this framework, it is evident that China's approach to Indonesia is part of a succession of agendas aimed at securing future economic, energy, and maritime transportation resource supplies from China. Furthermore, the United States' failure to increase influence in the Asia-Pacific region post the unsuccessful Rebalance to Asia strategy has heightened China's approach towards Indonesia.¹⁵ The stalling of the Trans-Pacific Partnership (TPP) initiated by the U.S. during President Barack Obama's tenure, due to insufficient support from his successor, Donald Trump, has made China a rational choice for Indonesia to build a strategic economic alliance.¹⁶

Despite the strengthening economic relations between Indonesia and China, sovereignty disputes in the North Natuna Sea persist. This area, part of the broader South China Sea region, remains contested, with both nations asserting conflicting claims. Indonesia maintains that the North Natuna Sea falls within its Exclusive Economic Zone (EEZ) as defined by the United Nations Convention on the Law of the Sea (UNCLOS) 1982, while China continues to uphold its claims based on

¹¹ Andri Yanto, 'Resolusi Konflik Zona Ekonomi Eksklusif Indonesia Dan Vietnam Dalam Pengamanan Sumber Daya Maritim Natuna Utara', *Recht Studiosium Law Review* 2, no. 1 (2023): 9–18.

¹² Xiao Ren, 'China as an Institution-Builder: The Case of the AIIB', *The Pacific Review* 29, no. 3 (2016): 435–42, <https://doi.org/10.1080/09512748.2016.1154678>.

¹³ Inggrit Fernandes et al., 'Status of Indonesia's Sovereign Rights in the North Natuna Sea Conflict Area Consequences of China's Nine-Dash Line Claim', *Linguistics and Culture Review* 5, no. S3 (29 December 2021): 1775–83, <https://doi.org/10.21744/lingcure.v5nS3.2051>.

¹⁴ Robert D Kaplan, 'The South China Sea Is The Future of Conflict', *Foreign Policy*, no. 188 (October 2011): 2011.

¹⁵ ME Manyin et al., 'Pivot to the Pacific? The Obama Administration's "Rebalancing" Toward Asia.', *Library of Congress Wahington DC Congressional Research Service*, 2022, <https://apps.dtic.mil/sti/citations/ADA584466>.

¹⁶ Jefferson Benyamin and Hikmat Zakky Almubaroq, 'The Dynamics of The China Maritime Militia Conflict In South China Sea On Sovereignty Indonesian Countries And ASEAN Region Countries', *JESS (Journal of Education on Social Science)* 5, no. 2 (31 January 2022): 185, <https://doi.org/10.24036/jess.v5i2.385>.

the Nine-Dash Line.¹⁷ Incidents involving Chinese vessels entering the North Natuna Sea have been ongoing. Notably, in October 2024, Indonesia's Maritime Security Agency (Bakamla) reported expelling a Chinese coast guard vessel that had disrupted a seismic survey conducted by Indonesia's state-owned energy company, Pertamina. The Chinese vessel re-entered Indonesian waters shortly after being driven out, leading to repeated confrontations.¹⁸ In 2016 alone, there were three recorded instances of Chinese fishing vessels being apprehended while operating in North Natuna. Tensions escalated further in 2019 when China issued a Protest Note expressing objections to Indonesia's natural gas exploration in Natuna, and in 2020, Indonesia reciprocated with a Protest Note following an incident involving Chinese Coast Guard and Indonesian Navy vessels in North Natuna. In response to these intrusions, Indonesia has intensified its maritime patrols in the North Natuna Sea, deploying both sea and air assets to safeguard its territorial waters. The Indonesian Navy has also utilized drones and unmanned aircraft to monitor and protect its maritime interests.¹⁹

The dichotomy between economic relations and sovereignty between Indonesia and China underscores the necessity for the government's legal and policy formulation to be a careful and precise strategy in bilateral diplomacy.²⁰ Errors in decision-making regarding North Natuna can have far-reaching implications for the economic infrastructure jointly developed by both nations. Therefore, conflict resolution efforts must be conducted with a judicious approach, one of which involves adhering to the principle of interest balancing.

The maritime claims dispute in the South China Sea is not only a challenge for Indonesia but also for other ASEAN countries, particularly Malaysia, Vietnam, the Philippines, and Brunei Darussalam. These four nations have even more intense disputes with China due to overlapping claims with Beijing's Nine-Dash Line. The Philippines, for instance, has repeatedly faced confrontations with Chinese coast guard and maritime militia vessels around the Spratly Islands and Scarborough Shoal, including a ship collision incident in early 2024 that escalated diplomatic

¹⁷ Suhanto Suhanto and Angelia Krisdanti Nasera Putri, 'Indonesia Policy In Resolving The North Natuna Sea Conflict With Tiongkok: A Case Study Of Illegal Fishing In 2019-2020', *Jurnal Sosial Dan Humaniora* 8, no. 1 (12 June 2023): 48–56, <https://doi.org/10.47313/pjsh.v8i1.2210>.

¹⁸ Ding Hongbin and Ihsan Ullah, 'The South China Sea's Nine Dash Line: Key Disputes And China's Historical Rights Claims', *Journal of Pakistan-China Studies (JPCS)* 3, no. 1 (1 December 2022): 67–86, <https://doi.org/10.55733/jpcs.v3i1.53>.

¹⁹ 'Indonesia Drives Out China Coast Guard Again in Disputed Sea', *Bloomberg*, 2025, <https://www.energyconnects.com/news/oil/2024/october/indonesia-drives-out-china-coast-guard-again-in-disputed-sea/>.

²⁰ Naifa Rizani, 'ASEAN Way: Managing Expectation in the Code of Conduct for the South China Sea', *Global: Jurnal Politik Internasional* 23, no. 2 (6 December 2021): 218, <https://doi.org/10.7454/global.v23i2.666>.

tensions. Meanwhile, Vietnam continues to encounter aggressive actions from Chinese vessels in its waters, which are rich in energy resources. Malaysia faces similar challenges, with reports of increased patrols by Chinese warships near its EEZ. Although Brunei Darussalam is less vocal in the dispute, it still has claims in the South China Sea that could be affected by China's maritime expansion. With China's growing military and economic activities in the region, ASEAN countries face a major dilemma in safeguarding their maritime sovereignty while maintaining close economic ties with Beijing.²¹

The resolution of disputes in the South China Sea must be examined from a regional perspective—one that ensures China's growing political and economic dominance does not come at the expense of ASEAN member states. How can ASEAN countries, with their diverse political and economic interests, form a unified stance to safeguard their sovereignty while maintaining crucial economic ties with China? For Indonesia, the stakes are even higher. With its strategic energy interests in the North Natuna Sea, how can it ensure that the exploration and development of its resources proceed without external interference? Can Indonesia, alongside ASEAN, strengthen regional mechanisms to counterbalance China's assertiveness, or will economic dependence gradually erode their negotiating power? These pressing questions underscore the urgency of a regional approach that not only upholds international law but also secures the long-term strategic interests of ASEAN nations in an increasingly contested maritime domain.

METHOD

This study uses a juridical-normative legal method with a descriptive approach as an analytical framework to examine conflict resolution strategies in the South China Sea, especially in the perspective of ASEAN collectivism. This analysis is elaborated on top of credible secondary sources, including books, peer-reviewed journals, scholarly articles, and reputable online platforms, ensuring a well-reasoned and academically rigorous argument to find relevance between *das sollen* and *das sein* in formulating descriptions according to the research topic being discussed.²² The synthesis of this research is directed to highlight the need for conflict resolution through regional

²¹ Renato Cruz De Castro, 'The Limits of Intergovernmentalism: The Philippines' Changing Strategy in the South China Sea Dispute and Its Impact on the Association of Southeast Asian Nations (ASEAN)', *Journal of Current Southeast Asian Affairs* 39, no. 3 (December 2020): 335–58, <https://doi.org/10.1177/1868103420935562>.

²² Rhuks Ako and Damiola S. Olawuyi, 'Methodology, Theoretical Framework and Scholarly Significance: An Overview of International Best Practices in Legal Research', *Journal of Sustainable Development Law and Policy (The)* 8, no. 2 (1 January 1970): 225–41, <https://doi.org/10.4314/jsdlp.v8i2.11>.

cooperation, affirming that ASEAN's strength lies in its collective diplomatic engagement. In the context of the South China Sea dispute, a unilateral approach risks escalating tensions, while ASEAN's united stance strengthens regional sovereignty and legal frameworks, such as the 1982 UNCLOS. By encouraging multilateral dialogue and cooperative security measures, ASEAN can better protect the territorial rights of its member states while maintaining long-term economic and political stability.

RESULT & DISCUSSION

3.1. The Economic Utility Politics of China in Southeast Asia

It is undeniable that China employs an economic approach to soften the political stance of Southeast Asian countries and facilitate the OBOR projects.²³ Previously, the NDL claim, spanning 80% of the total SCS, had led to overlapping territorial conflicts with Vietnam, the Philippines, Malaysia, Brunei Darussalam, and Indonesia.²⁴ China's approach through investment instruments has influenced these countries' attitudes towards China's claims in the SCS.²⁵

Firstly, during the leadership of President Benigno Aquino III, the Philippines staunchly opposed China's claims in the SCS that encroached upon the Philippines' territorial boundaries.²⁶ In 2011, the Philippines brought the dispute to the Permanent Court of Arbitration in The Hague and won the case. However, China unilaterally refused to accept the decision and maintained its Nine-Dash Line claim in the Philippines' territorial waters.²⁷ In 2017, the Philippines softened its stance after China provided investments for 30 cooperation projects worth IDR 484 trillion. Under President Rodrigo Duterte's leadership, China-Philippines

²³ Ren, 'China as an Institution-Builder: The Case of the AIIB'.

²⁴ Zhiguo Gao et al., 'The Nine-Dash Line in the South China Sea: History, Status, and Implications', *American Journal of International Law* 107, no. 1 (1 January 2013): 98–123, <https://doi.org/10.5305/amerjintlaw.107.1.0098>.

²⁵ Yang Lai Fong, Ramachandran Ponnann, and Antoon De Rycker, 'Different Countries, Different Perspectives: A Comparative Analysis of the South China Sea Disputes Coverage by Malaysian and Chinese Newspapers', *China Report* 56, no. 1 (February 2020): 39–59, <https://doi.org/10.1177/0009445519895627>.

²⁶ Farhan Muhammad Aditomo et al., 'Review of the Formulating of the Code of Conduct in South China Sea between ASEAN and the People's Republic of China', *Konfrontasi: Jurnal Kultural, Ekonomi Dan Perubahan Sosial* 9, no. 1 (31 March 2022): 119–30, <https://doi.org/10.33258/konfrontasi2.v9i1.199>.

²⁷ Christina J Lai, 'Rhetorical Traps and China's Peaceful Rise: Malaysia and the Philippines in the South China Sea Territorial Disputes', *International Relations of the Asia-Pacific* 19, no. 1 (2017): 117–46, <https://doi.org/10.1093/irap/lcx008>.

disputes were discussed bilaterally in a more accommodating and dialogical manner.²⁸

Secondly, Malaysia altered its perspective towards China after receiving a substantial investment injection.²⁹ Similar to the Philippines, Malaysia's confrontational stance softened during Prime Minister Najib Razak's leadership, following agreements on 10 cooperation projects worth US\$ 15 billion. Post this agreement, Malaysia sought resolution through peaceful dialogue. Thirdly, Brunei Darussalam was one of the countries that vehemently opposed China's SCS claims. This was due to China's claims overlapping with Louisa Reef in Brunei's oil-rich EEZ. However, Brunei's stance changed after China provided assistance for oil drilling activities in the Louisa Reef area. In 2016, a Chinese company, Guangxi Beibu Gulf International Port Group Co, signed a project for the management of the main port in Brunei Darussalam.³⁰

In contrast to the positions of the Philippines, Malaysia, and Brunei, Vietnam remains steadfast in its opposition to China's presence in the SCS.³¹ Vietnam rejects China's claims that encroach upon its territory, even as economic cooperation projects between Vietnam and China continue to show positive growth trends.³² Vietnamese Customs data records a 43% surge in the export value of rice from Vietnam to China, totaling USD 13 billion in 2017. Until 2023, China's economic approach has failed to soften Vietnam's stance on China's claims in the SCS. Consistently, Vietnam advocates for continued discussions on the Code of Conduct (CoC), proposed as a resolution to the NDL conflict in the SCS between ASEAN and China.³³

Regarding Southeast Asian countries with no direct involvement in the NDL claims in the SCS, their positions vary. Cambodia and Laos having strong economic-political ties with China, tend to express support. In the 2012 ASEAN Summit in Cambodia, the host country refused to include the NDL issue in the

²⁸ De Castro, 'The Limits of Intergovernmentalism'.

²⁹ Yew Meng Lai and Cheng-Chwee Kuik, 'Structural Sources of Malaysia's South China Sea Policy: Power Uncertainties and Small-State Hedging', *Australian Journal of International Affairs* 75, no. 3 (Des 2020): 277–304, <https://doi.org/10.1080/10357718.2020.1856329>.

³⁰ Muhammad Ghaffaar Irsyad Sumarsono, 'The People's Republic of China Claims the Nine Dash Line under International Law', *The Indonesian Journal of International Clinical Legal Education*, 2023, <https://doi.org/10.15294/ijicle.v5i3.72001>.

³¹ Phuong Hoang, 'Domestic Protests and Foreign Policy: An Examination of Anti-China Protests in Vietnam and Vietnamese Policy Towards China Regarding the South China Sea', *Journal of Asian Security and International Affairs* 6, no. 1 (April 2019): 1–29, <https://doi.org/10.1177/2347797019826747>.

³² Shirley V. Scott and Shirley V. Scott, 'China's Nine-Dash Line, International Law, and the Monroe Doctrine Analogy', *China Information* 30, no. 3 (31 August 2016): 296–311, <https://doi.org/10.1177/0920203x16665054>.

³³ Rizani, 'ASEAN Way'.

SCS as an agenda item. Similarly, Myanmar and Thailand support peaceful resolutions and have built strong economic-political ties with China.³⁴

The heterogeneity of perspectives among Southeast Asian countries towards China impedes collective efforts for dispute resolution through ASEAN. Since 2002, ASEAN and China have successfully reached an agreement in the Declaration of the Conduct of Parties in the South China Sea (DoC). The DoC represents the first ASEAN-China agreement explicitly outlining general principles for the peaceful use of the SCS. Subsequently, in 2012, efforts to address the NDL conflict in the SCS materialized with the discussion of the CoC between ASEAN and China.³⁵ However, as of 2025, an agreement on this matter has not been reached. The changing stances of ASEAN member states weaken the mission of dispute resolution through the CoC, leaving China in a dominant position amidst regional political dynamics.

In the perspective of international political economy, the shifts in government stances in ASEAN countries can be viewed as pragmatic efforts to gain economic advantages. Economic development is contingent upon political stability and security. The harmony between China and Southeast Asian countries is built on the foundation of dependency of these countries on China in economic aspects. The same holds true for Indonesia, with the increase in investment value, cooperation projects, and import-export relations between the two countries.

For China, the effort to 'conquer' SCS is an unavoidable endeavor to ensure the success of the OBOR.³⁶ The primary orientation of the NDL's interest in the South China Sea is the control of global trade routes and rich maritime resources. The SCS is a maritime region spanning from the Karimata Strait and the Malacca Strait to the Taiwan Strait, part of the Pacific Ocean, with an area of up to 3,500,000 square kilometers.³⁷

The SCS region holds strategic significance in economic, political, and maritime transportation aspects. The SCS is the world's second-busiest maritime route, with over 50% of global annual cargo tonnage passing through the Malacca Strait,

³⁴ Budi Hermawan Bangun, 'Upaya dan Peran ASEAN dalam Penyelesaian Sengketa Laut China Selatan', *Jurnal Komunikasi Hukum (JKH)* 7, no. 1 (2 February 2021): 23, <https://doi.org/10.23887/jkh.v7i1.31455>.

³⁵ Rendi Prayuda and Fanesa Angeli, 'ANALISIS IMPLEMENTASI KONSEP COC (CODE OF CONDUCT) DALAM PENYELESAIAN KONFLIK DI LAUT NATUNA UTARA', *Jurnal PIR : Power in International Relations* 4, no. 2 (11 December 2020): 137, <https://doi.org/10.22303/pir.4.2.2020.137-150>.

³⁶ Padraig Lysaght, 'The South China Sea Conflict: Ten Thousand Stones and a Nine-Dash- Line – Rethinking Maritime Space Concepts', in *Unresolved Border, Land, and Maritime Disputes in Southeast Asia*, 2017 (BRILL, 2017), 168–82.

³⁷ Kaplan, 'The South China Sea Is The Future of Conflict'.

Sunda Strait, and Lombok Strait within the SCS.³⁸ Approximately 1.6 million cubic meters (10 million barrels) of crude oil per day traverse the Malacca Strait, making the SCS three times busier in terms of ship traffic than the Panama Canal in South America³⁹. Despite occasional reports of maritime piracy, the number of such incidents has significantly declined since the mid-20th century. In regional trade among Southeast Asian countries, the SCS serves as a primary transportation route connecting these nations.

In terms of economic potential, the SCS region boasts proven oil reserves of 1.2 cubic kilometers (7.7 billion barrels) and estimated total reserves of 4.5 cubic kilometers (28 billion barrels). The estimated natural gas reserves stand at 7,500 cubic kilometers (266 trillion cubic feet).⁴⁰ A 2013 report from the U.S. Energy Information Administration increased the total oil reserve estimate to 11 billion barrels.⁴¹ In 2014, China initiated oil exploration in the disputed waters with Vietnam. The Council on Foreign Relations (CFR) released data in 2019 indicating natural gas reserves in the SCS reaching 900 trillion cubic feet, significantly higher than the 2015 estimate of 266 trillion cubic feet by the American Security Project. This accounts for 60-70% of the total natural gas reserves in the Southeast Asian region. A report from the Department of Environment and Natural Resources in the Philippines revealed that the SCS harbors one-third of the world's marine biodiversity.⁴² The existence of the SCS is crucial for ecosystem conservation, serving as a biodiversity gene bank. However, this biodiversity is declining due to the increasing fishing activities in the SCS, contributing to 10% of the world's total annual fish catch.

China's success in prolonging the resolution of disputes provides ample time for the Middle Kingdom to strengthen its influence through economic schemes and investments in the contested nations. Concurrently, China continues to build economic and military resilience networks to position itself as the primary power axis in the Asia-Pacific. This progress positions China to gain full control over the SCS, transforming it into a future resource supply and economic surplus hub.

³⁸ Fong, Ponnann, and De Rycker, 'Different Countries, Different Perspectives'.

³⁹ Yanto, 'Resolusi Konflik Zona Ekonomi Eksklusif Indonesia Dan Vietnam Dalam Pengamanan Sumber Daya Maritim Natuna Utara'.

⁴⁰ Jian-liang Ye et al., 'The Second Natural Gas Hydrate Production Test in the South China Sea', *China Geology* 3, no. 2 (2020): 197–209, <https://doi.org/10.31035/cg2020043>.

⁴¹ Benyamin and Almubaroq, 'The Dynamics of The China Maritime Militia Conflict In South China Sea On Sovereignty Indonesian Countries And ASEAN Region Countries'.

⁴² Zhiguo Gao et al., 'The Nine-Dash Line in the South China Sea: History, Status, and Implications'.

3.2. One Voice ASEAN: Consolidation and Collectivism againsts China Politics over SCS

Indonesia's consistent assertion of sovereignty over North Natuna showcases the nation's commitment to preserving national unity in line with the concept of Maritime Fulcrum, resolute and non-negotiable. The government's firm actions in enforcing laws and expelling foreign vessels, including China Coast Guard ships, from North Natuna from 2010 to 2022 serve as evidence of the differentiation between economic relations and sovereignty matters.⁴³ Despite Indonesia's dependency on cooperation projects with China, the realization of the vision to 'defend Indonesia's bloodline' remains a guiding paradigm in upholding national territorial sovereignty. Furthermore, North Natuna is juridically part of Indonesia's EEZ according to the provisions of UNCLOS 1982, which China has also ratified.⁴⁴

However, Indonesia's long-term resistance against China in the North Natuna case may have broader impacts and follow-up consequences affecting bilateral relations between the two nations. For China, conceding the NDL claim in the South China Sea is not an option, and the same holds true for Indonesia. The resistance of both nations could potentially lead to armed conflict or strain diplomatic relations between Indonesia and China. The exchange of protest notes in 2019 and 2020 indicates a disagreement on the interpretation of boundaries under UNCLOS 1982, with each country asserting claims to North Natuna as part of its territorial waters.⁴⁵ Despite the weaknesses in China's claim based on traditional maritime arguments, its reluctance to swiftly resolve the dispute poses a real threat to Indonesia. Moreover, North Natuna is rich in oil and gas, making exploration and exploitation in the region a potential source of provocation for China.⁴⁶

A similar situation is observed in the Senkaku Islands (Japanese version) or Diaoyu Islands (Chinese version), straining the relations between the two East Asian economic giants. The discovery of natural gas reserves in Senkaku/Diaoyu

⁴³ Mustika Sukma Utari et al., 'China's Aggressive Stance In The North Natuna Region, Indonesia Did What?', *Asian Journal of Engineering, Social and Health* 2, no. 7 (31 July 2023): 484–96, <https://doi.org/10.46799/ajesh.v2i7.83>.

⁴⁴ Inggrit Fernandes et al., 'Status of Indonesia's Sovereign Rights in the North Natuna Sea Conflict Area Consequences of China's Nine-Dash Line Claim', *Linguistics and Culture Review* 5, no. S3 (29 December 2021): 1775–83, <https://doi.org/10.21744/lingcure.v5nS3.2051>.

⁴⁵ Hongbin and Ullah, 'THE SOUTH CHINA SEA'S NINE DASH LINE'.

⁴⁶ Joseph Victoryadi Kalemang and Yuwanto, 'Analisis Sangketa Zona Ekonomi Eksklusif Antara Indonesia Dan RRT Di Kepulauan Natuna', *Journal of Politic and Government Studies* 9, no. 4 (2020): 1–14.

has turned it into a conflict zone without a satisfactory resolution to date.⁴⁷ Therefore, preventive measures for North Natuna conflicts must be taken promptly, employing approaches that do not sacrifice bilateral relations and economic connectivity between the two nations.

The intricate political constellation in the bilateral relationship between Indonesia and China cannot be viewed through a linear lens solely focused on sovereignty discourse. Mutual trust and binding economic ties necessitate Indonesia to prioritize stability in conflict resolution.⁴⁸ From a pragmatic political perspective, China's political influence, backed by economic and military support and alliance networks, positions it as the most powerful nation in East Asia. Adopting a confrontational stance against China to secure North Natuna could backfire on Indonesia with far-reaching consequences compared to what China would endure. The imbalance of dependency places Indonesia in a less advantageous position in the event of confrontation.⁴⁹ In other words, disrupting stability in relations with China would adversely impact Indonesia's economy and foreign policy on a broad scale, while the reverse would have minor effects on China's economic and foreign policy structure.

The contextualization of the dichotomy between economic needs and manifestations of sovereignty can be mediated by determining national interest principles in a multi-aspect manner. The international policy considerations that Indonesia takes in response to China's claims should not be euphoric, focusing solely on sovereignty interests. Instead, it should consider the various domains of the relationship between the two countries and analyze the impacts of implementing such policies. In international relations theory, Johan Galtung's theory of transcendence points towards a resolution approach, emphasizing conflict resolution through transforming conflict situations into peaceful conditions without resorting to symbolic violence.⁵⁰

In the transcend theory approach, the optimal way to exit a conflict situation without disrupting the relational stability with the involved parties is by merging

⁴⁷ Koichi Sato, 'The Senkaku Islands Dispute: Four Reasons of the Chinese Offensive - A Japanese View', *Journal of Contemporary East Asia Studies* 8, no. 1 (2 January 2019): 50–82, <https://doi.org/10.1080/24761028.2019.1626567>.

⁴⁸ Arga Nugraha, 'Politik Pembangunan Era Jokowi (Studi: Peran Pemerintah Tiongkok dalam Pembangunan Infrastruktur di Indonesia).' (Universitas Sumatera Utara, 2018).

⁴⁹ Angkasa Dipua et al., 'Sea Defense Strategy the Indonesian Navy in Dealing with the South China Sea Conflict', *Italienisch* 11, no. 2 (2021), <https://italienisch.nl/index.php/VerlagSauerlander/article/view/103>.

⁵⁰ Penny Kurnia Putri, 'Manajemen Konflik dan Resolusi Konflik: Sebuah Pendekatan Terhadap Perdamaian', *Papua Journal of Diplomacy and International Relations* 2, no. 1 (30 May 2022): 16–34, <https://doi.org/10.31957/pjdir.v2i1.1945>.

negative peace with positive peace, achieving a stable peace.⁵¹ The merging of negative peace involves neutralizing all potential conflict elements, such as reducing the use of force, such as taking a stern approach toward Chinese vessels in North Natuna. Strict protocols need to be in place to ensure that maritime border protection efforts do not escalate into open conflict. Besides neutralizing potential conflict elements for negative peace, bilateral relations also need to be maintained and strengthened by increasing China's dependency on Indonesia, such as attracting more investments. This condition becomes a "forcing factor" for both countries to accelerate the transformation of conflict into a stable and peaceful situation.

China's unwavering position on sovereignty claims in the SCS aligns with its formidable economic, military, and political prowess. As of 2025, China holds the status of the world's second-most populous country, boasts the largest economy globally, possesses the third-strongest military—surpassed only by the U.S. and Russia—and commands the most formidable navy in Asia. This stark contrast accentuates the challenging position of ASEAN countries embroiled in conflicts with China in the SCS, characterized by their status as developing nations with inherent limitations in terms of economy, military capability, and global political influence.

Notably, the unity among ASEAN countries becomes paramount in confronting China's political maneuvering in the SCS. The collective strength and cohesion of ASEAN nations are crucial for Indonesia and other ASEAN countries engaged in disputes with China.⁵² Viewing the issue as a communal challenge enables ASEAN to adopt a more effective stance against China's hegemony. This unity serves as a strategic leverage for ASEAN to navigate the complexities of the SCS disputes and underscores the significance of a cohesive regional response to safeguard the interests of the member states.

The overarching aspiration for unity within ASEAN, ostensibly aimed at forging a collective front among its member states to contest territorial claims in the SCS against China, encounters a myriad of formidable challenges. A salient impediment emerges in the form of inherent heterogeneity characterizing the divergent opinions prevalent among ASEAN member states concerning China's NDL claim in the SCS. This intrinsic diversity of perspectives within the ASEAN

⁵¹ Johan Galtung and Dietrich Fischer, 'The Transcend Method in Conflict Mediation Across Levels', in *SpringerBriefs on Pioneers in Science and Practice*, vol. 5, n.d., <https://www.springer.com/series/10970>.

⁵² Nehginpao Kipgen, 'ASEAN AND CHINA IN THE SOUTH CHINA SEA DISPUTES', *Asian Affairs* 49, no. 3 (July 2018): 433–48, <https://doi.org/10.1080/03068374.2018.1487691>.

community introduces a layer of complexity, impeding the seamless coordination necessary for a unified and efficacious response to counteract China's territorial assertions in the region. The intricate interplay of varying viewpoints among member states poses a substantial hurdle to the cohesive stance envisioned by ASEAN in its efforts to navigate the intricate geopolitical landscape of the SCS disputes.

ASEAN's regional approach to resolving conflicts in the SCS can be viewed as a progressive step that has garnered attention since the early 1990s. As a cooperative organization aimed at achieving regional peace and stability, ASEAN is equipped with several principles that advocate unity. One crucial principle is the ASEAN Way⁵³, which asserts that conflict resolution in the region should be achieved peacefully through independent diplomacy, free from any form of intervention.⁵⁴ ASEAN values the independence of each member in expressing their opinions but shares a common interest in achieving regional stability.

In response to China's NDL claim in the South China Sea, ASEAN issued the ASEAN Declaration on the South China Sea on July 22, 1992.⁵⁵ The DoC represents the first ASEAN-China agreement explicitly outlining general principles for the peaceful use of the South China Sea. Overall, the DoC demonstrates a significant success in joint negotiations with China conducted collectively by ASEAN since 2002.⁵⁶ However, the DoC does not contain concrete provisions that can provide explicit guarantees for territorial sovereignty boundaries. This stems from the reality that China holds differing views on the territorial boundaries of countries in the South China Sea, even though they both base their perspectives on UNCLOS 1982.⁵⁷ Therefore, the subsequent discussions in the CoC become crucial and are expected to provide legally certain solutions. CoC negotiations are currently ongoing and have entered the second reading phase, projecting completion in the coming years. The CoC negotiations between ASEAN and China are pivotal for resolving disputes in the South China

⁵³ Rizani, 'ASEAN Way'.

⁵⁴ Le Hu, 'Examining ASEAN's Effectiveness in Managing South China Sea Disputes', *The Pacific Review* 36, no. 1 (2 January 2023): 119–47, <https://doi.org/10.1080/09512748.2021.1934519>.

⁵⁵ Farhan Muhammad Aditomo et al., 'Review of the Formulating of the Code of Conduct in South China Sea between ASEAN and the People's Republic of China'.

⁵⁶ Prayuda and Angeli, 'ANALISIS IMPLEMENTASI KONSEP COC (CODE OF CONDUCT) DALAM PENYELESAIAN KONFLIK DI LAUT NATUNA UTARA'.

⁵⁷ Hermawan Bangun, 'Upaya dan Peran ASEAN dalam Penyelesaian Sengketa Laut China Selatan'.

Sea, necessitating the unity and collective support of ASEAN countries guided by the principles of the ASEAN Way ⁵⁸.

The significance of the CoC discussion momentum should be viewed as a collective struggle of ASEAN countries. Although the SCS directly concerns only a few countries, not all ASEAN members, the commitment to the formation of ASEAN from the outset renders the SCS issue unavoidable. Moreover, the SCS dispute will have broad implications for regional stability as a whole, making China's claims a 'common threat' that cannot be tolerated ⁵⁹.

As a regional organization advocating collectivism, ASEAN provides a suitable platform for Indonesia, Vietnam, Malaysia, the Philippines, and Brunei Darussalam to navigate their pragmatic politics towards China while continuing to push for the acceleration of dispute resolution through the CoC.⁶⁰ Unlike countries that directly engage in bilateral relations with China, ASEAN-China negotiations are more effective because China's direct pressure on ASEAN is smaller than on individual member states. This is due to the de facto nature of economic and political relations directly established from one country to another. When dealing with regional or international organizations, relationships differ and cannot be equated. In other words, Southeast Asian countries can act more freely through ASEAN to promote conflict resolution with China.

Negotiations on the CoC in the SCS have shown significant progress in recent years. After being delayed due to the COVID-19 pandemic, discussions resumed in March 2023 in Jakarta. During this meeting, ASEAN and China agreed to accelerate the finalization of the CoC within the next three years. This renewed commitment underscores the importance of ensuring a legally binding and effective framework to manage disputes in the SCS. However, challenges remain, particularly concerning China's continued assertiveness and the differing national interests among ASEAN member states.

To expedite the CoC, ASEAN must leverage its principle of collectivism, reinforcing a united front in negotiations. A fragmented ASEAN would allow China to exploit divisions, weakening the region's bargaining power. ASEAN

⁵⁸ Dewa Gede Sudika Mangku and Muhammad Adam Firdaus, 'INTERNATIONAL LAW AND THE ROLE OF THE STATE OF INDONESIA IN ASEAN AS A CONFLICT MEDIUM ON SOUTH CHINA SEA ISSUES', *Jurnal Komunikasi Hukum (JKH)* 8, no. 1 (24 October 2022): 453–68, <https://doi.org/10.23887/jkh.v8i1.47022>.

⁵⁹ Benyamin and Almubaroq, 'The Dynamics of The China Maritime Militia Conflict In South China Sea On Sovereignty Indonesian Countries And ASEAN Region Countries'.

⁶⁰ Nguyen Tien Vinh and Nguyen Tien Vinh, 'The Legal Status of Islands and Other Features and the China's Unreasonable Claim on the Nine-Dash Line in South China Sea Under the Arbitration Award in the Philippines v. China Case' 36, no. 1 (27 March 2020), <https://doi.org/10.25073/2588-1167/vnuls.4251>.

should also maximize its diplomatic platforms, such as the ASEAN Summit and ASEAN Regional Forum (ARF), to pressure China into committing to a fair and enforceable CoC. Additionally, fostering deeper regional cooperation through security dialogues and joint maritime initiatives can strengthen ASEAN's position, ensuring that the final agreement truly reflects the collective interests of ASEAN nations.

For Indonesia, the stakes in the CoC negotiations are particularly high. The protection of North Natuna, a resource-rich maritime area within Indonesia's EEZ, depends on a stable regional framework that can deter external claims. Moreover, securing Indonesia's rights to conduct natural gas exploration without foreign interference is critical for national energy security. The success of the CoC would also contribute to broader regional stability, ensuring unimpeded trade and fostering a secure investment climate that benefits ASEAN's economic growth.

Indonesia must take a leadership role in reinforcing ASEAN collectivism, ensuring that the region presents a unified stance against unilateral claims and coercive maneuvers by external actors. Without a strong and legally binding CoC, ASEAN risks continued fragmentation, which could weaken its credibility and bargaining power in future geopolitical disputes. China's repeated incursions into this region, despite clear provisions under UNCLOS 1982, have raised concerns over Indonesia's ability to maintain sovereignty without escalating tensions. A robust and enforceable CoC would serve as a legal and diplomatic shield, preventing further violations while enabling Indonesia to proceed with resource extraction projects without external interference. More importantly, securing North Natuna is integral to Indonesia's long-term energy security, as natural gas exploration in this region is essential for meeting domestic energy demands and reducing reliance on foreign energy imports.

To advance the CoC negotiations, Indonesia must champion a strong institutional framework within ASEAN, ensuring that the agreement is not merely symbolic but enforceable. A key step is establishing a Permanent South China Sea Working Group under the ASEAN Political-Security Community (APSC), which would serve as the central coordination body for ASEAN's diplomatic, legal, and security responses related to the SCS. This mechanism would ensure that ASEAN states negotiate as a bloc rather than engaging in bilateral agreements that could undermine regional unity. Additionally, Indonesia should propose the formation of an ASEAN Maritime Arbitration Tribunal, tasked with resolving disputes and enforcing compliance with CoC provisions through legal mechanisms based on UNCLOS.

Beyond legal measures, Indonesia must advocate for enhanced regional security cooperation through joint maritime patrols and intelligence sharing among ASEAN states. This could be achieved by expanding the existing Trilateral Maritime Patrols (TMP)—currently involving Indonesia, Malaysia, and the Philippines—to include other ASEAN claimants such as Vietnam and Brunei. By strengthening regional surveillance and deterrence capabilities, ASEAN can collectively monitor Chinese incursions and respond more effectively to violations of the CoC. Additionally, Indonesia should push for the creation of an ASEAN South China Sea Monitoring and Response Center, which would integrate intelligence from all member states and facilitate coordinated action in response to maritime security threats.

Another critical aspect of Indonesia's strategy is economic diplomacy, aimed at reducing ASEAN's dependence on Chinese investments. Indonesia should lead efforts to strengthen ASEAN's trade diversification strategy, forging deeper economic ties with Japan, South Korea, India, and the European Union. By reducing economic vulnerabilities, ASEAN member states will be in a stronger position to negotiate a CoC that is fair, legally binding, and resistant to external pressure. Additionally, Indonesia can propose the establishment of an ASEAN Maritime Development Fund, which would provide financial support for infrastructure, security, and exploration projects in contested waters, minimizing reliance on Chinese economic assistance.

Indonesia must utilize soft power and public diplomacy to shape the global narrative on the South China Sea issue. Through active engagement in international forums such as the United Nations, G20, and Indo-Pacific dialogues, Indonesia can amplify ASEAN's collective stance and rally global support for a legally binding CoC. A well-coordinated ASEAN information campaign should also highlight China's assertive maritime activities and reinforce the need for a rules-based order in the SCS. By integrating legal, security, economic, and diplomatic strategies, Indonesia can play a pivotal role in ensuring that the CoC negotiations produce a meaningful outcome that safeguards both national and regional interests.

CONCLUSION

Indonesia and China maintain a multifaceted relationship, underpinned by deep political and economic cooperation across various sectors. From Indonesia's perspective, China is a strategic partner that plays a significant role in national development and regional stability. However, the persistent challenge of sovereignty, particularly in the North Natuna Sea, necessitates a firm yet pragmatic approach. Indonesia must carefully navigate this dynamic by employing a balancing of interests strategy, ensuring that economic and political engagements with China do not come at the expense of national sovereignty and security.

Complicating this issue further is the divergence of perspectives within ASEAN regarding the SCS. While ASEAN collectively seeks to address common concerns, its member states often have differing national priorities, which can weaken regional cohesion. In this context, Indonesia must take a leadership role by advocating for a unified ASEAN stance that prioritizes both national and regional stability. This requires a diplomatic conflict-resolution approach that not only safeguards Indonesia's territorial integrity but also reinforces ASEAN's collective bargaining power in negotiations with China.

To accelerate progress on the CoC negotiations, Indonesia must implement a three-pronged strategy. First, Indonesia should push for institutional strengthening within ASEAN, ensuring that all member states align their policies to project a unified stance in maritime disputes. Second, diplomatic engagements with China must be intensified through ASEAN-led multilateral negotiations, reinforcing that the SCS issue is a regional concern rather than a bilateral one. Finally, Indonesia should promote maritime defense cooperation among ASEAN members, enhancing joint surveillance, intelligence-sharing, and patrol mechanisms to deter unilateral actions by external actors.

By championing ASEAN collectivism and reinforcing a rules-based maritime order, Indonesia can solidify its role as a key regional power, ensuring that national and regional interests are safeguarded in the evolving geopolitical landscape. A strong and unified ASEAN, backed by a concrete CoC framework, will not only protect Indonesia's sovereign rights in the North Natuna Sea but also contribute to broader regional security, economic stability, and long-term peace in the South China Sea.

REFERENCES

- Ako, Rhuks, and Damiola S. Olawuyi. 'Methodology, Theoretical Framework and Scholarly Significance: An Overview of International Best Practices in Legal Research'. *Journal of Sustainable Development Law and Policy (The)* 8, no. 2 (1 January 1970): 225–41. <https://doi.org/10.4314/jsdlp.v8i2.11>.
- Amer, Ramses. 'China, Vietnam, and the South China Sea: Disputes and Dispute Management'. *Ocean Development & International Law* 45, no. 1 (2014): 17–40. <https://doi.org/10.1080/00908320.2013.839160>.
- Andrias Darmayadi, Andrias Darmayadi, Ervina Nabilah Purnamasari, and Ervina Nabilah Purnamasari. 'The Indonesia – China Relations in the Natuna Sea Dispute Resolution: Struggle for Sovereignty'. *Journal of Eastern European and Central Asian Research* 9, no. 1 (4 February 2022): 41–48. <https://doi.org/10.15549/jeecar.v9i1.870>.
- Bama Andika Putra. 'The Rise of Paragunboat Diplomacy as a Maritime Diplomatic Instrument: Indonesia's Constabulary Forces and Tensions in the North Natuna Seas'. *Asian Journal of Political Science* 31, no. 2 (4 May 2023): 106–24. <https://doi.org/10.1080/02185377.2023.2226879>.
- Benyamin, Jefferson, and Hikmat Zakky Almubaroq. 'The Dynamics of The China Maritime Militia Conflict In South China Sea On Sovereignty Indonesian Countries And ASEAN Region Countries'. *JESS (Journal of Education on Social Science)* 5, no. 2 (31 January 2022): 185. <https://doi.org/10.24036/jess.v5i2.385>.
- Binsar Simorangkir, Tri Legionosuko, and Surryanto Djoko Waluyo. 'Improvement Efforts Of Indonesia's Defense Diplomacy Performance Via Deterrence Strategy In Dealing North Natuna Sea Conflict (2016-2021)'. *International Journal Of Humanities Education and Social Sciences (IJHESS)* 2, no. 6 (15 June 2023). <https://doi.org/10.55227/ijhess.v2i6.519>.
- De Castro, Renato Cruz. 'The Limits of Intergovernmentalism: The Philippines' Changing Strategy in the South China Sea Dispute and Its Impact on the Association of Southeast Asian Nations (ASEAN)'. *Journal of Current Southeast Asian Affairs* 39, no. 3 (December 2020): 335–58. <https://doi.org/10.1177/1868103420935562>.
- Dewa Gede Sudika Mangku and Muhammad Adam Firdaus. 'INTERNATIONAL LAW AND THE ROLE OF THE STATE OF INDONESIA IN ASEAN AS A CONFLICT MEDIUM ON SOUTH CHINA SEA ISSUES'. *Jurnal Komunikasi Hukum (JKH)* 8, no. 1 (24 October 2022): 453–68. <https://doi.org/10.23887/jkh.v8i1.47022>.
- Dipua, Angkasa, Nuddin Harahap, Dhiana Puspitawati, Faishal Aminuddin, and Lukman Yudho Prakoso. 'Sea Defense Strategy the Indonesian Navy in Dealing with the South China Sea Conflict'. *Italenisch* 11, no. 2 (2021). <https://italienisch.nl/index.php/VerlagSauerlander/article/view/103>.
- Farhan Muhammad Aditomo, None Farhan Muhammad Aditomo, Edy Prasetyono, and None Edy Prasetyono. 'Review of the Formulating of the Code of Conduct in South China Sea between ASEAN and the People's Republic of China'. *Konfrontasi: Jurnal Kultural, Ekonomi Dan Perubahan Sosial* 9, no. 1 (31 March 2022): 119–30. <https://doi.org/10.33258/konfrontasi2.v9i1.199>.

- Fernandes, Inggrit, Zainul Daulay, Ferdi Ferdi, and Delfiyanti Delfiyanti. 'Status of Indonesia's Sovereign Rights in the North Natuna Sea Conflict Area Consequences of China's Nine-Dash Line Claim'. *Linguistics and Culture Review* 5, no. S3 (29 December 2021): 1775–83. <https://doi.org/10.21744/lingcure.v5nS3.2051>.
- . 'Status of Indonesia's Sovereign Rights in the North Natuna Sea Conflict Area Consequences of China's Nine-Dash Line Claim'. *Linguistics and Culture Review* 5, no. S3 (29 December 2021): 1775–83. <https://doi.org/10.21744/lingcure.v5nS3.2051>.
- Fong, Yang Lai, Ramachandran Ponnai, and Antoon De Rycker. 'Different Countries, Different Perspectives: A Comparative Analysis of the South China Sea Disputes Coverage by Malaysian and Chinese Newspapers'. *China Report* 56, no. 1 (February 2020): 39–59. <https://doi.org/10.1177/0009445519895627>.
- Galtung, Johan, and Dietrich Fischer. 'The Transcend Method in Conflict Mediation Across Levels'. In *SpringerBriefs on Pioneers in Science and Practice*, Vol. 5, n.d. <https://www.springer.com/series/10970>.
- Hermawan Bangun, Budi. 'Upaya dan Peran ASEAN dalam Penyelesaian Sengketa Laut China Selatan'. *Jurnal Komunikasi Hukum (JKH)* 7, no. 1 (2 February 2021): 23. <https://doi.org/10.23887/jkh.v7i1.31455>.
- Hoang, Phuong. 'Domestic Protests and Foreign Policy: An Examination of Anti-China Protests in Vietnam and Vietnamese Policy Towards China Regarding the South China Sea'. *Journal of Asian Security and International Affairs* 6, no. 1 (April 2019): 1–29. <https://doi.org/10.1177/2347797019826747>.
- Hongbin, Ding, and Ihsan Ullah. 'THE SOUTH CHINA SEA'S NINE DASH LINE: KEY DISPUTES AND CHINA'S HISTORICAL RIGHTS CLAIMS'. *Journal of Pakistan-China Studies (JPCS)* 3, no. 1 (1 December 2022): 67–86. <https://doi.org/10.55733/jpcs.v3i1.53>.
- Hu, Le. 'Examining ASEAN's Effectiveness in Managing South China Sea Disputes'. *The Pacific Review* 36, no. 1 (2 January 2023): 119–47. <https://doi.org/10.1080/09512748.2021.1934519>.
- 'Indonesia Drives Out China Coast Guard Again in Disputed Sea'. *Bloomberg*, 2025. <https://www.energyconnects.com/news/oil/2024/october/indonesia-drives-out-china-coast-guard-again-in-disputed-sea/>.
- Kalembang, Joseph Victoryadi, and Yuwanto. 'Analisis Sengketa Zona Ekonomi Eksklusif Antara Indonesia Dan RRT Di Kepulauan Natuna'. *Journal of Politic and Government Studies* 9, no. 4 (2020): 1–14.
- Kaplan, Robert D. 'The South China Sea Is The Future of Conflict'. *Foreign Policy*, no. 188 (October 2011): 2011.
- Kipgen, Nehginpao. 'ASEAN AND CHINA IN THE SOUTH CHINA SEA DISPUTES'. *Asian Affairs* 49, no. 3 (July 2018): 433–48. <https://doi.org/10.1080/03068374.2018.1487691>.
- Lai, Christina J. 'Rhetorical Traps and China's Peaceful Rise: Malaysia and the Philippines in the South China Sea Territorial Disputes'. *International Relations of the Asia-Pacific* 19, no. 1 (2017): 117–46. <https://doi.org/10.1093/irap/lcx008>.
- Lai, Yew Meng, and Cheng-Chwee Kuik. 'Structural Sources of Malaysia's South China Sea Policy: Power Uncertainties and Small-State Hedging'. *Australian Journal of International Affairs* 75, no. 3 (Des 2020): 277–304. <https://doi.org/10.1080/10357718.2020.1856329>.

- Lysaght, Padraig. 'The South China Sea Conflict: Ten Thousand Stones and a Nine-Dash-Line – Rethinking Maritime Space Concepts'. In *Unresolved Border, Land, and Maritime Disputes in Southeast Asia*, 168–82. 2017. BRILL, 2017.
- Manyin, ME, S Dagget, B Dolven, and SV Lawrence. 'Pivot to the Pacific? The Obama Administration's "Rebalancing" Toward Asia.' *Library of Congress Wahington DC Congressional Reseach Service*, 2022. <https://apps.dtic.mil/sti/citations/ADA584466>.
- Muhammad Ghaffaar Irsyad Sumarsono. 'The People's Republic of China Claims the Nine Dash Line under International Law'. *The Indonesian Journal of International Clinical Legal Education*, 2023. <https://doi.org/10.15294/ijicle.v5i3.72001>.
- Mustika Sukma Utari, Firman Hasan, Sri Oktavia, and Ilhamda Fattah Kaloko. 'China's Aggressive Stance In The North Natuna Region, Indonesia Did What?' *Asian Journal of Engineering, Social and Health* 2, no. 7 (31 July 2023): 484–96. <https://doi.org/10.46799/ajesh.v2i7.83>.
- Nguyen Tien Vinh, and Nguyen Tien Vinh. 'The Legal Status of Islands and Other Features and the China's Unreasonable Claim on the Nine-Dash Line in South China Sea Under the Arbitration Award in the Philippines v. China Case' 36, no. 1 (27 March 2020). <https://doi.org/10.25073/2588-1167/vnuls.4251>.
- Nugraha, Aрга. 'Politik Pembangunan Era Jokowi (Studi: Peran Pemerintah Tiongkok dalam Pembangunan Infrastruktur di Indonesia).' Universitas Sumatera Utara, 2018.
- 'OEC Report', 2025. https://oec.world/en/profile/bilateral-country/chn/partner/idn?utm_.
- Ploberger, Christian. 'One Belt, One Road – China's New Grand Strategy'. *Journal of Chinese Economic and Business Studies* 15, no. 3 (2017). <https://doi.org/10.1080/14765284.2017.1346922>.
- Prayuda, Rendi, and Fanesa Angeli. 'Analisis Implementasi Konsep Coc (Code Of Conduct) Dalam Penyelesaian Konflik Di Laut Natuna UTARA'. *Jurnal PIR: Power in International Relations* 4, no. 2 (11 December 2020): 137. <https://doi.org/10.22303/pir.4.2.2020.137-150>.
- Putra, Bama Andika. 'Comprehending Brunei Darussalam's Vanishing Claims in the South China Sea: China's Exertion of Economic Power and the Influence of Elite Perception'. Edited by Robert Read. *Cogent Social Sciences* 7, no. 1 (1 January 2021): 1858563. <https://doi.org/10.1080/23311886.2020.1858563>.
- Putri, Penny Kurnia. 'Manajemen Konflik dan Resolusi Konflik: Sebuah Pendekatan Terhadap Perdamaian'. *Papua Journal of Diplomacy and International Relations* 2, no. 1 (30 May 2022): 16–34. <https://doi.org/10.31957/pjdir.v2i1.1945>.
- Radityo, Fransiskus, Gabriella Rara, Indah Amelia, and Rifal Efraim. 'Geopolitik Tiongkok Di Kawasan Asia Tenggara: Jalur Perdagangan (Obor)'. *Jurnal Asia Pacific Studies* 3, no. 1 (24 July 2019): 84. <https://doi.org/10.33541/japs.v3i1.1073>.
- Ramadhani, Nurul Fitri. 'China Enhances Investment Support for Indonesia's Industrialization'. *Xinhua*, 2024. https://english.news.cn/asiapacific/20240517/2cc1962382684f16ae09910279b75ebc/c.html?utm_source.

- Reed, Lucy, and Kenneth Wong. 'Marine Entitlements in the South China Sea: The Arbitration Between the Philippines and China'. *American Journal of International Law* 110, no. 4 (October 2016): 746–60. <https://doi.org/10.1017/S0002930000763202>.
- Ren, Xiao. 'China as an Institution-Builder: The Case of the AIIB'. *The Pacific Review* 29, no. 3 (2016): 435–42. <https://doi.org/10.1080/09512748.2016.1154678>.
- Reuters. 'China and Indonesia Sign Multiple Cooperation Deals'. 2025. https://www.reuters.com/world/asia-pacific/china-indonesia-sign-multiple-cooperation-deals-2024-11-09/?utm_source=.
- Reuters. 'https://www.reuters.com/markets/commodities/chinese-firms-control-around-75-indonesian-nickel-capacity-report-finds-2025-02-05/?utm_source=''. 2025. https://www.reuters.com/markets/commodities/chinese-firms-control-around-75-indonesian-nickel-capacity-report-finds-2025-02-05/?utm_source=.
- Rizani, Naifa. 'ASEAN Way: Managing Expectation in the Code of Conduct for the South China Sea'. *Global: Jurnal Politik Internasional* 23, no. 2 (6 December 2021): 218. <https://doi.org/10.7454/global.v23i2.666>.
- Sato, Koichi. 'The Senkaku Islands Dispute: Four Reasons of the Chinese Offensive - A Japanese View'. *Journal of Contemporary East Asia Studies* 8, no. 1 (2 January 2019): 50–82. <https://doi.org/10.1080/24761028.2019.1626567>.
- Shirley V. Scott, and Shirley V. Scott. 'China's Nine-Dash Line, International Law, and the Monroe Doctrine Analogy:'. *China Information* 30, no. 3 (31 August 2016): 296–311. <https://doi.org/10.1177/0920203x16665054>.
- Suhanto Suhanto and Angelia Krisdanti Nasera Putri. 'Indonesia Policy In Resolving The North Natuna Sea Conflict With Tiongkok: A Case Study Of Illegal Fishing In 2019-2020'. *Jurnal Sosial Dan Humaniora* 8, no. 1 (12 June 2023): 48–56. <https://doi.org/10.47313/pjsh.v8i1.2210>.
- Yanto, Andri. 'Resolusi Konflik Zona Ekonomi Eksklusif Indonesia Dan Vietnam Dalam Pengamanan Sumber Daya Maritim Natuna Utara'. *Recht Studiosium Law Review* 2, no. 1 (2023): 9–18.
- Ye, Jian-liang, Xu-wen Qin, Wen-wei Xie, Hai-long Lu, Bao-jin Ma, Hai-jun Qiu, Jin-qiang Liang, et al. 'The Second Natural Gas Hydrate Production Test in the South China Sea'. *China Geology* 3, no. 2 (2020): 197–209. <https://doi.org/10.31035/cg2020043>.
- Zhiguo Gao, Zhiguo Gao, Bing Bing Jia, and Bing Bing Jia. 'The Nine-Dash Line in the South China Sea: History, Status, and Implications'. *American Journal of International Law* 107, no. 1 (1 January 2013): 98–123. <https://doi.org/10.5305/amerjintlaw.107.1.0098>.