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The Effectiveness of Indonesia's Foreign Policy on the Defense of the Natuna ZEE under UNCLOS 1982

Efektivitas Kebijakan Luar Negeri Indonesia terhadap Pertahanan ZEE Natuna melalui UNCLOS 1982

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Abstract

This study aims to analyze the application of the Rational Actor Model (RAM) in Indonesia's foreign policy in defending its sovereign rights over the Exclusive Economic Zone (EEZ) of the North Natuna Sea through legal diplomacy based on the United Nations Convention on the Law of the Sea (UNCLOS) 1982. Employing a qualitative approach, this research utilizes primary data derived from Indonesia's diplomatic notes submitted to the United Nations (2019–2020), UNCLOS 1982 provisions, and relevant national legal frameworks, complemented by secondary sources from academic journals and policy studies on maritime disputes and foreign policy decision-making. The findings indicate that Indonesia's reliance on legal diplomacy represents a rational policy choice aimed at maximizing international legal legitimacy, minimizing the risk of conflict escalation, and safeguarding national interests while maintaining regional stability. This strategy reflects Indonesia's calculated response to unilateral maritime claims without resorting to coercive measures. Overall, Indonesia's approach demonstrates a rational and adaptive foreign policy consistent with the "Independent and Active" principle in managing maritime sovereignty challenges.

Keywords: Exclusive Economic Zone; North Natuna Sea; Legal Diplomacy; Rational Actor Model

Abstrak

Penelitian ini bertujuan untuk menganalisis penerapan Model Aktor Rasional (RAM) dalam kebijakan luar negeri Indonesia dalam mempertahankan hak kedaulatannya atas Zona Ekonomi Eksklusif (ZEE) Laut Natuna Utara melalui diplomasi hukum berdasarkan Konvensi PBB tentang Hukum Laut (UNCLOS) 1982. Menggunakan pendekatan kualitatif, penelitian ini memanfaatkan data primer yang diperoleh dari catatan diplomatik Indonesia yang diajukan ke PBB (2019–2020), ketentuan UNCLOS 1982, dan kerangka hukum nasional yang relevan, dilengkapi dengan sumber sekunder dari jurnal akademik dan studi kebijakan mengenai sengketa maritim dan pengambilan keputusan kebijakan luar negeri. Temuan menunjukkan bahwa ketergantungan Indonesia pada diplomasi hukum merupakan pilihan kebijakan rasional yang bertujuan memaksimalkan legitimasi hukum internasional, meminimalkan risiko eskalasi konflik, dan melindungi kepentingan nasional sambil menjaga stabilitas regional. Strategi ini mencerminkan respons terukur Indonesia terhadap klaim maritim sepihak tanpa menggunakan tindakan paksa. Secara keseluruhan, pendekatan Indonesia menunjukkan kebijakan luar negeri yang rasional dan adaptif sesuai dengan prinsip "Mandiri dan Aktif" dalam mengelola tantangan kedaulatan maritim.

Kata Kunci: Zona Ekonomi Eksklusif; Natuna Utara; Diplomasi Hukum; Rational Actor Model



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INTRODUCTION

Indonesia's Exclusive Economic Zone (EEZ) in the North Natuna Sea is, from a legal perspective, an area over which Indonesia exercises sovereign rights.¹ Under the United Nations Convention on the Law of the Sea (UNCLOS) 1982, coastal states are granted sovereign rights to explore and exploit natural resources within maritime zones extending up to a maximum of 200 nautical miles measured from the baselines. This provision provides a clear legal foundation for Indonesia to manage and safeguard its maritime interests in the North Natuna Sea as an integral part of its sovereignty and national interests.

The South China Sea, including the waters of the North Natuna Sea, is a region rich in natural resources and of high strategic value to Indonesia's national interests.² In addition to its significant economic potential, the area is also crucial in terms of maritime security and regional stability. Nevertheless, the North Natuna Sea faces serious challenges, particularly in the form of illegal fishing activities conducted by foreign vessels. These activities are allegedly linked to Chinese fishing boats escorted by the China Coast Guard (CCG), thereby constituting violations of Indonesia's sovereign rights within its EEZ.³ The presence of such vessels demonstrates that the issues in the North Natuna Sea are not merely economic in nature but are closely intertwined with broader geopolitical claims and interests.

This phenomenon cannot be separated from the Nine-Dash Line claim unilaterally asserted by China. The claim is based on a historical approach used to justify control over a large portion of the South China Sea. However, the Nine-Dash Line lacks a legal basis under the United Nations Convention on the Law of the Sea (UNCLOS) 1982, as the Convention does not recognize historical claims as a valid foundation for establishing sovereignty or sovereign rights over maritime areas. Although China advances historical arguments to support its claim, historical narratives are not recognized as a legitimate legal basis for determining maritime entitlements under the international law of the sea regime.⁴ Consequently, the Nine-Dash Line claim stands in direct contradiction to the provisions of UNCLOS 1982, which constitute the primary legal framework governing international maritime affairs.

In response to this unilateral claim, Indonesia has adopted a foreign policy grounded in legal diplomacy by firmly rejecting the Nine-Dash Line. This rejection was formally expressed through the submission of diplomatic notes to the Secretary-General of the United Nations during the period 2019–2020, aimed at reaffirming Indonesia's legal position that the North Natuna Sea forms part of its legitimate EEZ under UNCLOS 1982. This course of action reflects Indonesia's strategic choice to employ international legal mechanisms as the primary means of defending its sovereign rights, rather than resorting to coercive measures or military escalation, in order to preserve regional stability and maintain consistency in its foreign policy.

1 Belardo Prasetya Mega Jaya et al., "Republic of Indonesia Sovereign Right in North Natuna Sea According to United Nations Convention on the Law of the Sea 1982," *Australian Journal of Maritime & Ocean Affairs* 16, no. 1 (January 2, 2024): 127–40, <https://doi.org/10.1080/18366503.2023.2206261>.

2 Anastasya Greently Pongoh, "Tinjauan Yuridis Sengketa Zona Ekonomi Eksklusif (ZEE) Di Natuna Utara Antara Indonesia Dan Cina Berdasarkan Konvensi Hukum Laut 1982," *Jurnal Fakultas Hukum Universitas Sam Ratulangi* 13, no. 4 (2025): 3–4.

3 Dwi Wisayanto, "Hak Ruang Zona Ekonomi Eksklusif Indonesia Di Laut Natuna Utara Dari Sudut Pandang UNCLOS III (1973–1982) Dalam Penyelesaian Tumpang Tindih Batas Laut," *Jurnal Sipil Kokoh* 22, no. 1 (2023): 24–25.

4 F Deni and L Sahri, "Upaya Diplomasi Indonesia Terhadap Klaim China Atas Zona Eksklusif Indonesia Di Laut Natuna," *International & Diplomacy* 3, no. 1 (2017): 1–22.

Nevertheless, existing academic literature on the North Natuna Sea reveals certain limitations. First, studies examining the Natuna issue from the perspective of international law tend to focus on the legality of the Nine-Dash Line claim and the status of UNCLOS 1982 as the governing legal regime for Indonesia's EEZ.⁵ However, such studies are largely normative and have not sufficiently linked legal foundations with Indonesia's foreign policy decision-making processes. Second, other studies approach Indonesia's response to China's claims from a maritime security and regional geopolitics perspective, emphasizing increased military presence and bilateral dynamics.⁶ Yet, these analyses have not systematically framed Indonesia's policies as the outcome of rational state calculations that weigh costs, risks, and benefits. Consequently, a research gap remains in integrating Indonesia's legal diplomacy in the North Natuna Sea with foreign policy analysis based on the Rational Actor Model.

Therefore, this study aims to analyze Indonesia's foreign policy in defending its sovereign rights over the Exclusive Economic Zone in the North Natuna Sea through a legal diplomacy strategy using the Rational Actor Model. This analysis seeks to reveal how Indonesia's policy reflects rational state calculations in maintaining international legal legitimacy, minimizing the risk of conflict escalation, and optimizing national interests within the framework of UNCLOS 1982. This research is expected to contribute theoretically to foreign policy analysis grounded in rationality, while also offering practical insights into Indonesia's legal diplomacy strategy in addressing unilateral maritime claims.

Method

This study employs a qualitative research design to analyze Indonesia's foreign policy toward the North Natuna Sea within the framework of the Rational Actor Model. A qualitative approach is selected to enable an in-depth examination of policy decision-making processes, legal reasoning, and strategic considerations in the context of maritime disputes.⁷ The research relies on both primary and secondary data sources. Primary data consist of official documents, including Indonesia's diplomatic notes submitted to the United Nations between 2019 and 2020, relevant provisions of the United Nations Convention on the Law of the Sea (UNCLOS) 1982, and national legal instruments governing Indonesia's Exclusive Economic Zone. Secondary data are drawn from academic journal articles, books, policy reports, and authoritative studies related to maritime disputes, international law of the sea, and foreign policy analysis.

Data were collected through document analysis and literature review techniques. Official legal and diplomatic documents were systematically examined to identify Indonesia's legal positions, policy objectives, and strategic responses to the Nine-Dash Line claim. The collected data were then analyzed using qualitative content analysis, allowing for the identification of key themes, patterns, and policy choices relevant to Indonesia's foreign policy behavior. The Rational Actor Model was applied as the primary analytical framework to assess how Indonesia evaluated policy alternatives, calculated costs and benefits, and selected strategies aimed at maximizing national interests while minimizing risks. This analytical approach facilitates a structured evaluation of the rationality and effectiveness of Indonesia's foreign policy in addressing challenges in the North Natuna Sea.

5 Yohanes Firmansyah, Yana Sylvana, and Hanna Wijaya, "Review of International Law (Lex Specialis) on the Problems of the South China Sea (SSS) Boundary Conflict and the View of Indonesia's Diplomacy," *International Journal of Social Science and Religion (IJSSR)*, 2021, 153–74.

6 Chemi Rigzin, "Scott Bentley, The Maritime Fulcrum of the Indo-Pacific: Indonesia and Malaysia Respond to China's Creeping Expansion in the South China Sea," *Journal of Asian Economic Integration* 7, no. 1 (April 27, 2025): 99–114, <https://doi.org/10.1177/26316846241266712>.

7 John W Creswell, *Research Design: Qualitative, Quantitative, and Mixed Methods Approaches*, 4th ed. (Thousand Oaks, CA: Sage Publications, 2014).

RESULTS AND DISCUSSION

Legal Basis of Indonesia's Exclusive Economic Zone under UNCLOS 1982

Indonesia, as an archipelagic state, is internationally recognized as possessing sovereign rights over its Exclusive Economic Zone (EEZ), including the waters of the North Natuna Sea, based on the United Nations Convention on the Law of the Sea (UNCLOS) 1982.⁸ This Convention provides a clear legal foundation for the authority of coastal states over maritime zones beyond their territorial seas and serves as the primary international legal regime governing maritime boundaries, rights, and obligations of states in the utilization of marine resources. In the context of the North Natuna Sea, UNCLOS 1982 functions as a source of international legal legitimacy for Indonesia to assert its sovereign rights in a lawful and internationally recognized manner.

UNCLOS 1982 regulates coastal state authority over maritime zones in a graduated manner. Article 33 paragraph (1) stipulates that in the zone contiguous to the territorial sea, referred to as the contiguous zone, the coastal state may exercise the control necessary to prevent and punish infringements of its customs, fiscal, immigration, and sanitary laws and regulations within its territory or territorial sea.⁹ Furthermore, Article 33 paragraph (2) provides that the contiguous zone may not extend beyond 24 nautical miles from the baselines from which the breadth of the territorial sea is measured. Although this provision does not directly regulate the Exclusive Economic Zone, it illustrates the progressive expansion of coastal state jurisdiction prior to the application of the more extensive EEZ regime.

The Exclusive Economic Zone is specifically governed under UNCLOS 1982. Article 55 defines the EEZ as an area beyond and adjacent to the territorial sea, subject to a specific legal regime under which the rights and jurisdiction of the coastal state and the rights and freedoms of other states are governed by the relevant provisions of the Convention. Article 56 paragraph (1)(a) further grants the coastal state sovereign rights for the purpose of exploring, exploiting, conserving, and managing natural resources, whether living or non-living, of the waters superjacent to the seabed, as well as of the seabed and its subsoil.¹⁰ These rights also extend to other economic activities, including the production of energy from the water, currents, and winds. This provision affirms the exclusive authority of the coastal state in economic matters within its EEZ.

The geographical limit of the Exclusive Economic Zone is established under Article 57 of UNCLOS 1982, which provides that the EEZ shall not extend beyond 200 nautical miles from the baselines from which the breadth of the territorial sea is measured.¹¹ Based on this provision, the waters of the North Natuna Sea are geographically located within 200 nautical miles of Indonesia's archipelagic baselines and therefore fall within Indonesia's Exclusive Economic Zone.¹² Consequently, all activities related to the exploration, exploitation, and utilization of natural resources in this area constitute part of Indonesia's sovereign rights and are subject to its national jurisdiction.

8 Abdul Khakim Mahfud Zubaidi, Rachmat Indra Wiyana, and Syafitri Nur Ramadhani, "The Role of International Law in Safeguarding Indonesia's Sovereignty: A Case Study of the North Natuna Sea," *Journal of Political And Legal Sovereignty* 2, no. 2 (January 10, 2025): 248–60, <https://doi.org/10.38142/jpls.v2i2.213>.

9 United Nations, "United Nations Convention on the Law of the Sea," 1982.

10 Yoyon Mulyana Darusman, Anisa Fauziah, and Boru Dwi Sumarna, "The Study of Natuna Island Dispute between Indonesia and China, Based on UNCLOS 1982," in *The 2nd International Conference of Law, Government and Social Justice (ICOLGAS 2020)* (Atlantis Press, 2020), 386–94.

11 Robert Beckman, "Military Exercises Involving Live Firing in the EEZ and the 'Due Regard' Obligation in 1982 Unclos," in *Asia and UNCLOS 30 Years' Implementation. International Law in Asia*, 2024, 199–210, https://doi.org/10.1007/978-981-97-1556-5_8.

12 Oktriyanto Maatiri, "Tinjauan Yuridis Terhadap Sengketa Laut Natuna Antara Indonesia Dan Cina," *Lex Administratum* XII, no. 5 (2023): 7.

As a State Party, Indonesia ratified UNCLOS 1982 through Law Number 17 of 1985, thereby rendering the Convention legally binding and incorporating its provisions into the national legal system.¹³ Further implementation is provided by Law Number 5 of 1983 concerning the Indonesian Exclusive Economic Zone.¹⁴ Article 2 of this law stipulates that Indonesia's EEZ is a maritime area located beyond and adjacent to the territorial sea, with a maximum breadth of 200 nautical miles measured from the territorial sea baselines. Moreover, Article 4 paragraph (1)(a) grants Indonesia sovereign rights to explore, exploit, manage, and conserve natural resources within its EEZ, while Article 5 paragraph (1) requires any foreign party conducting exploration or exploitation activities in Indonesia's EEZ to obtain authorization from the Government of the Republic of Indonesia.

The existence of this international and national legal framework has significant strategic implications for Indonesia's foreign policy decision-making. Within the framework of the Rational Actor Model, the legal norms established by UNCLOS 1982 and domestic legislation function both as constraints and as opportunities in determining state behavior. Indonesia, as a rational state actor, seeks to adopt strategies that maximize benefits—such as international legal legitimacy and protection of national interests—while minimizing risks, particularly the escalation of conflict.¹⁵ Accordingly, legal diplomacy grounded in UNCLOS 1982 represents a rational and efficient policy choice compared to coercive approaches.

In foreign policy analysis, state actions are understood as the result of rational decision-making processes in which governments select policy alternatives deemed most optimal for achieving national objectives. The Rational Actor Model explains that states act based on calculations of goals, costs, and risks associated with each policy option.¹⁶ In the context of the North Natuna Sea, the legal certainty provided by UNCLOS 1982 enables Indonesia to formulate a foreign policy grounded in international legal legitimacy, thereby making legal diplomacy the primary instrument for defending its sovereign rights without undermining regional stability or the principle of an independent and active foreign policy.

The Issue of the Nine-Dash Line Claim in the North Natuna Sea

The Nine-Dash Line claim originated from a maritime map published by the Republic of China in 1947, depicting a dashed line encompassing most of the South China Sea.¹⁷ This claim emerged in the post–World War II context, when China began consolidating control over several islands in the region. Following the establishment of the People's Republic of China in 1949, the communist government inherited and reaffirmed these maritime claims, asserting itself as the sole legitimate representative of China.¹⁸ In the context of the North Natuna Sea, the

13 Agustina Merdekawati, Taufiq Adiyanto, and Irkham Afnan Trisandi Hasibuan, "Unclos 1982 and the Law Enforcement Against Illegal Fishing in Indonesia: Judges' Diverging Perspectives," *Mimbar Hukum* 33, no. 1 (June 18, 2021): 39–62, <https://doi.org/10.22146/mh.v33i1.1954>.

14 Pemerintah Pusat Indonesia, "Undang-Undang (UU) Nomor 5 Tahun 1983 Tentang Zona Ekonomi Eksklusif Indonesia" (1983).

15 Rd. Heri Solehudin, "Indonesia's Geostrategic Position in Global and Regional Politics: Government Preparation," *Revenue Journal: Management and Entrepreneurship* 1, no. 2 (February 15, 2024), <https://doi.org/10.61650/rjme.v1i2.434>.

16 Graham T Allison, *Essence of Decision: Explaining the Cuban Missile Crisis* (Boston: Little, Brown, 1971).

17 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* (BRILL, 2017), 168–82, https://doi.org/10.1163/9789004312180_008.

18 Chris P. C. Chung, "Drawing the U-Shaped Line," *Modern China* 42, no. 1 (January 11, 2016): 38–72, <https://doi.org/10.1177/0097700415598538>.

Nine-Dash Line is driven not only by political considerations but also by the strategic significance and abundant natural resources of the area.¹⁹

From the perspective of international maritime law, however, the Nine-Dash Line lacks legal validity.²⁰ The United Nations Convention on the Law of the Sea (UNCLOS) 1982 does not recognize historical claims as a legitimate basis for sovereignty or sovereign rights over maritime zones. In the context of the South China Sea, unilateral claims grounded in historical narratives—such as the Nine-Dash Line—are fundamentally incompatible with the normative framework established by UNCLOS 1982 and therefore lack legal standing within the Convention's regime. As a result, Indonesia's legal position in the North Natuna Sea rests on clear and widely recognized international legal norms.

The incompatibility of the Nine-Dash Line with UNCLOS 1982 was further clarified by the arbitral tribunal ruling of 12 July 2016, constituted under the Convention.²¹ The tribunal concluded that China's claims to historic rights, as reflected in the Nine-Dash Line, have no legal basis and cannot override the Exclusive Economic Zone regime established under UNCLOS. This ruling is particularly significant given that China is itself a State Party to UNCLOS 1982, having ratified the Convention on 7 June 1996.²² Nevertheless, the Chinese government rejected the arbitral award and has continued to uphold the Nine-Dash Line on the grounds of historical entitlement and national interest.

China's rejection of the arbitral ruling has been manifested in increased activities by foreign vessels in waters that are legally part of Indonesia's Exclusive Economic Zone, including fishing vessels and patrols by the China Coast Guard. These activities constitute repeated challenges to Indonesia's sovereign rights in the North Natuna Sea and generate persistent security pressures and legal uncertainty. Consequently, the Nine-Dash Line dispute transcends a purely normative legal debate and produces tangible implications for Indonesia's maritime security and foreign policy formulation.²³

In response, Indonesia has consistently reaffirmed its refusal to recognize the Nine-Dash Line claim, emphasizing that the claim is unilateral in nature and has never been negotiated or agreed upon within international legal forums, particularly under the framework of UNCLOS 1982. Indonesia positions the Convention as the primary legal reference in addressing maritime disputes in the North Natuna Sea and categorically rejects claims that contradict established international maritime law. This stance reflects the consistency of Indonesia's foreign policy in defending its sovereign rights through internationally recognized legal mechanisms.

Within the framework of the Rational Actor Model, the Nine-Dash Line constitutes a critical external constraint that shapes Indonesia's foreign policy decision-making. Although Indonesia possesses strong legal legitimacy under UNCLOS 1982, China's continued assertion of its claim and the absence of effective enforcement mechanisms in international law compel Indonesia to

19 Yulianto, "Pelaksanaan United Nations Convention on the Law of the Sea (UNCLOS) 1982 Di Perairan Natuna," *Jurnal Sainstek Maritime* 20, no. 2 (2020): 107.

20 Shirley V. Scott, "China's Nine-Dash Line, International Law, and the Monroe Doctrine Analogy," *China Information* 30, no. 3 (November 20, 2016): 296–311, <https://doi.org/10.1177/0920203X16665054>.

21 Parth Rishik and Malvika Sharma, "Arbitration under UNCLOS: An Analysis of Arbitration in Law of the Sea," *Issue 2 Int'l J.L. Mgmt. & Human.* 5 (2022): 1423.

22 Nazar Hussain, Asif Khan, and Rashid Wassan, "UNCLOS 1982: Comparative Analysis of Marine Pollution Prevention by Ships," *Annals of Human and Social Sciences* 4, no. II (June 30, 2023), [https://doi.org/10.35484/ahss.2023\(4-II\)29](https://doi.org/10.35484/ahss.2023(4-II)29).

23 Isaac B Kardon, "China Can Say 'No': Analyzing China's Rejection of the South China Sea Arbitration: Toward a New Era of International Law with Chinese Characteristics," *U. Pa. Asian L. Rev.* 13 (2018): 1.

carefully calculate the costs, risks, and benefits of its policy options. In this context, Indonesia's reliance on international law serves not only as a legal defense but also as a rational strategy to safeguard national interests while avoiding open conflict and preserving regional stability.

Overall, the dispute in the North Natuna Sea illustrates a fundamental tension between unilateral, historically based claims and the multilateral, rules-based international maritime order. By grounding its response in UNCLOS 1982, Indonesia seeks to assert its sovereign rights in a lawful and legitimate manner while framing its foreign policy within an internationally accepted legal framework. This approach underscores Indonesia's effort to protect its national interests without undermining regional stability, thereby setting the stage for a rational and law-based foreign policy strategy in addressing maritime disputes.

Indonesia's Rational Legal Strategy under UNCLOS 1982: A Multidimensional Policy Response

Indonesia has consistently constructed a strong legal foundation for its maritime sovereignty in the North Natuna Sea through the ratification of the United Nations Convention on the Law of the Sea (UNCLOS) 1982, which was adopted into national law through Law No. 17 of 1985. As an archipelagic state, Indonesia is entitled to sovereign rights over a 200-nautical-mile Exclusive Economic Zone (EEZ) as stipulated under Article 56 of UNCLOS, a principle that had been implicitly recognized earlier through the 1957 Djuanda Declaration. This legal framework forms the cornerstone of Indonesia's response to China's maritime claims and serves as the primary reference in asserting its sovereign rights in the North Natuna Sea.

Indonesia's legal response to China's Nine-Dash Line claim is most clearly reflected in its diplomatic Note Verbale No. 126/POL-703/V/2020 dated 26 May 2020, submitted to the Secretary-General of the United Nations. In this note, Indonesia articulated three core legal positions. First, Indonesia reaffirmed that it is not a claimant state in the South China Sea dispute, as it has no overlapping maritime claims with China under UNCLOS 1982. Second, Indonesia emphasized that the arbitral ruling of 12 July 2016 confirmed that no maritime features in the Spratly Islands are entitled to generate their own Exclusive Economic Zones. Third, Indonesia categorically rejected the Nine-Dash Line, asserting that it has no basis in international law and is fundamentally inconsistent with the provisions of UNCLOS 1982.²⁴ Through this diplomatic instrument, Indonesia sought to consolidate its legal position while preventing the normalization of China's unilateral claims.

Beyond bilateral diplomatic protests, Indonesia has actively utilized multilateral legal and political forums—such as the Commission on the Limits of the Continental Shelf (CLCS) and the United Nations General Assembly—to internationalize its legal position and reinforce the legitimacy of UNCLOS as the governing maritime regime. The 26 May 2020 diplomatic note can therefore be understood as an act of preventive diplomacy, aimed at both deterring further legal encroachment and strengthening Indonesia's standing within the international legal order.²⁵ At the same time, Indonesia has adopted an approach of “informal dialogue” with China to address issues related to Natuna without acknowledging the existence or legitimacy of the Nine-Dash Line. This approach enables continued communication and risk management while preserving Indonesia's principled stance on sovereignty.

24 Nguyễn Hồng Thao, “South China Sea: Battle of the Diplomatic Notes among China and Non-Claimant States,” *Asia-Pacific Journal of Ocean Law and Policy* 8, no. 1 (June 16, 2023): 128–54, <https://doi.org/10.1163/24519391-08010007>.

25 United Nations, “Note Verbale No. 126/POL-703/V/2020 Regarding China's Nine-Dash Line Claim” (United Nations, 2020).

In parallel with its international legal strategy, Indonesia has reinforced its domestic legal framework to support the enforcement of sovereign rights in its EEZ. In addition to ratifying UNCLOS through Law No. 17 of 1985, Indonesia enacted Law No. 45 of 2009, which provides a legal basis for strict law enforcement measures against illegal fishing, including the seizure and sinking of foreign vessels. This domestic legal reinforcement ensures that Indonesia's international legal claims are supported by credible enforcement mechanisms at the national level, thereby enhancing the overall effectiveness of its legal strategy.

Indonesia's response to challenges in the North Natuna Sea is not limited to legal diplomacy but reflects a broader multidimensional policy approach encompassing security, law enforcement, and diplomacy. From a security perspective, the Indonesian government has strengthened its defense posture in Natuna by deploying Indonesian National Armed Forces (TNI) personnel, combat aircraft such as the SU-27, SU-30, and F-16, as well as naval vessels.²⁶ These measures were supported by a significant increase in defense spending, which reached approximately IDR 108 trillion in 2017. President Joko Widodo's visit to Natuna in June 2016 and the convening of a cabinet meeting aboard KRI *Imam Bonjol-383* further signaled Indonesia's firm commitment to safeguarding its maritime sovereignty.²⁷

Maritime law enforcement has also played a central role in Indonesia's strategy. Under the leadership of the Ministry of Marine Affairs and Fisheries (KKP), particularly during the tenure of Minister Susi Pudjiastuti, Indonesia implemented the "capture–burn–sink" policy against foreign vessels engaged in illegal fishing. Official data indicate a significant increase in the number of foreign vessels sunk between 2015 and 2019, with a peak of 81 vessels in 2017. This policy was complemented by advancements in maritime surveillance technology, including collaboration with Spire Global (United States) to deploy mini-satellites and Vessel Monitoring Systems (VMS) capable of detecting foreign vessel movements in real time within Indonesian waters.

At the level of bilateral diplomacy, Indonesia has adopted differentiated approaches depending on the legal posture of the states involved. In dealing with Vietnam—a country that has ratified UNCLOS—Indonesia has pursued technical negotiations on maritime boundaries since 2010, resulting in twelve rounds of talks and the establishment of a provisional arrangement to prevent incidents in overlapping maritime areas. By contrast, in its relations with China, which continues to advance historical claims, Indonesia has opted for a strategy of preventive diplomacy that rejects the legitimacy of the Nine-Dash Line while maintaining stable economic relations with Beijing, Indonesia's largest trading partner.

Within the framework of the Rational Actor Model, Indonesia's legal and multidimensional strategy reflects a calculated policy choice based on cost–benefit analysis and risk assessment. Direct military confrontation is avoided due to the asymmetry of power and the risk of escalation, while purely legal confrontation through international adjudication could undermine Indonesia's non-claimant status and strategic economic interests. Consequently, Indonesia's reliance on UNCLOS-based legal diplomacy—supported by credible defense posture and firm law enforcement—represents a rational strategy aimed at maximizing legal legitimacy, preserving national sovereignty.²⁸

26 Achmad Wardana et al., "Review of Indonesian Government Policy in Procurement Plan of Dassault Rafale Fighter Aircraft," *Defense and Security Studies* 3 (August 30, 2022): 50–57, <https://doi.org/10.37868/dss.v3.id195>.

27 Muhamad Arif, "Balancing with Jokowi's Characteristics: A Neoclassical Realism Approach to Indonesia's Foreign and Security Policies in the South China Sea," *Journal of Asian Security and International Affairs* 8, no. 3 (December 22, 2021): 370–90, <https://doi.org/10.1177/23477970211041455>.

28 Ulfa Diana, and Muhammad Fikrul Umam. 2026. "Maintaining Neutrality Amid Rivalry: An Analysis of Indonesia's Foreign Policy in the ASEAN Outlook on the Indo-Pacific (AOIP)". *SYMPHONIA: Journal of Theory and Research Output* 1 (1): 165-75. <https://doi.org/10.12026/sym.v1i1.110>.

The Effectiveness of Indonesia's Foreign Policy toward the North Natuna Sea

In the geopolitical context of the North Natuna Sea, the effectiveness of Indonesia's foreign policy cannot be assessed solely based on consistency of stance or normative commitment, but rather on the extent to which the policy achieves its predefined national objectives. Within the framework of the Rational Actor Model (RAM), policy effectiveness is evaluated through the alignment between national goals, the strategic choices adopted, and the outcomes produced under conditions of limited resources and external pressures.²⁹ Accordingly, the effectiveness of Indonesia's foreign policy in the North Natuna Sea can be measured through several key indicators, namely the protection of sovereign rights, international legal legitimacy, prevention of conflict escalation, and the sustainability of economic relations and regional stability.

Indonesia has consistently demonstrated the characteristics of a rational state actor by identifying its national interests in a clear and hierarchical manner. Maritime sovereignty is positioned as a non-negotiable priority, followed by domestic security and long-term economic growth. This prioritization was evident in Indonesia's response to the KM *Kway Fey* incident in March 2016, when an attempt by Indonesian authorities to enforce fisheries law was obstructed by the Chinese Coast Guard.³⁰ In response, the Indonesian government increased its military presence in Natuna, a rational policy choice that placed sovereignty considerations above short-term economic interests.

Nevertheless, Indonesia has exercised caution by refraining from bringing the Natuna issue before an international court, unlike the Philippines. This decision reflects a rational calculation that legal escalation through international adjudication could jeopardize strategic economic relations with China, which reached a trade value of USD 115.7 billion in 2022.³¹ Within the RAM framework, Indonesia systematically evaluated several policy alternatives, including direct military confrontation, aggressive legal diplomacy through international judicial mechanisms, and preventive legal diplomacy supported by enhanced defensive capabilities. The first option was abandoned due to significant military power asymmetry and the high risk of regional conflict escalation, while the second was avoided because it could shift Indonesia's position from a *non-claimant state* to a direct party in the South China Sea dispute, a situation inconsistent with Indonesia's independent and active foreign policy doctrine.

Indonesia's preference for preventive legal diplomacy, combined with limited military deployment and firm maritime law enforcement, reflects a rational policy choice that takes into account national resource constraints and the complex geopolitical environment of the region. The effectiveness of this strategy is evident in its ability to preserve Indonesia's legal position without provoking open conflict with China. Indonesia has also demonstrated strategic adaptability in response to changes in the international environment. Following the 2016 Arbitral Award, which indirectly strengthened Indonesia's legal standing, the government reinforced its legal diplomacy by issuing a diplomatic note to the United Nations in 2020 that explicitly referred to the ruling as a legal reference for Indonesia's position.

29 Phillip Baker et al., "Generating Political Commitment for Ending Malnutrition in All Its Forms: A System Dynamics Approach for Strengthening Nutrition Actor Networks," *Obesity Reviews* 20, no. S2 (November 27, 2019): 30–44, <https://doi.org/10.1111/obr.12871>.

30 Shafiah F Muhibat, "4 Nationalism, Sovereignty and Foreign Policy: Indonesia and the Disputes Over," in *Indonesia in the New World: Globalisation, Nationalism and Sovereignty* (ISEAS-Yusof Ishak Institute, 2018), 52.

31 Libing Wang, Ya Wen, and Yun Zhang, "The Impact of EU Carbon Border Adjustment Mechanism on China's Export and Its Countermeasures," *Global Energy Interconnection* 8, no. 2 (April 2025): 205–12, <https://doi.org/10.1016/j.gloei.2024.11.017>.

The Effectiveness of Indonesia's Foreign Policy

At the same time, Indonesia has shown flexibility in dealing with states that adopt different legal approaches toward UNCLOS.³² When there was a surge in illegal fishing activities by Vietnamese vessels in 2021, detected through the Automatic Identification System (AIS), Indonesia responded through a technical and cooperative approach by convening the Indonesia–Vietnam Maritime Partnership Meeting in November 2021. This response resulted in a provisional arrangement to manage overlapping maritime areas and reflected a proportional policy response consistent with the cooperative nature of bilateral relations between the two countries.

To evaluate the effectiveness of Indonesia's foreign policy in a more systematic manner, key indicators of rationality and policy outcomes can be summarized as shown in Table 1.

Table 1. Evaluation of the Effectiveness of Indonesia's Foreign Policy in the North Natuna Sea within the Rational Actor Model Framework

Evaluation Dimension	Policy Objective	Strategy Adopted	Outcomes and Impacts
Maritime Sovereignty	Safeguard sovereign rights over the Natuna EEZ	Legal diplomacy combined with limited military presence	Sovereign rights remain legally recognized despite recurring violations
International Legal Legitimacy	Strengthen Indonesia's position internationally	Diplomatic notes, reliance on UNCLOS and the 2016 Arbitral Award	Indonesia's legal position remains consistent and normatively supported
Regional Stability	Prevent open conflict escalation	Preventive diplomacy and informal dialogue	No direct military confrontation has occurred
Economic Relations	Preserve strategic trade relations	Avoidance of international adjudication	Economic relations with China remain stable
Maritime Law Enforcement	Reduce illegal activities	Vessel sinking policy and enhanced surveillance	Deterrent effects remain limited; violations continue to occur

Source: Author Analysis

Despite these achievements, the effectiveness of Indonesia's foreign policy faces several structural constraints. First, persistent violations of UNCLOS 1982—particularly by China's disregard for the 2016 Arbitral Award—highlight the limitations of the international legal regime, which lacks strong enforcement mechanisms.³³ This condition restricts Indonesia's ability to translate legal legitimacy into full compliance on the ground.

Second, Indonesia's limited surveillance capacity over a vast maritime area of approximately 6.4 million square kilometers creates security gaps that are exploited by foreign vessels. Data from the Indonesian Ocean Justice Initiative (IOJI) indicate that insufficient publication of EEZ boundary coordinates contributes to uncertainty regarding claimed maritime zones, thereby complicating effective law enforcement. Third, the tension between sovereignty interests and economic considerations generates complex policy dilemmas. This is reflected in Indonesia's reluctance to impose economic sanctions on China despite repeated violations in the North Natuna Sea.

32 M Rezaul Karim Chowdhury, Saharuddin Abdul Hamid, and Nurul Haqimin Mohd Salleh, "Maritime Dispute Resolution: Understanding Adequacy of UNCLOS: A Systematic Review," *Australian Journal of Maritime & Ocean Affairs*, October 21, 2024, 1–22, <https://doi.org/10.1080/18366503.2024.2416334>.

33 Lowell Bautista, "The South China Sea Arbitral Award: Evolving Post-Arbitration Strategies, Implications and Challenges," *Asian Politics & Policy* 10, no. 2 (April 23, 2018): 178–89, <https://doi.org/10.1111/aspp.12398>.

Within the Rational Actor Model, these structural constraints do not necessarily indicate policy failure but rather reflect the rational limitations faced by states operating in an anarchic international system. Relatively speaking, Indonesia's foreign policy toward the North Natuna Sea can be considered effective in maintaining legal legitimacy, preventing open conflict escalation, and preserving key bilateral relationships. However, this effectiveness remains limited in terms of fully eliminating violations at sea, underscoring the need for enhanced maritime surveillance capacity, stronger inter-agency coordination, and a more consistent long-term strategy.

CONCLUSION

This study finds that Indonesia's foreign policy toward the North Natuna Sea reflects a rational and calculated strategy consistent with the Rational Actor Model. By prioritizing maritime sovereignty while carefully managing security and economic interests, Indonesia has opted for UNCLOS-based legal diplomacy supported by limited military presence and firm maritime law enforcement. This approach has proven relatively effective in maintaining international legal legitimacy, preventing open military escalation, and preserving strategic economic relations, particularly with China. Although violations in Indonesia's Exclusive Economic Zone persist, the policy has succeeded in positioning Indonesia as a non-claimant state that adheres to international law and promotes regional stability. Overall, Indonesia's response demonstrates a rational balancing of costs and benefits under structural constraints within the international system.

Future policy efforts should focus on strengthening the long-term effectiveness of Indonesia's strategy in the North Natuna Sea. First, Indonesia needs to enhance maritime surveillance capacity and inter-agency coordination to address enforcement gaps across its vast maritime domain. Second, greater transparency in publishing EEZ boundary coordinates could reduce ambiguity and improve law enforcement effectiveness. Third, Indonesia should continue consolidating multilateral legal support for UNCLOS while maintaining preventive diplomacy with China to manage tensions. Finally, integrating legal diplomacy with technological investment and regional maritime cooperation would allow Indonesia to better convert legal legitimacy into practical compliance, thereby reinforcing sovereignty protection without undermining economic interests or regional stability.

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