

Research Article

Reconstruction of Law Enforcement Regulations on Female Circumcision by Medical and/or Healthcare Personnel: Equity-based Health

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Abstract.

Regulation of Law Enforcement of Female Circumcision by Medical and/or Health Workers has not been concretely regulated in the positive law applicable in Indonesia, and its implementation is not yet based on justice. The purpose of this research is to analyze and find out why this is the case, what the weaknesses are in the current regulation of the law enforcement in these cases, and how to reconstruct these regulation. Research results: 1. The current Regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers in the positive law of Indonesia is not yet based on justice. 2. Regarding these law enforcement, there is no legal substance that concretely regulates it. From the legal structure, there is no knowledge and understanding of health law among law enforcement officers, so there is no uniformity in the way the law is enforced. From the legal culture, there is still limited understanding and awareness of health law for the Indonesian people. 3. The Regulation of Law Enforcement of Female Circumcision is to provide balanced protection and law enforcement to female circumcision perpetrators and society in general. Reconstruction of legal norms Article 102 letter a of Government Regulation Number 28 of 2024 concerning the Implementing Regulations of the Health Law can produce regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers in Indonesia, which is balanced in terms of legal certainty, legal benefits, and the sense of justice of the community.

Keywords: female circumcision, justice, law enforcement, reconstruction

1. Introduction

Climate change litigation has evolved into a prominent legal strategy for addressing the failures of governments and corporations to adequately mitigate greenhouse gas emissions or adapt to climate-related risks. Initially grounded in statutory environmental law, administrative procedure, and tort-based claims, early climate cases aimed to enforce regulatory compliance or establish liability for environmental harms. Landmark decisions, such as *Massachusetts v. Environmental Protection Agency* (2007) in the

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United States, recognized carbon dioxide as a pollutant under domestic environmental statutes and opened the door for judicial intervention in climate policy. Similar developments in other jurisdictions relied on procedural safeguards like environmental impact assessments. Yet, these early strategies faced significant doctrinal limitations, particularly concerning causation, standing, and the availability of effective remedies.

In recent years, a shift toward rights-based litigation has gained momentum, particularly following the Paris Agreement and the growing international recognition of the human right to a healthy environment. Rights-based approaches reframe climate inaction as a violation of legally protected rights such as the rights to life, health, private life, or dignity under constitutional, regional, or international human rights law. Parallel innovations in Latin America, especially in Ecuador and Colombia, have given rise to a complementary eco-centric logic, that is the recognition of the rights of nature. These developments assert that ecosystems themselves may possess legal subjectivity and inherent rights to exist, flourish, and regenerate, independent of their utility to humans. This doctrinal evolution signals a profound rethinking of legal accountability in the Anthropocene.

The move toward rights-based litigation is supported by several normative and procedural advantages. First, it offers a more robust legal foundation: human and constitutional rights often enjoy direct effect, broader standing thresholds, and stronger remedial possibilities. Second, rights claims resonate more forcefully in judicial and political discourse, aligning climate litigation with moral imperatives and international commitments. Third, developments in international law, including the UN General Assembly's 2022 recognition of the right to a clean, healthy and sustainable environment, as well as advisory opinions from regional human rights courts, provide growing normative authority. Lastly, Indigenous epistemologies and ecological worldviews challenge anthropocentric legal frameworks and introduce more relational, holistic conceptions of environmental harm and justice.

2. Methods

This article adopts a comparative doctrinal methodology grounded in the legal analysis of national and regional court decisions. It examines judicial reasoning, constitutional provisions, international human rights instruments, and the evolving interpretation of environmental norms in litigation. The cases selected are notable for their precedential value, legal innovation, and jurisdictional diversity, encompassing civil law, common

law, and mixed legal systems. The analysis is informed by theoretical insights from environmental constitutionalism, legal pluralism, and Earth jurisprudence, and focuses on how courts translate climate science into enforceable legal duties.

The article makes three original contributions to legal scholarship. First, it proposes a typology that distinguishes rights-based climate litigation into three strategic approaches: human rights-based, rights of nature-based, and Indigenous or hybrid claims. This typology is used to assess doctrinal foundations, procedural strategies, and jurisdictional contexts. Second, it provides a comparative legal analysis of landmark rulings such as *Urgenda*, *Juliana*, *Atrato River*, *Los Cedros*, and *Future Generations*, demonstrating how courts are expanding legal subjectivity to include ecosystems and future generations. Third, it introduces a strategic synthesis framework to identify the conditions under which these approaches can be effectively integrated. This contribution advances both theoretical understanding and practical application of rights-based environmental litigation within a transnational legal order.

In doing so, the article builds on an emerging line of scholarship, particularly the work of Boyd (2012, 2017), UNEP (2020), and Kauffman and Martin (2021), that identifies the plural legal logics shaping climate litigation. While the proposed classification is not yet standardized in the literature, it reflects a growing scholarly and judicial awareness of the need to reconceptualize legal tools in response to planetary crisis. This study situates rights-based climate litigation as both a product and a driver of normative transformation, with implications for environmental governance, legal theory, and the future of constitutional and international law.

3. Result and Discussion

3.1. Current Regulations on Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers

a. Regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers According to the Regulation of the Minister of Health Number 1636 of 2010 Concerning Female Circumcision

According to Article 1 paragraph (1), female circumcision means the act of scratching the skin that covers the front of the clitoris, without injuring the clitoris.

Article 2

(1) Female circumcision can only be performed by certain health workers

(2) Certain health workers who can provide female circumcision services as referred to in paragraph (1) are only doctors, midwives and nurses who have a practice permit or work permit.

(3) Certain health workers as referred to in paragraph (2) are primarily female.

Article 3

(1) Every female circumcision can only be carried out at the request and with the consent of the woman being circumcised, her parents and/or her guardian.

(2) Every implementation of female circumcision as referred to in paragraph (1) must be informed of the possibility of bleeding, infection and pain.

Article 5

(1) Female circumcision cannot be performed on women who are suffering from external genitalia infections and/or general infections.

(2) Female circumcision is prohibited by:

- a. cauterize the clitoris
- b. cutting or damaging the clitoris either in part or in whole and
- c. cutting or damaging the labia minoras, labia majora, hymen and vagina either partially or completely

b. Regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers According to the Regulation of the Minister of Health Number 6 of 2014 Concerning the Revocation of the Regulation of the Minister of Health Number 1636/Menkes/Per/Xii/2010 Concerning Female Circumcision

article 1

Minister of Health Regulation Number 1636/Menkes/Per/XII/2010 concerning Female Circumcision is revoked and declared invalid.

Article 2

Giving a mandate to the Health and Sharia Advisory Council to issue guidelines for the implementation of female circumcision that guarantee the safety and health of women who are circumcised and do not carry out female genital mutilation.

c. Regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers According to Government Regulation Number 61 of 2014 Concerning Reproductive Health

Article 30

(1) Every woman has the right to reproductive health services.

(2) Reproductive Health Services as referred to in paragraph (1) are aimed at protecting reproductive organs and functions so that they are free from disorders, diseases or disabilities in women.

(3) Reproductive Health Services as referred to in paragraph (1) are carried out by paying attention to the stages of the female reproductive cycle according to standards.

d. Regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Personnel According to Government Regulation Number 28 of 2024 concerning Implementing Regulations of Law Number 17 of 2023 concerning Health

Article 102

Efforts to improve the reproductive health of infants, toddlers and preschool children as referred to in Article 101 paragraph (1) letter a include at least:

- e. Eliminate the practice of female circumcision
- f. Educate toddlers and preschoolers to know their reproductive organs
- g. Educating about the differences between male and female reproductive organs
- h. Educate to refuse touching reproductive organs and body parts that are prohibited to be touched.
- i. Practicing clean and healthy living behavior in reproductive organs, and
- j. Providing medical clinical services in certain conditions

From the description above, we can see that from the 4 (four) Regulations on Law Enforcement of Female Circumcision by Medical Personnel and/or Health Personnel that apply in positive law in Indonesia today, there is indeed no uniformity or concrete provisions in providing legal certainty in the enforcement of female circumcision laws carried out by medical personnel and/or health personnel. So that in order to obtain benefits, legal certainty and justice in law enforcement, a reconstruction of the regulation on law enforcement of female circumcision carried out by medical personnel and/or health personnel is needed. This needs to be done so that the enforcement of female circumcision laws by medical personnel and/or health personnel that apply in Indonesia can be felt by the community, have legal certainty and its justice can be felt by the community as a whole.

3.2. Weaknesses in Current Regulations on Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers

a. The weakness of the current regulation on law enforcement of female circumcision by medical personnel and/or health workers in terms of legal substance

In the positive law currently in force in Indonesia, there are indeed no concrete and detailed provisions that regulate the enforcement of female circumcision by medical personnel and/or health workers.

Regulation of female circumcision law enforcement by medical personnel and/or health workers substance in positive law that still applies in Indonesia today is still very limited. In fact, there is almost no law or regulation that regulates in detail in the provisions of positive law that apply in Indonesia today.

Of course, this certainly has a great influence on the success of the implementation process of the regulation of female circumcision law enforcement by medical personnel and / or health workers. So that the implementation of the regulation of female circumcision law enforcement by medical personnel and / or health workers will be very difficult to do. Of course, the estuary of the absence of uniform and concrete legal substance in positive law that is still in effect in Indonesia today will result in the absence of legal certainty, the difficulty of obtaining justice and also the benefits of law for society will not be achieved.

There is no uniform and detailed legal substance regardingThe regulation of law enforcement of female circumcision by medical personnel and/or health workers in the positive law currently in force in Indonesia can be said to be a weakness in the legal system related to female circumcision. As conveyed by Lawrence Meir Friedman, the success or failure of law enforcement depends on three things, namely, Legal Substance, Legal Structure/Legal Institutions and Legal Culture. Thus, it can be said that the regulation of law enforcement of female circumcision by medical personnel and/or health workers currently in Indonesia is not based on justice.

b. Weaknesses of Current Regulations on Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers from the Legal Structure/Legal Institution

The legal structure in the implementation of law enforcement related to the regulation of female circumcision law enforcement by medical personnel and / or health workers at this time where the investigators and investigators of the Indonesian National Police are mostly high school graduates who have never received education about Health Law.

The personnel who are mostly high school graduates then take education to become a Police at the National Police School. The curriculum at the National Police School is usually without learning about Health Law in its entirety. They only get education about the Criminal Code, the Criminal Procedure Code, the Civil Code, and the Indonesian National Police Law.

These investigators and investigators of the Republic of Indonesia National Police will certainly have personalities and characters that are greatly influenced by the provisions contained in the Criminal Code, Criminal Procedure Code, Civil Code, and the Law on the Republic of Indonesia National Police.

Law enforcement officers who are not equipped with complete knowledge and understanding of health law will certainly not be able to understand, let alone internalize, what is contained in health law.

This will certainly result in the law enforcement of female circumcision by medical personnel and / or health workers will not be able to succeed properly. As conveyed by Lawrence Meir Friedman, the success or failure of law enforcement depends on three things, namely, Legal Substance, Legal Structure / Legal Institutions and Legal Culture. So if the legal structure is not good, the success of law enforcement will also not be able to run optimally.

c. Weaknesses of Law Enforcement Regulations on Female Circumcision by Medical Personnel and/or Health Workers at the Time of Legal Culture

Lawrence Meir Friedman stated in his Legal System Theory that legal culture is the attitude of humans towards law and the legal system, beliefs, values, thoughts, and hopes of humans. Legal culture is also the atmosphere of social thought and social power that determines how law is used, avoided, or misused. Legal culture is closely related to public legal awareness. The higher the public legal awareness, the better the legal culture will be created and can change the public mindset about law so far. Simply put, the level of public compliance with the law is one indicator of the functioning of the law. The structure is likened to a machine, the substance is what is done and produced by the machine, while legal culture is anything or anyone who decides to turn the machine on and off, and decides how the machine is used.

The legal culture in Indonesia is still thick with the culture of “*ewuh pekeuwuh*”, a culture of guarding people’s feelings so that they do not dare to voice the truth even though violations of the law are before their eyes. The culture of waiting for orders from superiors, the culture of just making the boss happy, even destructive cultures such as

the culture of corruption, collusion and nepotism. With the condition of the legal culture that is still like this, it will certainly be very difficult to be able to uphold justice as strictly as possible. It will still be a long way from getting legal certainty that has benefits for the wider community. Likewise in the case of the Enforcement of the Law on Female Circumcision by Medical Personnel and / or Health Workers, because the legal culture is not so good, it will certainly be difficult to be upheld as strictly as possible.

3.3. Reconstruction of Law Enforcement Regulations for Female Circumcision by Medical Personnel and/or Health Workers Based on Justice

a. Reconstruction of Philosophy/Values

Gustav Radbruch (Gustav Radbruch, 1996) argues that there are three main pillars in the implementation of law in general that are always a unity that cannot be removed to obtain one of the other things, namely justice, legal certainty, and benefits. Where these three pillars, if one of them is defeated to win the other, the existing balance will be lost and discomfort will be felt. The basic value of benefits that will direct the law to the consideration of the needs of society at a certain time, so that the law really has a real role in the welfare of its people.

According to Sudikno Mertokusumo, law and ethics are two sides of the same coin. Law is aimed at humans as social beings, who live in the bonds of society, who are influenced by social ties. On the other hand, ethics are aimed at humans as individuals, which means that their conscience is touched. So that a Medical Personnel and / or Health Personnel when carrying out their professional work are required to always comply with ethical norms, discipline and law at the same time. If there is a violation of these three norms, there must be consequences for each (Sudikno Mertokusumo, 2007).

In carrying out their professional work, a medical and/or health worker must always prioritize the quality of service and patient safety. The principles held by Medical and/or Health Workers in carrying out their professional work always apply the principle that is good for the patient or the main patient safety. Whatever is done by a Medical and/or Health Worker in carrying out their professional work must bring greater benefits to the patient. A Medical and/or Health Worker is not allowed to take actions that can worsen the patient's condition. Medical and/or Health Workers must also always uphold ethical

values so that all their actions in carrying out their professional work are better, besides that they must also prioritize the principle of justice in acting (Sutarno, 2014).

Related to the three basic values in the implementation of Soedikno Mertokusumo's law (Sudikno Mertokusumo and A. Pitlo, 1993) argues that law is not identical to justice, therefore the implementation or enforcement of law must be fair. Law is general, equalizing, for example anyone who steals must be punished; while justice is subjective, individualistic and not equalizing where fair for one person is not necessarily fair for another. Still according to Sodikno Mertokusumo, legal certainty is legal protection against arbitrary actions, where society will obtain something that is expected, so that it is hoped that order can occur in society. The implementation or enforcement of law must provide benefits or uses for society, the enforcement of law must not actually injure the sense of justice of society

Related to the basic values of legal certainty, benefit and justice, it is not uncommon for a dilemma to occur, which basic value should be prioritized if there is a situation where we have to choose between the three, which should be prioritized. Sometimes due to lack of knowledge and understanding of Health laws and a sense of public justice, there are often still law enforcement officers who prioritize law enforcement to pursue legal certainty but do not or pay less attention to the value of justice and its benefits for the community. As a result, the sense of public justice and the benefits of implementing the law are not felt by the general public. If there is a conflict between the principles of justice, benefit and legal certainty, according to Sudikno Mertokusumo, then the principle of justice is prioritized first. Why should justice be prioritized over legal certainty, because the aim is to make a challenge so that the law always develops and catches up with changes in society, while the principle of justice is prioritized over the principle of benefit because in many cases politically, benefits are more accessed by the elite rather than by the general public. In fact, the general public's sense of justice is often harmed by the interests or benefits of this elite society, sometimes for the sake of upholding legal certainty they actually ignore the benefits and justice itself (Aryanto Kush Anjawani).

To be able to uphold justice, one must know the meaning of justice, besides that it cannot be separated from the factors of legal regulations, law enforcement officers and public legal awareness or legal culture in society. Legal regulations that are in accordance with the aspirations of the community, law enforcement officers who are professional and have a strong mentality or have commendable moral integrity, and the

last is public legal awareness so that the law can be implemented (Baharuddin Lopa, 1987).

The enactment of Law Number 17 of 2023 concerning Health, followed by Government Regulation, namely Government Regulation Number 28 of 2024 concerning the Implementing Regulations of Law Number 17 of 2023 concerning Health. It is expected to provide greater benefits for the development of the health sector in Indonesia. However, in several Articles in Government Regulation Number 28 of 2024 concerning the Implementing Regulations of Law Number 17 of 2023 concerning Health, according to the author, it is not very appropriate and needs to be reconstructed, so that medical personnel in carrying out their professional work do not feel afraid of being criminalized, or getting caught up in legal problems. Thus, the reconstruction of values regarding the regulation of law enforcement for female circumcision by medical personnel and / or health workers based on justice can be felt in its legal certainty, its legal benefits and its justice can also be felt by society as a whole.

As mandated in Article 28 H of the 1945 Constitution of the Republic of Indonesia, that everyone has the right to live in physical and spiritual prosperity, to have a place to live, and to have a good and healthy living environment and has the right to receive health services., in addition, every Indonesian citizen has the right to a decent and good living environment to achieve equality and justice in order to develop themselves fully as civilized human beings with guaranteed personal property rights from the arbitrariness of other people or other parties.

Reconstruction of the regulation of law enforcement of female circumcision by medical personnel and / or health workers Based on Justice, must be carried out very carefully and must not leave the philosophy of protecting the rights of women who experience female circumcision. Related to the need for legalization of female circumcision or restrictions on female circumcision or even prohibition of female circumcision which aims to protect the future of women who undergo female circumcision, to avoid psychological trauma and social burdens for women who undergo female circumcision. On the other hand, women who undergo female circumcision also have the freedom to determine something for themselves, especially concerning unwanted female circumcision which has social and psychological impacts. However, if there are women who want to undergo female circumcision, it is also solely because they also have the basic rights to determine their personal lives free from psychological and social pressure due to undergoing female circumcision.

At the same time, in the study according to Islam, Islam is not a rigid religion, but a dynamic one, which views human life from various angles, so that solutions can be found from various problems faced by humans, including the problem of female circumcision. Therefore, it is necessary to study women who want to undergo female circumcision, before a woman undergoes female circumcision and how the law of performing female circumcision according to Human Rights, according to positive law in force in Indonesia and according to Islamic Law.

The law should be able to keep up with the times, be able to respond to changes in the times with all the bases therein, and be able to serve the interests of the community by relying on the moral aspects of the human resources of law enforcement itself (Satjipto Raharjo, 2006).

Justice-based must be the basis for reconstruction of the regulation of female circumcision law enforcement by medical personnel and/or health workers, because with the justice of this progressive legal theory, the reconstruction of the regulation of the legal system and law enforcement is not only based on articles and procedures written in the Law Book, but also includes three things, namely a conscientious legal method, legal slogans for humans, and the issue of progressive actors and actions. A conscientious legal method is the implementation of law that does not only focus on Articles, but is also related to a broader system. The legal method is a unit of; legal mission; paradigm; use of theory and behavior of determination and concern, courage, determination, empathy and a sense of feeling. A conscientious legal method requires a qualified level of intellectuality of a legal scholar, in addition to the empathy and sympathy of a legal scholar. The implementation of laws and regulations, knowledge and empathy, follows the development of the times, is able to respond to changes in the times with all the bases in it, and is able to serve the interests of the community by relying on the morality aspect of the human resources of law enforcement itself

Reconstruction enforcement of female circumcision by medical personnel and/or health workers based on the theory of justice will result in justice for all, justice that benefits humanity, and the welfare of society in general. By realizing such justice values, it will have an impact on the concept of law using conscience, following the development of the times, being able to respond to changes in the times with all the bases therein, and being able to serve the interests of society by relying on the moral aspects of the human resources of law enforcement itself, so that it can benefit society.

3.4. Legal Reconstruction

The practice of female circumcision is carried out in various ways, some are actually done, namely directly cutting off the tip of the clitoris, even if only a little (the size of granulated sugar), and some are done symbolically using turmeric as a medium which is placed on the woman's clitoris, the clitoris is then cut. In practice, between the real and the symbolic, it depends on the dukun doing it.

Circumcision implementation in Banjar performed when the girl is still a toddler between the ages of 40 days after birth to the age of two years. Circumcision is done by cutting or scratching the baby's clitoris using scissors carried out by a midwife. While if it is done by a midwife, the implementation is to scratch a little from the tip of the clitoris using a razor. Both are done by having to draw blood because according to their beliefs it is a valid requirement for female circumcision.

The practice of circumcision on girls is not only done because of encouragement from the family. The role of the surrounding environment is also an actor in the implementation of circumcision on girls. This can be done by being disseminated when teaching or preaching, also through influence which eventually becomes a belief carried out by midwives. The practice of circumcision on girls has continued to be sustainable until now because of their great trust in the Kyai. The community 'relies' on their lives from the messages conveyed by their Kyai. Including the practice of circumcision on girls there. The supporting actors for circumcision of girls are parents, religious leaders and community leaders from Madurese cultural backgrounds who believe in the obligatory evidence of circumcision for girls.

Implementation of the Law Enforcement Regulation on Female Circumcision by medical personnel and/or health workers in force in positive law in Indonesia currently has no uniformity. Indeed, in the positive law in force in Indonesia at this time, there are no concrete provisions in providing protection or law enforcement for perpetrators of female circumcision. So that obtaining legal certainty in law enforcement in Indonesia is still not easy to obtain. Likewise, in terms of its benefits, it has not been felt by the community, so that the sense of justice cannot be enjoyed by the community seeking justice.

With the above background, the author is of the opinion that it is time to create a regulation that allows for the creation of firm law enforcement, without discrimination but remains humane, while at the same time providing a sense of justice to the community so that the community gets a real sense of justice and feels its benefits for their lives.

“No act can be punished except by virtue of criminal provisions in existing legislation before the act is committed,” is the mandate of Article 1 paragraph (1) of the Criminal Code. In criminal law, there is a principle of legality, namely the principle that states that an act can only be punished if it has been regulated in law before the act is committed.

In relation to the provisions contained in Article 102 letter a of Government Regulation Number 28 of 2024 concerning the Implementing Regulations of Law Number 17 of 2023 concerning Health, which states that: Efforts to improve the reproductive health of infants, toddlers and preschool children as referred to in Article 101 paragraph (1) letter a must at least include: Eliminating the practice of female circumcision.

While the regulations in the provisions of Article 1 paragraph (1) of the Minister of Health Regulation Number 1636 of 2010 concerning Female Circumcision state that female circumcision is the act of scratching the skin covering the front of the clitoris, without injuring the clitoris.

Meanwhile, the Regulation on Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers According to the Regulation of the Minister of Health Number 6 of 2014 concerning the Revocation of the Regulation of the Minister of Health Number 1636/Menkes/Per/XII/2010 concerning Female Circumcision includes;

article 1

Minister of Health Regulation Number 1636/Menkes/Per/XII/2010 concerning Female Circumcision is revoked and declared invalid.

This reconstruction needs to be carried out because the regulation of law enforcement on female circumcision by medical personnel and/or health workers is felt to be less than fair and its legal certainty and benefits have not been felt by society as a whole.

4. Conclusion

From the description above we can conclude as follows: 1) Regulations on law enforcement regarding female circumcision by medical personnel and/or health workers in positive law in Indonesia that are currently in force are not yet based on justice. 2) The weakness of the regulation of law enforcement of female circumcision by medical personnel and/or health workers in Indonesia at this time in terms of legal substance, namely, the legal substance contained in the positive legal provisions currently in force in Indonesia is still not concrete and there is no uniformity so that it is not based

TABLE 1: Table of Reconstruction of Article 102 letter a of PP No. 28 of 2024 concerning Implementing Regulations of Law No. 17 of 2023 concerning Health.

Before Reconstruction	Weakness	After Reconstruction
Efforts to improve the reproductive health of infants, toddlers and preschool children as referred to in Article 101 paragraph (1) letter a at least include: Eliminating the practice of female circumcision."	Article 102 letter a before reconstruction,Eliminate the practice of female circumcisionwhereas in the current MUI Fatwa it is mandated that, Circumcision, for both men and women, is part of the fitrah (rules) and propagation of Islam. Circumcision of women is makrumah, its implementation as one of the recommended forms of worship	Efforts to improve the reproductive health of infants, toddlers and preschool children as referred to in Article 101 paragraph (1) letter a include at least: a.Female circumcision is the act of scratching the skin that covers the front of the clitoris, without injuring the clitoris. b. Female circumcision is done by simply removing the membrane that covers the clitoris. c. Female circumcision should not be excessive, such as cutting or injuring the clitoris (incision and excision) which can result in pain. d. Eliminate the practice of female circumcision which is not in accordance with the MUI fatwa.

on justice. Weaknesses of Law Enforcement Regulations The current law enforcement regulations for female circumcision by medical personnel and/or health workers in Indonesia from the legal structure are that the knowledge and understanding of law enforcement officers regarding health law is still limited so that the way they think and act is still not in accordance with the provisions of health law and so is not based on justice. 3) Reconstruction of values of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers is to provide balanced protection and law enforcement to female circumcision perpetrators and society in general. Reconstruction of legal norms Article 102 letter a of Government Regulation Number 28 of 2024 concerning the Implementing Regulations of the Health Law can produce regulation of Law Enforcement of Female Circumcision by Medical Personnel and/or Health Workers in Indonesia which is balanced in terms of legal certainty, legal benefits and the sense of justice of the community.

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