

## A Civil Law Perspective on the Music Copyright Dispute: Agnez Mo vs. Ari Bias

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### Abstract

*Copyright disputes in the music industry often arise due to unclear mechanisms for royalty payments. The case of Ari Bias vs. Agnez Mo, regarding the unauthorized use of the song "Bilang Saja" in a concert, sparked legal debate over royalty payment responsibilities. The Central Jakarta Commercial Court's ruling, which held Agnez Mo accountable, raised questions about civil law interpretations in copyright protection. This study uses a qualitative method with a normative juridical approach, examining Copyright Law No. 28 of 2014, collective management organization (LMK) regulations, and music industry contracts. The findings reveal that unclear royalty payment responsibilities, lack of transparency by LMKs, and weak legal awareness within the music industry are major causes of disputes. Furthermore, music contracts often fail to clearly define royalty obligations, creating legal loopholes. This study concludes that clearer regulations on royalty responsibilities in concerts, improved LMK transparency, and legal education for musicians and songwriters are essential. With stronger policy reforms, similar disputes can be reduced, and the copyright and royalty protection system in Indonesia can operate more effectively and fairly.*

## A. INTRODUCTION

The music industry is one of the rapidly growing sectors within the creative economy in the digital era. Copyright and royalties play a crucial role in ensuring that songwriters, singers, and other music industry players receive fair economic rights for their work.<sup>1</sup> Copyright in the music industry provides legal protection for songwriters and related rights holders, particularly regarding distribution, usage, and remuneration of their creations.<sup>2</sup> However, in practice, disputes related to copyright and royalties frequently occur—between musicians and record labels, event organizers, or between songwriters and performers who use songs without proper authorization or royalty payments.

One high-profile copyright dispute is the case involving Agnez Mo and Ari Bias. Ari Bias, the songwriter of “*Bilang Saja*,” sued Agnez Mo for performing the song in three concerts in May 2023 without permission and without paying royalties.<sup>3</sup> After receiving no response to his formal notice, Ari Bias filed a lawsuit with the Central Jakarta Commercial Court, which ruled that Agnez Mo was guilty and ordered her to pay damages of IDR 1.5 billion.

This case highlights civil law issues in copyright protection and royalty distribution mechanisms in Indonesia, particularly regarding royalty obligations in live performances.<sup>4</sup> Agnez Mo claimed that the responsibility lies with the event organizers, not the performers. Conversely, Ari Bias argued that anyone performing a copyrighted song must obtain permission and fulfill royalty obligations in accordance with copyright law.

This research seeks to answer the following legal questions: 1) What are the civil law provisions regarding copyright and royalties in Indonesia's music industry? 2) How are royalty payment mechanisms in concerts regulated? 3) How does civil law analyze the copyright dispute between Agnez Mo and Ari Bias? 4) What are the legal implications of the court's ruling on industry practices in Indonesia?

The research aims to analyze civil law provisions on copyright and royalties in the music industry, examine royalty payment mechanisms and legal responsibilities, assess

<sup>1</sup> Kirui, A. K. (2024). Ethical dilemmas and copyright challenges among independent artists in Kenya's music industry. *Journal of Humanities and Social Sciences (JHSS)*, 3(1), 13-22.

<sup>2</sup> Nordås, H. K. (2024). Copyright and trade in the digital music industry. In *Handbook of Innovation and Intellectual Property Rights* (pp. 177-190). Edward Elgar Publishing.

<sup>3</sup> Setiawan, A. (2025). Konflik Royalti” Performing Rights” dan Polarisasi Musisi. *Kompas Id*.

<sup>4</sup> Panjaitan, H., Betlehn, A., Situmeang, T., Khan, M. Z. K., & Miraz, M. H. (2024). Music Copyright Protection in The Digital Era: Legal Framework and Strategies for Enforcement. *Jurnal Hukum UNISSULA*, 40(2), 235-257.

the court's decision in the Agnez Mo vs. Ari Bias case, and identify its implications on Indonesia's copyright protection system.

This study is expected to contribute to the development of civil law in copyright and royalty issues and offer recommendations for improving regulations, increasing legal awareness among musicians and songwriters, promoting transparency among industry players, and enriching academic and legal discourse on intellectual property rights.

## **RESEARCH METHODS**

This study uses a qualitative method with a normative and empirical juridical approach. The normative approach involves examining laws, legal doctrines, and academic literature related to copyright and royalties in the music industry.<sup>5</sup> The empirical approach analyzes the copyright dispute between Agnez Mo and Ari Bias and its legal implications for the Indonesian music industry.<sup>6</sup>

The purpose of this approach is to understand civil law provisions on copyright and royalties, identify the royalty payment mechanism in music concerts, and evaluate the court's decision using civil law principles.<sup>7</sup> The study also aims to provide legal recommendations to better protect the rights of songwriters and musicians.

Two types of data are used: primary data, such as the court ruling from the Central Jakarta Commercial Court, the Copyright Law No. 28 of 2014, and the Ministry Regulation on Collective Management Organizations (LMK); and secondary data, including books, academic journals, news articles, and online publications about the case and copyright disputes in general.

Data collection techniques include literature review, court decision analysis, and media case analysis. Data is analyzed qualitatively and descriptively, focusing on legal regulations, court rulings, and academic sources.

The analysis includes: Identifying legal issues such as copyright infringement and breach of contract; Comparing with similar cases in Indonesia and abroad; Evaluating the court decision based on civil law principles; Formulating policy and legal

<sup>5</sup> Bansal, K. (2024). *Copyright Law and Performers' Rights in the Entertainment Industry: A Case Study Analysis of India and Australia* (Doctoral dissertation, Swinburne).

<sup>6</sup> Morroi, L. (2024). Exploring the Impact of Ecofeminist Theory on Contemporary Art: A focus on National Participations at the 59th Venice Art Biennale (2022).

<sup>7</sup> Sianipar, S. D. A. H. B., & Harahap, M. Y. (2024). Unlawful Acts as a Result of Payment of Compensation Through Royalty Rights Perpsective of Law Number 28 Year 2014 Copyright. *Journal Equity of Law and Governance*, 5(2), 8-14.

recommendations; Triangulation is used to ensure data validity by comparing legal documents, court decisions, and secondary sources.

Limitations of this study include its focus on civil law aspects only, reliance on secondary data without interviews, and a descriptive-analytical nature that does not test hypotheses quantitatively.

## DISCUSSION

This section aims to provide a comprehensive analysis of the copyright and royalty dispute between Ari Bias and Agnez Mo within the context of Indonesia's civil law. The discussion explores the legal framework governing copyright protection and royalty distribution in the music industry, highlighting the challenges and ambiguities that often lead to disputes. By examining the applicable laws, court rulings, and practices in the music business, this section seeks to uncover the root causes of the conflict and assess the extent to which current legal mechanisms protect the rights of songwriters and performers. Furthermore, this discussion offers a critical evaluation of the responsibilities of various parties in royalty payment, and the broader implications of this case for future copyright enforcement and legal reform in Indonesia's creative industry.

### 1. Copyright and Royalty Protection in the Music Industry

Copyright is an exclusive right granted to creators for their works in the fields of art, literature, and science, including music.<sup>8</sup> This right includes both moral and economic rights, allowing creators to benefit from their work and control how it is used by others.<sup>9</sup>

In Indonesia, copyright is regulated under Law No. 28 of 2014 on Copyright, which provides legal protection for songwriters, performers, record producers, and other related parties.<sup>10</sup> Article 9 of the Copyright Law grants creators the exclusive right to publish, reproduce, and distribute their works, and to authorize others to use their creations in various forms, including concerts and musical performances.<sup>11</sup>

However, in practice, copyright protection in the music industry still faces many challenges. Copyright violations remain common, including the unauthorized use of songs, music piracy, and issues in the royalty payment system, which is often considered non-transparent and unfair.<sup>12</sup>

<sup>8</sup> Isaac, J. S., & Sundharam, A. (2025). Recalibrating originality for music in copyright law. *International Journal of Law and Management*, 67(3), 363-371.

<sup>9</sup> Ruhtiani, M., Prihatinah, T. L., Sulistyandari, S., Park, H. K., & Whindari, Y. (2024). Legal Protection of Architectural Works as Copyright: An Epistemological and Islamic Law Perspective. *El-Mashlahah*, 14(1), 43-70.

<sup>10</sup> Baisuni, H., Djulaeka, D., & Sajjad, M. A. (2024). Legal Protection For Unauthorized Copying Of Songs On Digital Platforms Through Audio Watermarking Method. *JUSTISI*, 10(3), 547-564.

<sup>11</sup> Kiss, B. (2024). *Unlocking research: a study of UK copyright law and copyright licences in light of Open access versus traditional publishing* (Doctoral dissertation, C).

<sup>12</sup> Walther, J. (2024). *The Right to Equitable Remuneration in South African Copyright Law: An Analysis of the Current Copyright Reform with Special Consideration of the Legal Treatment of Changed Material Contractual*

One of the main aspects of copyright protection in the music industry is the royalty payment mechanism, which is the compensation given to songwriters and copyright holders when their works are used by others.<sup>13</sup> Royalties are paid whenever a song is used in various forms, such as radio broadcasts, digital streaming, live performances, and use in films or advertisements.<sup>14</sup>

In Indonesia, royalty payments are managed by Collective Management Organizations (LMK), which are responsible for collecting and distributing royalties to copyright holders.<sup>15</sup> However, this system still encounters several issues, including: Lack of transparency in royalty distribution, where many musicians and songwriters express concerns about unclear calculations and distribution processes; Delays in royalty payments, with some creators waiting long periods to receive their rightful compensation; Unfair contracts that disadvantage musicians, causing them to lose a significant portion of their economic rights over their creations.

The dispute between Ari Bias and Agnez Mo illustrates how misunderstandings about the royalty payment system can lead to legal conflicts in the music industry. The case concerns the use of the song "Bilang Saja" in three concerts in May 2023 without the creator's permission. Ari Bias claimed he had not received the royalty payments due to him as the songwriter. After failed communication and legal notice attempts, he filed a lawsuit with the Central Jakarta Commercial Court, which ruled that Agnez Mo was liable and ordered her to pay damages of IDR 1.5 billion.

In her defense, Agnez Mo argued that the responsibility for royalty payments lies with the concert organizer, not the performing artist. In practice, event organizers are indeed typically responsible for obtaining usage licenses and paying royalties to songwriters through the LMK.

The court's ruling raises important questions about copyright protection in Indonesia, particularly regarding who holds the responsibility for royalty payments in a music concert. Is the royalty management system run by Collective Management Organizations (LMK) transparent and fair enough for songwriters? This case highlights the regulatory ambiguities in the royalty payment system, which could create loopholes for future disputes.

Based on the analysis of the Agnez Mo vs. Ari Bias case and the study of Indonesia's copyright protection framework, several key challenges emerge in safeguarding copyright and royalty rights in the music industry. First, there is a lack of legal awareness among music industry players. Many musicians, singers, and songwriters do not fully understand

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*Circumstances.* LIT Verlag Münster.

<sup>13</sup> Azwar, T. K. D., Desiandri, Y. S., Arifiyanto, J., Siagian, P. R., & Wau, H. S. M. (2024, February). Alter Ego of Payments Royalties for Songs and Music on Radio Stations. In *International Conference On Law, Economic & Good Governance (IC-LAW 2023)* (pp. 655-661). Atlantis Press.

<sup>14</sup> Kumar, T., & Mahajan, R. (2024). The Digital Sonata: Digitalization's Impact on India's Music Industry and Artist Revenues. *Digital Society*, 3(3), 1-26.

<sup>15</sup> Ayu Palar, M. R., Rafianti, L., Puspitasari, W., & Novianti, I. (2025). Centralized management of copyright royalties: A case study on the National Collective Management Organization for songs and music in Indonesia. *The Journal of World Intellectual Property*, 28(1), 24-57.

their rights and obligations related to copyright and royalties, leading them to sign unfavorable contracts or struggle to assert their rights when violations occur.<sup>16</sup> Second, there is regulatory uncertainty regarding royalty payments in live concerts.<sup>17</sup> To date, no specific regulation clearly defines who is responsible for paying royalties in such events, leading to varying interpretations in legal disputes like the one between Agnez Mo and Ari Bias. Third, there is a lack of transparency in royalty management by LMK. Many songwriters and musicians complain about not receiving clear information on how their royalties are calculated and distributed, resulting in distrust in the LMK system and contributing to disputes within the music industry.<sup>18</sup>

## 2. Case Analysis: Agnez Mo vs. Ari Bias

The copyright dispute between Ari Bias and Agnez Mo attracted public attention as it involved one of Indonesia's top singers in a legal case over song royalties. The dispute began when Agnez Mo performed the song "Bilang Saja" at three concerts in May 2023—at HW Superclubs Surabaya (May 25), H Club Jakarta (May 26), and HW Superclub Bandung (May 27)—without obtaining prior permission or paying royalties to the songwriter. Ari Bias, the composer of "Bilang Saja," claimed that Agnez Mo had performed the song without his official consent and without compensating him as the rightful copyright holder. After attempts at communication and legal warnings went unanswered, Ari Bias filed a lawsuit with the Central Jakarta Commercial Court, which ruled that Agnez Mo had violated copyright laws and was ordered to pay Rp 1.5 billion in damages.

In her defense, Agnez Mo argued that the responsibility for royalty payments should lie with the concert organizers, not the performing artist. She asserted that in all her performances, the event organizers were the ones responsible for handling licensing and royalty payments. This case sparked a legal debate over who should be held accountable for royalty payments at music concerts: the performing artist, the event organizer, or the Collective Management Organization (LMK).<sup>19</sup>

Legally, this case relates to Law No. 28 of 2014 on Copyright, which protects the rights of songwriters, performers, and other copyright holders. Relevant provisions include Article 9 Paragraph (1), which grants creators exclusive rights to the use and distribution of their works, including public performances; Article 9 Paragraph (2), which requires permission from the copyright holder for others to use the work; and Article 113, which outlines penalties for copyright infringement, including compensation for damages.

<sup>16</sup> Herbst, J. P., Williams, K., Tolstad, I. M., & Barber, S. (2025). The Benefits of Collaborative Popular Music Songwriting: A Spectrum of Artist-Songwriter Involvement. *Popular Music and Society*, 48(1), 1-24..

<sup>17</sup> Litoama, F. (2024). The Legal Certainty of Legitimate Ownership in Copyright Works of Songs or Music, as well as Associated Rights in Non-Declarative Recording in accordance with the Royalty Management System under Government Regulation No. 56 of 2021 (Case Study on Copyright). *Sinergi International Journal of Law*, 2(1), 1-13..

<sup>18</sup> Perot, E. (2025). Music Copyright Ownership: Factors Behind the Increase in Writer Credits and Rights Clearance. *Berkeley Journal of Entertainment and Sports Law*, 14.

<sup>19</sup> Ayu Palar, M. R., Rafianti, L., Puspitasari, W., & Novianti, I. (2025). Centralized management of copyright royalties: A case study on the National Collective Management Organization for songs and music in Indonesia. *The Journal of World Intellectual Property*, 28(1), 24-57.

The court ruled that Agnez Mo violated Article 9 by performing the song without written permission from the songwriter. However, the central legal question remains: is the performing artist directly liable for royalties, or should that responsibility fall on the concert organizer?

A major issue in this case is determining who holds the responsibility for paying royalties at music concerts.<sup>20</sup> Internationally, royalties are typically managed by Collective Management Organizations, which collect and distribute royalties on behalf of songwriters.<sup>21</sup> In Indonesia, organizations such as Wahana Musik Indonesia (WAMI) and Karya Cipta Indonesia (KCI) play this role. Generally, it is the concert organizer—not the performer—who is responsible for obtaining song licenses and making royalty payments to the LMK.<sup>22</sup>

However, in the Agnez Mo vs. Ari Bias case, the court still held Agnez Mo liable for the unpaid royalties because she directly performed the song without prior authorization. This decision has stirred debate among legal experts and musicians, as it sets a potential precedent that may differ from standard industry practices.

Arguments supporting the court's decision include the notion that performers are legally accountable for obtaining usage rights, especially if no written agreement exists stating that the event organizer is responsible.<sup>23</sup> Additionally, the Copyright Law clearly requires explicit permission from the creator before a work is used in public. On the other hand, opponents argue that, in practice, event organizers handle all licensing and royalty matters. Holding artists personally responsible could burden them with additional administrative duties and complicate the performance process.<sup>24</sup>

This ruling has several important implications for Indonesia's music industry.<sup>25</sup> First, there is an urgent need to revise copyright regulations related to live performances. Clearer rules on who is accountable for royalty payments can help avoid legal uncertainty and prevent future disputes.<sup>26</sup> Second, transparency in royalty management must be

<sup>20</sup> Azwar, T. K. D., Desiandri, Y. S., Arifiyanto, J., Siagian, P. R., & Wau, H. S. M. (2024, February). Alter Ego of Payments Royalties for Songs and Music on Radio Stations. In *International Conference On Law, Economic & Good Governance (IC-LAW 2023)* (pp. 655-661). Atlantis Press.

<sup>21</sup> Junitasari, I. D. (2024). The Effectiveness of The National Collective Management Institute in Song or Music Royalty Management Based on Lawrence M. Friedman's Theory. *International Journal Of Humanities Education and Social Sciences*, 4(1).

<sup>22</sup> Utama, A. N. R., Palar, M. R. A., & Muchtar, H. N. (2024). ReView Of Reversionary Rights In The Sold-Flat Agreement Of Song Creation Associated With Law Number 28 Of 2014 On Copyright. *Transnational Business Law Journal*, 5(1), 15-35.

<sup>23</sup> Veluwenkamp, H. (2025). What responsibility gaps are and what they should be. *Ethics and Information Technology*, 27(1), 1-13.

<sup>24</sup> Yuan, Q., & Chen, T. (2025). Holding AI-based systems accountable in the public sector: A systematic review. *Public Performance & Management Review*, 1-34.

<sup>25</sup> Halim, T., Harsha, R., & Sinurat, G. (2024). Juridical Analysis: Unraveling Malaysia's Modification of the Song "Halo-Halo Bandung" Within the Legal Parameters of Law No. 24 of 2014. *Anthology: Inside Intellectual Property Rights*, 2(1), 300-316.

<sup>26</sup> Al Mahdouri, A. (2024). *Ambiguity and Uncertainty Surrounding Public Policy and Confidentiality in the Context of Arbitration Intellectual Property Disputes* (Doctoral dissertation, The University of Manchester)

improved. LMKs should provide clearer information on how royalties are calculated and distributed. Adopting digital technologies, such as blockchain, could enhance transparency and accountability.<sup>27</sup> Third, there is a need for greater education and outreach to musicians and songwriters. Many still lack a thorough understanding of how copyright and royalty systems work. The government and LMKs should provide guidance and awareness programs to ensure that creators understand their rights and responsibilities, thereby reducing the likelihood of future legal conflicts.

### **3. Royalty Payment Mechanism and Emerging Issues**

In the music industry, royalties serve as financial compensation for songwriters, copyright holders, and related parties for the use of their works.<sup>28</sup> The purpose of royalty payments is to protect the economic rights of creators and ensure that they benefit from the commercial exploitation of their works.<sup>29</sup> In Indonesia, the royalty payment mechanism is governed by Law No. 28 of 2014 on Copyright, which outlines how songwriters and copyright holders receive economic rights from their works.<sup>30</sup> Article 9 of the Copyright Law grants creators exclusive rights to announce, reproduce, distribute their works, and grant permission to others to use their songs in various forms. These payments are generally managed by Collective Management Organizations (CMOs), responsible for collecting and distributing royalties to songwriters and copyright holders. Several CMOs operate in Indonesia, such as Wahana Musik Indonesia (WAMI), Karya Cipta Indonesia (KCI), Performing Rights Society of Indonesia (PRSI), and Royalti Anugrah Indonesia (RAI), all of which help collect royalties from various sources like concert organizers, radio and television stations, streaming platforms, and commercial establishments that play songs.

However, despite these regulations, various issues arise in practice that lead to disputes between songwriters, musicians, and event organizers. One of the main debates in the Agnez Mo vs. Ari Bias case centers on who is responsible for paying royalties in a music concert. While in the international music industry, event organizers typically handle royalty payments, this case placed the responsibility on Agnez Mo as the performing artist. This ambiguity creates legal uncertainties and could set a problematic precedent for future cases. In addition, many event organizers fail to pay royalties correctly, leaving songwriters at a disadvantage. Furthermore, a significant issue in the system is the lack of transparency in royalty management by CMOs. Many musicians and songwriters have complained about unclear processes regarding how royalties are calculated and distributed. There is

(United Kingdom)).

<sup>27</sup> Kapsoulis, N. (2024). Blockchains beyond Digital Currencies: privacy-oriented implementations of industrial architectures.

<sup>28</sup> Gupta, E., & Agrawal, A. (2024). Who do we pay for Music: Artists or DSP's. *International Journal for Research in Applied Science and Engineering Technology*, 12(1), 890-900.

<sup>29</sup> Darmantho, A. (2024). Copyright in the Art Industry: Ethical and Management Challenges for Artwork Protection. *Jurnal Seni Musik*, 13(1), 42-58.

<sup>30</sup> Baisuni, H., Djulaeka, D., & Sajjad, M. A. (2024). Legal Protection For Unauthorized Copying Of Songs On Digital Platforms Through Audio Watermarking Method. *JUSTISI*, 10(3), 547-564.

also a lack of periodic reporting to songwriters on the royalties they have earned, along with slow payout processes, which can cause delays in receiving payment. This lack of transparency erodes trust in the system, prompting some songwriters to choose independent management or enter direct contracts with record labels or event organizers.

Additionally, a lack of legal awareness and understanding among industry players exacerbates these problems. Many musicians and songwriters do not fully comprehend their rights and obligations in the royalty system, leading them to sign contracts without understanding the legal and financial consequences. This lack of understanding often results in songwriters losing their economic rights, and increases the likelihood of legal disputes, as seen in the Agnez Mo case. To address these issues, improvements in both regulation and industry practice are necessary. The government needs to clarify regulations on who is responsible for paying royalties in music concerts, ensuring greater legal certainty and preventing future conflicts. CMOs should also enhance transparency by providing songwriters with access to information about how royalties are calculated and distributed, and utilizing digital technologies like blockchain for more accurate and transparent tracking. Furthermore, there is a need for greater education and awareness about copyright and royalties for musicians and songwriters. This could be achieved through seminars, online courses, and the distribution of legal guides, helping industry players to better understand their rights and obligations in the music business.

#### 4. Implications of Civil Law on the Music Industry in Indonesia

Copyright is a legal instrument that provides protection for intellectual creations, including in the music industry.<sup>31</sup> This protection encompasses moral and economic rights, allowing songwriters to benefit from the works they create. In Indonesia, copyright protection is regulated by Law No. 28 of 2014 on Copyright,<sup>32</sup> which ensures the rights of songwriters and copyright holders over the use of their works by others. The dispute between Ari Bias and Agnez Mo is a concrete example of how copyright infringement remains a critical issue in Indonesia's music industry. In this case, Agnez Mo was found guilty of performing the song "Bilang Saja" without permission from its creator and was ordered to pay compensation of IDR 1.5 billion. This case sparked debates over the responsibility for royalty payments in music concerts and the implications of civil law for the music industry in Indonesia.

Civil law plays a crucial role in resolving copyright and royalty disputes in the music industry, particularly through contractual mechanisms between parties. The legal implications for the music industry can be seen in several aspects. One of the most significant issues arising from the case is the lack of legal awareness among music industry

<sup>31</sup> Kumar, P. (2024). Intellectual Property Rights (IPR): Nurturing Creativity, Fostering Innovation. *Idealistic Journal of Advanced Research in Progressive Spectrums (IJARPS) eISSN-2583-6986*, 3(02), 32-38.

<sup>32</sup> Soraya, J., & Althafzufar, M. A. (2024). Intellectual Property Rights Protection for Actors in the Creative Economy Based on Intellectual Property Rights Law Number 28 of 2014 Concerning Copyright. *Realism: Law Review*, 2(1), 39-53.

players.<sup>33</sup> Many musicians, songwriters, and event organizers do not fully understand their rights and obligations in copyright and royalty agreements, which can lead to legal conflicts. This case underscores the need for legal education within the industry to help stakeholders better understand how copyright and royalties work and how to protect their rights in contracts.<sup>34</sup> Providing legal guides for musicians and songwriters could reduce the potential for disputes in the future.

Another major issue highlighted in the case is the ambiguity regarding the responsibility for royalty payments in music concerts. International music industry practices generally establish that event organizers are responsible for paying royalties to Collective Management Organizations (CMOs), not the artists performing the songs. However, in this case, the court placed the responsibility on Agnez Mo, raising questions about inconsistent legal interpretation. This case calls for clearer regulations regarding royalty payments in music concerts. The government needs to revise regulations concerning royalty payment obligations and clarify the roles of event organizers, artists, and CMOs in the process.

The case also emphasizes the need for strengthening the role of CMOs in royalty distribution.<sup>35</sup> While CMOs are responsible for managing royalties for songwriters and musicians, there are still many complaints regarding the lack of transparency in royalty distribution. This case highlights the legal implications of requiring CMOs to improve transparency and accountability in managing royalties.<sup>36</sup> Measures should include making royalty calculations more open, ensuring timely and proportional royalty distributions, and utilizing digital systems like blockchain for more accurate and transparent tracking.

Furthermore, the royalty dispute in this case raises concerns about contract practices in the music industry. Contracts between songwriters, record labels, event organizers, and artists often become sources of conflict due to imbalanced bargaining power and unclear contract clauses. The legal implications of this case suggest the need for standardized contracts that fairly address the responsibility for royalty payments in music concerts. The inclusion of arbitration clauses to resolve royalty disputes and stronger legal protections for songwriters in copyright agreements can help prevent long litigation processes and ensure fair compensation for creators. Improving contract quality in the music industry will provide legal certainty for all parties involved and reduce the potential for future disputes.

This case also offers valuable lessons for the government in developing more effective policies for copyright and royalty protection. Policy implications to consider

<sup>33</sup> Shroff, L. (2024). AI & copyright: A case study of the music industry. *GRACE: Global Review of AI Community Ethics*, 2(1).

<sup>34</sup> Hithaishree, D. N., & Banerjee, J. Exploring Intellectual Property Rights: Legal Frameworks, Case Studies, And Societal Implications.

<sup>35</sup> Giga, G. (2024). The role and challenges of collective management organizations in copyright protection. *Актуальные исследования*, (41 (223)), 6-11.

<sup>36</sup> Hadziarapovic, N., van Steenbergen, M., Ravesteijn, P., Versendaal, J., & Mertens, G. Integrating Stakeholder Values in System of Collective Management of Music Copyrights: A Value-Sensitive Design Approach.

include revising the Copyright Law to clarify the responsibility for royalty payments in music concerts and ensuring that these regulations align with international best practices to avoid misinterpretations. Additionally, the government needs to enhance oversight of CMOs to ensure transparency and accountability in royalty management. The adoption of digital technologies in royalty tracking can help mitigate uncertainties in royalty distribution. Finally, legal education and awareness programs for musicians, songwriters, and event organizers should be organized to prevent future disputes and ensure that all parties understand their rights and obligations within the royalty system.

## **CONCLUSION**

The copyright dispute case between Agnez Mo and Ari Bias highlights the importance of legal certainty in the mechanism of royalty payments and copyright protection in the Indonesian music industry. The court decision that imposed responsibility on Agnez Mo in paying royalties shows the lack of clarity in regulations regarding the obligations of artists, concert organizers, and Collective Management Institutions (LMK) in managing the economic rights of songwriters. This dispute shows the need for standardization of contracts and clearer legal mechanisms to avoid similar conflicts in the future. The civil law implications of this case show that revision of policies related to copyright and royalties is urgent, especially in strengthening regulations regarding royalty payments in music concerts, increasing transparency in the management of royalties by LMK, and legal education for musicians and songwriters. The government and related institutions need to formulate clearer regulations that are in line with international practices, so that the copyright protection mechanism can run more fairly and effectively. With regulatory reforms and increased legal awareness among music industry players, it is hoped that copyright and royalty disputes can be minimized, and songwriters can obtain their economic rights optimally. In addition, strengthening the royalty management system and a more accountable role for LMK will help create a more sustainable and equitable music industry for all parties involved.

## **BIBLIOGRAPHY**

Al Mahdouri, A. (2024). *Ambiguity and Uncertainty Surrounding Public Policy and Confidentiality in the Context of Arbitration Intellectual Property Disputes* (Doctoral dissertation, The University of Manchester (United Kingdom)).

Ayu Palar, M. R., Rafianti, L., Puspitasari, W., & Novianti, I. (2025). Centralized management of copyright royalties: A case study on the National Collective Management Organization for songs and music in Indonesia. *The Journal of World Intellectual Property*, 28(1), 24-57.

Azwar, T. K. D., Desiandri, Y. S., Arifiyanto, J., Siagian, P. R., & Wau, H. S. M. (2024, February). Alter Ego of Payments Royalties for Songs and Music on Radio Stations. In *International Conference On Law, Economic & Good Governance (IC-LAW 2023)* (pp. 655-661). Atlantis Press.

Baisuni, H., Djulaeka, D., & Sajjad, M. A. (2024). Legal Protection For Unauthorized Copying Of Songs On Digital Platforms Through Audio Watermarking Method. *JUSTISI*, 10(3), 547-564.

Bansal, K. (2024). *Copyright Law and Performers' Rights in the Entertainment Industry: A Case Study Analysis of India and Australia* (Doctoral dissertation, Swinburne).

Darmantho, A. (2024). Copyright in the Art Industry: Ethical and Management Challenges for Artwork Protection. *Jurnal Seni Musik*, 13(1), 42-58.

Giga, G. (2024). The role and challenges of collective management organizations in copyright protection. *Актуальные исследования*, (41 (223)), 6-11.

Gupta, E., & Agrawal, A. (2024). Who do we pay for Music: Artists or DSP's. *International Journal for Research in Applied Science and Engineering Technology*, 12(1), 890-900.

Hadziarapovic, N., van Steenbergen, M., Ravesteijn, P., Versendaal, J., & Mertens, G. Integrating Stakeholder Values in System of Collective Management of Music Copyrights: A Value-Sensitive Design Approach.

Halim, T., Harsha, R., & Sinurat, G. (2024). Juridical Analysis: Unraveling Malaysia's Modification of the Song "Halo-Halo Bandung" Within the Legal Parameters of Law No. 24 of 2014. *Anthology: Inside Intellectual Property Rights*, 2(1), 300-316.

Herbst, J. P., Williams, K., Tolstad, I. M., & Barber, S. (2025). The Benefits of Collaborative Popular Music Songwriting: A Spectrum of Artist-Songwriter Involvement. *Popular Music and Society*, 48(1), 1-24..

Hithaishree, D. N., & Banerjee, J. Exploring Intellectual Property Rights: Legal Frameworks, Case Studies, And Societal Implications.

Isaac, J. S., & Sundharam, A. (2025). Recalibrating originality for music in copyright law. *International Journal of Law and Management*, 67(3), 363-371.

Junitasari, I. D. (2024). The Effectiveness of The National Collective Management Institute in Song or Music Royalty Management Based on Lawrence M. Friedman's Theory. *International Journal Of Humanities Education and Social Sciences*, 4(1).

Kapsoulis, N. (2024). Blockchains beyond Digital Currencies: privacy-printed implementations of industrial architectures.

Kirui, A. K. (2024). Ethical dilemmas and copyright challenges among independent artists in Kenya's music industry. *Journal of Humanities and Social Sciences (JHSS)*, 3(1), 13-22.

Kiss, B. (2024). *Unlocking research: a study of UK copyright law and copyright licences in light of Open access versus traditional publishing* (Doctoral dissertation, C).

Kumar, P. (2024). Intellectual Property Rights (IPR): Nurturing Creativity, Fostering Innovation. *Idealistic Journal of Advanced Research in Progressive Spectrums (IJARPS) eISSN-2583-6986*, 3(02), 32-38.

Kumar, T., & Mahajan, R. (2024). The Digital Sonata: Digitalization's Impact on India's Music Industry and Artist Revenues. *Digital Society*, 3(3), 1-26.

Litoama, F. (2024). The Legal Certainty of Legitimate Ownership in Copyright Works of Songs or Music, as well as Associated Rights in Non-Declarative Recording in accordance with the Royalty Management System under Government Regulation

No. 56 of 2021 (Case Study on Copyright. *Sinergi International Journal of Law*, 2(1), 1-13..

Morroi, L. (2024). Exploring the Impact of Ecofeminist Theory on Contemporary Art: A focus on National Participations at the 59th Venice Art Biennale (2022).

Nordås, H. K. (2024). Copyright and trade in the digital music industry. In *Handbook of Innovation and Intellectual Property Rights* (pp. 177-190). Edward Elgar Publishing.

Panjaitan, H., Betlehn, A., Situmeang, T., Khan, M. Z. K., & Miraz, M. H. (2024). Music Copyright Protection in The Digital Era: Legal Framework and Strategies for Enforcement. *Jurnal Hukum UNISSULA*, 40(2), 235-257.

Perot, E. (2025). Music Copyright Ownership: Factors Behind the Increase in Writer Credits and Rights Clearance. *Berkeley Journal of Entertainment and Sports Law*, 14.

Ruhtiani, M., Prihatinah, T. L., Sulistyandari, S., Park, H. K., & Whindari, Y. (2024). Legal Protection of Architectural Works as Copyright: An Epistemological and Islamic Law Perspective. *El-Mashlahah*, 14(1), 43-70.

Setiawan, A. (2025). Konflik Royalti "Performing Rights" dan Polarisasi Musisi. *Kompas Id*.

Shroff, L. (2024). AI & copyright: A case study of the music industry. *GRACE: Global Review of AI Community Ethics*, 2(1).

Sianipar, S. D. A. H. B., & Harahap, M. Y. (2024). Unlawful Acts as a Result of Payment of Compensation Through Royalty Rights Perspective of Law Number 28 Year 2014 Copyright. *Journal Equity of Law and Governance*, 5(2), 8-14.

Soraya, J., & Althafzufar, M. A. (2024). Intellectual Property Rights Protection for Actors in the Creative Economy Based on Intellectual Property Rights Law Number 28 of 2014 Concerning Copyright. *Realism: Law Review*, 2(1), 39-53.

Utama, A. N. R., Palar, M. R. A., & Muchtar, H. N. (2024). ReView Of Reversionary Rights In The Sold-Flat Agreement Of Song Creation Associated With Law Number 28 Of 2014 On Copyright. *Transnational Business Law Journal*, 5(1), 15-35.

Veluwenkamp, H. (2025). What responsibility gaps are and what they should be. *Ethics and Information Technology*, 27(1), 1-13.

Walther, J. (2024). *The Right to Equitable Remuneration in South African Copyright Law: An Analysis of the Current Copyright Reform with Special Consideration of the Legal Treatment of Changed Material Contractual Circumstances*. LIT Verlag Münster.

Yuan, Q., & Chen, T. (2025). Holding AI-based systems accountable in the public sector: A systematic review. *Public Performance & Management Review*, 1-34.