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Research Paper

Revisiting Copyright Compliance in Micro-Enterprises: Legal Awareness of Live Music Royalty Obligations among Indonesian Café Owners from a Maqāṣid al-Sharīʿah Perspective

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ABSTRACT

This study examines the legal awareness and compliance of café owners who stage live music in Madiun City with the royalty obligations imposed by Law No. 28 of 2014 on Copyright and Government Regulation No. 56 of 2021, and evaluates their non-compliance through the lens of maqāṣid al-sharīʿah. Using a qualitative socio-legal design, data were collected in December 2025 through semi-structured interviews, observations, and documentation at three angkringan-style cafés, triangulated with regulatory documents and national news coverage, and analyzed. None of the cafés had paid royalties. Awareness remained at the level of hearsay knowledge: informants learned of royalties from musicians and peers, conflated royalties with regional taxes, and believed that performers rather than venues were liable—a view later rejected by Constitutional Court Decision No. 28/PUU-XXIII/2025. Attitudes ranged from conditional acceptance to explicit rejection, shaped by absent outreach, opaque tariffs, distrust of the distribution, and thin margins, resulting in what this study terms "deferred compliance". From a maqāṣid perspective, non-payment is not merely a failure of ḥifẓ al-māl; it breaches justice (ʿadl) and balance (tawāzun), constitutes exploitation (ẓulm) of creative labor, and weakens ḥifẓ al-nasl by eroding the inheritable livelihood of creators and their families. The same framework, however, prohibits ẓulm against small businesses through disproportionate or non-transparent collection. The study therefore proposes a "two-way anti-ẓulm" compliance model combining proactive outreach, tiered tariffs for micro-enterprises, transparent distribution, and responsive enforcement.

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Introduction

Intellectual Property Rights (IPR) are legal instruments designed to protect the fruits of human creativity while ensuring economic benefits for their owners. In the creative industry, copyrights to songs and/or music hold a strategic position because their use extends to a wide range of commercial activities, from restaurants, hotels, and shopping centers to cafes (Putri et al., 2026; Yulia, 2021). Music is no longer merely entertainment; it has become a source of added value that sets the mood, strengthens a business's identity, and extends customer visits. In the city of Madiun, the growth of this sector is evident: the number of cafes and cafeterias stood at 21 in 2020, dropped to 19 in 2021–2022 due to the pandemic, and then surged to 58 in 2024 (Madiun City Government, 2025). Amid this competition, *live music* performances have become a common differentiation strategy, raising a fundamental question about how the economic value generated by songwriters' works is fairly distributed between the creators and the business operators who utilize them.

Normatively, Law No. 28 of 2014 on Copyright (UUHC) classifies the performance of a work as part of the creator's economic rights (Article 9, paragraph (1), letter f), prohibits commercial use without permission (Article 9, paragraph (3)), and requires commercial users to pay royalties through a Collective Management Organization (Article 23(5) and Article 87). These provisions are implemented by Government Regulation No. 56 of 2021 on the Management of Royalties for Song and/or Music Copyrights, which explicitly designates restaurants, cafes, pubs, and bars as commercial public services (Article 3(2)), with royalty rates that currently refer to the Minister of Law and Human Rights Decree No. HKI. 2.OT.03.01-02 of 2016, namely Rp60,000 per seat per year for composer royalties and Rp60,000 per seat per year for related rights. The management framework was subsequently updated through Minister of Law Regulation No. 27 of 2025, which centralized collection through the National Collective Management Organization (LMKN), capped operational costs at 8 percent, and expanded the scope of commercial users (Muliawati, 2025). Ultimately, Constitutional Court Decision No. 28/PUU-XXIII/2025, dated December 17, 2025, interpreted the phrase "every person" in Article 23 (5) of the Copyright Law to mean "including organizers of commercial performances," such that the party deriving economic benefit from the performance is obligated to pay royalties (CNN Indonesia, 2025; Mahkamah Konstitusi, 2025).

This constantly updated regulatory framework actually demonstrates that royalty compliance in Indonesia remains fragile. Throughout 2025, this issue became a national controversy. The director of the Mie Gacoan franchise license holder in Bali was named a suspect in a copyright infringement case in July 2025 before the case was settled amicably with a lump-sum license payment of Rp2.2 billion, mediated by the Minister of Law (Mahendro, 2025). The case triggered a chilling effect: several cafes switched to playing bird chirps, to which the LMKN responded that even recordings of nature sounds are subject to the related rights of phonogram producers (Anggraini, 2025); cafes in Malang chose not to play any music at all (Faruq, 2025); while in Surabaya, hundreds of members of the café and restaurant association claimed they had never received an official letter from LMKN (Devi, 2025). On the other hand, concerns about the transparency of royalty distribution prompted the House of Representatives and the government to agree to an audit of LMKN and LMK (Hukumonline, 2025; Muliawati, 2025), even though LMKN's royalty distribution in 2024 had reached only approximately Rp54 billion (Fathurrozak, 2025). This series of

events demonstrates that the problem with royalties does not end with the existence of legal norms but rather concerns the clarity, proportionality, and legitimacy of the system in users' eyes.

From a socio-legal perspective, the gap between legal norms and practice can be examined through the concepts of legal awareness and legal compliance. Soekanto (1982) identifies knowledge, understanding, attitudes, and patterns of legal behavior as indicators of a multi-tiered legal consciousness (Erwin, 2016; Faisal & Mariyani, 2022), thereby enabling researchers to distinguish between business actors who are unaware of the rules, those who are aware but do not understand them, those who understand but do not accept them, and those who accept but do not comply with them. Friedman (1975) notes that the effectiveness of the law is determined by the interaction of legal substance, structure, and culture. Kelman (1958) distinguishes between compliance due to coercion, due to identification, and due to the internalization of values, while Tyler (2006) demonstrates that voluntary compliance is more strongly influenced by perceptions of legitimacy and procedural justice than by the threat of sanctions (Friedman, 2009; Kelman, 1958; Tyler, 2006). Winter and May (2001) add that compliance among small business owners depends on both ability, that is, knowledge of the rules, and financial capacity and willingness (Winter & May, 2001). Within this framework, non-compliance should not simply be interpreted as defiance but must be traced back to how legal information is received, evaluated, and decided upon—whether to follow it or not.

The issue of royalties also has a strong normative dimension in Islamic law, and this dimension cannot be reduced to ḥifẓ al-māl (protection of property) alone. *First*, regarding the aspect of *ḥifẓ al-māl*, the International Islamic Fiqh Academy (Majmaʿ al-Fiqh al-Islāmī al-Duwalī), through Resolution No. 43 (5/5) of 1988, recognized immaterial rights (*ḥuqūq maʿnawiyyah*), including copyright, as valuable property (*māl mutaqawwam*) protected by Islamic law; this position was adopted by the Indonesian Ulema Council (MUI) through Fatwa No. 1 of 2003 on Copyright and Fatwa No. 1/MUNAS VII/MUI/5/2005 on the Protection of Intellectual Property Rights (Asmuni et al., 2024). *Second*, regarding the aspects of justice (*al-ʿadl*) and balance (*al-tawāzun*), the Qur'an commands the upholding of fair scales (Quran 55:7–9; Ministry of Religious Affairs of the Republic of Indonesia, 2019), so that the economic benefits of a work must not be enjoyed unilaterally. Third, regarding the prevention of exploitation (*ẓulm*), Islamic law prohibits unjustly taking another's property (Quran 4:29), depriving others of their rights (Quran 11:85), and reaffirms the principle "*lā taẓlimūna wa lā tuẓlamūn*": do not oppress and do not be oppressed (Quran 2:279). *Fourth*, regarding the aspect of *ḥifẓ al-nasl*, royalties serve as a source of livelihood for the creator's family and are inheritable for seventy years following the creator's death (Article 16(2) and Article 58 of the Copyright Law), so their protection is directly linked to the continuity of future generations and the creative ecosystem (Ashur, 2006; Auda, 2008; Gorda et al., 2022). This multidimensional interpretation is important because the *maqāṣid* demand two-way justice: the creator's rights must be fulfilled, but the burden imposed on small businesses must not become a new form of injustice (Dusuki & Abdullah, 2007; Nassery et al., 2018).

Previous studies can be categorized into three trends. *First*, normative studies on institutional design and royalty management highlight the legal certainty of creators' economic rights, the status of LMKN, and issues of transparency in collection and distribution (Handke & Towse, 2007; Maddusila et al., 2026; Pramanto, 2022; Sunputri et

al., 2025). *Second*, empirical studies on compliance among commercial music users reveal varying practices: cafes in Cirebon have obtained licenses and pay royalties amounting to 3 percent of their daily revenue on performance days (Kharisma, 2022), while cafes in Pekanbaru and Malang generally remain non-compliant (Oktaviano, 2024; Pertiwi et al., 2024), and legal awareness among music workers remains limited (Rohmatulloh et al., 2022). *Third*, studies of Islamic law position copyright as property protected through *ḥifẓ al-māl* (Asmuni et al., 2024; Helim, 2019; Sahroni & Karim, 2015). These three trends leave three gaps: (1) a lack of studies on micro-scale cafes with the "angkringan" concept in medium-sized cities, which differ structurally in terms of costs from large restaurants; (2) the dominance of Islamic legal analyses that stop at *ḥifẓ al-māl* without elaborating on the dimensions of justice, the prohibition of *ẓulm*, and *ḥifẓ al-nasl*; and (3) the lack of data documenting business owners' awareness precisely at the time when the ambiguity regarding the subject of royalty obligations was being tested in the Constitutional Court.

The city of Madiun provides a relevant context for addressing this gap. The researcher's initial observations identified seven angkringan-style cafes featuring live music, with pop, acoustic, and other popular songs as their primary repertoire (Observation Results, December 7, 2025). Three of these agreed to participate in an in-depth study. This context illustrates the intersection of a low-cost local economy, the use of creative works, and rapidly evolving national legal compliance requirements.

Based on this description, this article will address several research questions: *First*, what is the level of legal awareness among café owners who host *live music* in Madiun City regarding their obligation to pay royalties under the Copyright Law (UUHC), Government Regulation No. 56 of 2021, and Constitutional Court Decision No. 28/PUU-XXIII/2025, as measured through indicators of legal knowledge, understanding, attitudes, and behavior. *Second*, what factors explain the gap between this awareness and compliance? *Third*, how is this non-compliance assessed from the perspective of *maqāṣid al-sharīʿah*, and what are its implications for the design of a fair royalty policy? The main argument of this article is that the non-compliance found constitutes "*deferred compliance*" resulting from a deficit in capacity and legitimacy, rather than a pure rejection of creators' rights. At the same time, *maqāṣid al-sharīʿah* demands a two-way resolution grounded in the principle of anti-*ẓulm*. Theoretically, this study enriches the fields of intellectual property rights and Islamic economic law with a multidimensional interpretation of *maqāṣid*. In practice, the findings are intended to help local governments, the LMKN, business associations, and business operators design fair and sustainable educational programs, fee structures, and compliance mechanisms.

Research Method

This study is an empirical legal study using a qualitative juridical-sociological approach, which examines law both as a norm and as the actual behavior of business actors (Muhaimin, 2020). The research subjects are legal awareness and compliance with the obligation to pay royalties for the use of songs in live music performances. Of the seven angkringan-style cafes identified as hosting *live music* in Madiun City, three were purposively selected based on the following criteria: regularly hosting live music, performing songs composed by others, and willingness to participate in in-depth interviews. The three locations are Angkringan *Mreneo AE* (established in 2022; open daily from 4:00 PM to 1:00 AM WIB; *live music* every day except Monday; 80–100 visitors per

day), *Teras Wedangan* (established in 2010; open from 9:00 AM to 12:00 AM WIB; 60–80 visitors per day), and *Mucoffe* (established in 2015; approximately 50 visitors per day; serves as a discussion space for the youth community).

The primary informants consisted of three individuals with decision-making authority over the businesses: the owner of Angkringan Mreneo AE (hereinafter Informant L, interviewed on December 7, 2025), the manager of Teras Wedangan (Informant S, December 10, 2025), and the manager of Mucoffe (Informant M, December 12, 2025). All informants gave their consent to be interviewed, and their identities are presented using initials. The research orientation is case depth, not statistical representativeness. Primary data were collected through semi-structured interviews, non-participant observation of performance events, and documentation of business activities. The interview guidelines were developed based on Soekanto's (1982) four indicators of legal awareness: knowledge of the existence of regulations and royalty-administering institutions; understanding of the content, purpose, obligated parties, and mechanisms; an attitude of acceptance or rejection; and payment behavior (Soekanto, 1977). Secondary data included primary legal materials (the Copyright Law, Government Regulation No. 56 of 2021, Ministry of Law and Human Rights Regulation No. 27 of 2025, the 2016 Minister of Law and Human Rights Decision on rates, Constitutional Court Decision No. 28/PUU-XXIII/2025, as well as fatwas from the Indonesian Ulema Council (MUI) and resolutions from Majmaʿ al -Fiqh al-Islāmī), scholarly literature, and national media reports throughout 2025, which were used as contextual data to test whether local findings reflect broader patterns.

The analysis was conducted interactively following the model proposed by Miles et al. (2014; see also Sulistiyo, 2019) through data condensation, data presentation, and the drawing and verification of conclusions (Miles et al., 2013; Sulistiyo, 2023). The analysis proceeded in two stages aligned with the separation of the research questions. The first stage was juridical-sociological in nature: interview data were coded into four indicators of legal awareness, presented in a matrix for each informant, then compared with the norms of the UUHC, Government Regulation No. 56 of 2021, and Constitutional Court decisions to identify points of alignment and gaps, which were subsequently explained through compliance theory (Kelman, 1958; Tyler, 2006; Winter & May, 2001). The second stage is normative-evaluative: the empirical findings are assessed through the four dimensions of *maqāṣid al-sharīʿah* (*ḥifẓ al-māl*, *ʿadl–tawāzun*, the prohibition of *ẓulm*, and *ḥifẓ al-nasl*), taking into account the levels of *ḍarūriyyāt*, *ḥājiyyāt*, and *taḥsīniyyāt* (Al-Shatibi, 2012; Auda, 2008). Data validity was tested through source triangulation (among informants), methodological triangulation (interviews, observations, documentation), and contextual triangulation with national news reports. Qualitative findings were not converted into scores but were categorized descriptively (high, partial, low) for each indicator.

Results

The Economic Role of *Live Music* for Angkringan Cafés

Observations show that *live music* is an integral part of the business model, not merely an add-on. Angkringan Mreneo AE hosts performances six nights a week and provides a spacious semi-*outdoor* area to accommodate visitors; Teras Wedangan uses *live music* to attract students on a tight budget; while Mucoffe combines musical performances with community activities and youth discussions. The repertoire performed consists primarily of pop, acoustic, and trending songs, nearly all of which are composed by others.

This pattern aligns with findings that *live music* influences customer satisfaction and boosts café sales (Amalia & Amali, 2025). In other words, songwriters' works have become a productive input that generates economic value for these businesses.

Legal Knowledge: Acquired Through Informal Channels

All three informants were aware of the royalty issue, but their knowledge did not come from official outreach efforts. Informant L first learned about it from the musicians performing at his café:

> *"I first learned about the music royalty regulations not from the news, but from the live music performers—a topic that was already being widely discussed among business owners. So before it appeared in the news, we'd already been told by the performers (musicians).... As far as I know, we business owners are required to pay taxes on songs performed during live music sets or perhaps music played through the sound system."* (Informant L, December 7, 2025)

This statement reveals two things: an informal knowledge pathway and the equating of royalties with "taxes." Informant S obtained the information through a community of fellow business owners but acknowledged that the information did not explain how it would be implemented at the local level:

> *"I heard about the policy from a community of fellow business owners who share information, but it was just general information—not specifics on how it would be implemented in Madiun. ... As far as I know, the royalty system is like paying royalties to songwriters."* (Informant S, December 10, 2025)

Knowledge about the institutional framework is also vague. Informant S is aware of the existence of managing agencies but does not understand how they operate: "Yes, I know there are agencies that manage royalties, such as LMK or MLI as far as I know, that agency handles royalty payments from business owners to songwriters, although I don't fully understand the details of how the management system works" (Informant S, December 10, 2025). The mention of "MLI" instead of LMKN indicates that even the name of the authorized agency is not yet accurately recognized.

Understanding the Law: The Purpose Is Understood, but the Subject Is Often Misunderstood

At the level of purpose, the informants' understanding was relatively good. Informant M viewed royalties as recognition of creative work and an incentive for continued creation:

> *"To honor the work and show appreciation for the songwriter. Furthermore, in my opinion, the obligation to pay royalties is also a way to preserve the authenticity and ownership of the creator's work. After all, a song is the result of the songwriter's thoughts and creativity, so it would be a shame not to provide them with the compensation they deserve. This way, songwriters will be motivated to create more works in the future."* (Informant M, December 12, 2025)

However, there is a consistent misunderstanding regarding who is obligated to pay royalties. Informants L and M both believe that the performing musicians, not the venue owners, should be the ones to pay royalties:

> *"In my opinion, it should be the musicians, because we've already paid the musicians here; we're not the ones performing for free here—we're also paying, so the ones singing the songs are the musicians. "So, in my opinion, the musicians are the ones who should pay."* (Informant L, December 7, 2025)

> *"In my opinion, the ones obligated to pay royalties for songs performed during live music shows should be the musicians. After all, we've already paid the musicians—why should we still be required to pay royalties as well?"* (Informant M, December 12, 2025)

The logic used by the informants is transactional: since the musicians' fees have been paid, all obligations related to the performance are considered to have been transferred to the musicians. Additionally, two informants stated that their attitudes were shaped by the views of fellow business operators, so their legal understanding is more influenced by social consensus within the business community than by the regulations themselves. Their understanding is also influenced by the assumption that an obligation only becomes binding after the government has conducted outreach.

Legal Stance: Between Conditional Acceptance and Firm Rejection

The informants' stances were not uniform. Informant L expressed firm rejection by linking royalties to local tax burdens already borne:

> *"Frankly, I disagree, because we pay a lot in taxes, and we don't pass those taxes on to our customers. The reason I disagree is that there's a 10% VAT for the region—which restaurants are supposed to pass on to our customers—but we don't pass that on to them. We also have advertising taxes, environmental agency taxes, and property taxes."* (Informant L, December 7, 2025)

He even reversed the direction of the benefit relationship by stating that "in my opinion, musicians should also benefit from the existence of the café; if there's a new song, it indirectly serves as free promotion" (Informant L, December 7, 2025). In contrast, Informants S and M expressed conditional acceptance. Informant S stated, "If it's mandatory, we're willing to pay royalties as long as the amount isn't burdensome for the business" (Informant S, December 10, 2025), while Informant M set a reasonable limit: "Not necessarily, as long as the cost doesn't exceed a certain threshold of the café's sales revenue" (Informant M, December 12, 2025). Both informants indicated a willingness to pay as long as the royalty does not exceed approximately 10 percent of business revenue. Concerns regarding a per-seat fee scheme were also explicitly raised:

> *"That's absolutely right; royalty fees are a major consideration for us. Because with food prices being so low, if we're charged a per-seat royalty fee, it will affect the café's already meager income—since we bear the tax burden ourselves and don't pass it on to customers."* (Informant M, December 12, 2025)

Legal Behavior and Barriers to Compliance

Regarding behavioral indicators, the findings were consistent: not a single informant had ever applied for a license or paid royalties through the LMKN. Three factors emerged consistently. First, the lack of outreach and oversight. Informant S stated, "To date, there has been no outreach or warning from the government or LMK. We have also never received official information regarding our obligations and the mechanism for paying royalties" (Informant S, December 10, 2025). Second, the lack of clarity regarding procedures and amounts:

> *"Our biggest obstacle is the lack of outreach regarding royalty payments, so we are unaware of the procedures, the purpose of the payments, and the exact amounts that must be paid."* (Informant S, December 10, 2025)

Third, economic considerations related to the "angkringan's" characteristic low-price strategy. Informant L explained, "In my opinion, it's about the price—because prices at Angkringan Mreneo AE are affordable, even though the cost of ingredients is rising, we haven't raised our prices. So, if we have to pay these royalties, it will be a burden because we've never raised our prices" (Informant L, December 7, 2025). In addition to these three factors, there is a demand for fairness in enforcement. Informant L stated, "Frankly, there needs to be public outreach first from the relevant authorities regarding this policy, and cafes in Madiun should all be subject to it—not just the busy ones—because sometimes taxes are only imposed on the busy cafes. So I want it to be applied evenly" (Informant L, December 7, 2025). A summary of the findings for the four indicators is presented in Table below.

Table 1. Matrix of Informants' Legal Awareness Regarding Royalty Obligations

	Informant L (Mreneo AE)	Informant S (Teras Wedangan)	Informant M (Mucoffe)	Category
Knowledge	Learned about royalties from musicians; equates royalties with taxes	Learned about royalties through business networks; has a vague awareness of collective management organizations (CMOs)	Aware of royalty obligations through general sources	Partial
Understanding	Believes musicians are responsible for paying royalties	Understands the purpose but lacks understanding of payment mechanisms and rates	Understands the purpose well but believes musicians are responsible for paying royalties	Low

	Informant L (Mreneo AE)	Informant S (Teras Wedangan)	Informant M (Mucoffe)	Category
Attitude	Strongly opposed; perceives royalties as an additional tax burden	Conditionally accepts, provided payments are not burdensome	Conditionally accepts, provided payments do not exceed a sales-based threshold	Conditional acceptance to rejection
Behavior	Does not pay royalties	Does not pay royalties	Does not pay royalties	Low

A similar pattern is evident in national news coverage. A café owner in Surabaya stated that he had not yet received an official letter from the LMKN and planned to seek "non-royalty options" if the regulation were enforced (Devi, 2025), while the Chair of Apkrindo Malang argued that a per-seat fee was not ideal because music is merely a complement to the atmosphere and proposed differentiating fees based on business class (Faruq, 2025). These similarities indicate that the findings in Madiun are not a local anomaly but rather a reflection of structural problems within the royalty system affecting the small-business segment.

Discussion

The research findings indicate that legal awareness among owners of *live music* cafes in Madiun City is relatively low, with a profile characterized by partial knowledge, misconceptions about key points, attitudes ranging from conditional acceptance to outright rejection, and outright noncompliance. However, this profile does not indicate a rejection of the idea that creators are entitled to compensation; two out of three informants even accepted this principle. The issue lies in the gap between accepting the principle and being willing to act on it. The following section first discusses this gap within the realm of positive law, then within the realm of *maqāṣid al-sharīʿah*.

Legal Awareness from the Perspective of the Copyright Law Regarding *Live Music* at Angkringan

An analysis of indicators of knowledge and understanding reveals three misconceptions that hinder compliance. The first misconception is the conflation of royalties with taxes. Legally speaking, the two are fundamentally different. Article 1, point 21 of the Copyright Law defines royalties as compensation for the use of a work's economic rights, received by the creator or the holder of related rights; royalties are a direct civil consideration paid to the rights holder. In contrast, the tax on certain goods and services—specifically food and/or beverages—complained of by Informant L is a local tax under Law No. 1 of 2022 on Financial Relations between the Central Government and Local Governments, which is compulsory and involves no direct consideration. Therefore, the argument that "we have already paid a lot of taxes" is legally irrelevant to negate the obligation to pay royalties. However, it is sociologically relevant because it reflects the accumulated burden felt by business operators. This conflation also explains why royalties are perceived as "government levies" rather than as the creator's property rights, resulting in resistance similar to that against taxes.

The second misconception concerns the party obligated to pay royalties. The assumption that performing musicians are required to pay royalties is inconsistent with the construction of Article 23(5) and Article 87 of the Copyright Law, which designate commercial users as the parties responsible for paying royalties through the LMK. Constitutional Court Decision No. 28/PUU-XXIII/2025 closed this interpretive loophole by defining "every person" as including organizers of commercial performances, because it is the organizers who are aware of and benefit from the economic proceeds of the performances (CNN Indonesia, 2025; Silfiani, 2022). This finding holds particular analytical significance because the interviews were conducted on December 7–12, 2025—just a few days before the ruling was read on December 17, 2025. This means that the informants' confusion was not merely a matter of individual oversight but reflected a systemic ambiguity so pronounced that dozens of musicians themselves challenged it before the Constitutional Court. Following the ruling, the argument that the subject matter was unclear can no longer be sustained, making educational intervention all the more urgent.

The third misconception is the assumption that new obligations become binding only after they have been publicized. Dogmatically, regulations that have been enacted are binding on everyone based on the legal fiction that everyone is presumed to know the law. However, this finding confirms Soekanto's (1982) thesis that the effectiveness of the law depends on legal communication: norms that have never been adequately communicated will only be recognized as an issue, not as an obligation. In Friedman's (1975) terms, the substance of the law is in place. Still, the legal structure—the LMKN, LMK, and local government—is not yet present at the grassroots level, while the prevailing legal culture views musicians' honoraria as fulfilling all obligations. The experience in Cirebon, where cafes that have understood the licensing mechanism are willing to pay 3 percent of their revenue on performance days (Kharisma, 2022), shows that compliance is not impossible for small businesses when the necessary knowledge and mechanisms are available.

Delayed Compliance: Capacity, Will, and Legitimacy

The identified barriers can be analyzed through the framework proposed by Winter and May (2001). In terms of capacity, business operators are unaware of the procedures, relevant institutions, and fee amounts, and they operate on thin margins due to their low-price strategies. For example, a street-side food stall with 50 seats, subject to a fee of Rp120,000 per seat per year (covering creator royalties and related rights), would incur an annual obligation of approximately Rp6,000,000. LMKN states that Indonesia's rates are among the lowest and that MSMEs are taken into consideration (detikBali, 2025); however, without official information regarding these relief schemes, business operators can only imagine the maximum burden and choose to postpone payment. From a willingness perspective, the conditional attitudes of Informants S and M indicate latent willingness that has not yet been activated. In contrast, Informant L's refusal stems from a perception of an unfair burden.

Within Kelman's (1958) typology, none of the informants are at the *compliance* stage due to pressure, as there has never been any monitoring or reprimand; nor are they at the identification stage, as their social references (fellow business owners and musicians) actually normalize non-compliance; and internalization is only partially evident in Informant M, who understands the value of recognition for one's work. Tyler's framework (2006) helps explain why this partial internalization has not yet resulted in action: voluntary

compliance requires the belief that authorities act fairly and transparently. This finding reinforces the view that legal awareness only leads to compliance when norms are perceived as fair and relevant to daily life (Arifin et al., 2026). Informant L's demand that enforcement be carried out "equitably" and not target only busy cafes is a demand for procedural justice. At the national level, doubts regarding the transparency of royalty distribution—which even led to audit agreements between LMKN and LMK (hukumonline, 2025; Muliawati, 2025)—demonstrate that this legitimacy deficit is real, even though Article 17 of Government Regulation No. 56 of 2021 mandates financial and performance audits to be made public.

Therefore, non-compliance in Madiun is more accurately described as *deferred compliance*: compliance that is postponed until three prerequisites are met, namely clarity of information, proportionality of costs, and trust in the administrators. This finding expands upon previous studies that tended to explain royalty noncompliance solely through a lack of knowledge (Oktaviano, 2024; Pertiwi et al., 2024). The national market response following the Mie Gacoan case reinforces this argument. Enforcement that jumps directly into the criminal realm without prior education does not foster compliance but rather strategies for avoidance: cafes turn off the music or play bird sounds (Anggraini, 2025; Faruq, 2025). This aligns with Ayres and Braithwaite's (1992) model of *responsive regulation*, which places persuasion and dialogue at the base of the enforcement pyramid, administrative sanctions in the middle, and criminal sanctions at the top as a last resort (Ayres & Braithwaite, 1995). The UUHC itself accommodates this logic through the complaint-based nature of offenses (Article 120) and the requirement for mediation before criminal prosecution (Article 95, paragraph (4)), as seen in the amicable settlement of the Mie Gacoan case (Mahendro, 2025).

Royalty Obligations for *Live Music* at Angkringan Cafés: A *Maqāṣid al-Sharīʿah* Perspective

In the realm of Islamic law, a café owner's non-compliance is assessed through four interrelated dimensions of *maqāṣid*. The first dimension is *ḥifẓ al-māl*. Contemporary fiqh broadens the meaning of property to encompass benefits and rights of economic value in accordance with *ʿurf* (Helim, 2019; Janwari & Muliawati, 2016; Sahroni & Karim, 2015). Resolution No. 43 (5/5) of 1988 by the Majmaʿ al-Fiqh al-Islāmī affirms that copyright is a protected property right that must not be violated, and the 2005 MUI Fatwa states that intellectual property rights violations, including unauthorized use, are haram. Al-Shāṭibī (1997) and al-Ghazālī (1993) classify the protection of property among the five necessities (*al-ḍarūriyyāt al-khams*), which are safeguarded both in terms of existence (*min jānib al-wujūd*) and in terms of preventing harm (*min jānib al-ʿadam*). The payment of royalties is a form of safeguarding the creator's property from the perspective of preventing harm. Previous research has classified this obligation as a *ḥājiyyāt*; however, for creators whose livelihood depends on royalties, the absence of payment can border on an infringement of the *ḍarūriyyāt*, and its normative weight should not be underestimated.

The second dimension is justice (*ʿadl*) and balance (*tawāzun*). The command to uphold the scales of justice and not to shortchange them (Quran 55:7–9) requires that the economic value arising from the combination of the creator's work and the café owner's efforts be divided proportionally. The fiqh principles of *al-ghunm bi al-ghurm* (profit entails responsibility) and *al-kharāj bi al-ḍamān* (yield follows liability) provide the basis that the

party benefiting from the performance must bear responsibility for it. Interestingly, the logic of these principles aligns with the *ratio decidendi* of Constitutional Court Decision No. 28/PUU-XXIII/2025, which imposes royalty payments on the organizer because the organizer is aware of and benefits from the performance's economic proceeds. Thus, the informant's argument that the musician should be the one to pay is not only erroneous under positive law but also contradicts the principle of balance in muamalah jurisprudence: the musician receives a fee for their performance, while the café owner reaps the benefits from the appeal of the work being performed.

The third dimension is the prohibition against *ẓulm* and exploitation. Exploiting another person's work to gain profit without compensation falls under the category of unlawfully consuming others' property (Quran 4:29) and depriving others of their rights (*bakhs*), which is condemned in Quran 11:85. The Prophetic hadith commanding that workers be paid before their sweat dries (Mâjah, 2003) indicates that productive labor—including creative work—must not be enjoyed without compensation. Informant L's claim that playing songs in a café constitutes "free promotion" for musicians contains a subtle form of *ẓulm*: the benefit received by the creator is speculative, whereas the benefit received by the café is tangible and measurable. However, the principle "*lā taẓlimūna wa lā tuẓlamūn*" (Quran 2:279) is a two-way street. Royalty collections with non-transparent distribution, disproportionate rates for micro-enterprises, or selective enforcement that targets only certain business operators can also constitute *ẓulm* against users, and may even lead to the abuse of rights (*al-taʿassuf fī istiʿmāl al-ḥaqq*). Informants' demands for transparency and equitable enforcement thus derive their legitimacy from the *maqāṣid*.

The fourth dimension is *ḥifẓ al-nasl*. Auda (2008) expands *ḥifẓ al-nasl* from merely the protection of offspring to a concern for the well-being and sustainability of the family, while Ibn ʿĀshūr (2006) emphasizes the social dimension of the *maqāṣid* for the social order. In the context of royalties, this connection is evident: royalties are a source of livelihood for the creator's family, and the economic rights are transferred to the heirs through inheritance (Article 16(2) of the Copyright Law). They are protected for up to seventy years after the creator's death (Article 58 of the Copyright Law). Royalties thus function as an inheritance (*tirkah*) that supports future generations. Widespread non-compliance erodes the economic foundation of creators' families and weakens the incentive for a new generation of creators to emerge, as Informant M noted: royalties give creators "the motivation to create other works." At the same time, *ḥifẓ al-nasl* also concerns the families of business owners and local musicians who depend on cafés' continued operation for their livelihoods; cafés' decision in Malang to stop playing music (Faruq, 2025) risks eliminating performance venues and income for local musicians. Therefore, the design of royalty policies must safeguard the welfare of both family groups.

These four dimensions are complemented by the principles of *rafʿ al-ḥaraj* (removing hardship) and *tadarruj* (gradual implementation). The legal maxim *al-mashaqqah tajlib al-taysīr* and the hadith *lā ḍarar wa lā ḍirār* (Mâjah, 2003, no. 2340) do not eliminate the obligation to pay royalties, but require that the method of fulfillment not cause disproportionate harm to micro-enterprises. The tradition of *tadarruj* in the formation of Islamic law establishes a precedent that education and gradual adaptation take precedence over sanctions. Thus, an assessment based on *maqāṣid* yields two conclusions that are not mutually exclusive: the café owner's noncompliance cannot be justified because it violates *ḥifẓ al-māl*, *ʿadl*, the prohibition against *ẓulm*, and *ḥifẓ al-nasl*; but the state and LMKN are

also bound by the obligation to establish a fair, transparent, and proportional system so that these obligations can be fulfilled without causing new injustices. This is what is referred to as two-way anti-*ẓulm*, in line with the idea that *maqāṣid* serves as a framework for evaluating economic policy, not merely a label of legitimacy (Chapra, 2008; Laldin & Furqani, 2013).

Table 2. A *Maqāṣid al-Sharīʿah* Assessment of Noncompliance with Royalty Obligations

Maqāṣid Dimension	Normative Basis	Assessment of Informants' Practices	Policy Requirements
***Ḥifẓ al-māl* (Protection of Wealth)**	Qur'an, al-Nisāʾ 4:29; Islamic Fiqh Academy Resolution No. 43 (5/5); Indonesian Ulema Council (MUI) Fatwa (2005)	Creators' economic rights remain unprotected.	Simple and affordable licensing
***ʿAdl* and *tawāzun* (Justice and Balance)**	Qur'an, al-Raḥmān 55:7–9; the legal maxim *al-ghunm bi al-ghurm* (entitlement to gain entails bearing liability)	Cafés enjoy benefits without sharing the corresponding financial burden	Proportionate royalty rates based on business scale
Prohibition of *ẓulm* (Injustice)	Qur'an, Hūd 11:85 and al-Baqarah 2:279; Hadith narrated by Ibn Mājah, No. 2443	Exploitation of creative labor; risk of imposing injustice on microenterprises in turn	Transparent royalty distribution and equitable enforcement
***Ḥifẓ al-nasl* (Protection of Progeny)**	Articles 16(2) and 58 of the Copyright Law; Auda (2008)	The livelihoods and inheritance of creators' families are eroded	Safeguarding the long-term livelihoods of creators and local musicians

These findings lead to five actionable policy recommendations—first, proactive, region-based outreach. LMKN, together with the East Java Regional Office of the Ministry of Law and the Madiun City Government, can integrate information on royalty obligations into business licensing and local taxpayer registration services, so that every registered café receives official information from the outset. Second, a tiered rate structure that is sensitive to business scale. The per-seat scheme should include options for micro-businesses, such as a low annual flat rate or a percentage of the day's gross revenue from performances—as practiced in Cirebon (Kharisma, 2022)—and be accompanied by an official announcement of relief schemes for MSMEs. Third, clarity regarding parties and the division of roles following the Constitutional Court's ruling: café owners, as organizers, are responsible for licensing, while contracts with musicians may include a song list to facilitate distribution based on actual usage. Fourth, transparency in distribution through the publication of audit results as required by Article 17 of Government Regulation No. 56 of 2021 and a publicly accessible distribution dashboard, so that users know that royalties actually reach the creators. Fifth, collective licensing through associations or angkringan communities to reduce transaction costs, as well as responsive enforcement that prioritizes education and warnings before mediation and sanctions.

From the perspective of the religious ecosystem, religious organizations, Islamic educational institutions, and majelis taklim for business owners can help disseminate the MUI Fatwa on intellectual property protection as part of Islamic business ethics. This approach is important because the majority of business owners in Madiun are Muslim, and the argument that paying royalties is a means of avoiding ẓulm and the unjust acquisition of wealth has the potential to foster the internalization of values rather than mere compliance out of fear of sanctions. Thus, the issue of music royalties at cafes in Madiun City is not merely a matter of individual compliance but relates to the effectiveness of regulations, the legitimacy of the managing institutions, and the balance of justice between creators and business owners.

Conclusion

This study draws three conclusions based on the breakdown of the research questions. First, in the realm of positive law, the level of legal awareness among owners of *live music* cafes in Madiun City regarding royalty obligations under the Copyright Law, Government Regulation No. 56 of 2021, and Constitutional Court Decision No. 28/PUU-XXIII/2025 is relatively low. Their knowledge is partial and informal; they hold misconceptions on three key points: equating royalties with taxes, assuming that musicians are the parties obligated to pay royalties, and assuming that the obligation only becomes binding after public outreach; their attitudes range from conditional acceptance to outright rejection; and not a single informant pays royalties. Second, the gap between awareness and compliance is explained by a capability deficit (lack of official information, unclear procedures and rates, and slim profit margins) and a legitimacy deficit (doubts regarding the transparency of distribution and the fairness of enforcement), so that this non-compliance is more accurately understood as *deferred compliance* rather than outright rejection. Third, within the realm of Islamic law, this non-compliance is inconsistent with the *maqāṣid al-sharīʿah* because it violates *ḥifẓ al-māl*, the principles of *ʿadl* and *tawāzun*, the prohibition against *ẓulm*, and *ḥifẓ al-nasl*; however, the *maqāṣid* also require that the royalty system not inflict injustice upon microenterprises through disproportionate rates and non-transparent management.

Theoretically, this study offers a multidimensional interpretation of the *maqāṣid* regarding intellectual property rights that transcends the dominance of *ḥifẓ al-māl* and the concept of deferred compliance in explaining the non-compliance of small business owners. In practice, this study recommends a two-way anti-ẓulm compliance model that combines proactive outreach, tiered rates for micro-enterprises, clarity on the scope of application following the Constitutional Court's ruling, transparency in distribution, collective licensing, and responsive enforcement. This study was limited to three informants in one city and was conducted before Constitutional Court Decision No. 28/PUU-XXIII/2025 was read. Future research is recommended to involve more cafes in various regions, use a mixed-methods approach to measure compliance more broadly, track changes in business owners' attitudes following the Constitutional Court ruling and the implementation of Ministry of Law and Human Rights Regulation No. 27 of 2025, and incorporate the perspectives of songwriters, local musicians, and LMKN to obtain a more comprehensive picture.

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