

The Fine Line Between Inspiration and Imitation: Delving into The Intersection of Fashion Dupes, Law and Society

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Abstract

In the evolving fashion industry, dupes are not a novel circumstance yet they have been shaking the fashion trend due to the openness of information through social media, particularly the short-video culture like TikTok. This phenomenon in society questions the objective of Intellectual Property (“IP”) Law, especially Trademarks, which upholds the creativity of individual minds instead of imitating under the guise of dupes. This study will delve into three main aspects regarding the increasing trend of fashion dupes, from the impact on social culture, the economic realm, and the Intellectual Property Rights itself while also comparing and contrasting with other jurisdictions to understand how other IP laws treat the issue in question. This writing uses a normative approach utilizing statutory, historical and comparative approaches. The data collection covers primary and secondary resources that mainly come from legal literature and online documents. The result of the study shows that the dupe culture is concerning in those three aspects, pertinently the legal certainty. Dupe has changed the consumer behaviour, damage the environmental aspect and the negative treatment to labors. In terms of economic, the price elasticity has been increasing due to the easy access towards high-end brand through its duplicates. Many people will rely on duplicating while remaining justifiable under the IP Law and it gives dupe product in the gray area of IP Law, especially trademarks.

Keywords: Fashion Dupes; Intellectual Property Rights (IPR); Trademarks

Abstrak

Dalam industri mode yang terus berkembang, produk dupe menjadi suatu atensi di tengah masyarakat. Fashion Dupe tentu bukanlah sesuatu yang asing, hal ini secara sejarah telah dipraktikkan dari zaman ke zaman. Namun, perkembangan teknologi dan kemudahan akses terhadap sosial media membuat para individu semakin mudah untuk menemukan produk-produk dupe ini. Permintaan produk dupe kemudian semakin meningkat yang di mana membuat pada pedagang industri mode semakin tertarik untuk menjual produk dupe baik itu tas, alat kosmetik, perawatan, dan lainnya. Hal ini kerap kali merugikan desainer mode, khususnya para pelaku usaha kecil. Ide-ide mereka diambil dan dijual kembali dengan mengatasnamakan dupe, kemudia dijual dengan harga yang lebih murdah. Keasilan dan keunikan adalah nilai jual yang tinggi dan seharusnya mendapatkan perlindungan yang

memadai dalam ranah hukum, dalam hal ini merek dagang. Dengan demikian, penelitian ini mengkaji tiga aspek utama terkait tren produk dupe dalam dunia mode yang semakin meningkat, yaitu dampak terhadap budaya sosial, ekonomi dan Hak Kekayaan Intelektual. Penulisan ini juga akan menyelami perbandingan hukum HAKI di Indonesia dengan negara lain tentang penanganan budaya dupe ini. Penulisan ini menggunakan pendekatan normatif dengan memanfaatkan pendekatan Undang-Undang, sejarah, dan perbandingan. Pengumpulan data mencakup sumber data primer dan sekunder yang bersalah dari literatur hukum dan dokumen daring. Hasil penelitian menunjukkan bahwa budaya dupe menimbulkan kekhawatiran dari aspek sosial budaya seperti transisi perilaku konsumen, kondisi lingkungan sampai menimbulkan eksploitasi tenaga kerja. Dari segi ekonomi, budaya dupe memberikan peningkatan sensitivitas harga konsumen, khususnya di Indonesia, sebagai alternatif produk yang lebih terjangkau. Legalitas budaya Dupe dalam hukum kekayaan intelektual cenderung kurang jelas dan bahkan tergolong tidak melanggar hukum.

Kata Kunci: *Produk Dupe; Mode; Hak Kekayaan Intellektual; Hak Dagang*

A. Introduction

The fashion industry has thrived in lieu of the normalization e-commerce in Indonesia initiated over a decade ago. But with rapid movements within business and society, most tend to overlook the importance of Intellectual Property (IP) that belongs to the creative minds that contribute greatly to thriving business trends. IP Rights Protection and Reinforcement within Indonesia has garnered negative review from other countries, which can be seen in the emerging surge of duplicate products that infringe upon the IP rights of the original creator without consent. Within the fashion industry, the classification of IP that is infringed upon the most is the Trademark placed on a particular product or design. A trademark can be defined as a mark (image, word, letter, number, colour, two or three dimensional form, sound, hologram, etc) that identifies and distinguishes a particular good or service from another. The consumers themselves have various reasons for wanting to purchase duplicates instead of the named product it was originally designed from, such as lifestyle choices, economic considerations, the normalized concept of purchasing duplicates in society, and the lack of repercussions from buying such products, be it from society or even from the law. Duplicate products can be defined as a mimic of

popular brands without deceiving the consumers.¹ This indicates that the consumers in their choice of buying products that look similar to a popular brand, are fully aware that the product they purchase is not created by the original company that first coined the idea into a working design.

Based on the recent data published by the Indonesian Anti-Counterfeiting Society (IACS), Indonesia has suffered a loss of 291 Trillion Rupiah in 2020 from duplicate goods alone. An interview conducted by Vice uncovered that the reason behind why middle-class consumers actively choose to buy duplicate products is simply because of curiosity and the need to keep up with the relevant fashion trends.² This phenomena of keeping up with fashion trends and the Fear Of Missing Out (FOMO) of said trends had resulted in a vicious cycle of consumers willing to purchase duplicate products in order to keep up with relevant fashion trends, all the while they are shunned by society for not keeping up, even if it means they are spending more towards fashion more than they are able to.

This phenomenon in society must not be allowed to remain as it actively harms the economy in the present as well as in the future. Foreign businesses that wish to expand their business will find themselves dissuaded by the fact that their IP is at risk of being infringed without proper legal enforcement and remedies to rectify damages done to their business by the duplicates that have been normalized by society.³ Foreign investors that wish to invest into Indonesia will follow suit, not convinced due to Indonesia's lack of urgency to resolve IP enforcement issues within the country, creating a situation where the economy is unable to thrive due to the demands of the consumer in only seeking duplicates and reducing the sale value for the original, named-brand items that first introduced the product.

¹ Fajar Sugianto, Astrid Athina Indradewi, and Yohanie Mareta, "Book Pirates and Copycats : Infringement That Speaks For Itself" 2, no. 1 (2024): 259–69.

² Mayasari, IIn, Adrian Azhar Wijanarko, IIn Mayasari, and Adrian Azhar Wijanarko. "Riset Ungkap Alasan Kelas Menengah Indonesia Doyan Belanja Barang Mewah Palsu." VICE. Last modified August 2, 2024.<https://www.vice.com/id/article/riset-tim-universitas-paramadina-sebut-kelas-menengah-indonesia-doyan-belanja-barang-mewah-palsu-38-persen-di-pasaran/>.

³ Hari Sutra Disemadi, "Contextualization of Legal Protection of Intellectual Property in Micro Small and Medium Enterprises in Indonesia," *Law Reform: Jurnal Pembaharuan Hukum* 18, no. 1 (2022): 89–110, <https://doi.org/10.14710/lr.v18i1.42568>.

Having this said, the legal issues in this research are:

1. From an Economic perspective, why is it that consumers actively choose to purchase duplicates instead of the named brand original?
2. How did Duplicates come to be and why does Indonesian society normalize the culture of purchasing duplicates?
3. Why are our IP Enforcement methods unable to effectively combat the production and distribution of duplicates in Indonesian market

B. Research Method

The research paper will be utilizing a normative approach, incorporating statutory and case analysis. Normative research is a qualitative research method involving existing laws, regulations and policies to assess their impact on social and legal issues. This writing employs statutory approach, historical approach and comparative approach. The use of statutory approach is to look through the concept of trademarks in Indonesia and how it is relevant to the current case. The comparative analysis between Indonesian TGI Law and other jurisdictions will primarily provide how other countries' regulatory framework treat the present issue, as well as with a twist of historical approach to let the readers understand regarding the evolvement of the problem. The primary legal sources cover Indonesian and other countries' laws and regulations pertaining to Intellectual Property Law and International conventions. The author also assessed the secondary legal sources including journal articles, government reports and online databases. In regard to data collection, the authors will undertake a comprehensive review of legal literature and relevant online documents. Subsequently, the authors will combine the collected data and pieces of information into systematic writing by first dissecting the relevant regulations to the current issue and providing the compilation of additional aspects using secondary resources.

C. Analysis and Discussion

C.1 The Growth of Fashion Dupes Towards Social Culture

In the evolving world of fashion, trends not only signify the latest hype products or styles but also consumer behaviour. In recent years, the phenomenon of dupe culture has been a signal of how digital connectivity and social media have reformed the fashion industry. The term ‘dupe’ is not so much new. But what makes it game-changing is due to the ease at which these dupe products can be accessible on the internet. It is a matter of the openness of these discoveries that are shared through social media, such as TikTok, Amazon, AliExpress, Shopee and other E-Commerce. The prevalence and acceptance of dupe goods have evolved with increasing living cost pressures and a generational shift in consumption of goods and media normalized by Gen Z and lower income groups.

Unlike counterfeits, Dupes are the short term of “Duplicates”, meaning a mimic of companies’ high-end or popular brands, without trying to deceive the consumer into thinking it is the real deal. It carries a less negative connotation compared to counterfeits or knockoffs, but what constitutes “dupes” remains in a grey area and is widely open to interpretation. Even some dupe companies maintain their strategies to get as close not only to the appearance of the product but also to the name and packaging, without actually infringing the Intellectual Property law. This is called “risky dupes and the Australian cosmetic company MCoBeauty is one of the examples. It publicly pushes legal boundaries to duplicate trending, high-end cosmetics and sells them to the major retail market at a much lower price.⁴

Tracing back history, the concept of dupes existed when only the wealthiest individuals could afford to adorn themselves with luxury jewelry or decorate their homes with exquisite furniture. These opulent items were symbols of wealth and high social standing. However, not everyone can afford and experience such extravagance. As a result, skilled craftsmen and artisans gathered and learnt the details of the original pieces, enhancing their skills to duplicate them with precision. This work of

⁴ Roberts, Alexandra J. “Dupes.” *NYU Journal of Intellectual Property & Entertainment Law* (November 2023): 4. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4933766.

art is known as “dupes”. They were affordable imitations yet crafted with details and care.⁵ Now, the development of technology and globalization has broadened the audience, reaching from the lowest to the highest social level. Meaning, that these dupes are demanded by a much larger audience as well because society is mostly likely covered by middle to low-income individuals. Therefore, it also transforms the social-cultural of individuals in perceiving the fashion industry.

Firstly, the most significant impact hits the shift in consumer values. The population that comes from Middle to Low Income and Gen Z in particular tend to emphasize affordability and accessibility over exclusivity. In 2020, a study shows 74% of Indonesian consumers frequently opt for cost-effective luxury items,⁶ thinking of these choices as financially savvy instead of settling for imitation. This behaviour demonstrates a deeper cultural movement that goes beyond budget considerations.

This leads to the second root where this dupe-promotion culture has become a communal effort shared in social media, like TikTok. Social media has been instrumental in normalizing the acceptance of dupes. Many fashion and beauty influencers have contributed to such promotion by incorporating affordable alternatives in their content, presenting dupes as stylish and practical.⁷ Consequently, this advocacy alternates the belief of consumers to explore budget-friendly options without having the negative stigma formerly known as imitation goods.⁸ Furthermore, Dupe-related hashtags such as #DupeAlert have become popular, which creates communities dedicated to discovering and sharing dupes easily. This phenomenon is critical because it enables consumers to exchange dupe tips and recommendations while further normalizing the acceptance of dupes in mainstream

⁵ “The ‘middle-income Trap’ Is Holding Back Over 100 Countries.” *World Economic Forum*. Last modified September 10, 2024. <https://www.weforum.org/stories/2024/09/middle-income-trap-world-bank-economic-development/#:~:text=Today%2C%20roughly%2075%25%20of%20the,for%2040%25%20global%20economic%20output>.

⁶ “Indonesian Consumers Prefer Socially Conscious Brands: Study.” *Jakarta Globe*. <https://jakartaglobe.id/business/indonesian-consumers-prefer-socially-conscious-brands-study>.

⁷ Asg. “How Dupe Culture Is Reshaping Retail.” *ASG*, November 6, 2024. <https://consultasg.com/how-dupe-culture-is-reshaping-retail/>.

⁸ Proctor, Ella. “Dupe Culture: Here'S Its Current State.” *Socially Powerful*. Last modified November 3, 2023. <https://sociallypowerful.com/post/the-current-state-of-dupe-culture>.

culture. While dupe products do not harm directly notorious luxury brands like Gucci or Chanel. However, the implication prominently damages the small business original designers. These enterprises often face challenges in safeguarding their unique creations as fast fashion brands replicate their designs, sometimes even appropriating the promotional images used to market the original products. Small designers are forced to compete against the low prices and rapid production that fast fashion exploits. This will obstruct small designers from thriving in a competitive market later on.⁹ Critically, investing in dupe goods will contribute to a homogeneous fashion in the long term.

The concern extends to ethical risk, specifically on creativity and intellectual property rights due to its vague interpretation and regulation. Since many mimic brands are not considered trademark infringement, including in Indonesia under Law No. 20 of 2016 on Trademarks and Geographical Indications (“**TGI Law**”), they can impair brand identity and undermine the creative efforts of original designers.¹⁰ Not to mention, the fast fashion dupe products that matter quantity over quality, have also led to exploitative labour practices. Factory workers find themselves working long hours up to sixteen hours every week, to barely return. Some textile industry uses child labourers due to their low-skilled and can be underpaid.¹¹ Shein, a fast fashion brand, disclosed that two of its supply chains were involved in child labour during 2023. Upon discovering the child exploitation case, Shein suspended orders from the implicated manufacturers and implemented corrective measures. These include termination of the contract with the minor workers, ensuring they receive unpaid wages, arranging medical checkups and returning to their guardians.¹²

⁹ Peet, Ellen. “The Rise of “Dupe” Culture: Designers Struggle to Protect Their Designs.” *Patent Lawyer Magazine*. Last modified September 9, 2024. <https://patentlawyermagazine.com/the-rise-of-dupe-culture-designers-struggle-to-protect-their-designs/>.

¹⁰ *Ibid.*

¹¹ Ross, Emma. “Fast Fashion Getting Faster: A Look at the Unethical Labor Practices Sustaining a Growing Industry.” *International Law and Policy Brief*. Last modified October 28, 2021. <https://studentbriefs.law.gwu.edu/ilpb/2021/10/28/fast-fashion-getting-faster-a-look-at-the-unethical-labor-practices-sustaining-a-growing-industry/>

¹² Sato, Mia. “Shein Says It Found Two Cases of Child Labor in Its Supply Chain Last Year.” *The Verge*, August 27, 2024. <https://www.theverge.com/2024/8/27/24229755/shein-child-labor-fast-fashion-transparency-report>.

The rise of dupe culture crawls to environmental concern, impacting the land and sea. Such culture creates impulsive buying behaviours because the consumers can afford those trendy designs through their dupes. The low-barrier accessibility leads to the purchase of items merely to fulfil one's satisfaction, resulting in quantity-over-quality. As previously discussed, fast-fashion dupes are well-known for their rapid production cycles. To illustrate, there are around 92 million tons of textile waste production globally every year, and ended up in landfills.¹³ In Indonesia, Bappenas has reported that textiles reached around 2.3 million tons annually, and this amount is expected to increase by 70%.¹⁴ The United Nations Environment Programme ("UNEP") notes that the production of fast fashion itself is responsible for about 8-10% of global carbon emissions, which has a substantial impact on the environment, more than aviation and sea freight. The synthetic textile industry relies heavily on plastic, utilizing approximately 42,534 kilotons every year.¹⁵ Additionally, the washing of synthetic fabrics like polyester releases microfibers into waterways. This problem can create underwater pollution, hampering marine ecosystems and the human food chain.¹⁶ These various data in a way show apprehensive situations without serious handling efforts.

The normalization of fashion sustainability such as the role of repair services should be taken into consideration. Through repair efforts, it allows brands to reduce textile waste and promote a culture of responsible consumption among consumers. Furthermore, the government should collaborate with policymakers and businesses to create smart regulations. Even though TikTok has established community guidelines prohibiting users from distributing dupe-related content or any dupe

¹³ Florian, Meagan. "COPYCAT CULTURE: The Environmental and Ethical Costs of Dupes — Sustain." *Sustain*. Last modified October 26, 2024. <https://sustainyrlife.com/read/copycat-culture-the-ethics-of-dupes>.

¹⁴ Khafid Mardiyansyah, "Limbah Pabrik Tekstil Di Indonesia Capai 2,3 Juta Ton per Tahun," <https://nasional.okezone.com/>, July 5, 2024, <https://nasional.okezone.com/read/2024/07/05/337/3030106/limbah-pabrik-tekstil-di-indonesia-capai-2-3-juta-ton-per-tahun?page=all>.

¹⁵ Cwts, "Towards Circular Fashion: The Need for Regulation and Strengthening Cooperation," <https://cwts.ugm.ac.id>, last modified June 15, 2022, <https://cwts.ugm.ac.id/en/2022/06/15/towards-circular-fashion-the-need-for-regulation-and-strengthening-cooperation/>.

¹⁶ Florian, Meagan. "COPYCAT CULTURE: The Environmental and Ethical Costs of Dupes — Sustain." *Sustain*. Last modified October 26, 2024. <https://sustainyrlife.com/read/copycat-culture-the-ethics-of-dupes>.

influences. However, the enforcement still seems lacking. Amazon is more proactive in this case as it formed the Anti-Counterfeiting Exchange, and industry partners are collaborating to create a shared database of counterfeit sellers. This database will enable participating online retail stores to exchange information and identify individuals involved in counterfeit activities on their platforms. Eventually, this will disrupt and dismantle counterfeit operations. Similarly, such a policy should be arranged to provide access to test which counterfeits under the guise of dupes. E-commerce should manage the promotion flow for dupe influences.¹⁷

C.2 The Economic Analysis in The Rise of Dupe Trend

In July 2024, the World Economic Outlook reported that the momentum of global disinflation is slowing down. Despite prices for goods decreasing, prices for services are still rising faster than average. Additionally, wages are increasing rapidly in some countries, and people are expecting higher inflation in the near future. These factors could make it harder to bring inflation back to normal levels¹⁸. Living under the circumstance of inflation in almost every aspect of our lives can be difficult to cope with, and is specifically worse-off for lower to middle income groups. From rising essential expenditures to household debts, the people's expenditure on necessary goods and services are rising. People have less discretionary income to spend on luxury goods, or even worse: they barely have access to them. Dupes are their answer for getting out of this "misery".

The "dupe culture" is a doorway for lower to mid income class individuals to access luxury goods on a budget they can afford and to be on par with the high income culture or staying on trend via influence of social media. The term "dupes", which is short for duplicates, is the Gen Z abbreviation for knock-off versions of more

¹⁷ Nicolette Shamsian and Nicolette Shamsian, "Fashion Victims: Dupes Are a Serious Problem," *Above the Law*, December 8, 2023, <https://abovethelaw.com/2023/12/fashion-victims-dupes-are-a-serious-problem/>.

¹⁸ IMF. 2024. "World Economic Outlook Update, July 2024: The Global Economy in a Sticky Spot." *IMF*. <https://www.imf.org/en/Publications/WEO/Issues/2024/07/16/world-economic-outlook-update-july-2024>.

expensive items¹⁹. In the U.S., the trend of dupes has been spreading like wildfire. As of late, Americans are struggling in the face of sky-high prices for everyday items, and most have exhausted their savings and are now leaning on credit cards to make ends meet. As consumers continue to stretch to cover rising rent, increased food prices and higher borrowing costs, there is less disposable income left for discretionary spending, according to Brett House, economics professor at Columbia Business School. That has helped open the door to dupes²⁰.

If global inflation is an ongoing phenomenon, we need to analyze if the same economic challenges pose threats to Indonesians' ability to purchase luxurious items for the purpose of discretionary spending. The dupe culture exists because people cannot afford or refuse to pay for luxurious goods with insane price tags. An economic class' lifestyle depends on their purchasing power. Logically, the higher the class, the greater the purchasing power. The best indicator to measure a consumer's purchasing power is discovering an individual, a household's, or a business' level of discretionary income, as non-essential items like vacations and luxury goods are usually paid for with funds from discretionary income. Discretionary income is the amount of money that you have left for spending, investing, or saving after you've paid your taxes (known as disposable income) and paid for personal necessities, which include food, housing, and clothing—so-called non-discretionary expenses²¹. From disposable income, deduct all necessities and obligations like rent or mortgage, utilities, loans, car payments, and food. Once you've paid all of those items, whatever is left to save, spend, or invest is your discretionary income²².

¹⁹ Hales, Bella. 2023. "Trendsetters: What Is Dupe Culture?" THE FIFTH. March 3, 2023. <https://thefifthagency.com/trends/trendsetters-what-is-dupe-culture-a-deep-dive-into-the-latest-trend-to-take-tiktok-by-storm/>.

²⁰ Dickler, Jessica, and Ana Teresa Solá. 2024. "Designer 'Dupes' Go Mainstream as Shoppers Choose Affordability over Luxury. 'It Just Makes More Financial Sense,' Expert Says." CNBC. CNBC. August 14, 2024. <https://www.cnbc.com/2024/08/14/designer-dupe-demand-soars-a-sign-of-the-economic-times.html>.

²¹ "What Is Discretionary Income?" 2019. Investopedia. 2019. <https://www.investopedia.com/terms/d/discretionaryincome.asp>.

²² *Ibid.*

In order to determine to what extent the economic struggles faced by Indonesians affect the level of discretionary income, we must analyze each of the contributing economic variables:

1. Level of Income

The most basic contributing variable to discretionary income is the earnings one makes. This variable acts as a foundation that is subject to taxes and other necessary expenditures like groceries (food and beverages), household bills (water and electricity), installment payments (mortgage, auto loans, student loans, business loans). Ideally, the greater the income, the more discretionary income one can obtain. However, realistically speaking, this is not the case. The obligation to pay taxable income and smart budgeting in relation to one's lifestyle are two key factors to determine an adequate amount of discretionary income.

According to Statista, as of February 2024, the average Indonesian employee could expect a net monthly salary of around three million Indonesian rupiah. The highest recorded average monthly net salary was in August 2023, reaching around 3.2 million Indonesian rupiah²³. This statistic is confirmed by *Badan Pusat Statistik Indonesia (BPS)*, stating in their last update on 6 November 2024 that as of August 2024, the average net wage/salary of Indonesians is Rp. 3.267.618²⁴. Additionally, the provisional minimum wage (*UMP*) of 2024 is Rp3.113.359,85²⁵. However, this has not included the essential and non-essential expenditures. For example, in Jakarta alone, the cost of living reached IDR 14.88 million per month in 2022²⁶. With an average salary of Rp 3 million per month across all industries, there is less discretionary income left to support a high-end lifestyle. The ability for individuals in Jakarta to spend almost Rp. 15 million per month suggests that people rely on other sources to

²³ Siahaan, Mona. 2024. "Average Monthly Net Wage of Employees in Indonesia from February 2013 to February 2024." Statista. October 30, 2024. <https://www.statista.com/statistics/1065801/indonesia-average-monthly-net-wage-of-employees/>.

²⁴ Indonesia, BPS-Statistics. 2024. "Average of Net Wage/Salary - Statistical Data." *Www.bps.go.id*. <https://www.bps.go.id/en/statistics-table/2/MTUyMSMy/rata-rata-upah-gaji.html>.

²⁵ "Satudata Kemnaker | Portal Data Ketenagakerjaan RI." 2024. *Satudata.kemnaker.go.id*. January 5, 2024. <https://satudata.kemnaker.go.id/data/kumpulan-data/1611>.

²⁶ Pamela. 2024. "Rincian Biaya Hidup Di Jakarta 1 Bulan - Ajaib." *Ajaib*. November 18, 2024. <https://ajaib.co.id/berapa-biaya-hidup-di-jakarta/>.

support their lifestyle, including debts to *pinjaman online (pinjol)*, pay later features, online gambling, and credit cards, which will be discussed further in the later sections.

2. Tax Rates

When it comes to taxes, there are a couple of ways to collect them, but the types that affect the people's purchasing power and inherently discretionary income are: income tax and value-added tax (VAT).

Firstly, income tax in Indonesia is regulated under Law Number 36 of 2008 concerning Income Tax, specifically in:

- Article 21: obliges employer, treasurer, and others which have the obligation to cut amount of taxes before paying the wages to employees (withholding system)
- Article 25: obliges taxpayers to pay monthly amount of tax due; i.e. estimated all income tax after deduction by employer related with Art 21, divided by 12 months (self-assessment).

Specifically for the obligation under Article 21 of the Income Tax Act, some companies have agreements with their employees to have a fixed salary amount regardless of tax rate changes. However, the majority of income-earners are subject to either one of the obligations stipulated in the articles. Under Article 21, a minimum salary of Rp. 60 million is charged the lowest progressive tariff of 5%, while those who earn above Rp. 5 billion are subject to 35% progressive tariff. On the other hand, the tariff set out in Article 25 is 0.75% of the gross circulation amount per month from each business place. This tax is not final so it can be credited at the end of the tax year. Based on these stipulations, the income tax rate mainly affects the middle to upper income class, in which the individuals belonging to these groups are deemed capable to pay taxes based on their nominal income.

Secondly, it has been reported that the Indonesian government has increased VAT to 12%, specifically for luxury goods, in 2024²⁷. VAT refers to the kind of tax

²⁷ Sandy, Ferry. 2024. "PPN 12% Barang Mewah, Ini Dampak Bagi Masyarakat & Pengusaha." *CNBC Indonesia*, December 10, 2024. <https://www.cnbcindonesia.com/news/20241210071339-4-594604/ppn-12-barang-mewah-ini-dampak-bagi-masyarakat-pengusaha>.

imposed for every purchase of goods and services carried out by taxable persons like a VAT-registered business (*pengusaha kena pajak*). The 1% increase from the previous year might discourage consumers from buying high-end products that are inherently pricey.

3. Inflation

On the year-end recap, Indonesia's inflation rate has gone down to 1.55%²⁸, remaining under the healthy and acceptable category of creeping inflation²⁹. Although this rate is relatively low, Indonesians are price-sensitive³⁰ to begin with³¹. Indonesian consumers will always seek cheaper alternatives compared to buying expensive, high quality products. This is understandable recalling how low the average income-earners receive on a monthly basis. Apart from affecting the ability to purchase niche goods, the prices of daily commodities would have risen too. If people's purchasing power over necessary goods have gone down, then they will be less likely to have income left to dedicate to their personal indulgences.

4. Debt Rate

The easier access to gadgets combined with a minimum salary are perhaps the two driving forces that push people to become in debt with digital or online loans. Up to August 2024, outstanding online loans were recorded to reach IDR 72.03 trillion and IDR 66.06 trillion of this total came from individual loans among Gen Z and millennials³². Considering how purchasing dupes as part of consumerism is common among Gen Z, the rise in online debts might be triggered by the desire to increase discretionary income in support of such lifestyle.

In correlation with the minimal income average, consumerism, and easier access to gadgets and forms of technology, Indonesians have become susceptible to

²⁸ Emir Yanwardhana. 2024. "Prabowo Beberkan Capaian Terbaik RI: Jarang Dalam Sejarah Dunia." *CNBC Indonesia*, December 10, 2024. <https://www.cnbcindonesia.com/news/20241210161421-4-594779/prabowo-beberkan-capaian-terbaik-ri-jarang-dalam-sejarah-dunia>.

²⁹ Creeping inflation refers to a relatively slow rise in prices, usually around 3% or less annually.

³⁰ Price sensitivity refers to consumer's response towards a change in price.

³¹ International Trade Administration. 2024. "Indonesia - Selling Factors and Techniques." *Www.trade.gov*. January 9, 2024. <https://www.trade.gov/country-commercial-guides/indonesia-selling-factors-and-techniques>.

³² Susi Setiawati. 2024. "Utang Pinjol Menggunung, Gen Z & Milenial Paling Demen Ngutang." *CNBC Indonesia*. [cnbcindonesia.com](https://www.cnbcindonesia.com/research/20241104062333-128-585270/utang-pinjol-menggunung-gen-z-milenial-paling-demen-ngutang). November 5, 2024. <https://www.cnbcindonesia.com/research/20241104062333-128-585270/utang-pinjol-menggunung-gen-z-milenial-paling-demen-ngutang>.

online or digital loans and credit card loans. As of September 2024, Indonesians set a record of Rp. 74.48 trillion of online debt (“*pinjol*”). Out of an outstanding total of Rp. 66 million from individual lenders, the biggest contributor came from millennials and Gen Z. This number proves to be significant because the follower of the dupes trend is Gen Z. As inference, gen z might have fallen into victims of online debt to support their consumerist lifestyle that they can barely afford.

After analyzing each variable, it is evident that the barely-sufficient-income Indonesians earn, the rising VAT, stable rates of inflation, and debt over digital loans, have decreased the people’s ability to set aside their income for discretionary purposes.³³ Hence, with less discretionary income and low purchasing power, Indonesians are more than willing to get the taste of the “high life” through purchase of dupes.

Considering how purchasing dupes as part of consumerism is common among Gen Z, the rise in online debts might be triggered by the desire to increase discretionary income in support of such lifestyle. The economic struggles faced by Indonesians significantly impact their discretionary income. While the average monthly salary has increased, it remains insufficient to cover the rising cost of living, particularly in urban areas. Income tax and VAT further reduce disposable income, especially for the middle and upper-income classes. Inflation, though relatively low, can erode purchasing power, making it harder for individuals to afford non-essential goods and services. Additionally, the surge in online lending, driven by the desire for quick access to funds and the influence of consumerism, can lead to debt burdens that further constrain discretionary spending. As a result, many Indonesians find themselves with limited financial flexibility, struggling to balance their needs and wants in an increasingly expensive environment.

³³ Fajar Sugianto, Stevinell Mildova, and Felicia Christina Simeon, “Increasing Economic Performance Through the Rule of Law in Indonesia: Law and Economics Perspective” 140, no. *Icleh* (2020): 92–99, <https://doi.org/10.2991/aebmr.k.200513.019>.

C.3 The Enforcement of IP Law Towards Dupe Products

1. Lack of IP Enforcement

The surging trend of knock-offs in recent years has led to various negative perceptions that places Indonesia as a country riddled with IP related issues left unaddressed. This issue has persisted for so long that the U.S. had placed Indonesia as one of the countries placed on the Priority Watch List.³⁴ Countries that is mentioned in such reports are faced with varying levels of deficiencies in relation to how IP is enforced in those states, as the report has made repeated mentions of how the primary law regulating Trademarks in Indonesia, namely Law No. 20 of 2016 concerning Brands and Geographical Indications, more commonly referred to as the Trademark Law, is still lacking in terms of IP enforcement, despite receiving an amendment through the Omnibus Law enacted in 2023.³⁵ The Trademark Law itself has regulated many aspects concerning the Trademark IP, including the method to reinforce the IP in an effort to combat knock-offs and acts of piracy within the state. However, the Trademark Law still is considered by many to be ineffective in enforcing IP protection, which will be analyzed based on three different parties involved in IP enforcement.

2. First Party Enforcement

The first party in any given IP enforcement framework involves the original holder of the IP itself to enact several layers of due diligence acts in order to place their IP on the radar of the Law. First, It is important to understand that IP registration falls between either one of two camps: [1] The First-to-File Principle and [2] The First-to-Use Principle. As stated in Article 3 of the Trademark Law, Indonesia adopts the First-to-File Principle, as the rights over a specific trademark will only be obtained after the original IP holder has registered their trademark to the Directorate General of Intellectual Property (DGIP). Having the First-to-File Principle does mean that should the IP holder not register within the domicile of Indonesia for their trademark, then the trademark belonging to the original holder is not protected by the law, and could

³⁴ “2024 Special 301 Report.” United States Trade Representative. <https://ustr.gov/issue-areas/intellectual-property/special-301/2024-special-301-report>.

³⁵ “UU No. 20 Tahun 2016.” Database Peraturan | JDIH BPK. <https://peraturan.bpk.go.id/Details/37595/uu-no-20-tahun-2016>.

not be reinforced. Secondly, the trademark holder has been granted a right to file for investigation should their trademark be infringed or copied by another party without consent. This method of filing is commonly referred to as *delik aduan* or complaint delict as stated in Article 103, where the involvement of investigators and police must be initiated from a complaint from the original trademark holder. This creates a gap in the law, where if the original trademark holder does not realize or is unable to file a complaint to the police to initiate an investigation, the acts of infringements and piracy will continue to persist without deterrent. This reactive method of enforcing trademarks in Indonesia instead of a more preemptive method is one of the reasons behind why IP enforcement from a first party perspective is lacking and inefficient to combat knockoff brands that infringe upon registered trademarks.

3. Second Party Enforcement

The second party in relation to trademark reinforcement would include direct infringers to the registered trademark, such as the producers of the knockoffs as well as their distribution chains and sellers. Consumers are not part of the second party as they are simply involved as a result of the knockoffs being able to reach the market to begin with, resulting in consumers being able to purchase knockoffs with similar designs but with cheaper materials and less skillful craftsmanship. Continuing the previously mentioned investigators that are mobilized after receiving a complaint from a registered trademark holder, the investigators mentioned above did not originate from the police department, but rather originates from the DGIP that formed the Civil Service Investigation Office (PPNS).³⁶ Despite being a specialized branch tasked with conducting an investigation for the goal of enforcing infringements, the PPNS ultimately fails in its objective due to the fact that they are not provided with the adequate resources, equipment, and authority to address infringements. The lack of authority impacts PPNS the most as it does not allow them to make arrests and had to rely on police cooperation to enact their enforcements. The process of enforcement,

³⁶ Sara, Megawati Barthos Rineke. “*Dysfunctional IP Infringements and Ineffectiveness of Enforcement Mechanisms Under Indonesian Law.*” Last modified March 7, 2019. <https://www.abacademies.org/articles/dysfunctional-ip-infringements-and-ineffectiveness-of-enforcement-mechanisms-under-indonesian-law-7951.html>.

such as raids, interviews, bringing experts to provide an official opinion is also quite costly to enact, ranging from Rp.50.000.000 to Rp.200.000.000 which is significantly higher than our neighboring countries such as China and Thailand.

A closer look at the Trademark Law shows that a penalty fine does exist for investigations that conclude with the perpetrator of the infringement found and proven to have conducted infringements over a registered trademark. The Trademark Law states that:

Article 100

(1) Every person who **without right** uses a Mark which is **completely the same** as a registered Mark belonging to another party for similar goods and/or services produced and/or traded, shall be punished by **imprisonment** for a maximum of **5 (five) years** and/or a maximum fine of **IDR 2,000,000,000.00 (two billion Rupiah)**.

(2) Any person who **without right** uses a Mark which is **substantially similar** to a registered Mark belonging to another party for similar goods and/or services produced and/or traded, shall be punished by **imprisonment** for a maximum of **4 (four) years** and /or a maximum fine of **IDR 2,000,000,000.00 (two billion Rupiah)**.

Article 102

Every person who **trades** goods and/or services and/or products who **knows or is reasonably suspected to know** that the goods and/or services and/or products are the result of a criminal act as intended in Article 100 and Article 101 shall be punished with a maximum **imprisonment** of **1 (one) year** or a maximum fine of **IDR 200,000,000.00 (two hundred million Rupiah)**.

Article 100 and 102 of the Trademark Law does seem to carry a hefty punishment in order to deter and impune any further infringements on registered trademarks, however this penalty in practice does little to no effect in enforcing trademarks. Comparing the Trademark Law in Indonesia to other countries provides a unique insight into why other countries are finding greater success implementing a penalty

fine for trademark infringement.³⁷ The U.S. in their efforts to combat trademark infringements have enacted 17 U.S. Code § 506 on Criminal Offenses that regulates against criminal infringements for financial gain to be considered a felony punishable up to 10 years imprisonment and a fine of a maximum of 250.000 USD, which amounts to approximately **4.000.000.000 Rupiah**.³⁸ The European Union (EU) meanwhile, has also enacted their own regulations to enhance their IP enforcement, specifically through Directive 2004/48/EC on the Enforcement of Intellectual Property Rights (Enforcement Directive).³⁹ Article 10 and 13 of the Enforcement Directive recognized the need to investigate infringements to enact measures such as recalling, removing, and destroying goods that infringe a particular IP while also compensating the original IP holder without setting a price floor or ceiling for compensation. This may seem a bit carefree for the EU to not provide a proper threshold for what is to be considered proper compensation for acts of infringements, but from a recent application of this law we can be certain that the limitless compensation clause is not abused and is instead used to properly deter interested parties from committing IP infringement. One such case can be seen when Google was fined by the Autorité de la concurrence, France, in March 2024 for reproducing other media companies' content without providing prior notification.⁴⁰ In their efforts to continue developing their own Large Language Model (LLM) named Bard, rebranded to Gemini, they had provided information obtained from other media companies despite a prior commitment made in 2022 to not infringe on the rights holders. Coupled with the various instances that Google has conducted negotiations in bad faith has resulted in the Autorité fining Google in two separate instances. The first fine against Google

³⁷ Muhammad Azwar Am, "Sengketa Merek Dagang MS Glow Dan PS Glow Atas Merek Dalam Perspektif Hukum Di Indonesia," 2016, 143–53.

³⁸ United States Sentencing Commission. INTELLECTUAL PROPERTY; §2B5.3 (CRIMINAL INFRINGEMENT OF COPYRIGHT OR TRADEMARK), March 2020. https://www.ussc.gov/sites/default/files/pdf/training/primers/2020_Primer_Intellectual_Property.pdf.

³⁹ "Directive - 2004/48 - EN - EUR-Lex." <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004L0048>.

⁴⁰ Chrisafis, Angelique. "Google Fined €250m in France for Breaching Intellectual Property Deal." The Guardian, March 21, 2024. <https://www.theguardian.com/technology/2024/mar/20/google-fined-250m-euros-in-france-for-breaching-intellectual-property-rules>.

occurred in 2021 for 500.000.000 Euros and the recent fine for 250.000.000 Euros amounting to 750.000.000 Euros fined to Google, or approximately **12.500.000.000 Rupiah**. In contrast to both the U.S. and the EU, Indonesia's maximum penalty fine of 2.000.000.000 Rupiah no longer seems so imposing, especially to corporate giants that made more in profits than they are injured paying the fines issued by the court.

4. Third Party Enforcement

Third parties in IP enforcements typically involve interested parties, such as government agencies or even Non-Government Organizations (NGOs) that may possess aligning interests to enforce or revoke the registered status of a trademark.⁴¹ These third parties conduct their enforcement over trademarks through checks and balances to ensure that the IP itself is not being infringed upon by those without the rights to do such, but also to ensure that the original trademark holder is not abusing their right in enforcing their rights. Together these three perspectives bring together the full image of trademark enforcement, being able to cover extensively what is regulated by the law.⁴² But the Trademark law is far from perfect, as improvements are long overdue and must be enacted as soon as possible to ensure that IP can be sufficiently protected in the near future.

D. Conclusion and Recommendations

In conclusion, the "dupe" culture reflects a complex interplay of economic, social, and cultural factors, particularly in the context of Indonesia. The phenomenon is driven by the desire for luxury goods among a population with limited discretionary income, exacerbated by factors such as low average wages, rising taxes, and high levels of consumer debt. While Indonesia's inflation rate remains relatively stable, the price sensitivity of Indonesian consumers further contributes to the appeal of dupes as affordable alternatives to expensive brands. The normalization of dupes through social media platforms like TikTok has shifted consumer values, prioritizing

⁴¹ Dean Kermite, Denis Mercury, and Enge Christina, "Hak Merek Untuk Memperkuat Citra Bisnis," *Inside Intellectual Property Rights* 2, no. 1 (2024): 110–28.

⁴² Fajar Sugianto Sugianto, "Efisiensi Ekonomi Sebagai Remedy Hukum," *Refleksi Hukum: Jurnal Ilmu Hukum* 8, no. 1 (2014): 61–72, <https://doi.org/10.24246/jrh.2014.v8.i1.p61-72>.

affordability and accessibility over exclusivity. This has blurred the lines between genuine products and imitations, raising concerns about intellectual property rights and the potential harm to small businesses and original designers. The lack of clear regulations and enforcement mechanisms in Indonesia further exacerbates this issue, as highlighted by the country's inclusion on the U.S. Priority Watch List for IP-related deficiencies. Moreover, the environmental and ethical implications of dupe culture are significant. The fast fashion industry, fueled by the demand for cheap imitations, contributes to textile waste, carbon emissions, and exploitative labor practices. The prevalence of child labor in some supply chains underscores the urgent need for greater transparency and accountability within the industry.

Addressing these challenges requires a multi-faceted approach. Strengthening IP protection laws and enforcement mechanisms is crucial to safeguard the rights of original creators and deter counterfeiters. Policymakers and businesses must collaborate to create smart regulations that balance consumer interests with ethical considerations. E-commerce platforms should proactively manage the promotion of dupes and implement policies to identify and remove counterfeit products. Furthermore, promoting sustainable fashion practices and responsible consumption is essential. Encouraging repair services, reducing textile waste, and raising consumer awareness about the environmental and social costs of fast fashion can help mitigate the negative impacts of the dupe culture. Ultimately, navigating the complexities of the dupe culture requires a collective effort. By addressing the underlying economic factors, strengthening IP protection, and promoting ethical and sustainable practices, we can foster a more responsible and equitable fashion industry that respects both creativity and the environment.

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