

# The Laws of Hijacking Applicable In Indonesia

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## **ABSTRACT:**

*The purpose of this article is to describe literary framework; historical development; definition of hijacking; motives of hijacking such as personal motive, hostage taking motive, pure political motive and political asylum motive. Personal motive consist of criminal motive, mentally disturb people, home sick and blind love; cases of offences related to aviation namely hijacking, bomb threat or bomb joke, unruly passengers; international law of hijacking such as **Tokyo Convention of 1963** includes problems of unruly passengers and how to prevent it during check-in, security screening, boarding, prior departure and in flight; **The Hague Convention of 1970** related to offences and extradition provision; **Montreal Convention of 1971** includes variety of offences; **Act number 1 Year 2009** related to offences provisions; **Act number 1 Year 1979** and extradition treaty concluded by Indonesia and finally conclusion.*

**KEY WORDS:** *hijacking, unruly passengers, offences, extradition*

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## **I. INTRODUCTION**

Aircraft hijacking is the unlawful seizure of an aircraft by an individual or a group. In most cases, the pilot is forced to fly according to the orders of the hijackers. Occasionally however, the hijackers have flown the aircraft themselves, such as the September 9 attack of 2001. Skyjacking is not usually committed for robbery or theft. Majority of aircraft hijackers intend to use the passengers as hostages, either for monetary ransom or for some political or administrative concession by authorities. Motives vary from demanding,<sup>3</sup> the release of certain inmates, to highlighting the grievances of a particular community. Hijackers also have used aircraft as a weapon to target particular locations, such as the September 11 attack of 2001.

According to Alone E. Evans, aircraft hijacking is a contemporary addition to the roster of international and national crimes and the necessity for its control at national and international level is only beginning to be recognized by the States. The increase in the number of incidents of hijacking and increase in the dangers against the safety of the flights of aircrafts present grave problems before the international community and particularly before the International Civil Aviation Organization (ICAO). In order to solve these

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<sup>3</sup> There are several motivations of hijacking such as personal motive, hostage taking motive, pure political motive and gaining political asylum motive as well, see Martono K., Agus Pramono, Eka Budi Tjahjono., *Pembajakan Udara, Angkutan Udara dan Keselamatan Penerbangan*. Jakarta: Gramata Publishing, 2011, hal.11

problems and punish the hijackers several Conventions have been adopted such as Tokyo Convention of 1963,<sup>4</sup> the Hague Convention of 1970,<sup>5</sup> Montreal Convention of 1971,<sup>6</sup> Montreal Protocol of 1988 as well.<sup>7</sup>

## II. RESEARCH METHOD

The method used in this research is normative qualitative in nature by conducting an advanced study on the regulation of aircraft hijacking and states responsibilities in the scope of international law. The resources are collected through library study method. The approach used to analyse the data is an analysis approach on the Convention of International Civil Aviation, national law and regulations by examining the concepts and the cases. The resources are analysed descriptively and qualitatively to answer the research questions.

## III. DISCUSSION AND ITS RESULT

### 1. Literary Framework

International Civil Aviation Organization (ICAO) has established several international conventions in the efforts to prevent and to resolve aircraft hijacking in addition to the Annex 17 of Chicago Convention of 1944<sup>8</sup> along with its manual and ICAO Model Agreement as explained below.

Tokyo Convention of 1963 uses national jurisdiction principle, territorial jurisdiction principle, the site of the first landing, and the site of the last taking off. National Jurisdiction principle has been mentioned first by Paul Fauchille since 1903. This principle has its strength and weaknesses. The strength of this principle is that this principle may prevent the occurrence of lawless territory. Its weaknesses, however, may occur if the plane lands in other state, the state may not be able to sentence any penalty for the hijackers.

Territorial jurisdiction principle is sourced at the general law doctrine in criminal law. According to this principle, the state who owns the jurisdiction is the state in which the crime is committed. This principle also has its strength and its weaknesses. Its strength applies when there is an occurrence of aircraft hijacking; it is possible to call the local police immediately to arrest the hijackers because it is in accordance with the states sovereignty, and there will be no problem in extradition. However, the weaknesses in applying territorial jurisdiction principle is that it is difficult to decide quickly the site of the crime, because airplane can move at a such speed passing several states without paying attention to the state sovereignty. Although a state has its sovereignty, it does not mean that the state is free from taking the responsibility. The principle applied in the sovereignty.<sup>9</sup>

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<sup>4</sup> ICAO Doc.8364, *Convention on Offences and Certain Other Acts Committed on Board Aircraft*, Signed at Tokyo, on 14 September 1963; For the text Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,183.

<sup>5</sup> ICAO Doc.8920, *Convention for the Suppression of Unlawful Seizure of Aircraft*, Signed at The Hague, on 16 December 1970; For the text see Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,201.

<sup>6</sup> ICAO Doc.8966, *Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation*, Signed at Montreal on 23 September 1971; For the text see Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto : The Carswell Company, Ltd, Canada,215

<sup>7</sup> ICAO Doc.9518, *Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation, Supplementary to the Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation*, Done at Montreal on 23 September 1971, Signed at Montreal, on 24 February 1988; for the text see For the text see Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,229.

<sup>8</sup> Annex 17to the Convention on International Civil Aviation Security - Safeguarding International Civil Aviation against Acts of Unlawful Interference, <https://www.scribd.com/doc/307543261/ICAO-Annex-17-Security-Safeguarding-International-Civil-Aviation-Against-Acts-of-Unlawful>, accessed on 15 December 2021

<sup>9</sup> Agus Pramono., *AIRCRAFT HIJACKING: A LEGAL PERSPECTIVE.*, Faculty of Law, Diponegoro University, Semarang, email : ap\_300655 @ yahoo.com

## 2. Historical Development

The first recorded hijackings of aircraft took place in Peru in 1931 during the course of a civil war. On 21 February 1931 a Pan-American plane was seized by rebel forces as it landed at Arequipa. Two days later a plane of the Faucett Aviation Company was similarly seized by rebel forces when it landed at Piura. There were no casualties and both planes were eventually released. Between 1948 and 1950 there were 17 hijackings of aircraft - usually by persons seeking to escape from Eastern European countries to the West. They were given political asylum. When Castro seized power in Cuba the same pattern of political escape by commandeering aircraft was transferred to the New World. Then the traffic of hijackings switched direction and the number of American planes hijacked to Cuba increased and multiplied. It also widened internationally when on 9 August 1961 Pan-American flight.

## 3. Definition of Hijacking

There are several definitions of hijacking used by the authors such as hijacking, skyjacking, air piracy,<sup>10</sup> illegal diversion of aircraft and air banditry<sup>11</sup> as well. In the Tokyo Convention of 1963 entitled Convention on Offences and Certain Other Acts Committed on Board Aircraft and in The Hague Convention of 1970 entitled Convention for the Suppression of Unlawful Seizure of Aircraft no terms of hijacking as well, they used the term of an offences. Some time the meaning of hijacking similarly with the term of piracy provided in Article 13 Paragraph (1) (a) of the Geneva Convention of 1958.<sup>12</sup> According to the term of "piracy" means universal crime, but the term of "hijacking" does not mean universal crime. The hijacking by persons seeking to escape from Eastern European countries to the West, they were given political asylum and similarly when Castro seizure power in Cuba the same pattern of political escape were given political asylum as well and they were not classified as crime by the west.

## 4. Motives of Hijacking

With regard to hijacking motive can be group into four criteria such as personal motive, hostage taking motive, pure political motive and political asylum motive.<sup>13</sup> Personal motive consist of criminal motive, mentally disturb people, home sick and blind love. The hijacking which purely derived from criminal motive is a crime which is intended to collect money or belongings for private goal such as happened to Trans World Airlines (TWA) in June 1970,<sup>14</sup> and the hijacking committed due to personal motive occurred in May 1971. The hijackers who hijacked an aircraft flying from Miami New York-to Nassau demanded for five hundred thousand for the ransom.<sup>15</sup>

Another hijacking was committed due to other personal motive is being mentally disturb people. The hijacker was not able to cope with the life in the United States of America due to everything was expensive, crowded and bad situation, they live in a small apartment and those, in the end, disturbed them mentally. After watching a movie on airplane hijacking or reading a magazine on the same issue, they were provoked to hijack an airplane. This type of hijacking are easy to be recognized and therefore, it is easy for the authority to arrest the hijackers.<sup>16</sup>

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<sup>10</sup> A. Samuel, "The Legal Problems : An Introduction", JALC, Vol.37,page 165.

<sup>11</sup> Mc Whinney E., *The Illegal Diversion of Aircraft and International Law*. Leiden: The A. W. Sijthoff Company,1970, pages 103 and 119. In this book also use the terms of Aerial hijacking, aircraft skyjacking or aerial piracy.

<sup>12</sup> Geneva Convention of 1958 concerning the Law of the Seas. Done at Geneva, on 20 April 1958; See Martono K.,Usman Mellayu.,*Perjanjian Angkutan Udara di Indonesia*. Bandung : Penerbit Madar Maju,1996,page 89.

<sup>13</sup> Martono K., Agus Pramono and Eka Budi Tjahjono.,*Pembajakan, Angkutan Udara dan Keselamatan Penerbangan*. Jakarta : Penerbit: Gramata Publishing,pages 11-21.

<sup>14</sup> Agus Pramono., *AIRCRAFT HIJACKING: A LEGAL PERSPECTIVE.*, Faculty of Law, Diponegoro University, Semarang, email : ap\_300655 @ yahoo.com; see also Martono K., Agus Pramono and Eka Budi Tjahjono.,*Pembajakan, Angkutan Udara dan Keselamatan Penerbangan*. Jakarta : Penerbit: Gramata Publishing,pages 11-21.

<sup>15</sup> *Ibid.*

<sup>16</sup> Evan A.E., *Air Hijacking: Its Cause and Cure*, Vol.63 American Journal and International Law, 1969-page 705

An aircraft of hijacking due to broken home motive was committed by Ekanayaka Sapala to one of the airplanes owned Alitalia Airlines on 30 June 1982. He hijacked Boeing 747 type of aircraft during its flight from New Delhi to Bangkok, Thailand. He demanded to be united with his separated wife and children and a ransom of three hundred thousand US\$. After he was united with his children and his wife who was an Italian, the hijacker surrendered to the authority in Bangkok.

The aircraft hijacking with home sick motive were committed in the United States and in South America mostly flight to Cuba. The demand of aircraft hijacking was simple, that is to be taken to Cuba. Once they arrived at Cuba, they would surrender. This kind of aircraft hijacking has the small risk and therefore, to resolve such hijacking, usually the flight crew is ordered to fulfill the hijackers' demand. Based on that experienced, the Trans World Airlines (TWA) instructed all the flight crew to fulfill all of the hijackers' demands, Cuba.<sup>17</sup>

The aircraft of hijacking with the motive of hostage taking may be committed with or without government's involvement. The aircraft hijacking with involved the government may relate to political reason such as the hijacking committed by Ben Bella in 1956, by Libya Airforce to British Overseas Airways Corporation (BOAC), the other victim of such hijacking was the Vice Minister of Congo, Mose Thsombe in 30 June 1967, US Navy in 10 October 1985 and Israel Army on 3 February 1986. The hijacking with the motive of hostage taking without government's involvement was committed by Boyton on 1968 and by Jessi on 4 August 1968 by hijacking Cessna of Naples Airlines.

The aircraft hijacking with political motive consists of two type such as political motive with pure political motive and political motive with violence. Political motive with pure political was committed on 9 November 1968. Two Italian hijackers, named Giovine and Panichi hijacked the Olympic Airways plane that had just taken off in Paris for its journey to Athena. The hijackers demanded the plane to return to Paris and spread-out banners which were meant to support the democracy in Athena, Greek. In that case, there was no injured party and the hijackers were arrested and were sent to prison.

Aircraft hijacking political motive with hard violation started to take place in 1960s. Usually the hijackers take hostage of the aircraft, the passengers and the crew as well and demand the freedom of their imprisoned friends or which were brought to justice by their enemies. These cases of such hijacking were at its top during the dispute between the Arabian states and Israel in Middle East. The first hijacking was committed by Popular Front for the Liberation Palestine in 1968 by hijacking the airplane own by EL AL during its trip to Aljazire and demanded the freedom of their friend who were imprisoned in Israel.

Political motive of hijacking with violation read its top cases in 6 September 1970. Within one day, there were five aircraft hijacked. Of the five airplanes, three of which belonged to Swissair, Trans World Airline (TWA) and British Overseas Airways Corporation (BOAC), which all were blown up in Downson field Airport in Jordan. One airplane, Boeing 747, owned by Pan American Airways (Pan Am), were led to Cairo, Egypt, where it was exploded as well. The last plane, belonging to EL AL Airways, was landed at Heathrow, London as the hijacking was fail and the hijacker. Laila Khaled was arrested.

With regards to hijacking in Indonesia, there are two hijacking namely aircraft type Vickers Viscount belong to Merpati Nusantara Airlines (MNA) committed by marine people in Yogyakarta on 5 February 1972, the motive was intended to collect money for private goal. The second hijacking related to Indonesia was Garuda Indonesia's aircraft. On March 28, 1981, Garuda Indonesian Airlines flight GA 206 DC-9 "Woyla" was en-route from Palembang to Medan, the plane has flown from Jakarta destined to Medan. Two passengers took off from their seats, one went to the cockpit and one stood in the aisle. The aircraft was completely under the control of five hijackers, all in firearms. The hijackers have declared their demand, the release of Jihad Commando's that the Indonesian government has imprisoned, and the US \$ 1.5 million. They also demand a plane is prepared for the released prisoners to an unnamed-yet destination, they have a bomb set on the plane.<sup>18</sup> With regards to its hijacking motive, this hijacking could be classified as political motive with violation.

## **5. Cases of Offences Related to Aviation**

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<sup>17</sup> Fick R.L.,Gordon J.L.,Patterson J.C. *Aircraft Hijacking: Criminal and Civil Aspects*,Vol.22 University of California Law Reues 1969-1970,page 83

<sup>18</sup> <https://special-ops.org/hijacking-of-garuda-indonesia-flight-206/>, diakses tanggal 13 Desember 2021

a. **Aircraft of Hijacking**

Indonesian airlines had been hijacked twice, one was *Vickers Viscount* owned by *Merpati Nusantara Airlines* (MNA) that was hijacked on February 5th, 1972 in Yogyakarta Middle Java<sup>19</sup>, when a desperate marine hijacked a domestic flight for money, then he was killed by the pilot himself. The second of hijacking was *Garuda Indonesian Airlines* flight GA 206 DC-9 “Woyla” was en-route from Palembang to Medan, a domestic flight between two Indonesian cities. The plane has flown from Jakarta in 0800, destined to Medan. During flight, two passengers took off from their seats, one went to the cockpit and one stood in the aisle. By 1010, Woyla is completely under the control of five hijackers, all in firearms.<sup>20</sup>

The hijacker in the cockpit ordered the pilot to fly the plane to Colombo, Sri Lanka, but according to the pilot fuel wouldn't be enough, then the plane is flown to Penang, Malaysia. The terrorists are from the Jihad Commando group, Muslim radicals responsible for the raid of police stations, military bases, and various sabotages in Indonesia during 1977-1981. In the midday, the Indonesian government has been on red alert. Indonesia also never dealt with serious hijacking before. In the evening, the newly created Indonesian Special Force, Kophasanda, has borrowed another DC-9 from *Garuda Indonesian Airlines* and used it for combat training.<sup>21</sup>

The September 11 attacks were a series of four suicide attacks that were committed in the USA on September 11, 2001, coordinated to strike the areas of New York and Washington D.C. On that Tuesday morning, 19 terrorists from the militant group Al-Qaeda hijacked four passenger jets. The hijackers intentionally piloted two of those planes, into the North and South towers of the World Trade Centre complex in New York City; both towers collapsed within two hours.

The hijackers also intentionally crashed a flight into the Pentagon and intended to pilot the fourth hijacked jet, into the Capitol Building Washington, D.C.; however, the plane crashed into a field near Shanks Ville after its passengers attempted to take control of the jet from the hijackers. Almost 3000 people died in the attacks, including the 246 civilians and 19 hijackers aboard the four planes, none of whom survived. Suspicion quickly fell on Al-Qaeda, and in 2004, the group's leader Osama bin Laden, who had initially denied involvement, claimed responsibility.

b. **Bomb Joke**

On 3 March 2017 a Garuda Indonesia passenger of GA 611 flight with the initials of HI (51), a university lecturer in Makassar is detained at the security post in Sultan International Airport after he mentioned a bomb joke onboard. After the lecture check-in, he walked to the Gate 1 entrance while he waited for the boarding process. When the passengers were on board they were busy preparing to bring their luggage into the cabin. A flight attendant lifted the lecturer's luggage, the lecturer spontaneously warned the flight attendant to be careful since there were valuable things in it, but it is not a bomb. The flight attendant immediately report to the pilot then the pilot inform Garuda Indonesia's security officers and all of the 209 passengers were asked to disembark the plane. The perpetrator could be charged under the Civil Aviation Act of 2009

Several Lion Air passengers at the Pontianak airport were seriously injured after exiting the plane's emergency door and jumping off of the wing, while the engine was still running, due to a bomb scare. The attendants give their account of what took place in the cabin prior to the panic and admit that it was not Frantinus' initial bomb remark that set it off. The panic actually occurred when the captain ordered them to get passengers off the plane immediately. After interrogation, the police have charged Frantinus with violating air safety regulations by making a bomb hoax, a crime for which he could face up to 8 years in prison.<sup>22</sup>

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<sup>19</sup> Agus Pramono, *supra* note 12

<sup>20</sup> <https://special-ops.org/hijacking-of-garuda-indonesia-flight-206/>, accessed on 15 December 2021

<sup>21</sup> *Ibid.*

<sup>22</sup> Lion Air crew accused of escalating bomb joke into dangerous panic through poor handling <https://coconuts.co/jakarta/news/lion-air-crew-accused-escalating-bomb-joke-dangerous-panic-poor-handling/>, accessed on 14 December 2021

The incident in Pontianak was actually the *second* time a passenger made a bomb joke on a Lion Air flight that week. Another passenger had to be ejected from a flight leaving Soekarno-Hatta Airport for Kuala Lumpur for the same faux explosive reason, causing the flight to be delayed three hours. In that month at least 10 passengers who made bomb threats. A few days before two senior party officials from Banyuwangi's Regional Executive Council (DPRD) also made bomb jokes at Banyuwangi airport, causing the flight to be delayed and an ongoing investigation. They apologized but claimed they didn't know it was against the law.<sup>23</sup>

**c. Unruly Passengers**

An incident with an unruly passenger aboard a Virgin Australia plane on its way to Indonesia triggered reports of a hijacking, but according to Virgin, such reports turned out to be false. At no point was the safety of our passengers ever in question. The airline did not elaborate on the incident, other than to say the passenger was unarmed, and the pilot notified authorities of the disruption before landing. The plane, with 137 passengers and seven crew members, arrived safely at its destination of Bali, Virgin said. Authorities removed the disruptive passenger.<sup>24</sup>

**6. International Laws of Hijacking**

Based on Act Number 2 Year 1976,<sup>25</sup> Indonesia has ratified the Tokyo Convention of 1963,<sup>26</sup> The Hague Convention of 1970,<sup>27</sup> and Montreal Convention of 1971,<sup>28</sup> as well, consequently The Tokyo Convention of 1963, The Hague Convention of 1970 and the Montreal Convention of 1971 applicable in Indonesia.

**a. Tokyo Convention of 1963**

The Convention on Offences and Certain Other Acts Committed on Board Aircraft was signed at Tokyo in a diplomatic conference on September 14, 1963 and came into force on December 4, 1969. It applies in respect of offences against penal law, acts which, whether or not they are offences, may or do jeopardize, good order and discipline on board.<sup>29</sup> This convention shall apply in respects of offences committed or acts done by a person on board any aircraft registered in a Contracting State, while that aircraft is in flight or on the surface of the high seas or of any other area outside the territory of any State, it means that if the aircraft landing in the domestic, the Tokyo Convention of 1963 does not apply. It is worthwhile to note here that the convention shall not apply to aircraft use in military, customs or police services.<sup>30</sup>

The convention neither defines the term hijacking nor make an effort to deal with an offence itself presumably because the act of hijacking was not regarded as a crime. It simply lays down what would be the consequences if hijacking takes place. In addition, the offender may be taken into custody by the Contracting State which may initiate criminal proceeding or extradite the offender, but neither action is mandatory. Article

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<sup>23</sup> *Ibid.*

<sup>24</sup> Ben Brumfield, Unruly passenger aboard jet causes stir; plane safe in Indonesia, <https://edition.cnn.com/2014/04/25/world/asia/indonesia-plane-scare/index.html>

<sup>25</sup> Undang-Undang tentang Ratifikasi Konvensi Tokyo, Konvensi Den Haag, 1970 dan Konvensi Montreal 1971 (UURI No.2 Tahun 1976), Lembaran Negara Republik Indonesia Nomor... Tahun 1976, Tambahan Lembara Negara Republik Indonesia Nomor..

<sup>26</sup> ICAO Doc.8364, *Convention on Offences and Certain Other Acts Committed on Board Aircraft*, Signed at Tokyo, on 14 September 1963; For the text Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,183.

<sup>27</sup> ICAO Doc.8920, *Convention for the Suppression of Unlawful Seizure of Aircraft*, Signed at The Hague, on 16 December 1970; For the text see Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,201.

<sup>28</sup> ICAO Doc.8966, *Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation*, Signed at Montreal on 23 September 1971; For the text see Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto : The Carswell Company, Ltd, Canada,215

<sup>29</sup> Article (1) of 1963 Tokyo Convention

<sup>30</sup> Article 3 (b), Aircraft used in military, customs and police services shall be deemed to be state aircraft

16 makes it clear that it does not create an obligation to grant extradition. Exclusive rights given to flight commanders for protecting the aircraft and imposing restraints on the offenders are to some extent unjustifiable.

The Tokyo Convention makes it unlawful to commit “acts which, whether or not they are offences (against the penal law of a State), may or do jeopardize the safety of the aircraft or of persons or property therein or which jeopardize good order and discipline on board.” In addition to, the Tokyo Convention also provides the authority to the pilot in command (PIC) to appropriately deal with an unruly passenger and provides protection, under the law, from any subsequent legal proceedings for actions taken against a perpetrator “For actions taken in accordance with this Convention, neither the aircraft commander, any other member of the crew, any passenger, the owner or the operator of the aircraft, nor the person on whose behalf the flight was performed shall be held liability or responsible in any proceeding on account of the treatment undergone by the person against whom the actions were taken.”<sup>31</sup>

The Tokyo Convention also contain provisions for the prosecution and off-loading of unruly passengers, it has a jurisdictional gap which does not automatically allow most states to prosecute a disruptive passenger who has been removed from an inbound foreign registered aircraft. The PIC can disembark an unruly passenger in any State without coordination with the local law enforcement authorities. In this case, the individual is unlikely to face prosecution in that State unless the State itself has enacted enabling legislation allowing it press charges for the offence. If the PIC wishes the unruly passenger to face prosecution, he must land in a State that is a party to the Tokyo Convention and formally deliver the passenger to the local law authorities. For prosecution to be successful, it must be proven that the passenger committed a serious offence under the law of the State in which the aircraft is registered.

#### **b. Unruly Passengers**

Annex 17 to the Chicago Convention of 1944 defines unruly passengers is a passenger who fails to respect the rules of conduct at an airport or on board an aircraft or to follow the instructions of the airport staff or crew members and thereby disturbs the good order and discipline at an airport or on board the aircraft. In addition to, the Tokyo Convention of 1963 define Acts which, whether or not they are offences [against the penal law of a State], may or do jeopardize the safety of the aircraft or of persons or property therein or which jeopardize good order and discipline on board. The airline industry’s top priorities safety and security are considered to priorities,<sup>32</sup> however disruptive passengers have, over the past several years, become more prevalent and unruly passenger incidents are currently a very real and serious threat to both safety and security.<sup>33</sup>

#### **c. Problems of Unruly Passengers**

An unruly passenger is someone who, by action or stated intent, jeopardizes or might jeopardize the safety of the aircraft, persons or property therein or the accepted level of good order and discipline on board. To help airlines more easily identify the problem, International Air Transport Association (IATA) has developed and promulgated a "non-exhaustive" list of examples of what is considered unruly or disruptive behaviour whilst on board an aircraft. This list includes illegal consumption of narcotics; refusal to comply with safety instructions (not following cabin crew requests such as direction to fasten a seat belt, to not smoke, to turn off a portable electronic device or by disrupting the safety announcements); verbal confrontation with crew members or other passengers; physical confrontation with crew members or other passengers; uncooperative passenger (examples include interfering with the crew’s duties, refusing to follow instructions to board or leave the aircraft); making threats of any kind towards the crew, other passengers or the aircraft; sexual abuse / harassment; other type of riotous behaviour (examples include: screaming, annoying behaviour, kicking and banging heads on seat backs or tray tables).<sup>34</sup>

There are numerous factors and triggers that can lead a typical member of the travelling public towards unruly behaviour. These include, but are not limited to intoxication; drug use (both prescription and non-prescription); mental health issues; anxiety (including a fear of flying); fatigue; frustration as a result of personal

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<sup>31</sup> Ibid.

<sup>32</sup> Article 44 (a) of the Chicago Convention of 1944.

<sup>33</sup> <https://skybrary.aero/articles/unruly-passengers>, accessed on 14 December 2021

<sup>34</sup> Ibid.

issues or from travel related dissatisfiers such as: pre-boarding issues such as long queues; the security and screening process; departure delays (and the lack of timely information); missed connections; post-boarding issues, crowded conditions, lack of personal space, unserviceable equipment (seat won't recline, in-flight entertainment system inoperative etc); annoying individuals in one's vicinity (loud or boisterous passengers, seat kickers, crying babies etc). Of all of the causal factors listed, intoxication is the single item that triggers the majority of unruly passenger events.<sup>35</sup>

#### **d. Prevention of Unruly Passengers**

Identification and mitigation measures for the prevention of, or the control of, an unruly passenger incident must occur at all stages of the journey, beginning when the passenger first enters the terminal at the point of origin. To do this, company and airport employees must be vigilant when interacting with the travelling public during check-in, security screening, boarding gates, prior to departure and in flight as follows:

##### **(1). Check-In**

Check-in staff should be encouraged to identify, *and to report*, any passenger whose behaviour would suggest that they might be unsuitable for carriage. As an example, if a person appears to be in an intoxicated state or is acting strangely, their condition and actions should be reported to the ground supervisor before they are processed for acceptance onto the flight. Where a potential problem is identified, an assessment should be made by the person(s) nominated by the operator (Airline Duty Manager, PIC, Cabin Service Manager, etc) and a decision made to grant or to deny carriage.

##### **(2). Security Screening**

Personnel at the security screening points can be trained to be part of the mitigation measures. For example, the Canadian Air Transport Security Authority (CATSA) developed a Zero Tolerance Unruly Passenger policy after noticing an increase in the number of unruly passenger incidents at screening checkpoints. CATSA considers that people who engage in unruly behaviour during screening could be a safety risk to passengers and crew during a flight. A number of airlines now use a CATSA report of unruly behaviour during security processing as the basis for denying carriage.

##### **(3). Boarding Gate**

A passenger's state of intoxication, anxiety or agitation may not be recognized until his or her arrival at the boarding gate. A passenger who has checked in early or who has been subject to a departure delay may well have ample time to consume excessive amounts of alcohol after the assessments that took place at check in or during security screening. Frustration levels will often rise with mechanical or weather related flight delays.

##### **(4). Prior to Departure**

The final chance to leave a potential problem on the ground occurs just before the aircraft doors are closed. Observation of the boarding passengers by the cabin crew is an important tool for identifying potentially problematic behaviour. Cabin crew should note passengers who are extremely nervous, intoxicated, loud or belligerent or who otherwise appear suspicious. The first step in intervention would be for a member of the cabin crew to attempt speaking with the passenger. Often, this contact is all that is required to defuse the behaviour and to gain the passenger's cooperation. If it does not, then the situation should be handled as appropriate to the level of unruly behaviour. Unless the situation can be resolved to the satisfaction of the crew, if a passenger displays disruptive behaviour whilst the aircraft is still on the ground, they, and their baggage, should be removed from the aircraft.

##### **(5). In Flight**

Once the aircraft is in flight, the flight crew is no longer able to leave the flight deck to assess or assist in the resolution of a passenger problem. Responsibility for determining the threat level of a specific situation and dealing with it appropriately now lies in the hands of the cabin crew. Cabin crew training, in regard to unruly passengers, has become significantly more comprehensive in areas such as regulations, early detection,

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<sup>35</sup> *Ibid.*



intervention and restraint. In all cases, it is critical that the senior cabin crew member and the PIC be kept informed of any developing situation.

**e. The Hague Convention, 1970**

Increase in the number of incidents relating to hijacking and the shortcomings of the Tokyo Convention compelled the States to think and take some effective measures to solve the problem and to give deterrent punishment to hijackers. This process started in September 1968 when the International Civil Aviation Organization Council was asked to study the problem of hijacking, leading to the adoption of the Hague Convention, 1970, i.e., the Convention for the Suppression of Unlawful Seizure of Aircraft. After having been ratified by the prescribed number of States, The Hague Convention came into force on October 17, 1971.

Article 1 of the Hague Convention of 1970 defines the offences that may be covered by the Hague Convention of 1970. It provides any person who on board an aircraft in flight: Unlawfully, by force or threat thereof, or by any other form of intimidation, seizes, or exercises control of, that aircraft, or attempts to perform any such act, or an accomplice of a person who performs or attempts to perform such an act, commits an offence. Thus, in addition to actual wrongdoer, his accomplice also would be deemed guilty of the offence under the Convention, while Article 2 of the Convention states that each contracting state is required to make the offence punishable by severe penalties. Jurisdiction the Convention applies in international as well as domestic flights. Further, the Convention applies in case of forced landing.

The Convention also stipulates regarding the extradition of offenders. Article 8 provides that “the offence shall be deemed to be included as an extraditable offence in any extradition treaty”, and it shall be an obligation of the Contracting States to include the offence as an extraditable offence in every future treaty. Thus, the Convention may be considered as constituting an extradition treaty in respect of the offence amongst the Contracting Parties. The provision implies that the offence of hijacking shall not be deemed to as a political offence. The offender will have to be extradited even if the offence has been committed for political gain. However, the Convention also provides that “the extradition shall be subject to other conditions provided by the law of the requested State.” In other words, extradition has to be made in accordance with the existing law of extradition of the requesting State.

An act is qualified as an offence only when a person on board this particular aircraft commits it. The Convention does not provide any relief for the damage caused to passengers and goods. The Convention failed to recognize, like the Tokyo Convention, that hijacking is a crime under international law. Merely treating the various acts of hijacking as offence is not likely to serve any useful purpose. However, the Convention is a firm improvement in the law of aircraft hijacking.

**f. Montreal Convention of 1971**

The Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation was adopted on September 23, 1971 at a diplomatic conference in Montreal. The Convention came into force on December 14, 1973. The Convention under Article 1 enumerates the following unlawful acts as offences for the purposes of the convention, *viz.*, act of violence against a person on board an aircraft in flight, if that act is likely to endanger the safety of the aircraft; destroying or causing damage to an aircraft in service so as to render it incapable of flight; placing an aircraft in service any device or substance which is likely to endanger its safety in flight; the destruction or damage of navigation facilities, or interference with their operation, if any such act is likely to endanger the safety of aircraft in flight; and the communication of information which is known to be false, thereby endangering the safety of an aircraft in flight. The above provisions show that the Montreal Convention is directed against not only unlawful acts but also acts done with the intention against a person on board an aircraft in flight if that act is likely to endanger the safety of the aircraft in flight.

**7. Act Number 1 Year 2009**

The Indonesian Civil Aviation Act that came into force on 12 January 2009 (the CAA of 2009) and the aims objective to promote the development of Indonesian air transportation. It regulates a host of matters related to aviation, from sovereignty in airspace, aircraft production, operation and airworthiness of aircraft to aviation safety and security, aircraft procurement, aviation insurance, the independence of aircraft accident investigation, and the licensing of aviation professionals. The CAA of 2009 also regulates scheduled as well as non-scheduled air transportation, airline capital, the ownership of aircraft, aircraft leasing, tariffs, the liability of air carriers, air

navigation facilities, airport authorities and services, and law enforcement related to air transportation. The CAA of 2009 also has provisions aimed at supporting the development of national and international air transportation in Indonesia, including provisions regarding the creation of a public services institute to further those goals.<sup>36</sup> There several offences provided by Act Number 1 Year 2009 such as offences during flight, in the restricted area, relating to air navigations, crime carrying weapon and relating false information endanger the aviation safety and security as follows:

**a. Offences During Flight**

Any individual, onboard a flight of an aircraft, conducting any wrongdoing that may endanger aviation safety and security shall be condemned with imprisonment for a maximum of 2 (two) years or a fine of a maximum amount of Rp. 500,000,000.00 (five hundred million rupiahs), while any individual onboard a flight of an aircraft conducting any wrong-doing during flight that is in violation of aviation flight disciplines shall be condemned with imprisonment for a maximum of 1 (one) year or a fine of a maximum amount of Rp. 100,000,000.00 (one hundred million rupiahs).<sup>37</sup>

Any individual, during flight onboard an aircraft, taking or damaging aircraft equipment that is endangering safety shall be condemned with imprisonment for a maximum of 2 (two) years or a fine of a maximum amount of Rp. 200,000,000.00 (two hundred million rupiahs), while any individual during flight onboard an aircraft disturbing peacefulness, shall be condemned with imprisonment for a maximum 1 (one) year or a fine of a maximum amount of Rp. 100,000,000.00 (one hundred million rupiahs).<sup>38</sup>

Any individual during flight onboard an aircraft operating electronic device(s) that is disturbing flight navigation, shall be condemned with imprisonment for a maximum 2 (two) years or a fine of a maximum amount of Rp. 200,000,000.00 (two hundred million rupiahs) and in the cases of such crimes conducting any wrongdoing that may endanger aviation safety and security, violation of aviation flight disciplines, damaging aircraft equipment that is endangering safety, disturbing peacefulness causing any aircraft damage(s) or accident(s) and loss of assets the criminal(s) shall be condemned with imprisonment for a maximum 5 (five) years and a fine of a maximum amount of Rp. 2,500,000,000.00 (two billion and five hundred million rupiahs) and causing any permanent disability or death of a person, the penalty shall be imprisonment for a maximum 15 (fifteen) years.<sup>39</sup>

**b. Offences in Restricted Area**

Anybody appearing in certain area of an airport without prior authorization from the airport authority shall be condemned with imprisonment for a maximum 1 (one) year or a fine of a maximum amount of Rp.100,000,000.00 (one hundred million rupiahs), while anybody making any obstacle, and/or other activity within aviation operational safety areas that is endangering aviation safety and security shall be condemned with imprisonment for a maximum 3 (three) years and/or a fine of a maximum amount of Rp. 1,000,000,000.00 (one billion rupiahs).<sup>40</sup> Anybody entering a security restricted area without any entry permit or a plane ticket shall be condemned with imprisonment for a maximum 1 (one) year or a fine of a maximum amount of Rp. 500,000,000.00 (five hundred million rupiahs).<sup>41</sup>

**c. Offences Relating to Air Navigation**

Anybody using aviation radio frequency other than for the purpose of aviation activity or using the aviation radio frequency which is directly or indirectly disturbing aviation safety shall be condemned with

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<sup>36</sup> Gunawan Djajaputra, Hari Purwadi and Martono K., *Indonesian Civil Aviation Act of 2009: Aviation Safety, Security and Climate Change*, Vol.6 (1) [www.ijbmi.org](http://www.ijbmi.org) January 2017 (pp 01-16)

<sup>37</sup> Article 412 Paragraphs (1) and (2)

<sup>38</sup> Article 412 Paragraphs (3) and (4).

<sup>39</sup> Article 412 Paragraphs (5) and (6)

<sup>40</sup> Article 421 Act Number 1 Year 2009

<sup>41</sup> Article 432

imprisonment for a maximum 5 (five) years and a fine of a maximum amount of Rp.100,000,000.00 (one million rupiahs), while in the case of a crime causing the death of a person, the penalty shall be imprisonment for a maximum length of 15 (fifteen) years and a fine of a maximum amount of Rp100,000,000,00 (one million rupiahs).

#### **A. Crime Carrying a Weapon**

Anybody carrying a weapon, dangerous good(s) or equipment, or a bomb into an aircraft or an airport without authorization shall be condemned with imprisonment for a maximum length of 3 (three) years. In the case the crime resulting in a loss of asset(s), the penalty shall be imprisonment for a maximum length of 8 (eight) years and in the case the crime resulting in a death of a person, the penalty shall be imprisonment for a maximum length of 15 (fifteen) years.<sup>42</sup>

#### **e. Offences Relating False Information**

Anybody providing false information such as bomb threat or bomb joke endangering aviation safety shall be condemned with imprisonment for a maximum 1 (one) year. In the case such crime resulting in an accident or loss of assets, the penalty shall be imprisonment for a maximum length of 8 (eight) years and in the case such crime resulting in a death of a person, the penalty shall be imprisonment for a maximum length of 15 (fifteen) years.<sup>43</sup>

### **8. Act Number 1 Year 1979 and Extradition Treaty**

#### **a. Act Number 1 Year 1979**

Article 8 of 1970 The Hague Convention provides the offence shall be deemed to be included as an extraditable offence in any extradition treaty. Consistent with such Article Indonesia issued Act Number 1 Year 1979 regarding extradition came into force on 18 January 1979.<sup>44</sup> It provides general provisions, principle of extradition, criteria for arrests forwarded by requesting countries, request for extradition and requirements that must be met by the requesting country, examination of person's requested for extradition, cancellation and extension of custody, decision on request for extradition, handover of requested person for extradition, evidence material, transition and final closing. Basically, no extradition without treaties, but in the event that no treaty has been drawn extradition may be initiated based on good relations and if the interests of the Republic of Indonesia require it such as extradition with India.<sup>45</sup>

The extradition will apply for crime of murder, planned murder, physical abuse resulting in severe body injuries or the death of a person, planned abuse and severe persecution; rape, sexual acts with violence; intercourse with a woman outside marriage or sexual acts with a person despite knowing that the person is unconscious, helpless, or under-aged (under 15) and not mature enough to marry; sexual acts by a person of age with and under-aged person of the same sex; giving or using drugs or tools with intention of aborting a woman's pregnancy; abduct a woman with force, threats of violence or deception, deliberately running away with an under-aged person; trafficking of women/girls and under-aged boys; kidnap and detaining a person against the law; slavery; extortion and threats; copying or forgery of currency or bank paper or distributing forged money or bank paper; storing or importing forged money to Indonesia; forgery or crimes connected with forgery; false oaths; fraud; criminal acts related to bankruptcy; embezzling; theft, robbery; arson; intentional destruction of property or buildings; smuggling; intentional acts to endanger the safe travel of trains, ships, aircrafts and its passengers; sink or destroy ships at high sea; torture or physical abuse on board ships at high sea with intention to kill or maim; mutiny or agreement to mutiny by 2 (two) persons or more on board ships at high sea, in subordinating the captain, inciting to mutiny; sea piracy; air piracy, crimes against aviation, aircraft facilities and infrastructure; corruption; narcotics and other dangerous drugs; acts violating laws on weaponry/arms, explosives and combustible materials. It is worthwhile to note here the term used here sea and air piracy but no used hijacking terminology.<sup>46</sup>

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<sup>42</sup> .Article 436 of Aviation Act Number 1 Year 2009

<sup>43</sup> .Article 437 of Aviation Act Number 1 Year 2009

<sup>44</sup> Constitution of the Republic of Indonesia, Law No.1/1979 on Extradition, Signed on 18 January 1979

<sup>45</sup> [https://www.imolin.org/doc/amlid/Indonesia\\_Law%20on%20Extradition.pdf](https://www.imolin.org/doc/amlid/Indonesia_Law%20on%20Extradition.pdf), accessed on 15 December 2021

<sup>46</sup> *Ibid.*

**b. Extradition Treaty Concluded by Indonesia**

With regards to extradition treaties concluded by Indonesia, Indonesia has concluded an extradition treaty with, among others, the Philippines,<sup>47</sup> Malaysia,<sup>48</sup> Thailand,<sup>49</sup> India<sup>50</sup> and South Korea. As far as relating to hijacking, the extradition treaty with the Philippines provides hijacking offences can be extradited, other none. The extradition with India based on based on good relations and if the interests of the Republic of Indonesia require it such as extradition with India.<sup>51</sup>

**IV. CONCLUSION**

In accordance with Chicago Convention of 1944, aviation safety and security is a top priority in air transportation. In this regard, the above-mentioned article deals with the law of hijacking as a part of aviation security to implement the orderly, sustainability of national as well as international air transportation.

**REFERENCES**

**BOOKS**

- [1]. Martono K., Usman Mellayu., Perjanjian Angkutan Udara di Indonesia. Bandung: Penerbit Madar Maju, 1996, page 89.
- [2]. Martono K., Agus Pramono, Eka Budi Tjahjono., Pembajakan Udara, Angkutan Udara dan Keselamatan Penerbangan. Jakarta: Gramata Publishing, 2011.
- [3]. Martono K., Agus Pramono and Eka Budi Tjahjono., Pembajakan, Angkutan Udara dan Keselamatan Penerbangan. Jakarta: Penerbit: Gramata Publishing, 2011.
- [4]. Mc Whinney E., The Illegal Diversion of Aircraft and International Law. Leiden: The A. W. Sijthoff Company, 1970, pages 103 and 119

**ARTICLES**

- [5]. Agus Pramono., **AIRCRAFT HIJACKING: A LEGAL PERSPECTIVE.**, Faculty of Law, Diponegoro University, Semarang, email: ap\_300655 @ yahoo.com
- [6]. Samuel, "The Legal Problems : An Introduction", JALC, Vol.37, page 165
- [7]. Evan A.E., Air Hijacking: Its Cause and Cure, Vol.63 American Journal and International Law, 1969-page 70
- [8]. Fick R.L., Gordon J.L., Patterson J.C. Aircraft Hijacking: Criminal and Civil Aspects, Vol.22 University of California Law Review 1969-1970, page 83
- [9]. Gunawan Djajaputra, Hari Purwadi and Martono K., Indonesian Civil Aviation Act of 2009: Aviation Safety, Security and Climate Change, Vol.6 (1) [www.ijbmi.org](http://www.ijbmi.org) January 2017 (pp 01-16)

**DOCUMENTS**

- [10]. Annex 17 to the Convention on International Civil Aviation Security - Safeguarding International Civil Aviation against Acts of Unlawful Interference,
- [11]. <https://www.scribd.com/doc/307543261/ICAO-Annex-17-Security-Safeguarding-International-Civil-Aviation-Against-Acts-of-Unlawful>, accessed on 15 December 2021
- [12]. ICAO Doc.8364, Convention on Offences and Certain Other Acts Committed on Board Aircraft, Signed at Tokyo, on 14 September 1963; For the text see Dempsey P.S., Annals of Air and Space Law, (2005) Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada, 183.
- [13]. ICAO Doc.8920, Convention for the Suppression of Unlawful Seizure of Aircraft, Signed at The Hague, on 16 December 1970; For the text see Dempsey P.S., Annals of Air and Space Law, (2005) Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada, 201.
- [14]. ICAO Doc.8966, Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation, Signed at Montreal on 23 September 1971; For the text see Dempsey P.S., Annals of Air and Space Law, (2005) Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada, 215
- [15]. ICAO Doc.9518, Protocol for the Suppression of Unlawful Acts of Violence at Airports Serving International Civil Aviation, Supplementary to the Convention for the Suppression of Unlawful Acts Against the Safety of Civil Aviation, Done at Montreal on 23 September 1971, Signed at Montreal, on 24 February 1988; for the text see For the text see Dempsey P.S., Annals of Air and Space Law, (2005) Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada, 229.
- [16]. Geneva Convention of 1958 concerning the Law of the Seas. Done at Geneva, on 20 April 1958.
- [17]. Undang-Undang tentang Ratifikasi Konvensi Tokyo, Konvensi Den Haag, 1970 dan Konvensi Montreal 1971 (UURI No.2 Tahun 1976), Lembaran Negara Republik Indonesia Nomor... Tahun 1976, Tambahan Lembaran Negara Republik Indonesia Nomor..

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<sup>47</sup> Extradition Treaty Between the Republic of the Philippines and the Government of the Republic of Indonesia.

<sup>48</sup> Treaty Between the Republic of Indonesia and the Government of Malaysia Relating to Extradition, signed

<sup>49</sup> Treaty Between the Government of the Kingdom of Thailand and the Government of the Republic of Indonesia on Extradition.

<sup>50</sup> House agrees on Indonesia-India extradition bill, 24<sup>th</sup> June 2014  
<https://en.antaranews.com/news/94580/house-agrees-on-indonesia-india-extradition-bill>, accessed on 15 December 2021

<sup>51</sup> *Ibid.*

- [18]. Constitution of the Republic of Indonesia, Law No.1/1979 on Extradition, Signed on 18 January 1979
- [19]. Extradition Treaty Between the Republic of the Philippines and the Government of the Republic of Indonesia.
- [20]. Treaty Between the Republic of Indonesia and the Government of Malaysia Relating to Extradition, signed
- [21]. Treaty Between the Government of the Kingdom of Thailand and the Government of the Republic of Indonesia on Extradition.
- [22]. House agrees on Indonesia-India extradition bill, 24<sup>th</sup> June 2014
- [23]. <https://en.antaranews.com/news/94580/house-agrees-on-indonesia-india-extradition-bill>, accessed on 15 December 2021

#### **JOURNAL**

- [24]. Dempsey P.S., *Annals of Air and Space Law*, Vol. XXX-Part I. Toronto: The Carswell Company, Ltd, Canada,2005.
- [25]. Vol.63 *American Journal and International Law*, 1969-page 70
- [26]. *JALC*, Vol.37,page 165
- [27]. Vol.22 *University of California Law Reues 1969-1970*,page 83
- [28]. Vol.6 (1) [www.ijbmi.org](http://www.ijbmi.org) January 2017 (pp 01-16)

#### **OTHERS**

- [29]. Ben Brumfield, Unruly passenger aboard jet causes stir; plane safe in Indonesia,
- [30]. <https://edition.cnn.com/2014/04/25/world/asia/indonesia-plane-scare/index.html>
- [31]. <https://special-ops.org/hijacking-of-garuda-indonesia-flight-206/>, diakses tanggal 13 Desember 2021
- [32]. <https://www.scribd.com/doc/307543261/ICAO-Annex-17-Security-Safeguarding-International-Civil-Aviation-Against-Acts-of-Unlawful>, accessed on 15 December 2021
- [33]. [https://www.imolin.org/doc/amlid/Indonesia\\_Law%20on%20Extradition.pdf](https://www.imolin.org/doc/amlid/Indonesia_Law%20on%20Extradition.pdf), accessed on 15 December 2021
- [34]. Lion Air crew accused of escalating bomb joke into dangerous panic through poor handling
- [35]. <https://coconuts.co/jakarta/news/lion-air-crew-accused-escalating-bomb-joke-dangerous-panic-poor-handling/>, accessed on 14 December 2021
- [36]. <https://skybrary.aero/articles/unruly-passengers>, accessed on 14 December 2021

Sk. Md. Hassan Tarek, et. al. "WOM Marketing: Using Positive Word of Mouth in the Banking Sector in Khulna city as a Marketing Technique." *International Journal of Business and Management Invention (IJBMI)*, vol. 11(01), 2022, pp. 01-12. Journal DOI- 10.35629/8028