

Geographical Indications and Trademarks Protection: Empowering MSMEs Through Advocacy, Legal Services in Indonesia, Oman, Philippines

**I Gede Agus Kurniawan¹✉, Anak Agung Ayu Ngurah Sri Rahayu
Gorda¹, Souad Ahmed Ezzerouali²,
Princess Alyssa Tee-anastacio³, Ketut Elly Sutrisni¹**

¹ Faculty of Law, Universitas Pendidikan Nasional, Indonesia

² Faculty of Law, Dhofar University, Oman

³ Our Lady of Fatima University, Valenzuela Campus, Philippine

✉ Corresponding email: gedeaguskurniawan@undiknas.ac.id

Abstract

The protection of geographical indications (GIs) and trademarks represents a crucial instrument within intellectual property law, serving not only as a mechanism of legal protection but also as a means of economic empowerment, particularly for micro, small, and medium enterprises (MSMEs). Nevertheless, the effectiveness of such protection is often constrained by limited access to legal services and advocacy. This study aims to analyze the ideal legal framework for the protection of GIs and trademarks in Indonesia, the Philippines, and Oman, emphasizing the importance of integrating legal services and advocacy to strengthen MSME empowerment. The research employs a normative juridical

approach combined with comparative analysis, examining statutory provisions, institutional practices, and the legal cultures of each country. The findings reveal that the Philippines has developed a relatively ideal framework through the active role of the Intellectual Property Office of the Philippines (IPOPHL), which implements the IP Academy, Innovation and Technology Support Offices (ITSO), and the affirmative Juana Make a Mark initiative. By contrast, Indonesia and Oman continue to face challenges, as their regulatory structures remain heavily focused on administrative procedures without explicit provisions on legal advocacy. This study contributes by highlighting the necessity of embedding legal advocacy within substantive regulations and institutionalizing MSME support programs as a state obligation. It concludes that the protection of GIs and trademarks will be more effective if supported by structured and sustainable legal advocacy mechanisms. The key recommendation is for Indonesia and Oman to adopt the Philippines' best practices, particularly the integration of advocacy and legal services into formal regulations, thereby strengthening MSME empowerment through the protection of geographical indications and trademarks.

Keywords

Geographical Indications (GIs), Trademarks, Advocacy, Legal Services, MSMEs Empowerment

A. Introduction

In the era of increasingly rapid globalization, protection of geographical indications and trademarks is an important pillar in the intellectual property law system.¹ Both of them not only function as legal instruments to protect products, but also as economic instruments that provide added value to global competitiveness.² Trademarks serve

¹ Erich Nugroho Seto et al., "Upaya Perlindungan Hak Kekayaan Intelektual Pada Era Bisnis Digital: Upaya Perlindungan Hak Kekayaan Intelektual Pada Era Bisnis Digital," *Prosiding Seminar Nasional Hukum, Bisnis, Sains Dan Teknologi* 5, no. 1 (April 2025).

² Windi Arini and Zahra Nabila Mua'la, "Perlindungan Merek Dan Dampaknya Terhadap Reputasi Perusahaan Di Pasar Global," *Nexus Yuridis* 1, no. 1 (June 2025): 25–2025, <https://doi.org/10.21456/vol10iss1pp1-9>.

to guarantee commercial identity and consumer trust in a product, while geographical indications protect a product's reputation, quality, and unique characteristics, which are closely linked to its geographic origin.³ The link between the protection of geographical indications and trademarks and the empowerment of micro, small, and medium enterprises (MSMEs) is very close. MSMEs often relying on local identity and traditional innovation as capital to compete in the market.⁴ MSMEs often rely on local identity and traditional innovation as capital to compete in the market.⁵ Legal protection for geographical indications and trademarks can be a strategic tool to increase product sales value, expand market access, and strengthen MSMEs' bargaining position. Intellectual property law is not only protective but also productive in supporting economic development.

Indonesia, as a country with a strategic geographical location and abundant biological and cultural wealth, has regulated the protection of geographical indications and trademarks through Law Number 20 of 2016 concerning Trademarks and Geographical Indications.⁶ The MIG Law is also complemented by the Directorate General of Intellectual

³ Agustianto et al., "Perlindungan Lingkungan Berbasis Indikasi Geografis: Tantangan Hukum Dan Implementasi Sustainable Development Goals Di Indonesia: Geographical Indications-Based Environmental Protection: Legal Challenges and Sustainable Development Goals Implementation in Indonesia," *LITIGASI* 26, no. 1 (April 2025): 448–76, <https://doi.org/10.23969/litigasi.v26i1.19149>.

⁴ Safitri Wulandari and Sugeng Pradikto, "Pengembangan Model Ekonomi Kreatif Berbasis Produk Tradisional: Studi Literatur UMKM Jamu Bonagung Dalam Konteks Pemberdayaan Ekonomi Lokal Kota Pasuruan," *Journal of Sustainable Social and Economics* 1, no. 1 (July 2025): 54–61.

⁵ Ratih Agustin Wulandari et al., "Assistance In Optimizing Fishery Processing Technology And Protection Of Intellectual Property Rights For Pokdakan Sakato Farm In Supporting The Creative Economy," *Farmers: Journal of Community Services* 6, no. 2 (August 2025): 257–63, <https://doi.org/10.24198/FJCS.V6I2.65748>.

⁶ Novilla Ramayani et al., "Pengaruh Geografi Terhadap Kebudayaan Dan Tradisi Lokal: Sebuah Analisis Interaksi, Adaptasi, Dan Tantangan Kontemporer," *MUDABBIR Journal Research and Education Studies* 5, no. 2 (July 2025): 2058–68.

Property (DJKI) as its implementing agency.⁷ The Philippines regulates the protection of geographical indications and trademarks through the Intellectual Property Code equipped with support from the Intellectual Property Office of the Philippines (IPOPHL).⁸ Protection of trademarks and geographical indications in Oman is regulated through Royal Decree Number 67 of 2008 on the Law of Industrial Property Rights.⁹ Although all three countries have provided protection for geographical indications and trademarks through existing regulations, Indonesia, the Philippines, and Oman still face challenges in practice in the process of empowering MSMEs. Indonesia faces limited access to legal information and low legal awareness among MSMEs.¹⁰ The Philippines faces incomplete subsidies for intellectual property registration,¹¹ so that MSMEs are limited in accessing intellectual property registration. Oman faces challenges in the form of limited authority given to the Ministry of Commerce, Industry and Investment Promotion (MOCIIP) in implementing the protection of geographical indications and trademarks.¹²

A comparison between Indonesia, the Philippines, and Oman is important because each country has distinct legal, social, and economic characteristics but faces similar challenges. Indonesia and the Philippines are developing countries with a strong MSME base and

⁷ Muhammad Farlan Wijaya and Christine S.T. Kansil, “Tanggung Jawab Direktorat Jenderal Kekayaan Intelektual Terhadap Pendaftaran Merek Goto Yang Dilakukan oleh PT Aplikasi Karya Anak Bangsa dan PT Tokopedia,” *Multilingual: Journal of Universal Studies* 5, no. 1 (January 2025): 55–65.

⁸ Khine Wai Lin, “Legal Protection On Geographical Indications in ASEAN Countries,” *J. Myanmar Acad. Arts Sci* XXII, no. 7 (2025): 539–52.

⁹ Muhanna Hamed Al Zuheimi, “Development of New Technologies and Intellectual Property Regulations in the Sultanate of Oman,” ed. Nadia Naim (Singapore: Palgrave Macmillan, 2025), 79–107, https://doi.org/10.1007/978-981-96-4020-1_4.

¹⁰ Sandy Alun Samudra MB et al., “Urgensi Kesadaran Hukum Dalam Perlindungan Merek Dagang UMKM di Indonesia,” *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance* 5, no. 2 (2025): 1479–89.

¹¹ Daniel S Hofileña, “Reinforcing the Role of Intellectual Property in the Battle Against the Pandemic: The Vowel Framework,” *De La Salle University Business & Economics Review* 1 (2021).

¹² Al Zuheimi, “Development of New Technologies and Intellectual Property Regulations in the Sultanate of Oman.”

diverse local products.¹³ Oman presents a different perspective, dominated by the influence of international law and technocratic legal characteristics.¹⁴ Through a comparative approach, this study seeks to identify effective protection models and best practices that can be mutually adapted in the context of MSME empowerment through geographical indications and trademarks. The urgency of this research lies in the need to strengthen the position of MSMEs amidst global competition through appropriate legal instruments.

Research conducted by I Gede Agus Kurniawan et al., highlights the ethical dimensions of IPR protection between northern and southern countries. The research provides a philosophical perspective on the differences in approaches to intellectual property protection, including their implications for global justice.¹⁵ However, this study did not specifically focus on geographical indication and trademark protection for MSMEs. Ni Ketut Supasti Dharmawan et al., emphasized the importance of trademark protection for MSMEs in the Balinese tourism sector. The study demonstrated how legal protection for trademarks can enhance the competitiveness of community-based tourism in the era of the Industrial Revolution 4.0.¹⁶ However, the scope of the study is still limited to Bali, thus not providing cross-national comparisons.

Oktavia Pitta Marito Manurung et al., discusses Indonesia's IPR regulations in response to Priority Watch List status. The study highlights the challenges of Indonesian IPR regulation at the global

¹³ Ernestus Florian Lamaile, "Pengaruh Pertumbuhan UMKM, Indeks Keterbukaan Perdagangan, Pertumbuhan Pendapatan Per Kapita, Dan Indeks Pembangunan Manusia Terhadap Pengentasan Kemiskinan di 5 Negara ASEAN," *J-REMA* 1, no. 3 (November 2022): 38–38, <https://doi.org/10.25170/JREMA.V1I3.4593>.

¹⁴ James Worrall, "Power and Process: Decentralisation in Oman," *SSRN Electronic Journal*, October 2020, <https://doi.org/10.2139/SSRN.3715506>.

¹⁵ I Gede Agus Kurniawan et al., "Intellectual Property Rights and Ethics: A Comparison of Philosophical Approaches in Northern and Southern Countries," *Kosmik Hukum* 25, no. 1 (January 31, 2025): 106, <https://doi.org/10.30595/kosmikhukum.v25i1.24489>.

¹⁶ Ni Ketut Supasti Dharmawan et al., "Trademark Protection for Small-Medium Enterprises in Bali: Strengthening Community-Based Tourism in the Era of Fourth Industrial Revolution," *Journal of Legal, Ethical and Regulatory Issues* 23 (2020).

level, particularly in meeting international protection standards. However, the research focuses more on compliance with international standards, rather than on the protection function of MSMEs through geographical indications and trademarks.¹⁷ These three studies demonstrate a gap in the analysis of cross-country comparisons of geographic indication and trademark protection in empowering MSMEs. Therefore, this study fills this gap.

Previous research has been limited in scope and lack of a comparative approach linking IPR protection to MSME empowerment. Some studies have focused solely on the philosophical dimension, the local tourism sector, or international compliance, without linking these three aspects to the role of MSMEs. This study attempts to address these limitations by presenting a cross-jurisdictional analysis, namely Indonesia, the Philippines, and Oman. It also focuses on the role of advocacy and legal services as supporting factors in the effectiveness of protection. Therefore, this research is expected to yield more applicable recommendations for regulatory development.

The novelty of this research lies in the integration of three dimensions: geographical indication and trademark protection, MSME empowerment through advocacy and legal services, and a cross-national comparative perspective. No previous study has specifically integrated these legal, economic, and social dimensions into a single analysis. Furthermore, this research offers a practical contribution by identifying best practices that can be transferred between countries. This approach broadens understanding of the function of IPR law beyond simply protection to also serve as a means of economic empowerment. Therefore, this research has both academic value and policy implications.

The purpose of this study is to comparatively analyze the regulations on geographical indication and trademark protection in Indonesia, the Philippines, and Oman. It also aims to evaluate the role of advocacy and legal services in strengthening the empowerment of

¹⁷ Oktavia Pitta Marito Manurung, Jinner Sidaurok, and Samuel Fb Situmorang, "The Legal Arrangements of Intellectual Property Rights in Indonesia on Addressing Priority Watch List Status," *Jurnal Daulat Hukum* 8, no. 2 (July 2025): 277–94, <https://doi.org/10.30659/JDH.V8I2.47251>.

MSMEs. Furthermore, this study seeks to identify best practices that can be adopted within each country's legal framework to enhance the effectiveness of legal protection. With this goal, the study is expected to provide relevant policy recommendations for regulators and legal practitioners. Academically, this research is expected to enrich the literature on comparative law and intellectual property law.

The research questions include: To what extent are advocacy and legal services regulated under geographical indication and trademark regulations in Indonesia, the Philippines, and Oman? And what is the effective legal framework for geographical indication and trademark protection that supports the empowerment of MSMEs in each country?

This research employs normative legal research with a comparative approach.¹⁸ The normative approach was chosen because the primary focus of the study is to analyze the regulations, legal principles, and practices of geographical indication and trademark protection within the positive legal frameworks of Indonesia, the Philippines, and Oman. The comparative approach is used to identify similarities and differences in legal arrangements across the three countries and their relevance to MSME empowerment. Through this method, it is hoped that a more effective and adaptive legal protection model can be identified. The combination of approaches aims to produce a comprehensive and applicable analysis.

The data used in this study consists of secondary data sourced from national laws and regulations, international instruments, court decisions, academic literature, journal articles, and official reports from IPR-related institutions. All data were collected through a systematic literature review, prioritizing primary legal sources as the primary reference. The obtained data were then classified based on themes: geographical indication regulations, trademark regulations, and MSME empowerment policies. The classification process was carried out to facilitate the identification of similarities and differences between Indonesia, the Philippines, and Oman. Therefore, data processing was carried out in a structured manner in accordance with the research objectives.

¹⁸ Peter Mahmud Marzuki, *Penelitian Hukum*, 13th ed. (Jakarta: Kencana, 2017).

Data analysis was conducted using qualitative methods that emphasize deductive and comparative legal reasoning. Deductive analysis techniques were used to connect international legal concepts regarding IPR with their implementation at the national level of each country. Meanwhile, a comparative analysis was conducted to identify the strengths and weaknesses of the legal systems in Indonesia, the Philippines, and Oman. The results were then systematically interpreted to identify best practices relevant to empowering MSMEs. With this approach, the research is expected to provide both theoretical contributions and practical recommendations for the development of intellectual property law.

B. Integration of Advocacy and Legal Services in Geographical Indications and Trademark Regulations in Indonesia, the Philippines and Oman

Protecting geographical indications and trademarks requires not only normative aspects but also practical support through the provision of adequate legal services and advocacy. MSMEs, as key actors in the people's economy, often face challenges in understanding the complexities of intellectual property law.¹⁹ Regulations regarding geographical indications and trademarks need to accommodate this through legal services and advocacy mechanisms. These mechanisms ensure access to justice and the sustainable use of economic rights for MSMEs.²⁰ Indonesia, the Philippines, and Oman have different approaches to integrating legal services and advocacy into their geographical indication and trademark regulations.

Protection of geographical indications and trademarks in Indonesia is regulated by Law Number 20 of 2016 concerning

¹⁹ Putri Delfyrah et al., "Analisis Perlindungan Hukum Bagi UMKM: Pembebasan Hak Guna Pelaku UMKM Dengan Membebaskan Regulasi Perdagangan," *Indonesian Journal of Law and Justice* 2, no. 2 (November 2024): 7–7, <https://doi.org/10.47134/IJLJ.V2I2.3370>.

²⁰ Muhammad Arbani, "Aspek Hukum Perlindungan Umkm Dalam Penjualan Di E-Commerce: Tantangan Dan Solusi Di Era Digital," *Jurnal Syntax Admiration* 6, no. 2 (February 2025): 1166–75, <https://doi.org/10.46799/JSA.V6I2.2115>.

Trademarks and Geographical Indications.²¹ The MIG Law contains a mechanism for registering trademarks and geographical indications, but it does not include regulations regarding the legal services and advocacy system necessary to support the protection of geographical indications and trademarks. The Directorate General of Intellectual Property (DJKI) is the authorized institution responsible for implementing the process of protecting geographical indications and registered trademarks.²² The duties and functions of the DJKI are regulated in laws and regulations outside the MIG Law, namely the Regulation of the Minister of Law of the Republic of Indonesia Number 1 of 2024 concerning the Organization and Work Procedures of the Ministry of Law. Article 304 of the Regulation of the Minister of Law on Organization and Work Procedures of the Ministry of Law states that the Directorate of Trademarks and Geographical Indications has the task of carrying out the preparation of the formulation and implementation of policies and regulations, providing technical guidance and supervision, as well as implementing evaluations and reporting in the fields of applications, trademark classification, publication and documentation, technical services, examinations, certifications, extensions, mutations and licenses, monitoring, legal services for trademarks and geographical indications, changes to registered geographical indication description documents, and facilitation of trademark appeal commissions.

The phrase "providing technical guidance and supervision" in Article 304 of the Ministry of Law's Regulation on Organization and Work Procedures can be interpreted broadly and is limited to Article 305 letter d. The provision of technical guidance also includes the provision of legal services and advocacy to applicants, in this case MSMEs. The DJKI's duties in the form of providing technical guidance

²¹ Rai Widiatmika et al., "The Problems Related to Potential Trademark Rights Infringement: Construction in Inclusive Legal Perspective on Unregistered Marks," *Jurnal Dinamika Hukum* 23, no. 3 (2023): 499–513, <https://doi.org/http://dx.doi.org/10.20884/1.jdh.2023.23.3.3724>.

²² Masrifah Masrifah and Rani Apriani, "Legal Protection of Intellectual Property (IP) Types of Trademarks for Small, Micro and Medium Enterprises (MSMEs) According to Law No. 20 of 2016 Concerning Brands and Geographical Indications," *Jurnal Ilmiah Wahana Pendidikan*, February 2025.

and supervision are implemented through the implementation of the Mobile Intellectual Property Clinic (MIC) program by DJKI. MIC aims to disseminate information and education about the importance of intellectual property protection to the public.²³ The MIC program provides consulting, mentoring, and research services related to Intellectual Property.²⁴ This program is expected to raise business awareness and encourage intellectual property registration as a pillar of national economic development.

The Geographical Indication and trademark registration fee waiver for MSMEs is also a form of advocacy provided by the Directorate General of Intellectual Property Rights (DJKI) to empower MSMEs through the protection of geographical indications and trademarks.²⁵ DJKI collaborates with universities and local governments to provide assistance to help local producers register trademarks and geographical indications on their products.²⁶ This step is a form of legal and advocacy service provided by the Directorate General of Intellectual Property Rights (DJKI) in the form of technical guidance and supervision. In practice, the program's reach is still limited and is only conducted a few times a year. Consequently, many MSMEs in remote areas still lack understanding of the procedures for registering geographical indications or trademarks.²⁷ The limited number of intellectual property consultants and the relatively high cost of accessing intellectual property

²³ Direktorat Jenderal Kekayaan Intelektual, "Mobile Intellectual Property Clinic 2024 Dorong Potensi Lokal Raih Kejayaan Global," Direktorat Jenderal Kekayaan Intelektual, July 2024.

²⁴ Direktorat Jenderal Kekayaan Intelektual, "Mobile IP Clinic - Klinik Kekayaan Intelektual Keliling Hadir Di JIEXPO 2023," Kementerian Hukum & Hak Asasi Manusia, June 2023.

²⁵ Laina Rafianti et al., "Sosialisasi Pemberdayaan Kewirausahaan Di Kabupaten Indramayu Melalui Sosialisasi Hukum Merek Dan Indikasi Geografis," *Agrikultura Masyarakat Tani* 2, no. 2 (May 2025): 54–64, <https://doi.org/10.24198/AGRIMASTA.V2I2.62656>.

²⁶ Defid Ubaidillah and Vera Rimbawani Sushanty, "Sosialisasi Dan Pendampingan Pendaftaran Merek Bagi Pelaku Usaha Mikro Kecil Menengah (UMKM)," *Jurnal Dharma Bhakti Ekuitas* 8, no. 1 (September 2023): 1–11, <https://doi.org/10.52250/P3M.V8I1.612>.

²⁷ Hafifah Rezky Fachriah, "Perlindungan Hukum Atas Produk Kopi Bontocani Melalui Pendaftaran Indikasi Geografis Di Kabupaten Bone Provinsi Sulawesi Selatan" (Universitas Hasanuddin, 2024).

consultants are also obstacles.²⁸ Therefore, proactive advocacy programs need to be expanded, particularly through collaboration with legal professional associations and NGOs. This is crucial to ensure that MSMEs truly benefit from geographical indication and trademark protection, not just through formal registration with the Directorate General of Intellectual Property Rights (DGKI).

Legal protection of geographical indications and trademarks in the Philippines is regulated in Republic Act No. 8293 or the Intellectual Property Code of the Philippines.²⁹ The Intellectual Property Office of the Philippines (IPOPHL) is responsible for the implementation and oversight of Republic Act No. 8293, the Intellectual Property Code of the Philippines. Unlike Indonesia, the Philippines clearly stipulates the duties and functions of IPOPHL in Republic Act No. 8293. Section 11, Article 11.3, of the Bureau of Documentation, Information, and Technology Transfer, has the following function: “Educate the public and build awareness on intellectual property through seminars, lectures, and other similar activities.”³⁰ Article 11.7 also states “Provide technical, advisory, and other services relating to the licensing and promotion of technology, and carry out an efficient and effective program for technology transfer”.³¹ These two articles reflect the Philippines' strong integration of legal services and advocacy into its geographical indication and trademark regulations. The advocacy mechanism in the

²⁸ Sunan Trioko, Ulva Roifatul Lailin, and Cindy Ayu Amelia, “Strategi Manajemen Pelaku UMKM dalam Pengelolaan SDM dan Perlindungan Hak Kekayaan Intelektual,” *AKSIOMA: Jurnal Manajemen* 4, no. 1 (May 2025): 1–9, <https://doi.org/10.30822/AKSIOMA.V4I1.4373>.

²⁹ Ferdinand M. Negre and Jonathan Q. Perez, “The State of Intellectual Property Protection in the Philippines: What Lies Ahead?,” in *Intellectual Property Law in South East Asia* (Edward Elgar Publishing, 2023), 80–127, <https://doi.org/10.4337/9781035308392.00009>.

³⁰ Max Angelo Perin et al., “Design and Technical Evaluation of LISA (Local Irrigation System Assessment): A Mobile and Web-Based Platform for Farm Water Availability Monitoring,” *International Journal of Recent Technology and Engineering (IJRTE)* 14, no. 2 (April 2025): 1–6, <https://doi.org/10.2139/SSRN.5290234>.

³¹ Venson Sarita and Shiella Mae Inutan, “Technology Transfer Management Practices among Selected State Universities and Colleges in Davao Region, Philippines,” *Journal of Interdisciplinary Perspectives* 3, no. 4 (2025), <https://doi.org/10.69569/jip.2025.070>.

Philippines is implemented through the Intellectual Property (IP) Academy program, which provides free training, seminars, and legal consultations for MSMEs.³²

IPOPHL also establishes Innovation and Technology Support Offices (ITSOs) at various universities and research institutions to provide IPR consultation services.³³ In addition, there is the Juana Make a Mark program, which subsidizes trademark registration fees specifically for women-owned MSMEs. Advocacy support also comes in the form of limited litigation assistance, including facilitation of dispute resolution through the Bureau of Legal Affairs.³⁴ With this system, advocacy becomes an integral part of the institutional function of IPOPHL.

The effectiveness of the Philippine system is evident in the increasing number of trademark and GI registrations by MSMEs over the past five years.³⁵ IPOPHL actively reaches out to the producer community through a legal awareness campaign (*IP Awareness Campaign*).³⁶ This approach has made MSMEs more confident in registering their trademarks and geographical indications. The limited economic capacity of MSMEs outside Manila and their dependence on digital infrastructure are also significant. The Philippine legal framework can be considered progressive because advocacy is not merely an add-on, but rather an official mandate of the institution.

³² Intellectual Property Office Of The Philippines, "IP Academy," n.d.

³³ John Joshua F. Montanez, "Intellectual Property Policy Development: The Case of a State College in the Philippines," in *2021 IEEE Technology & Engineering Management Conference - Europe (TEMSCON-EUR)* (Dubrovnik: IEEE, 2021), 1–4, <https://doi.org/10.1109/TEMSCON-EUR52034.2021.9488633>.

³⁴ M. Negre and Q. Perez, "The State of Intellectual Property Protection in the Philippines: What Lies Ahead?"

³⁵ Jose Ramon G. Albert et al., "The Extent of Innovation in Philippine Business and Industry: Results of the 2021 PIDS Survey of Innovation Activities," PIDS Discussion Paper Series No. 2023-11 (Quezon: Quezon City: Philippine Institute for Development Studies (PIDS), 2023).

³⁶ Ma. Liezel Bumanglag, "Young Filipinos' Attitudes Towards Counterfeit Products: A Descriptive Study on Attitudes and Perceptions: A Study by the IP Academy of the Intellectual Property Office of the Philippines," *Asia-Pacific Journal of IP Management and Innovation* 1, no. 1 (June 2022): 14, <https://doi.org/10.59588/2984-892X.1013>.

Oman regulates the protection of trademarks and geographical indications through Royal Decree No. 67/2008 on Industrial Property Law, which has been adapted to the TRIPS agreement.³⁷ Royal Decree No. 67/2008 does not explicitly address legal and advocacy services in the context of geographical indication and trademark protection. The legal advocacy and service mechanisms in Oman are administrative in nature, provided through the Ministry of Commerce, Industry and Investment Promotion (MOCIIP).³⁸ MOCIIP provides consultancy services related to geographical indication and trademark registration procedures through an online portal. Advocacy is also provided through international collaboration with the World Intellectual Property Organization (WIPO), which regularly holds workshops in Oman.³⁹ However, these services have not yet directly reached the business level, particularly MSMEs in the non-oil and gas sector. Therefore, advocacy in Oman remains top-down and not empowerment-oriented.

Oman's challenge regarding the protection of geographical indications and trademarks in its efforts to empower MSMEs lies in the low public awareness of the benefits of registering geographical indications and trademarks. MSMEs tend to still view IPR registration as a cost burden, rather than a long-term investment.⁴⁰ Compared to the Philippines and Indonesia, Oman still lags behind in providing advocacy mechanisms and legal services. This highlights the need for legal and policy reforms to empower MSMEs.

A comparison of the three countries reveals fundamental differences in how advocacy and legal services are regulated. Indonesia relies on government programs through the Directorate General of

³⁷ Hanan Al-Mawla, "The Position of GCC States on Comparative Advertising and Trademark Infringement.," *Sultan Qaboos University Legal Studies Journal* 2, no. 1 (September 2023): 2–5, <https://doi.org/10.61191/squlsj.v2i1.5217>.

³⁸ Shaikha Al Akhzami et al., "Who Benefits from Strong Patent Protection? An Oil-Dependent Country's Perspective," *The Journal of World Intellectual Property* 28, no. 1 (March 2025): 240–62, <https://doi.org/10.1111/JWIP.12326>.

³⁹ Al Zuheimi, "Development of New Technologies and Intellectual Property Regulations in the Sultanate of Oman."

⁴⁰ Ranggalawe Suryasadin, "Pengembangan Kapasitas Usaha Kecil Menengah Dalam Memanfaatkan Sistem Hak Kekayaan Intelektual Bagi Peningkatan Daya Saing Usaha," *Jurnal Hukum & Pembangunan* 50, no. 1 (July 2020): 159, <https://doi.org/10.21143/jhp.vol50.no1.2488>.

Intellectual Property Rights (DJIP) without an explicit normative basis. The Philippines places advocacy as an official mandate of the IPOPHL, outlined in regulations and concrete programs. Oman provides only limited advocacy through MOCIIP and international cooperation, without addressing the practical needs of MSMEs. These differences demonstrate varying legal approaches that have implications for the effectiveness of IPR protection.

The success of geographical indication and trademark protection for MSMEs is not solely determined by substantive regulations. The role of advocacy and legal services is crucial to ensuring that MSMEs' rights are truly protected. The Philippines serves as a best-practice example with an advocacy system integrated into regulations. Indonesia occupies an intermediate position, with support programs in place, but not explicitly regulated in regulations. Oman still needs to strengthen community-based advocacy to enable MSMEs to actively participate in IPR protection.

C. The Effective Legal Framework for Geographical Indication and Trademark Protection in Supporting the Empowerment of MSMEs

Protection of geographical indications and trademarks is an important legal instrument in strengthening the competitiveness of local products and empowering MSMEs.⁴¹ Geographical indications and brands from an economic law perspective are not only commercial matters, but also instruments of legitimation of cultural identity and quality assurance.⁴² For this protection to be effective, the legal framework must not only focus on the normative aspects but also provide advocacy channels and legal services for businesses. Without advocacy and legal services, MSMEs often struggle to understand the

⁴¹ Johnson SMT Pangaribuan, "Pengaruh Hak Kekayaan Intelektual dan Perlindungan Hukum Hak Kekayaan Intelektual Bagi Pemberdayaan UMKM," *Jurnal Hukum To-Ra: Hukum Untuk Mengatur Dan Melindungi Masyarakat* 10, no. 3 (December 2024): 456–70, <https://doi.org/10.55809/TORA.V10I3.414>.

⁴² Moh. Fahrial Amrulla, "Urgensi Pengaturan Sanksi Pidana Terhadap Pelanggaran Nama Orang, Foto, Dan Badan Hukum Terkenal Dalam Rezim Hukum Merek Di Indonesia," *Jurnal Esensi Hukum* 7, no. 1 (August 2025): 28–40, <https://doi.org/10.35586/JSH.V7I1.430>.

registration procedures, financing, and legal protection strategies for geographical indications and trademarks.⁴³ Therefore, building an ideal legal framework requires an integration of legal substance, institutions, and accessibility.

Indonesia adheres to a civil law system that emphasizes codification and written regulations.⁴⁴ In the context of geographical indications and brands, this is evident in the creation of Law No. 20 of 2016. The civil law system demands that there be clear and firm regulations in legislation so that they can be implemented effectively.⁴⁵ The MIG Law substantially emphasizes formal registration and protection procedures without regulating advocacy and legal services to raise awareness of the benefits of geographical indications and trademarks, particularly for MSMEs. This is crucial considering that Indonesia is a country governed by the rule of law, as Plato stated in his thought that "good governance is based on sound legal regulations."⁴⁶

Indonesian legal culture shows a tendency towards formality, where society views the success of legal protection on the side of administrative legality rather than on access or substantive justice.⁴⁷ In practice, some MSMEs are unable to pursue legal channels due to limited funds and knowledge.⁴⁸ This practice leaves MSMEs unable to

⁴³ Hadi Muhammad Tajuddin and Romi Faslah, "Urgensi Reformasi Perlindungan Merek Dalam Dinamika Hukum Bisnis Indonesia," *Jurnal Ekonomi Dan Bisnis Digital* 2, no. 4 (June 2025): 2515–18.

⁴⁴ Risma Hayatun Nisa and Alfi Barirah, "Literature Review Tentang Sistem Dan Klasifikasi Hukum Di Indonesia," *Jejak Digital: Jurnal Ilmiah Multidisiplin* 1, no. 3 (May 2025): 273–80, <https://doi.org/10.63822/MK988N78>.

⁴⁵ Ari Wibowo, Asep Rohman Dimyati, and Junaedi Junaedi, "Mewujudkan Sistem Hukum Nasional Yang Adil Dan Efektif: Urgensi Penataan Regulasi Dalam Perspektif Politik Hukum Di Indonesia," *Journal of Contemporary Law Studies* 2, no. 3 (May 2025): 223–36, <https://doi.org/10.47134/lawstudies.v2i3.3793>.

⁴⁶ Abdurrohman Baqi, "Gugatan Perwakilan Kelompok (Class Action) Dalam Sengketa Wakaf Di Pengadilan Agama (Studi Kasus Putusan Nomor 409/PDT.G/2016/PA.CLG)" (Fakultas Syariah dan Hukum UIN Syarif Hidayatullah Jakarta, 2022).

⁴⁷ Tedi Sudrajat and Endra Wijaya, *Perlindungan Hukum Terhadap Tindakan Pemerintahan*, ed. Tarmizi, Cetakan Pe (Jakarta Timur: Sinar Grafika, 2020).

⁴⁸ Heru Wardoyo and Budimah Budimah, "Efektivitas Klausul Kontrak Pada Hubungan Bisnis Antara UMKM Dan Mitra Usaha Di Indonesia," *Jurnal*

pursue legal procedures on their own. This creates a gap between legal norms and the actual needs of business actors. The integration of legal services and advocacy into regulations represents an adaptation to Indonesia's generally passive legal culture.

The role of advocacy and legal services is vital because they can bridge the gap between written norms and social reality. Proactive legal services will also strengthen MSMEs' trust in the legal system.⁴⁹ If this dimension is incorporated into the legal framework, geographical indication and trademark protection can function more as an instrument of empowerment, rather than simply a symbol of legality. Regulations that incorporate advocacy and legal services can encourage a transformation in legal culture toward more participatory geographical indication and trademark protection.

The Intellectual Property Agency in Indonesia is held by the Directorate General of Intellectual Property (DJKI). In its role, the Directorate General of Intellectual Property (DJKI) carries out various initiative programs, one of which is the Mobile Intellectual Property Clinic (MIC), which provides free legal consultations, outreach, and registration assistance for MSMEs.⁵⁰ This program is dependent on internal policies and budget availability. Advocacy and legal services in the form of the MIC program need to be legitimized through regulations as a form of state obligation. The MIC program is a progressive step taken by the DJKI, but the MIC does not have a legal basis explicitly stated in the MIG Law.

The implementation of laws and regulations in Indonesia is carried out through implementing regulations which are derivatives of the laws and regulations in question, in this context the MIG Law. One of the implementing regulations in the MIG Law is through the Regulation of

Penelitian Serambi Hukum 18, no. 02 (June 2025): 142–55, <https://doi.org/10.59582/sh.v18i02.1311>.

⁴⁹ Kevin Jousen Aprilino Poli, Jemmy Sondakh, and Devy K G Sondakh, "Perlindungan Hukum Bagi Pelaku Usaha Mikro Kecil Dan Menengah (UMKM) Dalam Pasar Digital," *Innovative: Journal of Social Science Research* 5, no. 4 (August 2025): 5995–6009, <https://doi.org/10.31004/innovative.v5i4.20601>.

⁵⁰ Intelektual, "Mobile Intellectual Property Clinic 2024 Dorong Potensi Lokal Raih Kejayaan Global."

the Minister of Law of the Republic of Indonesia Number 1 of 2024 concerning the Organization and Work Procedures of the Ministry of Law (Permenkum on the Organization and Work Procedures of the Ministry of Law). Article 305 letter d of the Permenkum on the Organization and Work Procedures of the Ministry of Law states that the provision of technical guidance and supervision by the DJKI takes the form of "provision of technical guidance and supervision in the fields of applications, trademark classification, publication and documentation, technical services, examination, certification, extension, mutation and licensing, monitoring, legal services for trademarks and geographical indications, changes to documents describing registered geographical indications, and facilitation of the trademark appeal commission." Unlike the Philippines, Indonesia separates regulations related to advocacy and legal services through implementing regulations of the MIG Law.

The legal framework for geographical indications and trademarks in Indonesia must carefully integrate the adopted legal system with the legal culture and socio-economic practices of MSMEs. The MIG Law needs to be expanded to include the state's obligation to provide advocacy and legal services, both in preventive and litigation forms. This will be embodied in implementing regulations, which will regulate the programs to be implemented in the advocacy and legal services aspects. Expanding the substance of the MIG Law in the realm of advocacy and legal services will support the distribution of justice for MSMEs experiencing difficulties in accessing digital information and the economy.

An ideal legal framework for geographical indications and trademarks in Indonesia also requires collaboration between the Directorate General of Intellectual Property Rights (DJKI) and universities, local governments, and professional organizations. This significantly supports the accessibility of MSMEs to easily obtain education and register geographical indications and trademarks. Currently, advocacy and legal services for MSMEs still rely on sporadic support from NGOs and universities. These activities need to be regulated within a sound legal framework as an institutional obligation, so that supporting components such as universities, NGOs, and legal professional organizations can be institutionalized permanently. Thus,

advocacy and legal services will not be merely seasonal activities carried out based on budget availability, but rather become an integral part of the IPR protection ecosystem. This effort is undertaken to ensure the sustainability of MSME empowerment through geographical indications and trademarks.

The Philippines has a mixed legal system, a combination of civil law and common law.⁵¹ This legal system provides flexibility in the formulation and implementation of regulations. This is evident in the Intellectual Property Code of the Philippines (RA 8293), which grants broad authority to the Intellectual Property Office of the Philippines (IPOPHL) to exercise its authority in intellectual property matters. This hybrid legal system allows administrative agencies to have broader functions, including advocacy and legal services.⁵² RA 8293 is a fairly ideal legal framework because it not only regulates the legal substance related to the registration procedures for geographical indications and trademarks, but also provides space for legal services and advocacy for businesses, in this case MSMEs. A mixed legal system encourages the law to function more adaptively to socio-economic needs.⁵³

Philippine legal culture is participatory and open to the involvement of various components of society.⁵⁴ MSMEs are seen not only as beneficiaries, but also as partners in the intellectual property protection process.⁵⁵ IPOPHL, through the IP Academy it established,

⁵¹ M. Negre and Q. Perez, "The State of Intellectual Property Protection in the Philippines: What Lies Ahead?"

⁵² Dian Kemala Dewi, *Fondasi Ilmu Hukum : Teori, Asas, Dan Sistem Hukum*, ed. J. Prayoga, Cetakan Pe (Payakumbuh: PT Serasi Media Teknologi, 2025).

⁵³ Yonathan Parlinggoman Wicaksono and Mahipal Mahipal, "Eksistensi Hukum Islam Dalam Sistem Hukum Nasional Indonesia: Peluang Dan Tantangan," *Indonesian Journal of Islamic Jurisprudence, Economic and Legal Theory* 3, no. 3 (July 2025): 2138–51, <https://doi.org/10.62976/IJIJEL.V3I3.1238>.

⁵⁴ Hariyanto Hariyanto et al., "Democratization of Village Autonomy in the Construction of Indonesian Administrative Law: Is It Possible?," *Jurnal Media Hukum* 32, no. 2 (July 2025): 190–209, <https://doi.org/10.18196/JMH.V32I2.25216>.

⁵⁵ Lavanya Madhusoodanan et al., "Intellectual Property Rights (IPRs) and Its Role in Propelling the Growth of the MSME Sector," *The Journal of World Intellectual Property* 25, no. 3 (November 2022): 603–16, <https://doi.org/10.1111/JWIP.12243>.

has a role as a national intellectual property education center that organizes courses, seminars and training for MSMEs, academics and practitioners.⁵⁶ This program increases the legal literacy of business actors so that they can specifically understand the strategic value of geographical indications and brands as business instruments.⁵⁷ IPOPHL also established Innovation and Technology Support Offices (ITSOs) located in various universities and research institutions. ITSOs serve as local service units providing consulting, patent research, and technical support for IPR registration.⁵⁸ The presence of ITSO brings legal and advocacy services closer to business communities in various regions, so that advocacy and legal services are not centralized in Manila.

IPOPHL also develops affirmative action policies through the Juana Make A. Mark program. This program is an initiative by the institution to provide special subsidies for women-led MSMEs. Juana Make A. Mark not only helps reduce the burden of geographical indication and trademark registration costs but also provides space for gender empowerment in intellectual property practices. The subsidy covers application fees, examinations, and trademark certificate issuance.⁵⁹ This program is expected to facilitate access to legal protection for women-owned MSMEs without the burden of costs. By combining the IP Academy, which strengthens literacy, the ITSO, which brings services closer, and Juana Make a Mark, which removes cost barriers, IPOPHL has succeeded in making IPR protection an instrument for inclusive economic empowerment. This model demonstrates how an institution with a broad mandate can create an ideal and progressive legal framework. The Philippine legal framework

⁵⁶ Hofilena, "Reinforcing the Role of Intellectual Property in the Battle Against the Pandemic: The Vowel Framework."

⁵⁷ Sarita and Inutan, "Technology Transfer Management Practices among Selected State Universities and Colleges in Davao Region, Philippines."

⁵⁸ Aiken O Larisa Serzo, "Philippine Regulations for Cross-Border Digital Platforms: Impact and Reform Considerations," Research Paper Series No. 2021-08 (Makati, 2021).

⁵⁹ Jean Clarisse T. Carlos, Jovito Jose P. Katigbak, and Jill Angeli Bacasmas, "Analysis of the Cross-Border E-Commerce Environment for Philippine Women-Led MSMEs: Challenges and Opportunities," PIDS Discussion Paper Series No. 2022-40 (Quezon: Quezon City: Philippine Institute for Development Studies (PIDS), 2022).

for geographical indications and trademarks has room for strengthening. The current registration fee subsidy program should be legitimized in existing regulations, as is the case in Indonesia. As long as the subsidy is solely program-based, its sustainability depends on the government's fiscal capacity and priorities. The purpose of integrating subsidy services into regulations is to guarantee legal access for MSMEs and also emphasize that MSME empowerment is a legal instrument, not just a temporary policy. This way, the law does not stop at its protective function but plays an active role in strengthening the community's economic capacity and fostering social transformation.

The combination of a flexible legal system, a participatory legal culture, and the role of IPOPHL makes the Philippines a relatively ideal legal framework. Strengthening regulations through the integration of subsidy-related provisions will further ensure the sustainability of the program. This step will ensure that MSME advocacy and empowerment are no longer solely dependent on external factors. The Philippines can serve as an example of how legal protection can be combined with advocacy and affirmative policies. This practice demonstrates that the law can play both an adaptive and transformative role.

Oman has a legal system influenced by Islamic law and positive law, outlined in Royal Decrees. Oman's legal system places greater emphasis on administrative compliance and the hierarchy of state authorities.⁶⁰ Royal Decree No. 67/2008 on Industrial Property Law serves as the basis for the protection of geographical indications and trademarks.⁶¹ Royal Decree No. 67/2008 does not explicitly include provisions related to advocacy and legal services for MSMEs. Geographical indication and trademark protection in Oman lacks a

⁶⁰ Rashid H S Al Junaibi, "European Journal of Interdisciplinary Studies Comparative Study Between the Omani and British Legal Systems in Terms of Judicial Independence and Separation of Powers," *European Journal of Interdisciplinary Studies* 7, no. 1 (2021): 48–76.

⁶¹ Balqees Ahmed Al-Yahmadi and Ayyappan Palanissamy, "The Role of Trade Secrets in Advancing Sustainable Business Innovation and Competitive Advantage," in *AI and IoT: Driving Business Success and Sustainability in the Digital Age*, ed. Bahaa Awwad (Cham: Springer, 2025), 923–33, https://doi.org/10.1007/978-3-031-92240-4_86.

subsidy program supporting micro-enterprises.⁶² While the registration system is efficient, the administrative costs and the requirement to use professional services make the process exclusive to those with the financial resources and access to professional services. Not all small business owners have the knowledge or financial capacity to optimally utilize the registration system.⁶³ This causes most people's economic actors to carry out trading activities without adequate legal protection, and ultimately become vulnerable to brand takeover or imitation by stronger parties.

Oman memiliki budaya hukum dengan ciri hierarkis dan top-down.⁶⁴ This legal culture demonstrates that legal initiatives tend to come from the government rather than from the public or communities. This has implications for low legal awareness among the public, particularly MSMEs, regarding the strategic value of geographical indications and trademarks. This legal culture requires legal services and advocacy legitimized by legislation. Without a regulatory mandate, advocacy and legal services tend to be ineffective. Therefore, integrating advocacy provisions and legal services is an urgent need for Oman.

The Ministry of Commerce, Industry, and Investment Promotion (MOCIIP) is Oman's intellectual property agency. MOCIIP's authority is limited to administrative practices in the intellectual property registration process.⁶⁵ MOCIIP has a collaborative program with WIPO in the form of training, but this program is temporary and limited to

⁶² Amal Al Muqarshi, Sharifa Said Al Adawi, and Sara Mohammed Al Bahlani, "English as a Medium of Instruction and Intellectual Capital Creation in Omani Higher Education: Unravelling the Dilemma," *Journal of Intellectual Capital* 25, no. 1 (January 2024): 119–42, <https://doi.org/10.1108/JIC-10-2022-0192>.

⁶³ Abdullah Mohammed Al Shukaili et al., "Can Government Financial Support Enhance Job Creations: Insights from Oman," *Journal of Science and Technology Policy Management* 14, no. 5 (August 2023): 807–29, <https://doi.org/10.1108/JSTPM-07-2021-0100>.

⁶⁴ Sara Brzuszkiewicz, "A Two-Way Path: State-Driven and Bottom-up Social Change in Contemporary Arab Gulf Monarchies," *European View* 24, no. 1 (April 2025): 142–52, <https://doi.org/10.1177/17816858251335433>.

⁶⁵ Hussein M. Azmy, "A Critical and Analytical Assessment of the 2019 Reformation of the Foreign Investment Regulatory Framework of Oman," *Arab Law Quarterly* 37, no. 3 (June 2021): 251–87, <https://doi.org/10.1163/15730255-bja10086>.

certain groups.⁶⁶ MSMEs rarely receive direct assistance due to limited access and costs. Oman's legal framework requires expanding MOCIIP's authority to accommodate advocacy and legal services on a permanent basis, rather than just within the administrative realm.

Legal advocacy in Oman must address the context of a hierarchical legal culture. Community-based advocacy mechanisms can be introduced through cooperatives or producer associations, under the supervision of MOCIIP. This way, advocacy remains consistent with top-down traditions but is closer to the community. Regulations should include state obligations to provide preventive and curative legal services to MSMEs. This will bridge the gap between formal protection and socio-economic realities. Oman's ideal legal framework must also address global challenges, particularly digital trade and the potential for international disputes. MSMEs in Oman face the risk of trademark and intellectual property rights infringement in regional markets, particularly in the Gulf. Without legal advocacy, they struggle to access cross-border dispute resolution mechanisms. By incorporating advocacy into the regulatory framework, Oman can provide an international consultation mechanism for MSMEs. This will make the law more adaptable to these challenges.

Indonesia and Oman share similarities in terms of regulatory substance, which does not explicitly include legal advocacy. Meanwhile, the Philippines stands out as a more progressive system, having institutionalized advocacy within the IPOPHL mandate. This demonstrates that hybrid legal systems provide greater room for institutional innovation. Indonesia and Oman can learn from the Philippines that legal advocacy not only complements regulations but also strengthens their effectiveness. Therefore, good practices from the Philippines can serve as an important reference. Indonesia and Oman face similar challenges: formalism and hierarchies. This leads communities, especially MSMEs, to be passive and wait for initiatives from authorities. In contrast, the Philippines exhibits a participatory legal culture, making legal advocacy more readily accepted. This comparison emphasizes that the ideal legal framework cannot be

⁶⁶ Al Zuheimi, "Development of New Technologies and Intellectual Property Regulations in the Sultanate of Oman."

uniform but must adapt to national legal cultures. Legal advocacy in Indonesia and Oman needs to be more institutionalized to overcome the barriers of passive legal cultures.

An effective legal framework must also take into account the legal cultures of each country's communities. In Indonesia, a community-based approach is relevant because MSMEs are often tied to local associations or cooperatives. Advocacy can be channeled through these associations with state support. In the Philippines, a participatory approach involving multiple stakeholders has proven effective. Meanwhile, in Oman, a government-based approach needs to be complemented by community empowerment to build legal awareness. Thus, the ideal legal framework is contextual and adaptive to national legal culture.

The role of institutions is central to determining the effectiveness of the legal framework. The Directorate General of Intellectual Property Rights (DJIP) in Indonesia, the IPOPHL (IPH) in the Philippines, and the MOCIIP (MOCIIP) in Oman hold primary mandates for the protection of intellectual property rights (GI) and trademarks. The DJIP in Indonesia already has an MIC initiative, but without an explicit legal basis. The MOCIIP in Oman plays an administrative role with support from WIPO, but its advocacy is limited. The IPOPHL in the Philippines is a prime example, given its explicit mandate for advocacy, consultation, and subsidies. This comparison demonstrates the importance of expanding the mandate of IP institutions to include legal advocacy functions. Thus, institutions can become the primary driving force for empowering MSMEs through GI and trademarks.

An ideal legal framework must also address the challenges of adapting to global developments. For example, digital trade competition requires MSMEs to be more vigilant about trademark and geographical indication infringement in cross-border e-commerce. Without adequate legal advocacy, MSMEs are unable to navigate the complexities of transnational disputes. The Philippines has begun integrating this aspect through digital IP education, while Indonesia and Oman remain limited. By strengthening digital advocacy, the legal framework will be more relevant to contemporary challenges. In the context of MSME empowerment, legal advocacy also serves as a means of legal literacy. Many MSMEs don't understand the strategic value of

GI and branding in expanding their markets. An ideal legal framework should mandate relevant institutions to carry out ongoing legal education. This can be achieved through collaboration between governments, universities, and professional associations. In this way, advocacy is not only curative but also preventive.

Internationally, Article 41 of the TRIPS Agreement stipulates that member states must provide effective and uncomplicated legal enforcement procedures.⁶⁷ However, TRIPS does not explicitly include legal advocacy obligations for MSMEs. This leaves room for countries to design advocacy models tailored to their national contexts. The Philippines exploits this gap by granting an explicit mandate to IPOPHL, while Indonesia and Oman continue to rely on government initiatives without explicit regulatory support. Therefore, the ideal legal framework is one that internalizes international obligations while accommodating domestic needs.

Therefore, the ideal legal framework for the protection of geographical indications and trademarks must encompass three key elements: legal substance that complies with international standards, institutions explicitly mandated for legal advocacy and services, and adaptive mechanisms that align with national legal culture. Integrating these three elements will create inclusive protection and empower MSMEs. The Philippines has demonstrated good practice through IPOPHL, while Indonesia and Oman still need to strengthen the role of advocacy in their regulations. All three countries are expected to develop adaptive legal frameworks so that GI and trademark protection becomes not only a formal legal instrument but also a tangible means of economic empowerment.

D. Conclusion

The protection of geographical indications and trademarks can only be effective if complemented by institutionalized legal advocacy mechanisms and support services. Indonesia, the Philippines, and

⁶⁷ Sali Ahmed Abdullah, Khadijah Mohamed, and Ahmad Shamsul Abd Aziz, "AN Appraisal of Yemen's Adherence to The TRIPs Agreement Standards on Civil and Criminal Enforcement Mechanisms of Copyright and Trademark Infringement," *UUM Journal of Legal Studies* 16, no. 2 (July 2025): 102–20, <https://doi.org/10.32890/UUMJLS2025.16.2.7>.

Oman exhibit distinct dynamics influenced by their legal systems, legal cultures, and the role of intellectual property institutions. Indonesia requires regulatory strengthening by incorporating advocacy into the substance of its laws to ensure formal legitimacy for programs like the Mobile Intellectual Property Clinic (MIC). The Philippines is relatively ideal, with IPOPHL's role not only being administrative but also educational, consultative, and affirmative through the IP Academy, ITSO, and Juana Make a Mark. Oman faces greater challenges due to its hierarchical legal system and culture, making explicit regulation of advocacy imperative. Comparatively, mixed legal systems are more flexible in providing space for institutional innovation. This demonstrates that the ideal legal framework must be contextual, tailored to the legal and cultural characteristics of each country.

The need to encourage the integration of legal services and advocacy into regulatory substance, while simultaneously expanding the mandate of intellectual property institutions so that they focus beyond administrative aspects. For Indonesia and Oman, legitimizing advocacy within the law will strengthen legal certainty and bridge the gap between formal norms and the actual needs of MSMEs. For the Philippines, the next step is to strengthen the sustainability of affirmative action policies by integrating registration subsidies into formal regulations. The research also recommends that each country build a multi-stakeholder advocacy network, including universities, professional organizations, and MSME associations. With this approach, IPR protection can function as an instrument for inclusive economic empowerment, not simply a symbol of legality. The implementation of this ideal legal framework can strengthen the competitiveness of local products in the global market, especially for MSMEs. Therefore, this research confirms that legal advocacy is a crucial bridge connecting formal protection with sustainable economic empowerment.

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