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## Dual Citizenship in Indonesia: Debates, Attitudes and Prospects

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# **Dual Citizenship in Indonesia:** *Debates, Attitudes and Prospects*

by

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## 1. Introduction

In the course of Indonesia's turbulent history, many Indonesians have moved abroad and created a large diaspora community outside of Indonesia. These Indonesians abroad often keep strong ties to their homeland, whether through culture, family or investments. From its independence in 1945, Indonesia adopted and has maintained a single citizenship policy, emphasizing national unity and loyalty. However, in today's globalized world, many Indonesians living abroad are raising questions about whether dual citizenship could benefit both them as individuals, and Indonesia as a nation. This has led to debates within the country about whether it should allow dual citizenship, especially for the millions of Indonesians who live abroad.

One important diaspora community affected by this issue is the one in the Netherlands.<sup>1</sup> This community has a unique history that is shaped by colonial ties between the two countries, and includes a diverse range of people – such as “Indo-Europeans” (Eurasians of multiracial parentage) who migrated after independence, Moluccans who arrived in 1951, Indonesian political exiles after 1965, and more recent migrants who came for work, study or family reasons. Together, they represent a broad spectrum of experiences, from first-generation migrants to third- and even fourth-generation descendants. The question of dual citizenship is especially interesting for this heterogeneous community, as it touches on their identity, practical challenges and their connection to Indonesia.

In this thesis, I explore the debates surrounding dual citizenship by focusing on the Indonesian diaspora in the Netherlands. Specifically, I aim to answer the following research question: *What are the debates, attitudes and prospects regarding dual citizenship for the Indonesian diaspora in the Netherlands?* To answer this, I investigate the members of this diaspora and ask a sample of them how they perceive dual citizenship, what impact they believe it could have on their personal lives, and how they think it could influence Indonesia as a country. I seek to understand how people in this diaspora community feel about dual citizenship, and to explore their motives, concerns and expectations regarding the issue.

The thesis starts with a look at the history of dual citizenship in Indonesia, examining how citizenship laws have evolved from independence to the present. The second chapter

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<sup>1</sup> Section 3.1 reflects on the appropriateness of the term “diaspora” in relation to this specific group.

looks at current debates in Indonesia, including the arguments for and against dual citizenship. In the third chapter, the focus shifts to the Indonesian diaspora in the Netherlands; it describes who they are and why they are an important part of the citizenship discussion. Chapter four presents the findings from my interviews with 14 members of the Indonesian diaspora in the Netherlands, what they think about dual citizenship, how it might affect their lives, and what they expect it could mean for Indonesia. Finally, the conclusion synthesizes my findings and connects them to the broader dual citizenship debate in Indonesia.

### The history of dual citizenship in Indonesia

The history of dual citizenship in Indonesia – or rather, the absence of it – is closely tied to the country's efforts to create a national identity after declaring independence from Dutch colonial rule in 1945. Defining who was Indonesian was a key aspect of nation-building and citizenship laws decided who belonged to this nation. When Indonesia proclaimed independence, the 1945 Constitution (*Undang-Undang Dasar 1945* or UUD 1945) became the foundation of Indonesia's legal system, together with the principles of Pancasila.<sup>2</sup> Citizenship was addressed in Article 26, which stated:

Citizens consists of indigenous Indonesian peoples and persons of foreign origin who have been legalized as citizens in accordance with the law.<sup>3</sup>

There was a distinction between indigenous Indonesians and people from other nations, but it was not clearly stated who qualified as indigenous Indonesian.

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<sup>2</sup> "Undang-Undang Dasar (UUD) Tahun 1945 dan Amandemen Nomor tentang UUD 1945 dan Amandemen," *Database Peraturan*, n.d. accessed 13 December 2024, <https://peraturan.bpk.go.id/Details/101646/uud-no-->.

<sup>3</sup> Art. 26 of 1945 Constitution.

### *1946 Act: ius soli*

In 1946, a new law on citizenship, Law No. 3 of 1946, was introduced to provide clearer regulations on citizenship.<sup>4</sup> This law was based on the *ius soli* principle (citizenship by birthplace), which automatically granted citizenship to those born within Indonesian territory. The law also identified Indonesian citizens as those who were indigenous to the region,<sup>5</sup> descendants of indigenous people or those who met specific conditions, such as long-term residence of at least five consecutive years in Indonesia, unless they objected because they already are citizens of another country.<sup>6</sup> This meant that unless someone explicitly refused Indonesian citizenship, they could hold dual citizenship in practice. The law was still unclear about who qualified as indigenous Indonesian, but it was broadly understood that it referred to persons who during the Dutch colonisation were known as *pribumi*.<sup>7</sup> While *pribumi* were automatically considered citizens, non-*pribumi* (such as the Chinese, Arabs and Europeans) had to meet additional conditions, such as proof of long-term residence or completion of naturalization processes to be recognized as Indonesian citizens.<sup>8</sup>

The law stated that Indonesian citizenship could only be lost in specific cases, such as acquiring citizenship from another country or serving as a soldier or civil servant for another nation without permission from the President of Indonesia.<sup>9</sup> However, it did not explicitly address people who already held another citizenship. Neither was there a requirement to renounce foreign citizenship when naturalizing as an Indonesian citizen.<sup>10</sup> This implies that people who met the criteria of being or becoming an Indonesian citizen could get Indonesian citizenship, even if they were still holding another citizenship.

The 1946 Citizenship Law's focus on "family unity" also created situations where dual citizenship could happen, especially for women. The law stated that a wife acquired her

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<sup>4</sup> "Undang-Undang (UU) No. 3 Tahun 1946 tentang Warga Negara dan Penduduk Negara," *Database Peraturan*, n.d. accessed 13 December 2024, <https://peraturan.bpk.go.id/Details/25033/uu-no-3-tahun-1946>.

<sup>5</sup> Art. 1(a) of Law No. 3 of 1946.

<sup>6</sup> Art. 1(b) of Law No. 3 of 1946.

<sup>7</sup> *Pribumi* is generally defined as the 'native' people whose ancestral roots lie mainly in the archipelago.

<sup>8</sup> Susi D. Harijanti, *Report on Citizenship Law: Indonesia* (San Domenico di Fiesole: European University Institute, 2017), 3.

<sup>9</sup> Art. 8 of Law No. 3 of 1946.

<sup>10</sup> Art. 5(5) of Law No. 3 of 1946.

Indonesian husband's nationality during marriage.<sup>11</sup> However, it did not state that a wife had to give up her original nationality if she already had one. It is likely that a woman who was already a citizen of another country ended up holding two nationalities – her original one and her Indonesian husband's. It was also stated that if a father became an Indonesian citizen, his children would automatically get Indonesian citizenship too.<sup>12</sup> Again, the law did not address what would happen if the children already had the citizenship of their mother, which meant that cases of dual nationality in Indonesia might also have existed at the time, even if it was not formally recognized.

#### 1958 Act: *ius sanguinis*

In 1958, Indonesia introduced a new citizenship law, Law No. 62, which replaced *ius soli* with *ius sanguinis* (citizenship by descent), meaning citizenship based on descent and usually through the father.<sup>13</sup> The law discouraged dual citizenship and followed the global trend of many other countries adopting single nationality over dual nationality. During that period, dual nationality was seen as problematic because it raised concerns about divided loyalties and instability between states.<sup>14</sup> Unlike the 1946 law, the 1958 law explicitly required individuals to formally renounce their previous nationality in order to acquire Indonesian citizenship. This was regarded as a reflection of the re-emergence of radical nationalism during the 1950s in Indonesia. The principle of "unity of family" was still preferred, where the nationality acquired by a man was automatically supposed to be passed on to his wife and children. In the same way, if a man lost his Indonesian nationality, his wife and children would lose theirs as well, unless it resulted in statelessness.<sup>15</sup> However, a foreign wife had to give up her foreign nationality when she wanted to become an Indonesian citizen. Children could regain Indonesian citizenship upon reaching the age of 18 years, after which they were required to renounce their foreign citizenship.<sup>16</sup> Although the 1958 law complicated acquiring

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<sup>11</sup> Art. 2(1) of Law No. 3 of 1946.

<sup>12</sup> Art. 3(1) of Law No 3 of 1946.

<sup>13</sup> "Undang-Undang (UU) No. 62 Tahun 1958 tentang Kewarga-Negaraan Republik Indonesia," *Database Peraturan*, n.d. accessed 13 December 2024, <https://peraturan.bpk.go.id/Details/52324/uu-no-62-tahun-1958>.

<sup>14</sup> Peter J. Spiro, "The Equality Paradox of Dual Citizenship," *Journal of Ethnic and Migration Studies* 45, no. 6 (2019): 880-882.

<sup>15</sup> Article 9 and Article 15(1 and 2) of Law No. 62 of 1958.

<sup>16</sup> Article 16(1) of Law No. 62 of 1958.

and maintaining dual citizenship, it does not rule out the possibility that people, especially children born to parents with mixed nationalities, still informally kept their two nationalities at the time.

#### 1955-1962: Sino-Indonesian Dual Nationality Treaty

The issue of dual citizenship became more complicated with the case of Chinese Indonesians. Many Chinese Indonesians held dual nationality because China's Citizenship Law also used *ius sanguinis* rather than *ius soli*. This law recognized all overseas Chinese as Chinese citizens, which was supposed to make them stay culturally and politically loyal to China.<sup>17</sup> To end dual citizenship, a bilateral agreement was signed between Indonesia and China in 1955, stipulating that Chinese Indonesians had to make an active choice between Indonesian and Chinese citizenship. Although the treaty was signed in 1955, it was only approved by China's National People's Congress in 1957 and ratified by Indonesia's People Representative Council in 1960, with the selection process actually taking place from 1960 to 1962.<sup>18</sup> It is estimated that out of the 2.45 million ethnic Chinese living in Indonesia during this period, around one million were believed to have dual nationality. Most of these individuals registered their choice, with official sources reporting that about 65 per cent chose Indonesian citizenship. According to Chinese leaders, the proportion was higher, ranging from 70 to 90 per cent.<sup>19</sup> Nevertheless, many Chinese Indonesians still encountered bureaucratic obstacles during the citizenship selection process, including limited access to courts and insufficient information, which left some stateless or unsure about their legal status.<sup>20</sup>

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<sup>17</sup> A. Safril Mubah and Sarah Anabarja, "Globalization, National Identity and Citizenship: Dilemma of Chinese Indonesians in Indonesian nation-building," *Tamkang Journal of International Affairs* 23, no. 3 (2020): 59.

<sup>18</sup> Susi D. Harijanti, *Report on Citizenship Law: Indonesia* (San Domenico di Fiesole: European University Institute, 2017), 7-9.

<sup>19</sup> Mely G. Tan, "The Ethnic Chinese in Indonesia: Issues of Identity." *Ethnic Chinese as Southeast Asians* (Singapore: ISEAS-Yusof Ishak Institute, 2018), 35.

<sup>20</sup> Taomo Zhou, "The Communal Battle between the Red and the Blue," *Migration in the Time of Revolution: China, Indonesia, and the Cold War* (Ithaca: Cornell University Press, 2019), 74-77.



#### 2006: limited dual citizenship

After Soeharto stepped down in 1998, Indonesia began a process of reformation. In 2006, the 1958 citizenship law was replaced with Law No. 12 of 2006,<sup>21</sup> which changed the definition of the term "indigenous Indonesian" and now includes all "natural-born citizens who have never acquired another nationality of their own free will."<sup>22</sup> Moreover, the law explicitly stated that children from parents with different nationalities can hold dual citizenship, but that they must choose one citizenship upon reaching the age of 18, after which they have three years to make their decision.<sup>23</sup> After the 1958 law change, the number of dual citizenship cases was already reduced but it was likely still informally maintained in practice. Over the years, these cases likely continued to decrease. However, with the 2006 reforms, the law has become stricter, as children born to parents with different nationalities are now required to formally choose which citizenship to keep.

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<sup>21</sup> "Undang-Undang (UU) No. 12 Tahun 2006 tentang Kewarganegaraan Republik Indonesia," *Database Peraturan*, n.d. accessed 13 December 2024, <https://peraturan.bpk.go.id/Details/40176/uu-no-12-tahun-2006>.

<sup>22</sup> Susi Dwi Harijanti, *Report on Citizenship Law: Indonesia* (San Domenico di Fiesole: European University Institute, 2017), 10-13.

<sup>23</sup> Article 6 of Law No. 12 of 2006.

## 2. Current debates in Indonesia

### 2.1 The rise of dual citizenship debates

After the implementation of Law No. 12 of 2006, debates surrounding dual citizenship have become more prominent.<sup>24</sup> A big turning point in these debates for Indonesia was the establishment of the Indonesian Diaspora Network (IDN) in Los Angeles in 2012, which was an initiative of the Indonesian diaspora in the United States and Dino Patti Djalal, the Ambassador of Indonesia to the United States at that time. The IDN is a global non-governmental organization and created to unify Indonesians abroad as well as to encourage them to contribute positively to Indonesia.<sup>25</sup> A major part of IDN's agenda has been to secure recognition of dual citizenship, which they believe would allow the diaspora to maintain stronger ties to Indonesia as they contribute through cultural promotion, remittances and other resources. They see it as a way to strengthen the diaspora's role in supporting Indonesia.<sup>26</sup> To advocate for this, the IDN's Task Force on Immigration and Citizenship had lobbied the government, collaborated with universities, and organized studies and seminars. These efforts gained momentum in 2015, when President Joko Widodo expressed willingness to consider changes to the Citizenship Act to allow dual citizenship,<sup>27</sup> specifically focusing on children from mixed marriages.<sup>28</sup> This announcement was positively received by the Indonesian Diaspora Network, which saw it as a recognition of the diaspora's potential to make a positive impact on Indonesia's development.<sup>29</sup>

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<sup>24</sup> These debates align with the global trend where countries create policies to maintain ties with their diaspora communities, see Alan Gamlen, "Diaspora Institutions and Diaspora Governance," *International Migration Review* 48, no. 1 (2014): S180-S216.

<sup>25</sup> Bilal Dewansyah, "Indonesian Diaspora movement and citizenship law towards 'semi-dual citizenship'." *Diaspora Studies* 12, no. 1 (2019): 52.

<sup>26</sup> Bilal Dewansyah, "Indonesian Diaspora movement and citizenship law towards 'semi-dual citizenship'." *Diaspora Studies*, 12, no. 1 (2019): 56.

<sup>27</sup> Ina Parlina, "Jokowi pledges to allow dual citizenship for Indonesians abroad," *TheJakartaPost*, 27 October 2015, <https://www.thejakartapost.com/news/2015/10/27/jokowi-pledges-allow-dual-citizenship-indonesians-abroad.html>.

<sup>28</sup> Fabian J. Kuwado, "Jokowi Janji Dorong RUU Dwikewarganegaraan," *Kompas.com*, 26 October 2015, <https://nasional.kompas.com/read/2015/10/26/15413891/Jokowi.Janji.Dorong.RUU.Dwikewarganegaraan>.

<sup>29</sup> Zeynita Gibbons "IDN Global Sambut Positif Pernyataan Presiden tentang Kewarganegaraan," *Antara*, 30 October 2015,

## 2.2 Concerns and controversies

Some Indonesian politicians, however, had serious reservations about this idea. Critics argued that permitting dual citizenship could pose significant risks under Indonesia's current legal and administrative systems. Hikmahanto Juwana, a professor of international law at the University of Indonesia, expressed concerns that dual citizenship might lead to increased tax evasion, as individuals could exploit their foreign citizenship to avoid paying taxes in Indonesia. He also pointed out the issue of divided loyalties, particularly in scenarios such as military conflicts involving Indonesia and another country of citizenship. Another concern was the complexity of determining which state would be responsible for protecting dual citizens in legal disputes or emergencies. Juwana instead suggested:

“However, [if the aim was] to ease migration for Indonesians who have been living abroad, the government could just amend visa regulations to favour those of Indonesian descent.”<sup>30</sup>

Khatibul Umam Winari, a member of the DPR RI Legislative Body, strongly opposed dual citizenship and argued that it is a serious to the sovereignty and national interests of the Indonesian people. He stated:

“Those who seek dual citizenship only want to enjoy Indonesia's wealth as a blessing from God, but they do not trust the leaders and governance of this nation.”<sup>31</sup>

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<https://m.antaranews.com/amp/berita/526501/idn-global-sambut-positif-pernyataan-presiden-tentang-dwi-kewarganegaraan>.

<sup>30</sup> Marguerite A. Sapila and Dandy Koswaraputra, “Jokowi's Dual Citizenship Comments Create Controversy,” *The Jakarta Post*, 29 October 2015, <https://www.thejakartapost.com/news/2015/10/29/jokowi-s-dual-citizenship-comments-create-controversy.html>.

<sup>31</sup> Republik Merdeka, “Tolak, Dwikewarganegaraan Bisa Jadi Ancaman Terhadap Kedaulatan NKRI,” *Republik Merdeka*, 26 August 2016, <https://rmol.id/pertahanan/read/2016/08/26/258399/tolak-dwikewarganegaraan-bisa-jadi-ancaman-terhadap-kedaulatan-nkri>.

Nasir Djamil, a member of the DPR's Commission III, expressed concerns about the security risks posed by dual citizenship. He expressed:

“Dual citizenship could become a means for spreading radical ideologies, separatism and terrorism. Indonesia is still a developing country, and we are not yet free from external influences on our domestic and foreign policies.”<sup>32</sup>

The debate became more heated in 2016, after two high-profile cases brought dual citizenship into the spotlights. The first case was about Arcandra Tahar, who briefly served as Indonesia's Energy and Mineral Resources Minister. It was revealed that he held dual citizenship – Indonesian and American. This led to a public backlash and as a result, Tahar was forced to step down from his position one month after his appointment. However, he was reappointed as deputy minister a few months later, after relinquishing his American citizenship and remaining an Indonesian citizen.<sup>33</sup> The second case involved Gloria Natapraja-Hamel, a 16-year old from Depok, West Java, who was selected to participate in the *Paskibraka* (National Flag Hoisting Troop) for Indonesia's Independence Day celebrations. However, just a few days before the event, Natapraja-Hamel was disqualified after it was discovered that she held dual citizenship – Indonesian and French – due to her French father. Although she had lived her entire life in Indonesia and identified as Indonesian, she was deemed ineligible to represent Indonesia in the ceremony.<sup>34</sup> In the end, Natapraja-Hamel was allowed to join the *Paskibraka* team later that day. The decision was based on her clear expression of nationalism and love for Indonesia, which she had expressed in a letter where she stated her commitment to staying Indonesian.<sup>35</sup> There have been other controversies as

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<sup>32</sup>Dieqy H. Widhana, “Kekhawatiran tentang Status Dwi Kewarganegaraan,” *Tirto.id*, 26 October 2016, <https://tirto.id/kekhawatiran-tentang-status-dwi-kewarganegaraan-bXPd>.

<sup>33</sup> Norman Harsono, “Former minister Arcandra appointed as PGN president commissioner,” *TheJakartaPost*, 21 January 2020, <https://www.thejakartapost.com/news/2020/01/21/former-minister-arcandra-appointed-as-pgn-president-commissioner.html>.

<sup>34</sup> Gilang Fauzi, “Antara Gloria dan Arcandra, Serupa Tapi Tak Sama,” *CNN Indonesia*, 16 August 2016, <https://www.cnnindonesia.com/nasional/20160816123418-12-151703/antara-gloria-dan-arcandra-serupa-tapi-tak-sama>.

<sup>35</sup> Hanni S. Soepardi, “Alasan Gloria Natapraja Diizinkan Bertugas Lagi di Paskibraka,” *Antara*, 17 August 2016, <https://www.antaranews.com/berita/579227/alasan-gloria-natapraja-diizinkan-bertugas-lagi-di-paskibraka>.

well. For example, the 177 hajj pilgrims who used fake Philippine passports to avoid Indonesia's long hajj waiting list<sup>36</sup>, a high-profile corruption suspect used a Papua New Guinea passport while fleeing corruption charges,<sup>37</sup> and the Regent-elect of Sabu Raijua (East Nusa Tenggara), Orient Riwu Kore, was found to have U.S. citizenship.<sup>38</sup> These incidents consistently show how sensitive the issue of dual citizenship is in Indonesia.

### 2.3 Different perspectives

Former Vice President of Indonesia (2014-2019), Jusuf Kalla, addressed some of these issues. He spoke about the impact of globalization on the dual citizenship debate, explaining that many talented individuals from developing countries tend to move to developed nations to gain experience. Some of them eventually want to return to their home countries. Referring to the Arcandra Tahar case, Kalla explained that Arcandra had a U.S. passport because he worked there and needed to secure his rights, which required becoming an American citizen.<sup>39</sup> Kalla cautioned against the risk of a single-citizenship policy, explaining that it might lead to a permanent loss of talent to other countries.<sup>40</sup>

Moreover, the first president of the Indonesian Diaspora Network (IDN) in the United States, Mohamad Al-Arief also stressed the importance of dual citizenship for Indonesians living abroad not only for economic gain, but also for maintaining a strong emotional and cultural connection with the homeland. He stated:

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<sup>36</sup> Tiara Sutari, "Punya Paspor Filipina, 177 Jemaah Haji Kehilangan Status WNI," *CNN Indonesia*, 25 August 2016, <https://www.cnnindonesia.com/nasional/20160825142815-12-153783/punya-paspor-filipina-177-jemaah-haji-kehilangan-status-wni>.

<sup>37</sup> Asep Munazat Zatinika, "Jaksa: Papua Nugini Cabut Paspor Djoko Tjandra," *Kontan*, 25 January 2013, <https://nasional.kontan.co.id/news/jaksa-papua-nugini-cabut-paspor-djoko-tjandra#>.

<sup>38</sup> Antara, "Sabu Raijua District Head-elect holds US, Indonesian Passports," *Antara*, 17 March 2021, <https://en.antaranews.com/news/170186/sabu-raijua-district-head-elect-holds-us-indonesian-passports>.

<sup>39</sup> Devira Prastiwi, "JK: Lagi Tren di Dunia, Pemerintah-DPR Bahas Dwi Kewarganegaraan," *Liputan 6*, 18 August 2016, <https://www.liputan6.com/news/read/2580319/jk-lagi-tren-di-dunia-pemerintah-dpr-bahas-dwi-kewarganegaraan>.

<sup>40</sup> Demokrasi News, "Wah! JK Sebut Dwi-Kewarganegaraan Bisa Bermanfaat untuk Indonesia," *demokrasi.co.id*, 19 August 2016, <https://www.demokrasi.co.id/2016/08/wah-jk-sebut-dwi-kewarganegaraan-bisa.html>.

“The dual citizenship advocated by the diaspora is to preserve a person’s Indonesian identity, not to Indonesianize (“*mengindonesiakan*”) foreigners (...) Opportunities abroad are a time to hone skills, build networks, adapt to global competition, and uphold integrity. However, when the time comes, we will certainly feel called to return to the Republic of Indonesia”<sup>41</sup>

Other proponents of dual citizenship, like Tristam Pascal Moeliono from Parahyangan Catholic University, argued in favour of dual citizenship as it eases the movement of people between countries and contribute to the improvement of Indonesia’s economy. He said that having dual citizenship would enable people to invest more easily in other countries.<sup>42</sup>

S.J.G. Litaay, the second president of the IDN countered the security concerns and stated:

“Diaspora Indonesians want to support the country by creating jobs and transferring skills. Their contributions could help build Indonesia’s future. Selective dual citizenship or tailored rights for diaspora members could address these concerns.”<sup>43</sup>

#### 2.4 National interests and diaspora needs

In recent years, the Indonesian government introduced policies to address the needs of its diaspora. One of these policies is the introduction of the *Kartu Masyarakat Indonesia di Luar Negeri* (Indonesian Diaspora Card, KMILN) in 2017. The KMILN or Diaspora Card was meant to offer recognition as well as practical benefits to Indonesians living abroad so that they can stay connected to their homeland. The card is available to Indonesian citizens (WNI), former Indonesian citizens (ex-WNI), children of ex-WNI and foreigners with one or two parents holding Indonesian citizenship. For Indonesian citizens abroad, the card allows access to

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<sup>41</sup> Ipak A. H. Nurcaya, “Kewarganegaraan Ganda: Inilah Pentingnya Dwi Kewarganegaraan Bagi Diaspora Indonesia,” *Espos News*, 30 August 2015, <https://news.espos.id/kewarganegaraan-ganda-inilah-pentingnya-dwi-kewarganegaraan-bagi-diaspora-indonesia-637621>.

<sup>42</sup> Marguerite A. Sapila and Dandy Koswaraputra, “Jokowi’s Dual Citizenship Comments Create Controversy,” *TheJakartaPost*, 29 October 2015,

<sup>43</sup> Dieqy H. Widhana, “Kekhawatiran tentang Status Dwi Kewarganegaraan,” *Tirto.id*, 26 October 2016, <https://tirto.id/kekhawatiran-tentang-status-dwi-kewarganegaraan-bXPd>.

certain administrative benefits, such as opening bank accounts, owning property and starting businesses in Indonesia. It can also replace the KTP (Indonesian ID card) for certain administrative processes.<sup>44</sup> However, the KMILN offers little for non-Indonesian citizens or their descendants; it does not provide any new privileges beyond what is already permitted by current laws. For example, it does not give them the right to live or work in Indonesia and serves more as a tool for gathering data.<sup>45</sup>

More recently in 2023, the Indonesian government introduced the Golden Visa. This visa, as an alternative, provides long-term residency (up to 10 years) for specific groups, including retirees, individual investors, corporate investors, global talent, family members, and ex-Indonesians or their descendants. The visa offers several advantages, such as the ability to live, work and travel freely within Indonesia during these years, and visa holders automatically receive an electronic limited stay and a re-entry permit. However, as it does not grant full citizenship, Golden Visa holders will not be able to vote and do not have the same rights as Indonesian citizens, which might disappoint those who want to actively participate in politics and society. The requirement for the Golden Visa differs per group. Global talent athletes have unique criteria and are eligible based on their achievements, such as international competition victories or global rankings and are either invited by or collaborate with the government. The other visa types mostly require financial stability and commitments, such as investments in bonds, stocks or real estate. For instance, individual investors need to invest at least USD 2.5 million for a 5-year stay or USD 5 million for a 10-year stay, which could make the program out of reach for those who might want to contribute to Indonesia but do not have the means. The category for descendants is only intended for individuals whose parent or grandparent was an Indonesian citizen, but has given up their Indonesian citizenship. This visa is meant to help people with family ties to former Indonesian citizens reconnect with the country. However, for those with a parent who still holds Indonesian citizenship, the Golden Visa is more complicated. Children under 18 may qualify under the child category if their parent holds a Golden Visa, but once they turn 18, they are

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<sup>44</sup> "Perpres No. 76/2017: Pemerintah Berikan KMILN Kepada Masyarakat Indonesia di Luar Negeri," *Sekretariat Kabinet Republik Indonesia*, 23 August 2017, <https://setkab.go.id/perpres-no-762017-pemerintah-berikan-kmiln-kepada-masyarakat-indonesia-di-luar-negeri/>

<sup>45</sup> "KMILN: The Indonesian Overseas Card," Dafluff, *Expat Indo*, 26 August 2017, <https://www.expatindo.org/kmiln-indonesian-overseas-card/>.

no longer eligible under this category unless they apply independently under a different category, such as investors or global talent.<sup>46</sup> In this regard, the Golden Visa remains limited for those who want to stay and work in Indonesia long-term, but do not fit into one of the specified categories.

Aliansi Pelangi Antar Bangsa (Rainbow Alliance Between Nations, APAB) was established in 2002 and is a coalition of various groups concerned with mixed-marriages issues faced by families with Indonesian and foreign spouses, especially regarding citizenship laws that discriminate against and disadvantage women, the families of Indonesians married to foreigners and Indonesians in general.<sup>47</sup> In August 2020, APAB pushed to change Law No. 12 of 2006, arguing that it did not meet the needs of modern global families. They suggested that Indonesia should allow children from mixed marriages to keep dual citizenship for life and that foreign spouses should have the option of dual citizenship after ten years of marriage. According to APAB, the current law forces children to choose between nationalities by the age of 18, which restricts their identity and their ties to Indonesia. Dewi Tjakrawinata, one of APAB's coordinators, also emphasized how dual citizenship could protect Indonesians abroad, such as migrant workers who often face discrimination and lack legal rights in their host countries, especially if they are not citizens or eligible for citizenship there. Tjakrawinata argued that Indonesia benefits greatly from the diaspora, especially through remittances, but fails to protect them adequately. Supporters of APAB's proposal, like former Deputy Speaker Fahri Hamzah and legal expert Susi Dwi Harijanti, believe that dual citizenship could benefit individuals and help Indonesia build stronger international connections.<sup>48</sup> APAB's proposal was included in the DPR's 2020-2024 National Legislation Program (Prolegnas), and they pushed for it to be prioritized. However, just like in the 2015-2019 Prolegnas,<sup>49</sup> the proposed

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<sup>46</sup> "Golden Visa," *Embassy of the Republic of Indonesia, the Hague, the Netherlands*, last modified 4 October 2024, accessed 28 November 2024,

<https://indonesia.nl/en/visa/golden-visa#e33a-global-talent-invited-by-the-government>

<sup>47</sup> "Aliansi Pelangi Antar Bangsa," *Living in Indonesia: A Site for Expatriates*, last modified 24 March 2024, <https://www.expat.or.id/orgs/aliansipelangiantarbangsa.html>.

<sup>48</sup> Andi Mardana, "APAB Dorong Perubahan UU untuk Kewarganegaraan Ganda," *Woman Indonesia*, 21 August 2020, <https://www.womanindonesia.co.id/apab-dorong-perubahan-uu-untuk-kewarganegaraan-ganda/>.

<sup>49</sup> Karlina Amkas, "Menkumham: Kecuali Isi Sumpah Pemuda Berubah, Indonesai Tak Akui Kewarganegaraan Ganda," *VOA Indonesia*, 5 June 2024, <https://www.voaindonesia.com/a/menkumham-kecuali-isi-sumpah-pemuda-berubah-indonesia-tak-akui-kewarganegaraan-ganda/7643356.html>.



law was not prioritized and ended up not being discussed in Parliament that year or in the years that followed.<sup>50</sup>

## 2.5 Scholarly perspectives

Several Indonesian scholars have written about the debates on dual citizenship in Indonesia. Harijanti argues that dual citizenship is unlikely to be implemented soon because nationalism and loyalty are still strong arguments in the debate.<sup>51</sup> However, her discussion mainly focused on historical issues, such as the loyalty of Chinese Indonesians after the 1949 agreement with the Netherlands, when many chose to renounce their Indonesian citizenship. Although this example is important for understanding Indonesia's citizenship policies and history, it is less relevant to the current debates, because it comes from the time when Indonesia was newly independent and questions of loyalty were seen as a big issue. Ramdhanilooks at the dual citizenship debate in Indonesia through the lenses of material and immaterial paradigms.<sup>52</sup> The globalist faction, which supports dual citizenship, focuses on material aspects such as economic opportunities, investments and property ownership as well as distributive justice for Indonesians living abroad. On the other hand, the nationalist faction opposes dual citizenship and wants to maintain immaterial aspects like identity, culture and ideology.

For members of the diaspora, on the other hand, nationalism plays a different role. As Wardoyo and Meliala<sup>53</sup> explain, many diaspora members still feel a strong emotional and cultural connection to Indonesia, even if they have taken foreign citizenship. This is the phenomenon of "long-distance nationalism," as discussed by Anderson. Many members of the diaspora feel that dual citizenship would resolve their loyalty dilemma by allowing them to stay legally connected to Indonesia while contributing, in ways such as investment, knowledge sharing, and public diplomacy, to the welfare of the nation.

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<sup>50</sup> Natasia C. Wahyuni, "Dibahas Lebih 10 Tahun, Nasib RUU Dwi Kewarganegaraan Belum Jelas," *BeritaSatu*, 3 December 2020, <https://www.beritasatu.com/news/705321/dibahas-lebih-10-tahun-nasib-ruu-dwi-kewarganegaraan-belum-jelas>.

<sup>51</sup> Susi D. Harijanti, *Report on Citizenship Law: Indonesia* (San Domenico di Fiesole: European University Institute, 2017), 20.

<sup>52</sup> Hilal Ramdhani, "The Citizenship Paradigm Debate in Dual Citizenship Discourses in Indonesia," *Jurnal Bina Praja* 14, no. 1 (2022): 51.

<sup>53</sup> Chris Setio Wardoyo and Adrianus Eliasta Meliala, "Loyalty Dilemma: Challenges and Opportunities of Dual Citizenship Policy for the Indonesian Diaspora," *Asian Journal of Engineering, Social and Health* 3, no. 11 (2024): 2551-2552.

## 2.6 Future prospects

More recently, in April 2024, Coordinating Minister for Maritime Affairs and Investment Luhut Binsar Padjaitan expressed support for dual citizenship and suggested that it could help attract skilled Indonesians back to the country. Luhut argues that allowing dual citizenship could bring back talented diaspora members who wish to contribute to Indonesia's growth. His statements brought more attention to the potential benefits of dual citizenship, highlighting how other countries, like Australia, New Zealand, South Africa, Switzerland, and Germany, have successfully adopted similar policies.<sup>54</sup>

Following this, in June 2024, the Minister of Law and Human Rights, Yasonna H. Laoly, proposed an alternative inspired by India's "Overseas Citizenship of India" (OCI) model. This approach would give Indonesians abroad certain rights, like a lifetime visa and the ability to live and work in Indonesia, without giving them full citizenship or political rights. Laoly described it as a win-win solution that could let Indonesia benefit from the diaspora's skills and resources without breaking with its single-citizenship tradition, which has historical roots going back to the 1928 *Sumpah Pemuda* or Youth Pledge.<sup>55</sup> Scholars like Dewansyah (2016) and Antikowati et al. (2023)<sup>56</sup> had already considered the concept of adopting a model similar to India's OCI. Dewansyah argued that such a system could serve as a transitional "diaspora test", which offers a pragmatic compromise between nationalists concerns about loyalty and the diaspora's desire for closer ties to Indonesia. He suggested that this approach could eventually evolve into full dual citizenship if political feasible. The Indonesian government recently announced that dual citizenship has become a focus in legislative discussions. In the recent legislative planning for the 2025-2029 National Legislation Program (Prolegnas), the revision of Law No. 12 of 2006 on Citizenship was listed as the sixth priority item by Commission II of the House of Representatives (DPR). This suggests that citizenship issues,

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<sup>54</sup> Michelle Gabriela, "Luhut Buka Kemungkinan Kewarganegaraan Ganda di Indonesia, Ini 5 Negara yang Sudah Menerapkannya," *Tempo*, 7 May 2024, <https://www.tempo.co/politik/luhut-buka-kemungkinan-kewarganegaraan-ganda-di-indonesia-ini-5-negara-yang-sudah-menerapkannya-61539>.

<sup>55</sup> Fath P. Mulya, "Menjawab polemic dwi-kewarganegaraan dengan skema OCI," *Antara*, 30 June 2024, <https://www.antaraneews.com/berita/4175127/menjawab-polemik-dwi-kewarganegaraan-dengan-skema-oci>.

<sup>56</sup> Antikowati et al. "Globalisation and Indonesia's Demand for Dual Citizenship: Problems and Alternatives," *Legality: Jurnal Ilmiah Hukum* 31, no. 1 (2023): 51-54.

like dual citizenship and citizenship-related matters, are recurring topics warranting the attention of Indonesian lawmakers.<sup>57</sup>

These recent events show how the debate on dual citizenship is becoming increasingly vigorous and gained more attention in the last decade. The Indonesian government seems to seek for a way to balance its historical commitment to single citizenship with the needs of its diaspora. The upcoming discussions in parliament under the new Indonesian government of president Prabowo Subianto will be decisive for Indonesia's management of this issue and its determination of the future of its citizenship laws.

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<sup>57</sup> Ady Thea, "Ini Daftar RUU Prolegnas 2025-2029 Usulan Komisi DPR," *HukumOnline*, 29 October 2024, <https://www.hukumonline.com/berita/a/ini-daftar-ruu-prolegnas-2025-2029-usulan-komisi-dpr-lt6720a3896855a/>.

### 3. Indonesians and potential Indonesians in the Netherlands

#### 3.1 The Indonesian diaspora in the Netherlands

The term *diaspora* comes from ancient Greek and means a population that is scattered across regions, separated from its geographic place of origin. Broadly speaking, diaspora is defined as a group of people who identify with a specific geographic location, but currently live elsewhere. However, the meaning of the word has evolved overtime and is interpreted differently depending on the context, which makes it hard to give one precise definition. Scholars like William Safran and Robin Cohen offer classical definitions of diaspora, which derive from the Jewish diasporic model that refers to forced exile from an ancestral homeland. Safran's framework identifies the dispersion as a result of trauma, with a strong connection to collective memory and a desire for eventual return to the homeland.<sup>58</sup> Cohen adds on this by including elements like maintaining connections with the homeland, the existence of a collective consciousness and the preservation of the homeland's culture in the host society.<sup>59</sup> However, this model of forced exile and collective memory does not entirely apply to the Indonesian diaspora in the Netherlands. Although there are certain groups, such as the Moluccan community and the Indonesian 1965 political exiles,<sup>60</sup> who were displaced to the Netherlands, who still feel a strong connection to their homeland and culture, and some of them do wish to return. Many others moved to the Netherlands voluntarily and for different reasons, such as for work, study or even relationships. This creates a diaspora that is not only first-generation migrants but also their children and grandchildren – second, third and even later generations – who have grown up in the Netherlands and who do not necessarily feel the desire to return to Indonesia.

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<sup>58</sup> William Safran, "Diaspora in Modern Societies: Myths of Homeland and Return," *Diaspora* 1, no. 1 (1991): 83-84.

<sup>59</sup> Robin Cohen, *Global Diasporas: An Introduction* (Seattle: University of Washington Press, 1997), 26.

<sup>60</sup> Indonesians who lost their Indonesian passport because of alleged communist sympathies, see David T. Hill "Indonesian Political Exiles in the Netherlands after 1965; Postcolonial Nationalists in an Era of Transnationalism," *Wacana* 23, no 3 (2022): 577-611.

The Indonesian diaspora is a relatively new concept. Earlier studies of Indonesians living abroad primarily concentrated on their ethnicities such as the Javanese<sup>61</sup>, Bugis<sup>62</sup>, Acehnese<sup>63</sup>, Minangkabau<sup>64</sup> and Moluccan<sup>65</sup> diasporas. Since the establishment of the Indonesian Diaspora Network in 2012, the term ‘diaspora’ became more popular and was widely used among Indonesians. The Indonesian Government does not officially use the term “diaspora” but rather refers to this group as overseas Indonesian citizens. The term that is used in documents concerning the Indonesian Diaspora is *Masyarakat Indonesia di Luar Negeri*, and subsequently, *Kartu Masyarakat Indonesia di Luar Negeri*.<sup>66</sup> In the 2017 Presidential Regulation No. 76, the Indonesian diaspora is defined as Indonesian citizens who reside and/or work abroad.<sup>67</sup> However, this definition does not encapsulate all people of Indonesian origins who have become foreign citizens or those who still have family connections to Indonesia or even to the former Dutch East Indies. Dino Patti Djalal classifies the Indonesian diaspora in four categories: first, the Indonesian people who legally still have their Indonesian passports; second, the Indonesians who became foreign citizens after a process of naturalization and no longer have their Indonesian passports; third, foreigners who through either familial lineage or historical connections have ties to Indonesia; and last, category, although more contested and at odds with the classic diaspora concept, the “special friends of Indonesia” or the ‘Indonesianists’ who have no Indonesian heritage at all,

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<sup>61</sup> Peter J. J. Meel. “De Javaanse diaspora in Suriname en de notie van een thuisland.” *Het verre gezicht. Politieke en culturele relaties tussen Nederland en Azië, Afrika en Amerika. Opstellen aangeboden aan Prof. dr. Leonard Blussé*, edited by Lindblad J.Th. & Schrikker A.F. (Franeker: Van Wijnen, 2011), 403-421.

<sup>62</sup> Andi F. Bakti, *Diaspora Bugis di Alam Melayu Nustantara* (Makassar: Inninawa, 2010).

<sup>63</sup> Antje Mißbach, et al. *Politik jarak jauh diaspora Aceh : suatu gambaran tentang konflik separatis di Indonesia* (Yogyakarta: Ombak, 2012).

<sup>64</sup> Oka A. Yoety, *Diaspora Perantau Minang: Sukses di Rantau, Enggan Pulang Kampung* (Bandung: Angkasa, 2017).

<sup>65</sup> Hans van Amersfoort, “The Waxing and Waning of a Diaspora: Moluccans in the Netherlands, 1950-2002,” *Journal of Ethnic and Migration Studies* 30, no. 1 (2007): 151-174.

<sup>66</sup> “Kartu Masyarakat Indonesia di Luar Negeri (KMILN) atau Kartu Diaspora,” *Indonesia.go.id*, 24 November 2024, <https://indonesia.go.id/kategori/kependudukan/1397/kartu-masyarakat-indonesia-di-luar-negeri-kmiln-atau-kartu-diaspora>.

<sup>67</sup> Presidential Regulation 76/2017 on facilities for Indonesian communities overseas: <https://iocs.kemlu.go.id/assets/downloads/PERPRES-76-THN-2017-KMILN.pdf>

but have an extraordinary love for Indonesia.<sup>68</sup> This very inclusive definition makes it difficult to determine how many members of the Indonesian diaspora there are worldwide.

According to the Ministry of Justice and Human Rights and the Ministry of Foreign Affairs, the Indonesian diaspora consists of about 6 to 9 million people in 2023.<sup>69</sup> This includes Indonesian citizens, foreign citizens who are children of Indonesian citizens, former Indonesian citizens, and children of former Indonesian citizens. Indonesian diaspora communities are also highly diverse in their demographic profiles. While more middle- and upper-class Indonesians with substantial financial resources are moving to more wealthy Western countries, the majority of Indonesians working overseas are migrant workers, mainly employed as domestic helpers or in low-skilled labour. The large scale migration of low-skilled workers from the Philippines, Thailand and later Indonesia began in 1973, when a rise in global oil prices created a demand for manpower in Saudi Arabia and other Middle Eastern countries. During the 1980s and 1990s, these migrant workers increasingly moved to Japan, South Korea, Taiwan, Hong Kong and Singapore.<sup>70</sup> The Ministry of Manpower estimated that by 2016 there are up to 6.5 million Indonesian migrant workers abroad, mostly in Malaysia and Saudi Arabia. These workers are often undocumented and have little financial or social resources.<sup>71</sup>

The Indonesian diaspora in the Netherlands has a different composition and background than the Indonesian diaspora elsewhere. The Indonesian archipelago was a Dutch colony for over 300 years, starting from the beginning of the seventeenth century until Indonesia's independence in 1945. Available estimates on the size and distribution of the Indonesian diaspora in the Netherlands vary greatly, depending on how it is defined, the data source, and the variables used to derive these estimates. According to AlleCijfers.nl, which

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<sup>68</sup> Bilal Dewansyah, "Indonesian Diaspora Movement and Citizenship Law Towards 'semi-dual citizenship'," *Diaspora Studies* 12, no. 1 (2019): 56.

<sup>69</sup> Ertar Darwati, "Kemlu: 2,2 Juta WNI Tinggal di Luar Negeri," *Bisnis.com*, 19 December 2023, <https://kabar24.bisnis.com/read/20231219/15/1725324/kemlu-22-juta-wni-tinggal-di-luar-negeri>.

<sup>70</sup> Graeme J. Hugo, "Changing Patterns of Population Mobility," *Demographic Change in Southeast Asia: Recent Histories and Future Directions*, edited by Lindy Williams and Michael Philip Guest (Cornell University Southeast Asia Program, 2012), 124.

<sup>71</sup> Pebrianto E. Wicaksono, "Jumlah Pekerja Asing di RI Masih Sedikit Ketimbang TKI," *Liputan 6*, 31 December 2016, <https://www.liputan6.com/bisnis/read/2692942/jumlah-pekerja-asing-di-ri-masih-sedikit-ketimbang-tki>.

collects data from public and open government sources, there were 349,301 Dutch people with an Indonesian migration background in 2022.<sup>72</sup> This includes both first-generation individuals born in Indonesia and second-generation individuals born in the Netherlands with at least one Indonesian parent. However, these estimates do not account for third- and fourth-generation Indonesians, such as the Moluccan diaspora, who have lived in the Netherlands for several generations. Nor does it include people with an Indo-European heritage, whose roots trace back to the former Dutch East Indies, and the Surinamese Javanese. The Javanese were brought to Suriname as indentured labourers during colonial times, and later many of them moved to the Netherlands.<sup>73</sup> The Indonesian Embassy of the Netherlands, on the other hand, did include them and estimated approximately 1.7 million people with Indonesian ancestry in 2021.<sup>74</sup> It is nearly impossible to accurately estimate the size of the Indonesian diaspora in the Netherlands, especially when it includes people with far away ancestral ties from the former Dutch East Indies.

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<sup>72</sup> Allecijfers, "Migratie uit Indonesië en Indonesische inwoners in Nederland," 2022, accessed 25 October 2024, <https://allecijfers.nl/migratie-nationaliteitengeboortelanden/indonesie/>.

<sup>73</sup> Peter J. J. Meel, "Javanese in Suriname: Between Multi-ethnicity and Nationalism," *Departing from Java: Javanese Labour, Migration and Diaspora*, edited by Rosemarijn Hoefte and Peter J. J. Meel (Copenhagen: Nordic Institute of Asian Studies 2018) 238-266.

<sup>74</sup> Emiten, "Diaspora Indonesia di Belanda Semangat Bangun Negeri via Investasi," *EmitenUpdate.com*, 5 August 2021, <https://emitenupdate.com/2021/08/05/diaspora-indonesia-di-belanda-semangat-bangun-negeri-via-investasi/>.

## 4. Diaspora Views

### 4.1 Introduction

The question of dual citizenship in Indonesia has been a subject of debate both within the country and among the Indonesian diaspora. This section presents an attempt at gathering sincere statements of individuals from the Indonesian diaspora in the Netherlands in how they think about dual citizenship for themselves as well as for Indonesia.

### 4.2 Research Design

This research used semi-structured interviews which means that while a set of guiding questions was prepared, there was also room for participants to freely share their thoughts, opinions and ideas. The list of guiding question is included in the appendix. This approach allowed for a more in-depth conversation with the participants to find out their personal motivations and perspectives on dual citizenship than questionnaires would have. Moreover, participants could raise points that were important to them or elaborate on topics that the guiding questions did not fully cover. The guiding questions focused on key themes, such as whether participants would choose dual citizenship if it were allowed, their motivations behind this decision and how they believed dual citizenship would impact their personal and professional lives as well as Indonesia as a whole. This ensured that every participant was asked similar questions.

### 4.3 Participant selection

In total, 14 people were interviewed. The participants came from my own social circle, but I made an effort to include individuals with a range of different backgrounds and experiences. Participants were selected based on their eligibility for dual citizenship, meaning that they are eligible for Indonesian state citizenship by law. This meant that they comply to the definition that is mentioned in article 12 of the 2006 Citizenship Law concerning Citizenship of Republic of Indonesia. Eligibility for Indonesian citizenship of Indonesia include individuals who had previously been an Indonesian citizen as well as children born from one or two parents who are or had previously been citizens of Indonesia. For the purpose of this research, only the following conditions from the law are considered, as they are most relevant. Indonesians who moved to the Netherlands and (permanently) settled here were also selected because under



Indonesian law they would be eligible for dual citizenship if it were allowed. However, their situation also depends on how the Netherlands handles dual citizenship, although this applies in both directions. The participants were divided into two groups: Indonesian passport holders and Dutch passport holders with Indonesian heritage.

The main criteria for selection were that participants were either Indonesians living in the Netherlands or Dutch citizens with Indonesian heritage. This included participants who were born and raised in Indonesia and had moved to the Netherlands as well as those with one or both parents who are or had been Indonesian citizens. The participants came from different backgrounds, including education, business, healthcare and arts. Those who had moved to the Netherlands did so for different reasons, such as work, study or relationships. Quantitative assessment was carried out to measure how often particular themes were mentioned during the interviews. Special attention was given to participants' motivations behind their interest in dual citizenship, how they thought it would affect their lives, and how they believed it would benefit Indonesia. By organizing the information around these motivations and themes, this research aims to explore whether the expectations of the Indonesian diaspora in the Netherlands aligns with or differs from the broader discussions and claims on dual citizenship in Indonesia.

#### 4.4 Interview process

The interviews were conducted between 7 October and 18 November 2024. Participants were interviewed either in person or via the online platform Teams, depending on their availability. Each interview lasted between 15 minutes and one hour. Before the interviews started, the participants were informed about the purpose of the study and they were asked for consent for being recorded and whether their names could be used in this research or if they wanted to be anonymized. With the consent of the participants, all interviews were recorded. I tried to remain as neutral as possible and did not share ideas or made suggestions beforehand, so that the participants were not biased and could bring up their own points that were relevant to them in relation to dual citizenship.

#### 4.5 Data analysis

During the interviews, notes were taken and the transcription function available in Teams and my iPhone was used. This saved time from having to transcribe the interviews manually and I was able to dedicate more time at reviewing the automatically generated transcripts and selecting the information that is most relevant to my research. A thematic analysis was then carried out to find common themes and patterns. Each interview was carefully reviewed, and important points about the participants' motivations, benefits, and concerns about dual citizenship noted. These key points were then organized into broader themes, such as economic motivations, emotional or cultural ties to Indonesia, and legal or political considerations. Then, a quantitative assessment was made to see how frequently certain themes were mentioned by participants. This helped to quantify the different motivations of the participants.

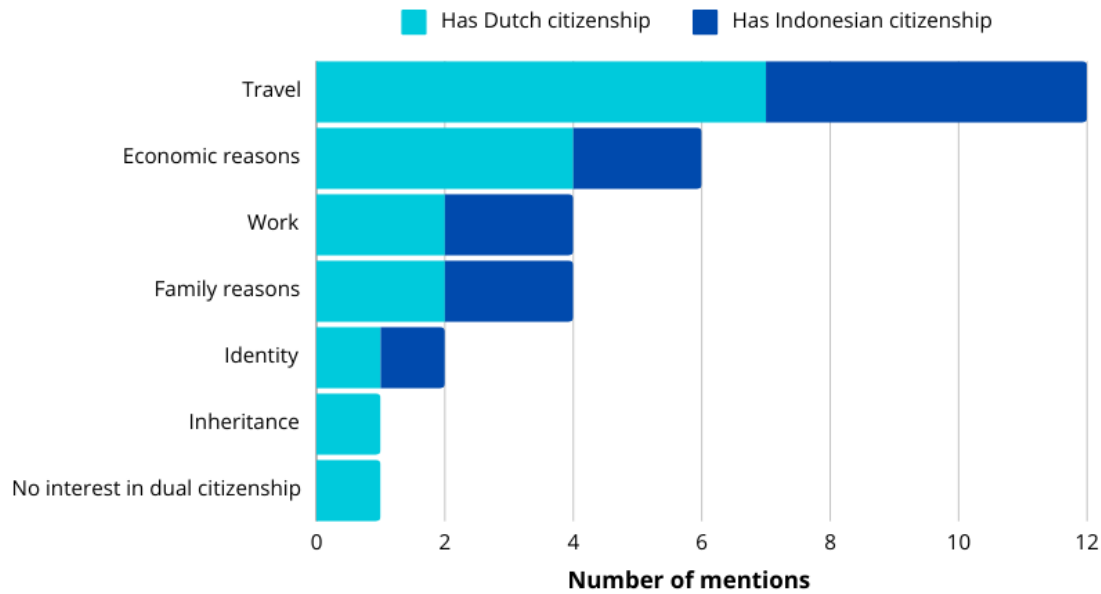
#### 4.6 Motivations and impacts of dual citizenship

An important part of the interviews focused on the participants' motivations for either pursuing or not pursuing dual citizenship. The guiding questions targeted themes such as:

- Whether participants would choose dual citizenship if it were allowed
- Their motivations behind this decision
- How they believed dual citizenship would impact their personal and professional lives.
- How they thought dual citizenship would affect Indonesia as a whole

#### 4.7 Personal motivations for dual citizenship

The different personal motivations for dual citizenship mentioned during the interviews are ranked in figure 1 on the basis of the number of times they were mentioned. A motivation mentioned by all participants was travel. Economic reasons were also frequently mentioned as a motivation by the participants. The results are summarized into key themes based on personal motivations and opinions regarding dual citizenship. The number of mentions for each category is shown in the figure down below. One outstanding observation is that when participants were asked what they would do differently if they had dual citizenship that they currently cannot, most either said that they would not change much or admitted they did not know what they would do.



**Figure 1. Personal motivations for dual citizenship mentioned by participants during semi-structured interviews.** (n= 14; participants often mentioned more than one motivation).

#### 4.7.1 Travel convenience

Almost all participants mentioned the ease of traveling with dual citizenship. They felt that having a dual citizenship would make travel easier, especially when there is no need for applying for visa. S.J.G. Litaay, former second president of the Indonesian Diaspora Network in the Netherlands, explained that having both nationalities would simplify travel and remove common hurdles faced by the diaspora. He shared:

"Having dual citizenship would bring a lot of practical benefits. For example, entering Indonesia and staying for an extensive period. I wouldn't have to worry about getting a visa just to travel to Indonesia. It would really simplify a lot of things."

Almost all participants with Dutch citizenship mentioned this inconvenience of standing in line upon arrival in Indonesia.<sup>75</sup> However, it should be taken into account that the cost of a Visa on Arrival (VOA) is relatively low and Indonesian citizens also have to wait at immigration, albeit in a different line. It may be possible that this desire to avoid the 'foreigner' line comes from a wish among some Dutch participants to be seen as 'insiders' in Indonesia.

<sup>75</sup> The Visa on Arrival costs Rp. 500.000 (or about 30 euros) and is valid for 30 days; see: <https://indonesia.nl/en/visa/visa-on-arrival>

Likewise, Hermansyah, the taskforce driver in immigration and citizenship of the Indonesian Diaspora Network, expressed that dual citizenship would be highly convenient for frequent travellers like himself. He explained,

“If I have dual citizenship, it gives me so much convenience. With a Dutch passport, I can travel to more than 190 countries without a visa.”

The participants with Indonesian citizenship mostly mentioned travelling because they wanted easier access to countries that require a visa for Indonesian passport holders, but not for Dutch passport holders. Agus Hermawan, the executive chef in Ron Gastrobar Indonesia, who has lived in the Netherlands for almost three decades, had switched to Dutch nationality for easier travel, especially in Europe and other Western countries, he noted the challenges he now faces when going back to Indonesia:

“I switched from Indonesian to Dutch nationality mainly because it makes traveling so much easier, especially within Europe and other Western countries. I remember a time in the U.S. when I still had my Indonesian passport—I was taken apart for extra checks and questioning, while my colleagues [with Dutch passports] just passed through without any problems. With my Dutch passport, I don’t really have situations like that anymore.”

Nur Sobari, a student born and raised in the Netherlands, holds Indonesian citizenship because both her parents are Indonesian citizens. She expressed a similar sentiment and shared a story about her travel to South Korea where she had to go through all the paperwork for a visa because she holds an Indonesian passport. These experiences show how passport status can affect treatment in international travel. For them, wanting dual citizenship comes from the wish to make traveling easier and avoid the limits that come with an Indonesian passport.

David Tanugraha, originally from Jakarta, also mentioned travel convenience as a factor in his decision to pursue Dutch citizenship. He currently holds Indonesian citizenship, but is in the process of applying for Dutch nationality, which is primarily for work reasons, so he has access to more countries without the need for visas. David also mentioned that it

would help him avoid the hassle of dealing with his migrant visa, like worrying about housing or in case he might lose his job.

Also, Linawati Sidarto, an Indonesian freelance journalist and translator, who has lived in the Netherlands for 26 years, shared how costly and time-consuming it can be to travel outside the Schengen area with an Indonesian citizenship. For instance, she had to pay over €1,600 for a 10-year UK visa just to avoid repeatedly applying for short-term visas.

#### 4.7.2 Economic reasons

A number of different economic reasons were mentioned by the participants. An anonymous participant in government function said he would consider dual citizenship if it allowed him to avoid higher taxes, although he doubts that such policy would be implemented considering Indonesia's current national context.

Henry Timisela, as a self-employed entrepreneur working as a museum director, policy advisor, and owner of a theatre company owner, sees dual citizenship as a practical way to simplify administrative processes related to expanding his business in Indonesia. Also, Wim Manuhutu acknowledged that dual citizenship could be useful in these kinds of scenarios, but especially in opening an Indonesian bank account or simplifying visa procedures for extended stays.

Wiwi Tjiok, a landscape architect in the municipality of Rotterdam, moved to the Netherlands around 1965 and changed her nationality about two decades ago. She viewed dual citizenship as beneficial for economic reasons. Currently, she has the Kartu Diaspora, a card that gives some privileges to Indonesians living abroad, such as easier access to certain services in Indonesia, including opening a bank account. Wiwi finds that the Kartu Diaspora only offers limited access compared to what dual citizenship could provide to her own professional life:

“The Kartu Diaspora helps a bit, but it doesn't give me the freedom I'd have as an Indonesian citizen, like managing property more effectively.”

An anonymous participant mentioned the ability to visit touristic attractions in Indonesia for less money as a benefit of dual citizenship.

#### 4.7.3 Work

Another common reason mentioned in the interview was work opportunities. Both S.J.G. Litaay and Hermansyah said that dual citizenship would make it easier for Dutch citizens with Indonesian heritage to work in Indonesia without facing the restrictions that come with foreign citizenship. Hermansyah shared that dual citizenship could open more career options, not only in Indonesia but also internationally. He believed that holding both Indonesian and Dutch citizenship would enable him to invest in Indonesia and potentially start a business there, as these activities are often restricted for foreign nationals. Litaay also explained that professionals like doctors, engineers, architects and researchers, even if they have strong ties to Indonesia, often struggle to get permission to work there because they hold Dutch citizenship. They need a special working visa to work there or to give lectures, but it would have been easier if they could get dual citizenship. He shared a personal experience:

“I was invited to give a lecture at an Indonesian university [while already being in Indonesia for family reasons with a visa on arrival], but I rejected it because, officially, it requires a business or invitation visa from the university itself. I decided not to go through with it because I was afraid of losing my visa or, worse, being banned from entering Indonesia for a certain period.”

Wim Manuhutu, a lecturer at VU university in Amsterdam, became a Dutch citizen at the age of 28 after growing up stateless. Many Moluccans, including Wim's family, arrived in the Netherlands in 1951. They were initially considered Indonesian citizens due to Indonesia's independence but many refused this as they did not see themselves as Indonesian. This decision left many of the Moluccan community, including Wim, into a position of statelessness. For Wim, getting the Dutch citizenship was a practical decision which he describes as an administrative formality to simplify his life, especially work related. He supported the idea of dual citizenship, and unlike S.J.G. Litaay and Hermansyah, he has not had significant obstacles when working in Indonesia:

“With just my Dutch passport, I can already do whatever I need in Indonesia, like traveling and guest lecturing at universities. It usually just requires a different visa [for work reasons] than a tourist visa.”

While he saw some benefits to dual citizenship, such as easier access to opening an Indonesian bank account or staying longer without visa renewals, he did not feel it would add significant value for him as for now. It is more the practical convenience of dual citizenship is appealing, but not essential for his current work in Indonesia.

Nur Sobari, who is interested in both Dutch and Indonesian work environments, felt that dual citizenship would let her explore career opportunities in both countries without the limitations of single nationality.

Henry Timisela, a Dutch citizen of Moluccan descent, sees dual citizenship as a practical benefit that could make his work easier. As an entrepreneur, he believes that dual citizenship would help facilitate “paperwork, permits and the like” when doing business in Indonesia and explained that “with just Dutch nationality, you still face restrictions in these areas.” Dual citizenship could make these processes a bit easier. Professionally, he sees dual citizenship as a useful benefit and that would simplify the administrative processes when doing business in Indonesia. borders and could create more job opportunities, boosting business in Indonesia. Henry also thinks dual citizenship could bring benefits by creating more job opportunities and supporting economic growth. He brought up that: “Indonesia is very willing to involve members of the Indonesian diaspora in efforts to improve and strengthen the country’s economy, and dual citizenship could be a practical way to support that effort.”

#### 4.7.4 Identity

For some, dual citizenship was about feeling connected to both countries and cultures. Aone van Engelenhoven, university lecturer at Leiden University, found himself often “split in half” between his Dutch and Indonesian upbringing. He explained,

“I am Dutch, born and raised here, fluent in the language, but there are moments where my thoughts make more sense when I translate them into Indonesian. I do many things in the Indonesian way. It’s just part of who I am.”

When asked about his interest in dual citizenship, Aone shared that it was more than just practicality. He believes that having both Dutch and Indonesian citizenship would let him to fully acknowledge his cultural background without the need to sacrifice either part of himself:

“For me, it’s an identity thing, I wouldn’t have to choose between my two sides. However, I would never give up my Dutch citizenship for Indonesian citizenship, but if I could have both, it would better represent who I am.”

Nur Sobari, who grew up in the Netherlands but has Indonesian roots, shared that her identity does not align with just one culture. She feels connected to both her Indonesian heritage and her Dutch upbringing and surroundings, but she does not fully identify with just one. Nur shared:

“Living here, I’m used to Dutch life, but I don’t feel fully Indonesian or fully Dutch; I’m somewhere in between.”

For both Aone and Nur, dual citizenship is not just a matter of convenience but more about representing who they are and feeling whole in their connection to both Indonesia and the Netherlands. So for them, dual citizenship would mean not having to pick one side over the other.

#### 4.7.5 Family reasons

Family was a reason mentioned for some participants who wanted dual citizenship. An anonymous participant born and raised in Indonesia, but currently living and working in the Netherlands as a lecturer in university, said it would give his children more opportunities and benefits in the future, as they would have more flexibility in choosing jobs in the Netherlands, Europe and in Indonesia. The participant said:

“If my son had dual citizenship, he would have a backup option. If he wants to work outside the Netherlands, he can, and he would still have the option to come back. But if he only holds an Indonesian passport, it becomes more complicated, because he has to make sure to come back within 8 months.”

S.J.G. Litaay also mentioned family as a key factor. His family came to the Netherlands in the 1950s as part of the Moluccan community that settled in the country. Originally from Saparua and Nusalaut, Litaay’s family has often talked about returning to the Moluccas. Litaay



explained that dual citizenship would make this dream more feasible by eliminating restrictions on how long they could stay in Indonesia:

“If we had dual citizenship, we wouldn’t have to worry about visa limits or facing bureaucratic hurdles each time we want to stay for a longer period or want to take care of the family.”

#### 4.7.6 Inheritance

One participant mentioned inheritance as a reason for dual citizenship. S.J.G. Litaay explained that with dual citizenship, the ownership of his family’s house is clear and you can claim it, otherwise you need to transfer it to family members who do have the Indonesian citizenship but are not direct family. His family possesses a so-called *rumah adat* (custom house) and *tanah dati* (family grounds) which is seen as holy for the family.

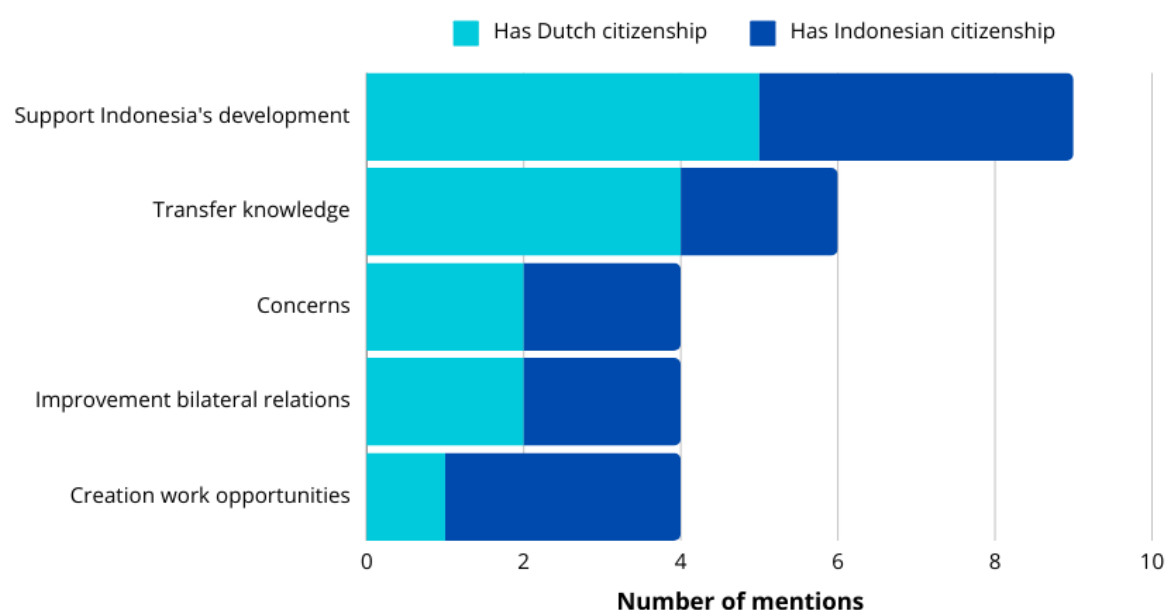
#### 4.7.7 No interest in dual citizenship

Not everyone was in favour of dual citizenship. A Dutch anonymous participant who works in education was not interested and said:

“Having dual citizenship means paying more taxes and fees [for instance, when applying for the passport]. Sure, it might make travel easier, but those extra responsibilities are making it less attractive for me.”

### 4.8 Broader impact of dual citizenship on Indonesia

Participants were specifically asked about their thoughts on the broader impact of dual citizenship on Indonesia. These responses were grouped into main themes and ranked in figure 2 on the basis of the number of times they were mentioned. Most participants mentioned the idea of “supporting Indonesia’s development” as a key benefit of dual citizenship. Other themes were transferring knowledge, the creation of work opportunities and the improvement of bilateral relations between Indonesia and the Netherlands, but were not discussed in as much depth as the other themes. Some participants were concerned about the issue of loyalty when it comes to dual citizenship. These concerns mainly came from how they thought others would perceive them when they would get dual citizenship.



**Figure 2. Broader impact of dual citizenship on Indonesia mentioned by participants during semi-structured interviews.** (n = 14; respondents expected multiple impacts at the same time)

#### 4.8.1 Supporting Indonesia's development

Several participants thought that dual citizenship would benefit Indonesia by making it easier for diaspora members to contribute to the country's development. Although this is a broad category, it essentially means the desire among participants to give something back to Indonesia, whether through sharing skills and knowledge (human capital) or providing financial support. Wiwi Tjiok sees dual citizenship as a way to contribute more directly to Indonesia's development. She pointed out that if dual citizenship were allowed, professionals could work more easily in Indonesia without having to go through the complicated process of obtaining a special work permit or visa.

"Take doctors for example, there are so many skilled Indonesian doctors abroad who would love to work or volunteer in Indonesia, but it's not straightforward. They need permits, they face long waiting times, and they can't practice as freely as they would if they still had Indonesian citizenship."

She believed that allowing dual citizenship would make it easier for these experts to bring their skills back to Indonesia, which would be a huge benefit for the country's healthcare

system. In the same way, Nur Sobari also believed that people with Indonesian heritage who have skills and education from the Netherlands could easily work in Indonesia, they would be more likely to go there and help. She thought that this would bring more brain gain to Indonesia, as people with expertise would feel more encouraged to support the country if they could move back and forth more freely:

“Dual citizenship could make it easier for people to work in Indonesia without all the hassle of visas and permits. This would attract skilled people who want to give back, if it was easier to do so.”

An anonymous participant, who has experience working in Indonesian governmental roles in the Netherlands, explained that dual citizenship could encourage business activities in Indonesia by simplifying travel and investment procedures. He noted that Indonesians living abroad want to invest in property or set up businesses in Indonesia but face difficulties due to their status as foreign nationals. He said:

“If you don’t have Indonesian citizenship, you’re restricted in what property you can own and how you can run a business. Dual citizenship could open doors for those who genuinely want to contribute to Indonesia’s growth.”

#### 4.8.2 Concerns and Reservations

Philine Wairata, another student with Dutch nationality, was more hesitant about dual citizenship. Her father, a second-generation Moluccan born in the Netherlands, came from the group of Moluccans whose families were placed in former concentration camps around the 1950s. Many Moluccans in the Netherlands still experience a strong resentment towards Indonesia because of the past conflicts and a desire for independence from Indonesia. This makes Indonesian citizenship a sensitive topic. However, Philine also expressed concerns about how dual citizenship might be perceived in her community. She said:

“There are a lot of negative feelings about Indonesia among Dutch Moluccans. If I get Indonesian nationality, people in my community might not accept it and even frown upon it, which makes me a bit uncomfortable.”

She was not sure if dual citizenship would be worth it, as it might cause awkwardness in her community.

An anonymous Indonesian civil servant in the Netherlands raised a different concern and said that some people in Indonesia might consider those with dual citizenship as less loyal, especially if the other nationality is from the former colonizer. The previous anonymous participant who worked in an Indonesian governmental role explained that some people in Indonesia, particularly those with more conservative or traditional views, might see dual citizenship as a lack of nationalism. The participant said: “There’s this perception among some people back home that living abroad or having another citizenship makes you less Indonesian. Especially for Indonesians living and working in the Netherlands, Indonesia’s former colonizer.”

## 5. Conclusion

This research shows a clear difference between what the Indonesian diaspora in the Netherlands wants from dual citizenship and what the Indonesian government is worried about. In the history of citizenship in Indonesia, dual citizenship has been mostly absent and actively avoided. After gaining independence in 1945, Indonesia mainly focused on building a strong national identity and dual citizenship matters were not explicitly addressed. Under the 1946 law, dual citizenship was practiced in some cases because there were no laws explicitly forbidding it. This meant that people who already had another citizenship, like the Chinese Indonesians or children in mixed-nationality families, could also hold Indonesian citizenship without giving up their other nationality. The 1958 law required people to renounce their other citizenships in order to stay or become an Indonesian citizen. While dual citizenship was likely still held by some people in practice, there were no formal laws on dual citizenship until the 2006 reforms, which stated that children could legally hold dual citizenship until the age of 18 (extendable to 21). However, the 2006 law was mainly focused on making Indonesian society more inclusive within the nation, but not on giving its diasporas communities the same rights and recognition.

In recent years, debates on dual citizenship have grown, especially with the Indonesian Diaspora Network (IDN) pushing for it as a way to bring economic benefits like remittances, investments and cultural promotion. However, critics worry about divided loyalties, security and potential exploitation by outsiders. As a compromise, the Indonesian government introduced the Diaspora Card in 2017 and the Golden Visa in 2023. However, critics argue that the Diaspora Card does not offer any practical benefits for non-Indonesian citizens and that the high financial requirements of the Golden Visa make it inaccessible to those who do not have the means to meet the criteria.

Since 2002, the organization Aliansi Pelangi Antar Bangsa has fought for more inclusive policies, such as lifelong dual citizenship for children of mixed marriages. However, these efforts only led to the issue being included in the National Legislation Program (Prolegnas) twice, without any concrete results, as the bill has not been prioritized or discussed in Parliament since it was first introduced in 2014. Recently, the debate on dual citizenship in Indonesia has again attracted more attention. In 2024, Minister Luhut Pandjaitan supported dual citizenship as a way to bring back skilled Indonesians from abroad to help the country

grow. Minister Yasonna Laoly proposed a middle ground, inspired by India's "Overseas Citizenship," which offers rights such as a lifetime visa without full citizenship. The inclusion of dual citizenship discussions in Indonesia's 2025-2029 government program shows that it remains a recurring but unresolved issue as this is the third time it has been part of the legislative agenda. This time, the outcome will depend on how the new Indonesian government under President Prabowo Subianto addresses the issue.

The Indonesian diaspora in the Netherlands has a unique history that is shaped by Indonesia's colonial past. It is very diverse in terms of generations, identities and connections to Indonesia. Over the past few decades, waves of different groups moved from the Indonesian archipelago to the Netherlands. Estimates suggest there are about 350,000 people with an Indonesian migration background, including first-generation migrants and their descendants. However, if we also consider people with Indo-European and Moluccan heritage or ties to the former Dutch East Indies, the number could be closer to 1.7 million. These estimates vary depending on how the diaspora is defined.

My research included interviews with 14 people from the Indonesian diaspora in the Netherlands, from different backgrounds and generations. The results show that their views on dual citizenship are mainly based on anticipated practical benefits, rather than on considerations of identity or loyalty. Most participants saw dual citizenship as a way to make life easier, such as easier travel, better job and investment opportunities, or the ability to start businesses or own property in Indonesia. These reasons focus on convenience and opportunity. Only two participants mentioned dual citizenship as something that reflects who they are, because they felt like they belonged to both Indonesia and the Netherlands. While participants who did not hold Indonesian citizenship did not express understanding for the conservative position, some participants who were Indonesian citizens said they could understand why others in Indonesia might feel uneasy about dual citizenship or even disapprove it. When asked how dual citizenship could benefit Indonesia, most participants focused on economic benefits, such as creating jobs, supporting Indonesia's development, transferring knowledge and improving ties between countries. These benefits often overlap with possible personal advantages, such as making it easier for diaspora members to invest or start businesses in Indonesia. A few participants saw dual citizenship as a way to strengthen ties between Indonesia and the Netherlands, but this was also linked by the informants in

question to practical benefits like trade or travel. Emotional or symbolic benefits for Indonesia were rarely mentioned.

The finding that most participants did not focus much on identity when talking about dual citizenship is perhaps surprising. This challenges the common idea that citizenship is about belonging to two places and two identities. For many, dual citizenship was more about solving practical problems, like traveling, finding better job opportunities, or managing property. This raises the question: is dual citizenship just a practical tool– a piece of paper that gives practical benefits like skipping lines at the airport? This way of thinking supports some of the concerns that Indonesian opponents of dual citizenship have, confirming that people might use dual citizenship only for personal benefits, without showing real loyalty or commitment to Indonesia. If dual citizenship is mainly seen as a way to make life easier for the diaspora, it might be that it does not fit with Indonesia's values of national unity and loyalty.

So for members of the Indonesian diaspora, it might be important to reflect on what dual citizenship really means to them. Is it just about the practical benefits or could it genuinely be a way to stay connected to Indonesia? If dual citizenship is framed as a way to build stronger cultural and emotional ties to Indonesia, it might help to ease some of the concerns of those who are against it. This focus of the Indonesian diaspora on practical benefits is also emphasized in Latifa's research on the Indonesian Diaspora Network.<sup>76</sup> She points out that the connection between the diaspora and Indonesia has become very business-focused, which is evident from IDN's overrepresentation of professionals and elites, while manual workers and ordinary people receive little attention. This shows how the diaspora is presented to the Indonesian government as a way to bring economic value rather than as a group with strong cultural and emotional connections. However, it is also worth noting that Indonesia's official approach to citizenship seems itself to be somewhat contradictory. Although the country values diversity and inclusivity with its motto *Bhinneka Tunggal Ika* (unity in diversity), when it comes to uniting and including the overseas diaspora in the community of the nation, there is reluctance and doubt.

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<sup>76</sup> Inditian Latifa, "Neoliberalism and Reconfiguration of the Diaspora in Contemporary Indonesia," *Paradigma Jurnal Kajian Budaya* 9, no. 1 (2019): 1-14.

Looking at the Filipino diaspora in the United States gives us an interesting comparison to Indonesia's debates about dual citizenship. The Philippines introduced dual citizenship in 2003 to allow Filipinos who had become citizens of other countries to reclaim their Filipino citizenship. This was a big step toward including the diaspora as an important part of the nation. However, just like in Indonesia, people worried about whether dual citizens could stay loyal to the country or whether they would only see the economic benefits of it. Despite these concerns, Filipino dual citizens seem to have stronger ties to their homeland compared to the Indonesian diaspora. This is partly because of the *balikbayan*<sup>77</sup> tradition in Filipino culture, where returning to the Philippines and staying connected to family is highly valued. On top of that, the Filipino diaspora has some representation in politics through initiatives like overseas voting, as well as Filipino media, like the Filipino Channel (TFC), helps the diaspora to stay in touch with the Philippines by showing news and other cultural content.<sup>78</sup> For Indonesia, the experience of the Filipino diaspora shows us that that focusing only on economic benefits, like remittances or investments, is not enough to build a strong connection between the diaspora and the homeland. If Indonesia creates something similar for its diaspora – like platforms for representation in media or participation in politics – it could help address fears about divided loyalties and make the connection between the diaspora and the nation stronger.

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<sup>77</sup> The *balikbayan*, literally meaning “one who continually leaves and returns home,” is tangibly linked to the homeland through the practice of *pasalubong* (Filipino for gift giving) and remittances; see Jonathan Okamura, *Imagining the Filipino American Diaspora: Transnational Relations, Identities, and Communities* (New York: Garland Publishing, 1998), 123-125.

<sup>78</sup> Kathleen Melissa Martinez, *Finding a Home for Filipino-American Dual Citizens: Membership and the Filipino National Identity* (master's thesis, Georgetown University, 2007), introduction and conclusion.



## Appendix

### Appendix 1: Guiding Interview questions

1. What is your current citizenship status? Dutch or Indonesian? What is your connection with Indonesia?
2. What is your region of origin?
3. What is your occupation?
4. IF WNI, how long have you been residing in NL?
5. IF WNI, what was the purpose for your move to NL?
6. Have you previously switched your citizenship?
7. Do you have a history in dual citizenship?
8. Would you be interested in obtaining dual citizenship? Why or why not? And would you take it if it was allowed? Why or why not?
9. Why would you personally take (or not take) dual citizenship?
10. How would dual citizenship impact your personal life?
11. How would dual citizenship impact your professional life?
12. Do you think your identity as Indonesian or Dutch would change if you were able to hold dual citizenship?
13. What possibilities do you see if dual citizenship were allowed?
14. Do you feel that having dual citizenship could have any impact on your sense of belonging or loyalty to Indonesia/Netherlands. And if so, how?
15. How would dual citizenship impact Indonesia? (positively or negatively)
16. How do you believe your community views dual citizenship. Positive, negative or neutral? Why?

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