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The Citizenship Paradigm Debate in Dual Citizenship Discourses in Indonesia

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Abstract: Various adjustments regarding citizenship law regulations in Indonesia still do not provide accommodation for all citizens. After the enactment of Law Number 12 of 2006 concerning Citizenship, there was pressure from the Indonesian diaspora to implement dual citizenship. This urge received a rejection from other citizens because it endangered security, economy, politics and questioned loyalty as a citizen. This study aims to examine in the literature the differences in paradigms of globalist and nationalist groups in Indonesia and the reality that occurs in other countries regarding dual citizenship. The study uses a qualitative approach with a literature study to examine the issue of dual citizenship in Indonesia and compare the development of dual citizenship in other countries. The results showed that the debate on the dual citizenship paradigm is in the material and immaterial debates. The group that supports dual citizenship wants distributive justice in terms of material (economics) for those who live abroad. In contrast, the opposing group wants to maintain immaterial aspects. (identity, culture, and ideology). This situation makes Indonesia unable to fully implement dual citizenship. Besides that, Law Number 12 of 2006 concerning citizenship at the beginning of its formation was intended to prevent *apatride* and *bipatride*. On this basis, recommendations for stakeholders related to dual citizenship need to be careful in making policies, being able to accommodate the various wishes of citizens, as well as further reviewing the legal and social impacts caused when implementing dual citizenship in Indonesia.

Keywords: citizenship paradigm; dual citizenship; Indonesia

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1. Introduction

In nowadays, political science researchers are accustomed to discussing and developing the scope of understanding the state in the context of the triangular relationship between the state, citizens, and the market, each of which plays a role in the dynamics of the development of a nation's civilization (Beall et al., 2013). In this case, citizenship is a real issue for a person in a country because the rights and obligations of newborns are related to citizenship status (Lister, 2007). However, the state ultimately provides the limits and requirements for citizenship. A person's citizenship status also determines his submission to legal jurisdiction in a country (Krasniqi, 2019).

Even though it has a long history, many regulations regulate it, and there has been a lot of progress, the issue of citizenship in Indonesia still needs to be addressed. Improvements are needed to respond to various developments in Human Rights (HAM) issues and public dissatisfaction when dealing with citizenship issues. The following is a matrix that explains the development of the dynamics of citizenship politics in Indonesia from the beginning of independence until the enactment of the 2006 Citizenship Law.

Table 1. Political Dynamics of Indonesian Citizenship

Post-Proclamation Period	The Old Order Period to the New Order	Post-Reformation
Law No. 3 of 1946 jo. Law No. 6 of 1947 jo. Law No. 8 of 1947 jo. Law No. 11 of 1948 concerning Citizenship and Population of the Republic of Indonesia	Law No. 62 of 1958 concerning Citizenship of the Republic of Indonesia	Law No. 12 of 2006 concerning Citizenship of the Republic of Indonesia
• The legal consequences of the 1945 Constitution Article 26 paragraph (1) and paragraph (2) • Indonesia states that it needs to have legal certainty regarding the people, territory, and sovereign government as an independent country. • The government firmly states that Indonesia has single citizenship. • Apply the principle of ius soli and passive stelsel. • The application of the option has the right to choose one nationality. • It provides the right of refusal for Dutch, Chinese, and Arab descendants who refuse Indonesian citizenship. • It established the state of Indonesia from August 17, 1945, to August 17, 1948. • After August 17, 1948, foreign nationals who wish to become Indonesian citizens must perform normal naturalization. • Regarding citizens, the Round Table Conference (KMB) December 27, 1949, between the Netherlands and Indonesia. • The KMB resulted in the determination of option rights and repudiation rights in the charter of the agreement on the distribution of citizens (Dutch adults, Dutch subjects, non-Dutch people born in Suriname, and the Netherlands Antilles). • The right of repudiation and the right of option are valid from December 27, 1949, until December 27, 1951	• The options expired on December 27, 1951; about 40% of Chinese Indonesians refused Indonesian citizenship. • Negotiations with China (Asia-Africa Conference), April 22, 1955, resulted in the ratification of Law No. 2 of 1958 concerning the Agreement between the Republic of Indonesia and the People's Republic of China regarding the issue of dual citizenship. • The contents of the Agreement are those who have dual citizenship adhere to the principle of equality mutual benefit and do not interfere in political affairs. • Law No. 2 of 1958 also contains the completion of dual citizenship, and they must choose between Indonesia or China within 2 (two) years since the Agreement was agreed. • The rejection of the Masjumi Party and the Indonesian Socialist Party, because Chinese have no loyalty, it is not clear what ideology they follow, whether Pancasila (Indonesia) or communism (China).	• Efforts to eliminate discrimination in terms of Indigenous and Non-Indigenous Chinese people in Indonesia were carried out by President BJ Habibie. • President Abdurrahman Wahid (Gus Dur) gave the Chinese people to enter politics. • Proof of Indonesian Citizenship (SBKRI) abolished • The main considerations of Law No. 12 of 2006 to avoid *apatride* and not recognize *bipatride* are implementing limited single citizenship and dual citizenship. • Dual citizenship for children is an exception. • Affirms the meaning of "original" Indonesians, namely those born in Indonesia and have never received another nationality. • Affirms who is a citizen (*ius sanguinis*, *ius soli*, single citizenship, and limited dual citizenship)

Source: processed by author, 2022

The matrix above shows that the political dynamics in the early independence days occurred between Indonesia and the Netherlands. The dominant issue that emerged during the discussion of citizenship during the independence period was the sovereignty of the Indonesian state. In 1949, various processes of citizenship formation encountered problems when about 40% of Chinese-Indonesians refused the option right as Indonesian citizens. This condition also forced the Indonesian government to enter into an agreement with the government of the People's Republic of China which resulted in dual citizenship. The agreement was rejected by the Masyumi Party and the Indonesian Socialist Party because dual Indonesian-Chinese

citizenship did not show national loyalty, and a citizen couldn't have two different ideologies.

The issue of dual citizenship between Indonesia and China was politically resolved during the Old Order. It was confirmed in law during the New Order, but it still brings up the issue of discrimination against Chinese people in Indonesia. After the end of Indonesia-China dual citizenship, the dominant issue that emerged was regarding equality, so the post-reform government, starting with President BJ Habibie and the subsequent administrations, firmly determined the elimination of all forms of citizenship discrimination. On that basis, Law No. 12 of 2006 concerning citizenship provides clarity on who becomes a citizen and seeks to eliminate *apatride* and *bipatride*.

Theoretically, the effort to realize dual citizenship is closely related to the discourse of cosmopolitan citizens, which is not a new discourse as material for citizenship studies. According to Osler and Starkey (2005), global citizenship or cosmopolitan citizenship is characterized by recognizing diversity, which is a human right. In an effort to fight for dual citizenship, some dimensions need to be considered in realizing citizenship according to national interests. Osler and Starkey (2005) state that citizenship needs a feeling as a unitary citizen, which is a sense of citizenship related to the bonds between individuals as citizens and as communities at the local level.

Conceptually, as proposed by Marshall (1950), citizenship has three dimensions of rights, namely civil, political, and social rights. Civil rights relate to basic issues such as freedom of speech and the right to access and fair treatment in the legal system— political rights concern electoral rights and greater access to political institutions to articulate their interests. In contrast, social rights are related to access to a social security system, where every citizen has the right to obtain a basic level of welfare that the state must fulfil.

Osler and Starkey's view of feeling as a unitary citizen is an aspect that is contrary to dual citizenship because they have to share feelings as citizens of two countries. It has implications for the three dimensions proposed by Marshall, namely civil, political, and social rights. A person who has dual citizenship will be bound by two laws from two different countries so that the civil, political, and social rights they get will be different.

The series of dynamics of citizenship politics in Indonesia always prioritizes equality and fights aspects related to discrimination. This condition shows conformity with the political theory of recognition, as explained by Honneth (1996) that what is meant by "law" refers to the value of modern law, which contains equality for all its members. Because it requires a wider intersubjective relationship, the realization of a rational law needs to be seen from its historical aspect, from the development of the formation of rights and the problems surrounding it. The ability to universalize values as in the private sphere requires a person to assume the will in his participation to be accepted by others. This concept is referred to as self-respect (Honneth, 1992).

Fraser (1996) explores the issue of social justice from the perspective of two progressive political configurations emerging in the age of globalization: First, progressive political battles centered on distributive justice in reaction to the global economic acceleration that spawned neo-liberalism. Second, progressive politics is a political trend of concern (recognition politics) that results in the emergence of new forms of political articulation such as ethnonationalism politics, the rise of religious, political movements, gender politics, and new social movements presenting multiculturalism discourses.

Law No. 12 of 2006 concerning citizenship accommodates the interests of Indonesian diaspora groups in various countries, amounting to 8 to 10 million people (Data Indonesian Diaspora Network). There is around 4.6 million diaspora who are still Indonesian citizens (WNI), and the rest are ex-WNI and their descendants. The role of the diaspora as one of the non-state actors in international relations has the potential to bring assets in various forms such as human capital, skills, wealth, and networks which are expected to strengthen the national economy. This has led to pressure from

the Indonesian diaspora to revise Law No. 12 of 2006 by accommodating dual citizenship, even though the background of the establishment of Law No. 12 of 2006 is to abolish *apatride* and *bipatride*. This is very interesting to investigate further because the issue of dual citizenship after Law No. 12 of 2006 differs from the history of dual citizenship between Indonesia and China in the early days of independence. In addition, the dynamics of dual citizenship after Law No. 12 of 2006 does not occur between countries but between citizens who have the highest sovereignty in Indonesia.

Contemporarily, the issue of dual citizenship is related to state activities, such as the case of the elected Regent of Sabu Raijua, East Nusa Tenggara (NTT), Orient Patriot Riwu Kore, which turned out to be based on the investigation by the Election Supervisory Body (Bawaslu) who was a citizen of the United States (US). This happened when President Joko Widodo appointed Arcandra Tahar as Minister of Energy and Mineral Resources (ESDM). After being sworn in, it was discovered that Arcandra also holds a United States passport (Hakim, 2021). Regarding political issues and children's rights, when the government aborted a candidate for the Pusaka Flag-raising Troop or Paskibraka, Gloria Natapradja Hamel, a representative from West Java. Gloria was canceled as a member of Paskibraka because she is a French citizen (Sarjana, 2016).

In the current context of globalization, the struggle to realize social justice is faced with the aggressive penetration of the neo-liberal economy, which has further deepened the gaps in global economic inequality and disparity (Morgan, 2016; Susser & Schneider, 2020; Thiessen & Byrne, 2018). Therefore, struggling for social justice in the context of redistribution justice, namely the distribution of resources and the economy more equitably and improving a better standard of living for the public, becomes important when dealing with the reality of a market economy without regulation, driven by private interests, and running during the absence of commitment to the public (Dierckxsens, 2000; Hertz, 2002). This situation makes the Indonesian Diaspora group of more than 8 million (Data Indonesian Diaspora Network) want to apply for dual citizenship to have economic access in the country they are in, which is considered to have a positive impact on increasing Indonesia's foreign exchange. On this basis, the Indonesian Diaspora proposed a revision of Law No. 12 of 2006 to provide access to dual citizenship as a solution to the socio-economic conditions they face abroad.

These problems indicate an urgency to examine the issue of dual citizenship in Indonesia by examining the dynamics between groups of citizens in formulating the revision of Law No. 12 of 2006 concerning citizenship to fight for social justice for all Indonesian citizens. Unfortunately, previous studies have not explained this condition, especially in Indonesia. On that basis, it is necessary to examine dual citizenship from political science.

This research is useful as an academic and practical study in understanding the debate on dual citizenship in Indonesia and examining studies of the dual citizenship debate in other countries. This is very important because citizenship development in a global context shows the direction of implementing dual citizenship, especially in Europe and Africa. Therefore, the purpose of this study is to explain how the debate on the dual citizenship paradigm in Indonesia has different issues from countries in Europe and Africa so that readers can understand the meaning of the dual citizenship debate in Indonesia.

2. Methods

This study uses a qualitative approach with a literature study that uses sources in journals related to dual citizenship in Indonesia and other countries as the unit of analysis. The criteria for the selected journal are based on the research location, namely research in European, African, Asian countries and research in Indonesia. Data processing is done through data presentation, data reduction, then concluding. The

steps in this study, using the Kuhlthau (2002) procedure, namely: a) topic selection; b) information exploration; c) determine the research focus; d) collection of data sources; e) preparation of data presentation; and f) preparation of reports. Data analysis uses content analysis by selecting, comparing, combining, and sorting various findings from various studies on dual citizenship. After all the data has been collected, the next step was to analyze the data to conclude. To obtain correct and precise results in analyzing data, data analysis techniques used an in-depth discussion of the contents of written or printed information in journals. Content analysis was used to analyze all research results that discuss the dual citizenship debate. The research analysis was intended to answer the formulation and research objectives, namely the debate on the dual citizenship paradigm.

3. Results and Discussion

The debate about the citizenship paradigm leads to the efforts of social groups to get justice. However, differences in views do not seem to have reached an agreement between social groups, so the revision of Law No. 12 of 2006 has not been realized. Theoretically, there are views of redistribution politics and recognition politics with different views on social justice.

The Indonesian Diaspora's insistence on recognizing the legal status of dual citizenship has created political dynamics among citizen groups. There are pros and cons to this pressure, making the discussion on dual citizenship in the Indonesian parliament more than ten years old, but has not been able to produce a law. The dual citizenship bill (RUU), which has long been included in the National Legislation Program (Prolegnas), must be studied more deeply, both its benefits and its negative impact on the Indonesian nation, especially its impact on national defense and security. This condition shows that the recognition of the legal status of dual citizenship in Indonesia has not been realized.

Based on a literature study regarding the development of dual citizenship issues after the implementation of Law No. 12 of 2006, two social groups, namely globalists and nationalists, have different views regarding the recognition of the legal status of dual citizenship in Indonesia. Table 2 shows the debate on the dual citizenship paradigm of globalist and nationalist groups.

Table 2. The Dual Citizenship Paradigm Debate After Law No. 12 of 2006

Social Group	The Development of Dual Citizenship Issues			
	Economy	Security and Sovereignty	Human Rights	Political Participation
Globalist	• Increase state income. • Desire to own property in Indonesia. • Access to employment in the country of residence.	• It can be handled rationally by making clear legal signs in the Act.	• Providing equality for Indonesian citizens abroad to be able to get a good life. • Rights of children born from mixed marriages.	• Dual citizenship is a populist issue that benefits politicians. • Changing past political relations regarding exile. • Become a connector in Indonesia's international relations.
Nationalist	• Dual citizenship has the potential to be used by certain parties to invest in low-tax countries. • Potential money laundering action.	• Potential to be an opportunity to avoid the law • The development of radicalism and separatism. • Citizens have the potential to prefer more developed countries.	• Human rights must be fought for, but not to interfere with other human rights.	• There is still a debate about the political rights of dual citizenship in the realm of politics and government. • People with dual citizenship cannot serve in politics.

Source: processed by author, 2022

The insistence of dual citizenship from the globalist group seems to have received a different response from other social groups, which indicates a difference with the state of the countries in the world that have started implementing dual citizenship. This indicates that every dual citizenship issue in Indonesia gets a different response

from each community member, making the dual citizenship legal status difficult to apply for because it has a large social impact on Indonesian unity. The lack of consensus among social groups makes dual citizenship neither legally nor morally recognized.

This argument demonstrates how critical the subject of dual citizenship is, given the size and expansion of the Indonesian expatriate population overseas. The diaspora community's rise has sparked various debates, including over mixed marriages, children born abroad, and individuals working overseas. Apart from contemporary polemics, historical causes such as individuals compelled to change their nationality due to the new order's political objectives also play a role. The events that transpired sparked debate about whether Indonesia should implement dual citizenship legislation. It should be mentioned that the present Indonesian regulation allows for dual citizenship up to the age of 18, at which point the individual must choose between the two.

Globalists embrace dual citizenship because some individuals lose their Indonesian citizenship due to the New Order's political practices. Those who oppose the New Order are rewarded for losing their Indonesian citizenship. These people, on the whole, retain a fondness for their magnificent motherland and a desire to return. On the other side, they have established a family and a life in the Czech Republic. Frequently, persons in this condition want to regain their Indonesian citizenship, but their lives have already been transferred to another nation.

Intermarried couples, particularly women, are more likely to follow their spouses overseas. The true scenario for such a person is the difficulties associated with old age. Therefore, it may be quite convenient for them to give up their nationality to share citizenship with their spouses. However, there are instances when a woman's spouse dies and is left alone without assistance—those who work internationally. While a residency permit may let these individuals work overseas, it will be considerably simpler to have a passport from that nation. What is discovered is that their work is constrained by the difficulties associated with traveling with an Indonesian passport. Businesses often do not want to take risks or overpay when their staff is required to get visas on a per-trip basis. This creates a huge barrier and restricts the individual's ability to work, to the point that the individual wants to change his nationality for better opportunities.

Nationalists responded to this issue by emphasizing the need to understand that although the diaspora may reside overseas, they can invest property in Indonesia. This may seem beneficial since it appears to be bringing money from overseas into the nation, but the effect is rather small. The state will get advantages such as taxes and others, but the state will not benefit from the circulation of investment revenues. Profits from the investment will not be spent in Indonesia since the investors do not reside there.

The nationalist group's concerns indicate the importance of making efforts to ensure social justice for the diaspora without resorting to a dual citizenship policy to encourage Indonesians to retain their Indonesian passports, and, indeed, the current situation is not ideal for Indonesians to retain their passports because the reason is currently unknown. A feeling of nationality determines the strongest passport that retains its validity. Along with a feeling of love for the motherland, there must be bargaining power and additional value associated with Indonesian. One method to do this is to fortify Indonesian passports.

The discourse of cosmopolitan citizens is not new, as citizenship studies are closely related to achieving dual citizenship. According to Osler and Starkey (2005), one of the characteristics of global citizenship is the understanding that diversity is something that should be celebrated and respected. In other words, the ideal citizen in this era of globalization is characterized by the ability to act locally, nationally, and globally. Unfortunately, the conditions proposed by Osler and Starkey do not always work well because a person's ability to act in a global context is limited by the laws that exist in

each country. This is what the Indonesian diaspora feels about living life in other countries.

In fighting for dual citizenship, it is necessary to pay attention to several aspects of achieving citizenship in both countries' best interests. First, individual citizens and their communities must feel connected to have a sense of citizenship (Osler & Starkey, 2005). Citizenship as a feeling is a sense of belonging to a citizen of his country. The degree of belonging or love for the nation and state can vary for each citizen. Interestingly, those who fight for dual citizenship impact the love that is divided between the two countries. The dimension of citizenship as a "taste" also guarantees a sense of belonging to citizens of their nationality, which does not need to be debated because cultural differences are necessary (Osler & Starkey, 2005). This indicates that cultural differences should not be debated, so love for the country also means love for ethnic diversity.

Dual citizenship has implications for various things, such as Marshall (1950), citizenship includes the civil, political, and social rights of its members. For example, civil rights cover freedom of expression and access to the court system. Political rights include more than the right to vote; they also include greater access to the political process and the ability to voice their concerns. Access to the social security system focuses on social rights because everyone is entitled to a minimum level of welfare that the state must provide. This concept is ideal in understanding citizenship, but it has not answered the challenge of dual citizenship. Each country's legal aspects limit civil, political, and social rights.

Efforts to urge the implementation of dual citizenship in Indonesia are a form of recognition politics. Theoretically, the last manifestation of recognition is politics in solidarity (Honneth, 1996). Legal acknowledgment generally applies to everyone, so there is a need for universal acknowledgment of particularity to create solidarity. Without this universal acknowledgment of particularity, recognition will always be in a certain dominant value or, in other words, merely legal. Guaranteed rights in law will not be able to meet the need for recognition of identity, where there is always something missing, so the universal value of equality still cannot provide recognition of this particularity (Honneth, 1996).

The redistribution justice paradigm sees injustice from a socio-economic perspective. It departs from the analysis that the roots of social injustice first start from the unequal socio-economic structure of society (Fraser, 1996). The idea of neoliberalism departs from a basic understanding that economic market transactions between people are the only model that underlies all their activities and actions (Büscher, 2012; Olssen & Peters, 2005; Schmidt, 2016). Every dynamic of life and transformation in the realm of human life can only be understood when it is included in the perspective of the economic market transaction model. On that basis, governance relations abolish the public interest and are replaced by the interests of each individual. The promotion of the common good as the embodiment of social justice in the principle of the state is then lost, replaced by the fulfillment of individual interests through the expansion of the free market regime. The promotion of the common good is lost in the bonds between the republic and its public.

In this context, it is understood that the basis for the insistence on dual citizenship is the economic interests of each individual abroad. Therefore, the economic injustice they feel creates pressure to ratify the dual citizenship law in Indonesia so that they have free access to economic activities in the country where they are located.

On another aspect, there is a view that the politics of recognition is one of the leading perspectives of the struggle for social justice discourse in the era of globalization. The liberation imagination built in this political struggle for recognition aims to realize a multicultural world where every particular identity is valued. In this context, every form of absorption and assimilation into dominant cultural norms is considered a form of ethical violation in the dimension of the struggle for recognition.

Supporters of recognition-based social justice reject the distributive social justice paradigm because they consider distributive justice materialist, blind, and partly

responsible for various forms of social injustice because there is no cultural concern for others (misrecognition). On the other hand, the context of cognitive justice requires institutionalizing cultural values that express equal respect for each participant in the socio-political order and guarantee equal opportunities for everyone to obtain a dignified life. This situation is referred to as the intersubjective condition for participatory equality. Both redistributive justice paradigms and cognitive justice are equally important in the struggle of social movements to defend social justice in the era of globalization.

Empirically, dual citizenship in Indonesia is different from the implementation of dual citizenship legal status in other countries. Many studies on dual citizenship, such as Sejersen's study (2008), collected data on 115 countries and found that almost half now recognize dual citizenship, compared with only a handful in the 1950s. The study highlights regional differences, with dual citizenship acceptance low in Asia and higher in Europe and the Americas. Sejersen's research shows that countries in Asia, including Indonesia, are more secretive about accommodating dual citizenship in law and prioritize single citizenship. This condition is created because social groups in society have different views and attitudes regarding dual citizenship.

Social, economic, security, and scientific developments also encourage the implementation of dual citizenship. Children born to parents from different countries, for example, and children born in countries that recognize the right of *ius soli* to parents from countries that have the right to *ius sanguinis* (Martin & Aleinikoff, 2002; Sejersen, 2008). Increasing gender equality also impacts the understanding that citizenship is no longer determined solely by the father; children can inherit citizenship from both mother and father (Howard, 2005; Sejersen, 2008). In addition, the decline in interstate conflict has also led to greater tolerance for dual citizenship due to increased mobility and concerns about decreasing national loyalty (Howard, 2005; Sejersen, 2008). Finally, in a context where human rights are expected to apply to citizens and non-citizens, membership in a particular political community becomes less important (Faist et al., 2004).

Issues that arise in the discussion of dual citizenship are also determined by the orientation of the social groups in the country. Dahlin and Hironaka's research (2008) shows that state recognition of dual citizenship is associated with internationally oriented state identities. Countries that are less bound to traditional notions of the nation are more likely to recognize dual citizenship. Gustafson (2002), in his research, shows that since 2001, Sweden has fully allowed dual citizenship. Opponents of dual citizenship, namely defending the order of the nation-state, must be embodied in national citizenship. Meanwhile, dual citizenship support groups balance national perspectives with global/international and individual perspectives.

Yanasmayan (2015) examined the potential impact of migrants being formally restricted by law in Spain, the Netherlands, and the UK. Research in the Netherlands shows Turkish migrants separate the legal and emotional aspects of citizenship, implying a thin sense of citizenship. Research in Spain shows a tolerant implementation of dual citizenship. Research in the UK shows the process of "self-bargaining" leads to a widening of the emotional landscape, where dual citizenship is allowed. Thus, the dynamics of international relations have developed from 'elitist' matters, centered in high-level politics, towards the everyday dynamics of citizens, which covered more issues (Intentilia & Surya Putra, 2021).

Poethig (2006) examines the debate over Cambodia's 1996 Dual Citizenship Law. The results show that opponents of dual citizenship aim to maintain cultural purity, double allegiance is dangerous for a fragile democracy, dangerous for political stability, and maintain a clear national identity, and pragmatism often trumps loyalty in difficult times. Meanwhile, the group that supports dual citizenship is questioning the "purity" of culture in the heterogeneous situation of Cambodian society. Claims against the state were rejected because, in difficult times, the Diaspora facilitated Cambodia's re-entry into the dynamics of international relations.

Whitaker (2011) researched dual citizenship in Senegal, Ghana, and Kenya. The study results indicate that the drivers of dual citizenship can come from the community (bottom) or the state (up). This condition is driven by political, economic, and security reasons. Mazzolari (2009) investigated dual citizenship in Colombia, the Dominican Republic, Ecuador, Costa Rica, and Brazil. Immigrants who choose dual nationality tend to promote economic assimilation. Hammar (1985) focuses on studying the phenomenon of migrant workers. This study shows that economic issues drive dual citizenship, and security issues are the obstacles. This study also states that increasing dual citizenship will protect political rights and promote political integration.

Kovács (2006) reviews the political aspects that underlie the 2004 referendum in Hungary on dual citizenship, which is limited to neighboring countries, such as Romania, Slovakia, Serbia-Montenegro, and Ukraine. The historical aspect of border disputes has left Hungarian minorities in neighboring countries. This prompted Hungary to establish dual citizenship. Knott (2019) examines a case in Moldova where a majority of the population can acquire (or regain) Romanian citizenship by the descent of a former Romanian citizen. This study shows that from the dimension of legitimacy, the acquisition of citizenship of state relatives is constructed as natural, normal, and thus legal.

On the basis of this research, it shows that, in general, the pressure for dual citizenship is caused by the economic dissatisfaction of the diaspora groups in the places where they live. This condition impacts the pressure to carry out dual citizenship but gets a rejection from nationalist groups who want to maintain the identity and culture of the country. Based on previous research, it also shows that the issue of immigrants is the dominant factor in ratifying dual citizenship in European countries.

In the Indonesian context, previous studies such as Prameswari (2019) examined two issues, namely the legal aspect and the impact of implementing dual citizenship in Indonesia. The Indonesian citizenship law is inseparable from the philosophy of citizenship which is based on the doctrine of "perpetual allegiance." Meanwhile, the impact in the legal field is changed to the provisions of the legislation. Charity (2016) examines from the point of view of the Indonesian Diaspora for the implementation of unlimited dual citizenship. The reasons for the reality of the development of the era of globalization, the reality of the pace of global development, the spirit of the constitution that protects all Indonesian bloodshed, including Indonesian citizens residing abroad.

Research in Indonesia focuses on legal studies regarding dual citizenship; the results that can be understood research in Indonesia show that if dual citizenship is stipulated in law, it will impact other laws, such as property, political rights, citizenship, and immigrants. This condition indicates that the dual citizenship law has a domino effect on other regulations in Indonesia. This study indicates that the debate on the citizenship paradigm of globalist and nationalist groups in fighting for citizenship is an attempt to obtain social justice. The lack of dual citizenship in Indonesia reflects that social groups prioritize immaterial justice, such as maintaining culture, identity, and ideology.

4. Conclusion

The paradigm difference regarding dual citizenship in Indonesia can be seen from the globalist group's struggle for material (economic) justice, but the nationalist group rejects that justice should not ignore immaterial aspects (identity, culture, and ideology). The reality in Indonesia shows the difference with dual citizenship in other countries, which provides legal recognition of dual citizenship. This indicates that the dimensions of citizenship initiated by Osler and Starkey, namely status, feeling, and practice, are indicators in implementing dual citizenship, the absence of agreement between social groups, resulting in the non-realization of dual citizenship in

Indonesia. This study enriches the discussion on the politics of citizenship, especially in looking at the debate between citizens regarding their citizenship status. For the dual citizenship rule in Indonesia, it is necessary to prioritize mutual consent among citizens so that all citizens can accept the applied law.

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