

The Transition of Indonesian Citizenship to Thai Citizenship from a Civil Law Perspective

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Abstract

The transition of citizenship from Indonesian citizenship to Thai citizenship represents a complex legal phenomenon involving the interaction of two different national legal systems with significant consequences in the civil law domain. Citizenship functions not only as a political status but also as a juridical bond that determines an individual's personal law, legal capacity, property rights, family relations, and inheritance regime. This study aims to analyze the legal procedures governing the relinquishment of Indonesian citizenship and the acquisition of Thai citizenship, as well as to examine the civil law implications arising from such transition from a comparative legal perspective. The research employs normative legal methods with a functional comparative law approach, relying on statutory regulations, legal doctrines, and scholarly literature related to citizenship law, civil law, and private international law in Indonesia and Thailand. The findings indicate that Indonesian law emphasizes the formal and administrative aspects of citizenship loss, while Thai law focuses on selective naturalization requirements and substantive integration. This asymmetry creates potential procedural gaps during the transitional phase that may expose individuals to legal uncertainty and risks of temporary statelessness. Furthermore, the transition of citizenship results in a fundamental transformation of civil legal status, including the loss of nationality-based rights in Indonesia, particularly land ownership rights, and the simultaneous acquisition of full civil rights under Thai law. The study concludes that citizenship transition constitutes a comprehensive legal transformation affecting the entire framework of civil rights and obligations rather than merely a change of nationality. Strengthening procedural synchronization, legal awareness, and cross-border administrative coordination is therefore essential to ensure legal certainty, protection of individual rights, and prevention of statelessness during the citizenship transition process..

INTRODUCTION

Citizenship constitutes a fundamental legal status that establishes a formal relationship between an individual and a state, giving rise to reciprocal rights and obligations in both public and private legal spheres. In Indonesia, citizenship regulation is governed by Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia, which primarily adopts the principle of *ius sanguinis* and limits dual citizenship to specific circumstances.¹ Consequently, any Indonesian citizen (WNI) who intends to acquire foreign citizenship must comply with formal procedures for relinquishing Indonesian citizenship in accordance with national legal provisions.²

In contemporary global mobility, the phenomenon of citizenship transition has become increasingly common due to factors such as employment opportunities, intermarriage, education, economic advancement, and personal considerations.³ Thailand has emerged as one of the destination countries for some Indonesian citizens because of its economic development, regional stability, and relatively structured naturalization system for long-term foreign residents.⁴ Geographical proximity and socio-cultural similarities within Southeast Asia also contribute to this mobility pattern. However, citizenship transition is not merely an administrative or political process; it also produces significant legal consequences, particularly within the domain of civil law.⁵

From the perspective of private international law, citizenship functions as a primary connecting factor that determines an individual's personal law, including personal status, family relations, property ownership, inheritance rights, and legal capacity.⁶ Therefore, a transition from Indonesian citizenship to Thai citizenship implies a shift from one legal regime to another, resulting in potential legal complexities related to recognition of civil status, property rights continuity, family law implications, and legal protection across jurisdictions.⁷ The absence of procedural synchronization between the relinquishment of

¹ M Alvi Syahrin, Warga Negara, and A Pendahuluan, "Naturalisasi Dalam Hukum Kewarganegaraan: Memahami Konsep, Sejarah, Dan Isu Hukumnya," *Jurnal Thengkyang* 2, no. 1 (2019): 36-53.

² Undang-Undang, "Undang-Undang Nomor 12 Tahun 2006 Tentang Kewarganegaraan Republik Indonesia" (2006).

³ Mansur Armin and Bin Ali, "Status Personal Dalam Rezim Hukum Perdata Internasional," *Mataram Journal of International Law* 1, no. 1 (2023): 88-95.

⁴ Subekti, *Pokok-Pokok Hukum Perdata* (Jakarta: Intermasa, 1985).

⁵ Pasal 832 KUHPerdata, "Kitab Undang-Undang Hukum Perdata" (2007).

⁶ Armin and Ali, "Status Personal Dalam Rezim Hukum Perdata Internasional."

⁷ Aldyan Faizal, "Perlindungan Dan Pemenuhan Hak Stateless Person Eks Dan Keturunan Warga Negara Indonesia Atas Status Kewarganegaraan," *Jurist-Diction* 3, no. 4 (2020): 1215-48, <https://doi.org/10.20473/jd.v3i4.20203>.

Indonesian citizenship and acquisition of Thai citizenship may also create risks such as temporary statelessness or legal uncertainty, which directly affect individual civil rights.

Although Law Number 12 of 2006 regulates the loss of Indonesian citizenship, its normative focus remains largely administrative and public-law oriented.⁸ At the same time, Thai citizenship acquisition is governed through naturalization mechanisms integrated with national civil law frameworks, particularly the Civil and Commercial Code of Thailand. The interaction between these two legal systems raises important comparative legal questions concerning procedural alignment and civil law consequences for individuals undergoing citizenship transition.

Existing Indonesian studies on citizenship transfer primarily focus on administrative procedures, migration policy, or political aspects of nationality law.⁹ However, the civil law implications particularly those related to personal status, property regime, inheritance rights, family relationships, and cross-border legal continuity remain underexplored, especially in the specific context of Indonesian citizens naturalizing in Thailand.¹⁰ This gap indicates the need for a more comprehensive legal analysis that integrates citizenship law with civil law consequences from a comparative perspective between Indonesia and Thailand.

The novelty of this research lies in its integrative and comparative analysis of citizenship transition between Indonesia and Thailand from a civil law perspective, an approach that has rarely been explored in previous Indonesian legal scholarship. While existing studies generally focus on administrative procedures, migration policy, or political dimensions of nationality, this study specifically examines the civil law consequences arising from citizenship transfer, including personal status continuity, property ownership regimes, family relationships, inheritance rights, and cross-border legal protection. Furthermore, this research introduces a comparative legal framework that connects Indonesian citizenship law with the Thai Civil and Commercial Code, thereby providing a more comprehensive understanding of how nationality transition affects individual civil rights across jurisdictions. By integrating private international law analysis with normative legal principles, this study offers a new perspective on citizenship transition as not merely an administrative event, but as a legal transformation that reshapes an individual's entire civil legal regime.

⁸ Undang-Undang, Undang-Undang Nomor 12 Tahun 2006 tentang Kewarganegaraan Republik Indonesia.

⁹ Undang-Undang.

¹⁰ Hilal Ramdhani, "The Citizenship Paradigm Debate in Dual Citizenship Discourses in Indonesia," *Jurnal Bina Praja* 14, no. 1 (2022): 43–53.

Based on the foregoing background, this research aims to examine the transition of Indonesian citizenship to Thai citizenship from a civil law perspective, focusing on both procedural mechanisms and legal implications. Accordingly, the research questions addressed in this study are: 1) How are the legal procedures for relinquishing Indonesian citizenship and acquiring Thai citizenship regulated within the legal systems of Indonesia and Thailand?; 2) What are the civil law implications arising from the transition of citizenship, particularly concerning personal status, property rights, family relations, and inheritance? This research is expected to contribute theoretically to the development of comparative citizenship law studies, particularly in integrating nationality law with civil law consequences. Practically, the findings may provide guidance for policymakers, legal practitioners, and individuals involved in cross-border citizenship transitions to ensure legal certainty, protection of civil rights, and prevention of statelessness.

METHODS

This study employs normative legal research with a comparative legal approach, which conceptualizes law as a system of norms governing human behavior within society.¹¹ The research focuses on analyzing legal principles, statutory regulations, and doctrinal interpretations related to the transition of citizenship from Indonesia to Thailand from a civil law perspective. The comparative dimension is applied to identify similarities, differences, and legal implications between the Indonesian and Thai legal systems concerning citizenship transition and its civil consequences.

The data sources used in this study consist primarily of secondary legal data, including primary, secondary, and tertiary legal materials. Primary legal materials include relevant statutory regulations, particularly Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia and the Civil and Commercial Code of Thailand, along with related implementing regulations.¹² Secondary legal materials comprise legal textbooks, academic journals, scholarly articles, and previous research discussing citizenship law, civil law consequences, and private international law. Tertiary legal materials include legal dictionaries, encyclopedias, and other supporting references that assist in clarifying legal terminology and concepts.

In this research, Surah An-Nisa verse 97 is not treated as a primary data source, but rather as a supporting normative value that enriches the analysis from the perspective of justice and legal protection. Its function is philosophical and ethical, aimed at reinforcing

¹¹ Juliansyah Noor, *Metode Penelitian: Skripsi, Tesis, Disertai Dan Karya Ilmiah* (Jakarta: Kencana Prenadamedia Group, 2011).

¹² Moloeng, *Metode Penelitian Kualitatif* (Bandung: Remaja Rosda Karya, 2018).

the interpretation of legal protection principles within citizenship transition, rather than serving as doctrinal legal evidence within the civil law framework.

Data collection was conducted through library research, which is the principal technique in normative legal studies. Legal materials were obtained through both physical and digital sources, including university libraries and credible academic databases. All collected materials were systematically classified according to the research issues and analytical framework.

The comparative analysis in this study adopts a functional comparative law approach, focusing on several key aspects:¹³

1. legal basis and regulatory structure of citizenship transition;
2. procedural mechanisms for relinquishing and acquiring citizenship;
3. civil law implications on personal status, property rights, family relations, and inheritance; and
4. legal protection and certainty during the transitional phase.

From the perspective of private international law, the analysis also considers the role of citizenship as a connecting factor (nationality principle) that determines the applicable personal law, while acknowledging the relevance of domicile in certain civil relations. This framework enables the study to examine how changes in nationality result in shifts in applicable legal regimes governing individual civil rights and obligations across jurisdictions.

Data analysis was conducted qualitatively using descriptive-analytical and comparative methods, by organizing legal materials into thematic categories, interpreting normative meanings, and comparing legal provisions between Indonesia and Thailand to identify legal consequences, coherence, and potential gaps in protection. The results are presented in a descriptive-argumentative form to provide systematic and logical answers to the research questions.

RESULTS AND DISCUSSION

1. Provisions for the Transfer of Citizenship Status from Indonesian to Thai Citizenship

The results of this study demonstrate that the transition of citizenship from Indonesian citizenship to Thai citizenship constitutes a complex legal process involving the interaction of two distinct national legal systems, each with its own doctrinal foundations, procedural requirements, and legal consequences. Citizenship is not merely

¹³ Zainuddin Ali, *Metode Penelitian Hukum* (Jakarta: Sinar Grafika, 2016).

an administrative identity but a juridical bond between an individual and a state that produces reciprocal rights and obligations in both public and private law dimensions. Therefore, the transfer of citizenship inherently results in the transformation of an individual's legal status across multiple legal domains.¹⁴

From the perspective of Indonesian positive law, citizenship is regulated under Law Number 12 of 2006 concerning the Citizenship of the Republic of Indonesia, which adopts the principle of single citizenship with limited recognition of dual citizenship only for children under specific conditions. Article 23 of the law explicitly provides that an Indonesian citizen loses his or her citizenship if he or she voluntarily acquires foreign citizenship.¹⁵ This provision reflects a strict doctrine of allegiance, emphasizing the exclusivity of legal loyalty between citizen and state. The loss of citizenship is therefore not merely declaratory but constitutive in nature, resulting in the termination of the legal relationship between the individual and the Indonesian state.

The relinquishment of Indonesian citizenship must be carried out through formal administrative procedures involving an application submitted to the President through the Minister of Law and Human Rights. This procedural mechanism indicates that Indonesian law prioritizes legal certainty and state sovereignty in regulating citizenship transitions. However, the law does not provide detailed synchronization mechanisms between the loss of Indonesian citizenship and the acquisition of a new citizenship, thereby creating potential transitional vulnerabilities.

In contrast, the acquisition of Thai citizenship by foreign nationals is governed primarily by the Thai Nationality Act and related administrative regulations rather than the Civil and Commercial Code of Thailand.¹⁶ The Nationality Act establishes substantive and procedural requirements for naturalization, including minimum residency periods, good conduct, language proficiency, economic stability, and loyalty to the Thai state.¹⁷ This demonstrates that Thailand adopts a selective and integrative naturalization policy designed to ensure that new citizens possess genuine social and legal integration into Thai society.¹⁸

¹⁴ Undang-Undang, Undang-Undang Nomor 12 Tahun 2006 tentang Kewarganegaraan Republik Indonesia.

¹⁵ Andi Agus Salim, Rizaldy Anggriawan, and Hazyar Arumbinang, "Dilemma Of Dual Citizenship Issues In Indonesia: A Legal And Political Perspective," *JILS (Journal Of Indonesian Legal Studies)* 7, no. 1 (2022): 101-54.

¹⁶ Rainer Bauböck, *Transnational Citizenship: Membership and Rights in International Migration* (Cheltenham: Edward Elgar Publishing, 1994).

¹⁷ Nationality Act B.E. 2508, "As Amended by Nationality Act (No. 4) B.E. 255" (Thailand, 2008).

¹⁸ Herni Widanarti, "Tinjauan Yuridis Akibat Perkawinan Campuran Terhadap Anak," *Diponegoro Private Law Review* 4, no. 1 (2019): 447-52.

Nevertheless, although citizenship acquisition is regulated under nationality law, the legal consequences of acquiring Thai citizenship extend into the civil law domain governed by the Civil and Commercial Code of Thailand.¹⁹ Once naturalization is granted, individuals become fully subject to Thai civil law provisions concerning personal status, legal capacity, family relations, property rights, and inheritance. Therefore, the relationship between nationality law and civil law in Thailand is functional rather than normative integration, meaning that citizenship status serves as a gateway to the application of civil law rather than being directly regulated within the civil code itself.²⁰

A comparative analysis between Indonesian and Thai legal systems reveals a fundamental structural difference. Indonesia emphasizes the legal consequences of citizenship loss, while Thailand emphasizes the qualifications for citizenship acquisition. This asymmetry creates a potential procedural gap during the transitional phase. If the relinquishment of Indonesian citizenship occurs before the approval of Thai naturalization, individuals may temporarily lose citizenship protection, resulting in a condition of statelessness. Statelessness poses serious legal risks, including the absence of diplomatic protection, limited access to civil rights, and difficulties in cross-border legal recognition.

From a justice perspective, this transitional vulnerability reflects a normative tension between state sovereignty and human rights protection. While states possess sovereign authority to regulate citizenship, international human rights principles require the prevention of statelessness. In this context, the synchronization of procedures becomes essential to ensure legal continuity and protection.

The Islamic legal perspective reinforces this normative obligation. Surah An-Nisa verse 97 emphasizes the prohibition against leaving individuals in conditions of injustice or oppression due to lack of protection. In the citizenship context, this principle can be interpreted as requiring states to ensure that individuals undergoing citizenship transitions remain under legal protection and are not placed in vulnerable legal positions due to procedural gaps. Thus, both positive law and Islamic legal values converge on the importance of legal certainty and protection during citizenship transition.

To provide systematic clarity, the comparative legal framework below illustrates the differences in regulatory orientation between Indonesia and Thailand.

¹⁹ Peter J. Spiro, "Citizenship, Nationality, and Statelessness," *International Journal of Constitutional Law* 17, no. 2 (2019): 345–370.

²⁰ Bronwen Manby, "Statelessness and Citizenship in Southeast Asia," *Asian Journal of International Law* 7, no. 1 (2017): 1–25.

Table 1. Comparison of Indonesian and Thai Citizenship Status Transition Provisions

Comparative Aspects	Indonesia	Thailand	Legal Analysis and Justice Values
Legal basis	Law no. 12 of 2006 concerning Indonesian Citizenship	Thai Nationality Act and administrative regulations; civil consequences governed by Civil and Commercial Code	Indonesia emphasizes legal certainty through special citizenship laws, while Thailand integrates citizenship into the civil law and state administration systems.
Principles of Citizenship	Not holding permanent dual citizenship	Does not recognize dual citizenship in general	Both countries demand sole loyalty to the state, but Indonesia is stricter about the consequences of losing citizenship.
Loss of Citizenship	Automatic loss if acquiring foreign citizenship of one's own free will (Article 23 Law 12/2006)	Not explicitly regulated as "loss", but implicit through the acceptance of naturalization	The Indonesian system is repressive-administrative, while Thailand's is selective-procedural.
Transition Procedure	Renunciation of citizenship through an application to the President via the Minister of Law and Human Rights	Application for naturalization through Thai authorities with administrative and substantive requirements	The transition must be bidirectional; failure to synchronize procedures can potentially lead to statelessness.
Substantive Requirements	Does not emphasize social integration after relinquishing citizenship	Length of stay, language skills, social integration, legal compliance	Thailand assesses the quality of social ties of prospective citizens, while Indonesia focuses on the formal aspects of relinquishing status.
Time and Synchronization	Does not regulate in detail the ideal time for relinquishing and	The naturalization process is relatively long and gradual.	Time asynchronous creates the risk of statelessness, which is contrary to the

	acquiring new citizenship.	principle of legal protection.
Individual Legal Protection	Protection ends once citizenship is legally relinquished.	There are gaps in transitional legal protection that require procedural caution.
Civil Law Implications	Termination of certain civil rights as an Indonesian citizen	Transfer of citizenship means a change in the legal regime governing personal status and legal capacity.
Islamic Legal Perspective	The state is obliged to ensure that the release of status does not harm citizens	The destination country is obliged to provide legal certainty and protection. QS. An-Nisa: 97 emphasizes the prohibition of leaving individuals in oppressed conditions, relevant to preventing statelessness.
Policy Orientation	Legal certainty and state sovereignty	Selectivity and national integration
		Substantive justice demands a balance between state sovereignty and the protection of human rights.

Source: research results

Based on this comparison, it becomes evident that citizenship transfer between Indonesia and Thailand requires careful procedural coordination. Indonesia focuses on legal certainty through formal relinquishment mechanisms, while Thailand emphasizes substantive integration requirements for naturalization. The absence of procedural synchronization creates a legal protection gap that may expose individuals to statelessness risk. Therefore, citizenship transition should be understood as a bidirectional legal process requiring simultaneous consideration of both legal systems.

Ultimately, the transfer of citizenship must balance three fundamental principles: state sovereignty, legal certainty, and human rights protection. The integration of these principles reflects substantive justice, ensuring that individuals remain protected throughout the transition process.

2. Rights and Obligations of Citizens After the Transition of Citizenship Status from a Civil Law Perspective

The transition from Indonesian citizenship to Thai citizenship produces significant civil law consequences affecting personal status, legal capacity, property rights, family relations, inheritance, and civil obligations. From the perspective of private international law, citizenship functions as a primary connecting factor determining the applicable personal law (*lex patriae*). Consequently, a change in citizenship results in a shift in the legal regime governing an individual's civil status and rights.

One of the most immediate legal consequences concerns property ownership, particularly land rights in Indonesia. Indonesian agrarian law adopts the nationality principle, under which only Indonesian citizens may hold Hak Milik (freehold ownership rights). When an individual loses Indonesian citizenship, ownership rights over land must be relinquished or transferred within a specified period.²¹ Failure to comply may result in the automatic cancellation of ownership rights by operation of law.²² This demonstrates that citizenship status directly determines the legitimacy of civil property rights under Indonesian law.

The implications also extend to marital relations, especially in cases involving mixed marriages. Under Indonesian private international law principles, marital property regimes and personal status may depend on nationality and domicile factors. A change in citizenship may therefore affect the applicable law governing marital property, divorce jurisdiction, and spousal rights. Questions of choice of law become particularly relevant when marriage was concluded under Indonesian law but the parties subsequently acquire foreign citizenship.²³ Legal conflicts may arise regarding recognition of marital status or division of property across jurisdictions.

Inheritance law presents another complex dimension. Under private international law, inheritance issues may be determined by nationality, domicile, or location of assets (*lex rei sitae*). After acquiring Thai citizenship, inheritance rights of the individual may be governed by Thai law concerning movable property, while immovable property located in Indonesia remains subject to Indonesian law. This duality may create cross-border legal fragmentation requiring careful legal interpretation and coordination between legal systems.

²¹ Undang-Undang, Undang-Undang Nomor 12 Tahun 2006 tentang Kewarganegaraan Republik Indonesia.

²² Anugerah Gilang Priandena, "Perlindungan Hukum Bagi Anak Yang Lahir Dari Perkawinan Campuran," *Jurisprudence* 4, no. 1 (2015): 15–23.

²³ Ervina Martha Herawati et al., "Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia," *Socius: Jurnal Penelitian Ilmu-Ilmu Sosial* 1, no. November (2023): 125–33.

The transition of citizenship also affects the legal status of children. Indonesian law recognizes limited dual citizenship for children born from mixed marriages until a certain age. When parents change citizenship, the child's legal status may depend on age, registration status, and applicable nationality laws. Potential conflicts may arise if the child retains Indonesian citizenship while parents become Thai citizens, creating family legal relations governed by multiple jurisdictions. This demonstrates that citizenship transition has intergenerational legal implications extending beyond the individual concerned.

After acquiring Thai citizenship, individuals become fully subject to Thai civil law. They gain full legal capacity to conduct legal transactions, own property under Thai law, enter contractual relations, and obtain civil legal protection from Thai institutions. However, the acquisition of new civil rights in Thailand simultaneously results in the loss of certain rights previously attached to Indonesian citizenship. This confirms that citizenship functions as a legal gateway determining access to civil rights within a national legal system.²⁴

Civil obligations also shift following citizenship transition. Tax obligations, contractual liabilities, and legal responsibilities follow the individual's citizenship and residence status, subject to international legal principles and bilateral agreements. Individuals must therefore undertake legal adjustments to pre-existing contractual relationships established prior to citizenship change to ensure compliance with the applicable legal regime.

From a normative justice perspective, the Islamic legal principle reflected in Surah An-Nisa verse 97 provides ethical justification for citizenship transition when it aims to obtain better legal protection and welfare. The verse encourages individuals to move from conditions lacking protection toward systems offering greater justice and security. Thus, citizenship transition may be understood as a legitimate effort to achieve legal certainty and well-being, provided it does not produce injustice or harm to others.

To clarify these legal consequences, the comparative mapping below illustrates the transformation of civil rights and obligations before and after citizenship transition.²⁵

²⁴ and Rainer Bauböck. Vink, Maarten Peter, "Citizenship Configurations: Analysing the Multiple Purposes of Citizenship Regimes," *Comparative European Politics* 11, no. 5 (2013): 621–48.

²⁵ Dian Apriyana, "Perkawinan Antara Warga Negara Indonesia Dan Warga Negara Asing Dalam Melindungi Hak Perempuan Dan Anak (Implementasi UU Nomor 12 Tahun 2006 Tentang Kewarganegaraan RI)," *Syakhshiyah Jurnal Hukum Keluarga Islam* 3, no. 12 (2023): 1–12, <https://doi.org/10.32332/syakhshiyah.v3i1.7075>.

Table 2. Comparison of Civil Rights and Obligations of Indonesian and Thai Citizens

Civil Aspects	Indonesian Citizen (Before Transition)	Thai Citizen (Post Transition)
Legal basis for personal status	Law No. 12 of 2006 concerning Indonesian Citizenship	Civil and Commercial Code of Thailand
Civil legal status	National legal subjects with full protection under Indonesian law	Subject to Thai national law with protection under Thai law
Land rights	Entitled to own land based on the principle of nationality	Not entitled to own land in Indonesia; subject to restrictions on foreign ownership
Capacity to perform legal acts	Full, as long as they meet the subjective and objective requirements of the agreement	Full Thai citizen under Thai civil law
Rights in family and marital relationships	Subject to Indonesian national law	Subject to Thai family and marriage law
Inheritance rights	Governed by Indonesian civil law	Governed by Thai civil law
Civil obligations	Contractual and civil obligations are subject to Indonesian law	Contractual and civil obligations subject to Thai law
Tax obligations	Taxpayers as Indonesian citizens according to national law	Taxpayer under the Thai tax system
Civil legal protection	Guaranteed by the Indonesian state	Guaranteed by the Thai state

Source: research results

The table confirms that citizenship transition results in a fundamental reconstruction of civil legal status. Prior to transition, Indonesian citizens possess exclusive civil rights tied to nationality, particularly land ownership and access to state protection. After transition, individuals become fully integrated into the Thai legal system while simultaneously losing nationality-based rights in Indonesia.

Importantly, citizenship transition should not be interpreted solely as an administrative or political change. Rather, it constitutes a transformative legal event that reallocates an individual's entire civil legal regime from one jurisdiction to another. The

implications extend beyond personal identity to affect property ownership, family relations, inheritance structures, and cross-border legal recognition.

Therefore, the transfer of citizenship from Indonesian to Thai citizenship represents a comprehensive legal transformation that redefines an individual's civil legal standing within national and international legal systems. This transformation highlights the central role of citizenship as a determining factor in civil law relations and confirms the necessity of procedural synchronization and legal awareness to ensure legal certainty and protection throughout the transition process.

CONCLUSION

Based on the research and discussion, it can be concluded that the transition of citizenship status from Indonesian citizenship to Thai citizenship constitutes a complex legal process involving two distinct national legal regimes that must be fulfilled cumulatively and sequentially. Under Indonesian law, the voluntary acquisition of foreign nationality results in the automatic loss of Indonesian citizenship pursuant to Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia. In contrast, Thai citizenship is obtained through a naturalization mechanism requiring administrative compliance, social integration, and loyalty to the Thai state. The comparative analysis demonstrates that procedural synchronization between the relinquishment of Indonesian citizenship and the acquisition of Thai citizenship is essential to prevent legal uncertainty, protection gaps during the transitional period, and the potential risk of statelessness. This confirms that citizenship transition is not merely an administrative act but a legal transformation affecting the continuity of an individual's legal status within national and international legal systems.

The transition also produces significant implications for civil rights and obligations, particularly regarding personal status, property ownership, family relations, inheritance rights, and civil liabilities. The loss of Indonesian citizenship terminates nationality-based civil rights, including land ownership rights and other entitlements restricted by the nationality principle. Conversely, upon acquiring Thai citizenship, the individual becomes fully subject to the Civil and Commercial Code of Thailand, which governs legal capacity, contractual relations, family law, inheritance, and civil responsibilities. This shift reinforces the principle that citizenship functions as a primary connecting factor in private international law, determining the applicable legal regime governing an individual's civil relations. Therefore, citizenship transition represents a transfer of the overall legal framework regulating a person's civil existence rather than a simple change of nationality.

From the perspective of justice and legal protection, citizenship transition may also be interpreted as an individual effort to obtain a legal system that provides greater certainty and welfare, consistent with the normative values reflected in Surah An-Nisa verse 97. This perspective emphasizes that individuals should not be placed in conditions of legal vulnerability due to the absence of state protection. Accordingly, both the country of origin and the destination country bear responsibility for ensuring that citizenship transfer processes are conducted in a fair, orderly, and legally protective manner, particularly during transitional phases where risks of legal limbo or statelessness may arise.

In addition to theoretical contributions, this research offers practical implications. First, there is a need for an official and integrated state information mechanism to provide accurate guidance on citizenship relinquishment procedures, naturalization requirements, and cross-border legal consequences in order to prevent misinformation and procedural errors that may lead to statelessness. Second, individuals intending to relinquish Indonesian citizenship should obtain prior legal consultation to address potential civil consequences, particularly those related to land ownership, marital status, inheritance rights, taxation obligations, and family legal relations before the change of nationality occurs. Third, the harmonization of civil administrative documentation across jurisdictions, including population records, marital registration, birth certificates, and property documentation, is essential to prevent legal discontinuity affecting personal status recognition and civil rights enforcement. Bilateral coordination between Indonesia and Thailand in civil registration recognition would significantly strengthen legal certainty for individuals undergoing citizenship transition.

Ultimately, the transition of citizenship from Indonesian to Thai nationality must be understood as a legal phenomenon requiring a balance between state sovereignty, legal certainty, human rights protection, and civil law continuity. Strengthening procedural synchronization, legal awareness, and cross-border administrative cooperation is therefore essential to achieving a more just and legally certain citizenship transition system.

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