



Citizenship and National Team Eligibility: Comparative Analysis between Indonesian Nationality Law and FIFA Regulation

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Abstract: *The phenomenon of football player naturalisation is growing alongside the globalisation of sports and the increasing cross-border mobility of players. In Indonesia, the policy on naturalising national team players is implemented under Law No. 12 of 2006 on Citizenship of the Republic of Indonesia, specifically through a naturalisation mechanism in the national interest. However, the citizenship status granted by the state does not automatically entitle a player to represent the national team in international competitions, as they must also meet the eligibility requirements set by the Fédération Internationale de Football Association (FIFA). This study aims to analyse the regulations governing the acquisition of citizenship for football players under Indonesian law and FIFA regulations, and to examine the legal implications of FIFA's eligibility regulations for naturalised players representing Indonesia. This study is a normative legal study employing statutory, conceptual, and comparative approaches. The legal sources include laws and regulations, the FIFA Statutes, the Regulations Governing the Application of the FIFA Statutes, and relevant legal literature. The research findings indicate that Indonesia naturalises football players under Law No. 12 of 2006, while FIFA regulations determine eligibility to play for the national team by requiring a genuine link to the country being represented. This study found a dual legal regime between legal citizenship and sporting nationality, meaning that naturalised players must simultaneously meet both national citizenship requirements and FIFA eligibility criteria. Therefore, harmonisation between national citizenship laws and FIFA regulations is necessary to ensure legal certainty and the effectiveness of football player naturalisation policies in Indonesia.*

Keywords: *Citizenship, Naturalisation of football Players, FIFA, Sporting Nationality, Eligibility*

A. Introduction

Globalisation has transformed many aspects of sport, particularly football. The development of the modern football industry, which is becoming increasingly integrated internationally, has driven a rise in player mobility across national borders, both for professional competitions and national team representation. This phenomenon has led many countries to adopt player naturalisation as a strategy to improve the quality and competitiveness of their national teams in international competitions. Countries such as Qatar, Morocco, Algeria, and several European nations have used naturalisation policies

to strengthen their national teams. This fact is supported by data from the University of Oxford's Centre on Migration, Policy and Society (COMPAS), which notes that countries like Morocco have drawn on their diaspora to fill as much as 73% of their squad with foreign-born players; statistically, teams with such diverse migration backgrounds have been shown to perform better and advance further in tournaments.¹ This situation demonstrates that the relationship between citizenship and national team representation is no longer merely a matter of domestic law, but is also linked to the international legal framework governing sports.

Citizenship is fundamentally a human right recognised under international law. Article 15 of the Universal Declaration of Human Rights states that everyone has the right to a nationality, and no one may be arbitrarily deprived of their nationality or denied the right to change their nationality. In the Indonesian context, Article 26 of the 1945 Constitution of the Republic of Indonesia guarantees the right to citizenship and provides the constitutional basis for the state to determine who may become an Indonesian citizen under applicable laws and regulations. Further provisions regarding citizenship are set forth in Law No. 12 of 2006 on Citizenship of the Republic of Indonesia, which governs various mechanisms for acquiring citizenship, including through the naturalisation process.

In recent years, the policy of naturalising football players has become a tool the Indonesian government frequently uses to improve the national football team's performance. Several players of Indonesian descent who play professionally abroad, such as Jordi Amat and Sandy Walsh, have obtained Indonesian citizenship through a naturalisation process based on national interest. This policy was clearly demonstrated when Sandy Walsh and Jordi Amat officially took their oaths of allegiance on November 17, 2022, with the primary goal of bringing their European football expertise to boost the Indonesian national team's performance on both regional and international stages.² Nevertheless, the practice of granting citizenship to athletes of foreign descent continues to spark legal debate, particularly regarding the interpretation of Article 20 of Law No. 12 of 2006, which governs the granting of citizenship to foreigners who have rendered meritorious service to the state or for reasons of national interest.

This issue becomes even more complex because the citizenship granted by a country does not automatically entitle a player to represent that country's national team in

1 Ben Brindle dan Adam Sawyer, "Has migration become an ingredient of World Cup success?" COMPAS, 2026, accessed June 19, 2026, <https://www.compas.ox.ac.uk/article/has-migration-become-an-ingredient-of-world-cup-success>.

2 Anonim, "Sah Jadi WNI, Kemenpora Harap Sandy Walsh dan Jordi Amat Secepatnya Bela Timnas Indonesia." Kemenpora, 2022, accessed June 19, 2026, <https://www.kemenpora.go.id/detail/2839/sah-jadi-wni-kemenpora-harap-sandy-walsh-dan-jordi-amat-secepatnya-bela-timnas-indonesia>.

international competitions. In addition to complying with national citizenship laws, football players must also meet the eligibility requirements established by the Fédération Internationale de Football Association (FIFA), the international organisation that governs world football. Under the FIFA Statutes and Regulations Governing the Application of the FIFA Statutes, this global football governing body affirms the separation of jurisdiction between public law and private international law (*lex sportiva*), under which an athlete may hold only one sporting nationality.³ To maintain the integrity of competition and prevent the practice of “instant passport” manipulation (*nationality shopping*), FIFA has established the “genuine link” doctrine as an additional legal requirement that players must objectively meet in order to represent a country in international matches.⁴

Unlike national citizenship laws, which focus on an individual’s civil legal status, international sports organisations apply the concept of “sporting nationality” to determine a player’s eligibility to represent a national team. The Court of Arbitration for Sport (CAS) has affirmed the existence of a dichotomy between the jurisdiction of public law (national citizenship) and private law (sporting eligibility), which coexist without conflict, whereby each athlete is, in principle, permitted to hold only one sporting nationality.⁵ Under FIFA regulations, citizenship is a legal requirement but is not sufficient on its own to qualify as an eligible player for a national team. Referring to the universal principles of international law outlined by the International Court of Justice, a player must also have a genuine connection (genuine link) based on social, cultural, and emotional ties to the country he or she will represent, whether through place of birth, lineage, or a specified period of residence as stipulated in Articles 5 through 9 of the FIFA Statutes.⁶

These two legal regimes highlight a fundamental difference between legal citizenship under national law and sporting nationality under international sports law. A country has sovereign authority to determine who its citizens are, whereas FIFA has autonomous authority to determine who is eligible to represent a national team in international competitions. This difference raises questions about the relationship between Indonesian citizenship law and FIFA regulations, particularly in the context of naturalising football players to benefit the Indonesian national team.

3 Anonim, *Commentary on the Rules Governing Eligibility to Play for Representative Teams* (Zurich: Fédération Internationale de Football Association, 2021).

4 *Ibid.*

5 Oli Rauste, *Court of Arbitration for Sport. Advisory Opinion CAS 98/215 International Baseball Association (IBA)* (Lausanne: Juris Legal Information, 2021).

6 Anonim, “Nottebohm Case Second Phase.” International Court of Justice, 1955, accessed June 19, 2026, <https://www.refworld.org/jurisprudence/caselaw/icj/1955/97455>.

Several previous studies have examined football player naturalisation through the lens of Indonesian citizenship law. Research by Nefrisa Adlina Maaruf, Rakhbir Singh, and Irwan Triadi shows that naturalising football players can be justified as long as it serves national interests and supports sports development in Indonesia.⁷ Furthermore, Gwenli Sirait and I Gede Perdana Yoga emphasised the importance of applying the principle of a “genuine link” in the naturalisation process for athletes as a means of legitimising the legal relationship between an individual and the country they represent.⁸ In addition, Gilang Kresnanda Annas and Noval Maulana Hazzar examined the protection of naturalised players’ citizenship rights based on the principle of equality and concluded that naturalised players who have obtained Indonesian citizenship are entitled to the same treatment, rights, and obligations as other Indonesian citizens.⁹

Although these studies have made important contributions to understanding the naturalisation of football players from the perspectives of both citizenship law and international law, research that specifically compares the relationship between legal citizenship granted by a state and sporting nationality as defined by FIFA remains relatively limited. Most previous studies have addressed citizenship law and FIFA regulations separately, and thus have not comprehensively explained how these two legal regimes interact in determining the eligibility of naturalised players to represent national teams. A comparative approach is essential because a player’s citizenship and eligibility fall under two distinct legal regimes: national public law, which is subject to state sovereignty, and FIFA’s transnational *lex sportiva* regime.

Therefore, this study offers a novel perspective through a comparative analysis of Indonesian citizenship law and FIFA regulations to explain the relationship, differences, and legal implications of “legal citizenship” and “sporting nationality” in the naturalisation process for football players. This study aims to analyse the regulations governing football players’ acquisition of citizenship under Indonesian law and FIFA regulations, and to examine the implications of FIFA’s eligibility regulations for the eligibility of naturalised players to represent the Indonesian national team.

7 Nefrisa Adlina Maaruf, Rakhbir Singh, and Irwan Triadi, “Implementasi Nilai Nilai Bela Negara Dalam Kebijakan Naturalisasi Pemain Bola Dilihat Dari Perspektif Undang-Undang Republik Indonesia Nomor 12 Tahun 2006 Tentang Kewarganegaraan”, *Civilia: Jurnal Kajian Hukum Dan Pendidikan Kewarganegaraan* 2, no. 5 (2023): 74-84, <https://doi.org/10.572349/civilia.v2i5.1273>.

8 irait, Gwenli, and I Gede Perdana Yoga, “Implikasi Hukum Internasional Terhadap Hak Kewarganegaraan Pemain Sepakbola Naturalisasi Indonesia”, *Kertha Desa: Journal Ilmu Hukum* 14, no. 2 (2026): 76-88, <https://ejournal2.unud.ac.id/index.php/kerthadesa/article/view/199>.

9 Gilang Kresnanda Annas dan Noval Maulana Hazzar, “Analisis Persamaan Hak Kewarganegaraan Bagi Pemain Naturalisasi Sepakbola Di Indonesia”, *Jurnal Hukum dan HAM Wicarana* 2, no. 2 (2023): 127-143, https://www.researchgate.net/publication/377394724_ANALISIS_PERSAMAAN_HAK_KEWARGANE_GARAAN_BAGI_PEMAIN_NATURALISASI_SEPAKBOLA_DI_INDONESIA.

B. Method

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This study is a normative legal study that analyses legal norms, legal principles, and legal doctrines related to football players' acquisition of citizenship, as well as the regulations governing player eligibility to represent national teams under FIFA regulations. This study uses the statutory, conceptual, and comparative approaches.¹⁰ The legislative approach is used to analyse provisions related to citizenship and immigration, specifically the 1945 Constitution of the Republic of Indonesia, Law No. 12 of 2006 on Citizenship of the Republic of Indonesia, and Law No. 6 of 2011 on Immigration. This study uses a conceptual approach to examine citizenship, sporting nationality, naturalisation, and player eligibility under international sports law. Meanwhile, the comparative approach compares citizenship regulations under Indonesian national law with the provisions on nationality and eligibility in the FIFA Statutes and the Regulations Governing the Application of the FIFA Statutes.

The legal sources used include primary and secondary sources. Primary legal sources include the 1945 Constitution of the Republic of Indonesia, Law No. 12 of 2006 on Citizenship of the Republic of Indonesia, Law No. 6 of 2011 on Immigration, the FIFA Statutes, and the Regulations Governing the Application of the FIFA Statutes. Secondary legal sources include books, academic journals, research findings, the FIFA Commentary, and other literature relevant to citizenship law, immigration law, and international sports law.

Legal materials were collected through library research by examining relevant laws and regulations, official FIFA documents, books, and scholarly articles. Subsequently, the legal materials were analysed qualitatively and descriptively using legal interpretation and comparative law methods to identify similarities, differences, and normative implications between citizenship regulations in Indonesian law and eligibility regulations in FIFA regulations.

C.Result & Discussion

1. Citizenship Acquisition For Football Players Regulated Under Indonesian Law and FIFA Regulations

Citizenship is a fundamental right of every human being, as stated in Article 15 of the Universal Declaration of Human Rights (UDHR), which declares that everyone has the right to a nationality and that no one shall be arbitrarily deprived of their nationality or denied the right to change their nationality. In Indonesia, Article 26 of the 1945 Constitution of the Republic of Indonesia (UUD NRI 1945) enshrines the right to

citizenship, stating that citizens are native-born Indonesians and persons of other nationalities recognised by law as citizens. ¹⁹

Based on these constitutional provisions, it can be concluded that the State of Indonesia may grant citizenship to members of the Indonesian people as well as to members of other nations who are subsequently recognised as citizens under the law. Law No. 12 of 2006 on Citizenship of the Republic of Indonesia (Law 12/2006) governs citizenship. Under Law 12/2006, the naturalisation process is divided into two categories: ordinary naturalisation and special naturalisation. The procedures for ordinary naturalisation are set forth in Article 9 of Law 12/2006, while the procedures for special naturalisation are set forth in Article 20 of Law 12/2006.

It is known that many football players on the Indonesian national team have been naturalised using the procedure outlined in Article 20.10. The urgency behind naturalising members of the diaspora stems from the need to improve the quality of the national team so it can compete at the regional and international levels.¹¹ Given this urgency, the application of the aforementioned Article raises a question: on what grounds can they be granted citizenship on an exceptional basis? Article 20 of Law No. 12 of 2006 essentially states that a foreign national who has rendered meritorious service to the state or for reasons of national interest may be granted citizenship by the President after obtaining the recommendation of the People's Representative Council. Furthermore, a review of the article's explanatory notes reveals that "meritorious service to the state" refers to extraordinary achievements in the fields of humanitarian work, science and technology, culture, the environment, and sports that have advanced the nation and brought honour to the name of Indonesia.

The second paragraph then explains the meaning of the "national interest" criterion, namely the assessment of foreign nationals whom the state deems to have made – and to be capable of making an extraordinary contribution to the consolidation of national sovereignty and the advancement of Indonesia, particularly in the economic sphere. If interpreted grammatically based on the wording of the article and its explanation, then none of these players meets the requirements of Article 20 of Law 12/2006. Regarding the requirement of having rendered meritorious service to the state, reality shows that the quality of diaspora players who have obtained citizenship falls far short of expectations in their countries of origin; however, when compared to local Indonesian players, they appear to be better. Indonesian pundit Justinus Lhaksana has even called them mediocre

10 Muhammad Arif Hasibuan, Budiyono, dan Candra Perbawati, "Perbandingan Pengaturan Hukum Naturalisasi Indonesia dengan Korea Selatan", *Simbur Cahaya* 31, no. 1 (2024): 177–190, <https://doi.org/10.29303/jkh.v8i2.153>.

11 Marudut Parulian Silitonga dan Dina Kristina, "Naturalisasi Pemain Asing dalam Hukum Konstitusi Indonesia", *Honeste Vivere Journal* 35, no. 1 (2025): 129–137, <https://doi.org/10.55809/hv.v35i1.429>.

because, if they were truly great, their home countries' national teams would have called them up.¹²

Given this reality, it is clear that they have not rendered meritorious service to the state, as their achievements are insufficient to bring honour to the Indonesian nation on the international stage, and because they are not Indonesian citizens. Furthermore, regarding the element of national interest, it is evident that this is the foundation upon which the naturalisation process is based. According to information from Cahyo Muzhar, Director General of General Legal Administration at the Ministry of Law and Human Rights, the athlete naturalisation program is part of the government's efforts to improve athletic performance (sport policy).¹³ The government's efforts to improve athletic performance are also outlined in Presidential Instruction No. 3 of 2019 on Accelerating the Development of National Football.

Although this is not directly correlated with the final phrase of the second paragraph of the aforementioned explanation – namely, “particularly in the field of the Indonesian economy” – considering the cause-and-effect relationship between improved athletic performance, which can enhance financial opportunities and attract investors, the special naturalization of these football players fulfills the requirements outlined in the second paragraph of Article 20.¹⁴ In addition to complying with the national laws of the host country, the naturalization process must also adhere to FIFA regulations. These FIFA regulations are known as *Lex Sportiva*. The principle of *Lex Sportiva* holds that sports have their own autonomous and independent legal framework for governing the rules of the game within their respective fields.¹⁵ In this regard, FIFA, as the regulator of football, has its own legal system and possesses full sovereignty that cannot be interfered with by anyone, including the state.¹⁶

12 Anonim, “Coach Justin Tak Ragu Bilang Kualitas Pemain Timnas Indonesia Medioder Usai 3 Kekalahan Beruntun Jelang Piala Asia,” *Tvonenews*, 2024, accessed June 17, 2026, <https://www.tvonenews.com/bola/timnas/181053-coach-justin-tak-ragu-bilang-kualitas-pemain-timnas-indonesia-medioder-usai-3-kekalahan-beruntun-jelang-piala-asia-2023?page=2>.

13 Randy Prasatya, “Naturalisasi Pemain Dianggap Sudah Sesuai Kebijakan Pemerintah,” *detik.com*, 2024, accessed June 17, 2026, <https://sport.detik.com/sepakbola/liga-indonesia/d-7231123/naturalisasi-pemain-dianggap-sudah-sesuai-kebijakan-pemerintah>

14 Theodore Siagian, “4 Alasan Utama dibalik Naturalisasi Pemain di Dunia Olahraga,” *IDN TIMES*, 2024, accessed Juni 17, 2026, <https://www.idntimes.com/sport/arena/4-alasan-utama-di-balik-naturalisasi-pemain-di-dunia-olahraga-01-1mc7z-rp4630>.

15 Khairul Amar dan Ridwan, “Pelaksanaan Prinsip *Lex Sportiva* dalam Penyelesaian Kasus Tindak Pidana pada Sepakbola di Bima NTB”, *Prosiding Seminar Nasional Pascasarjana* 2, no. 1 (2019): 109–116, <https://proceedings.unnes.ac.id/snpasca/article/view/423>.

16 Ardhian Fadillah Rindiarto dan Emmilia Rusdiana, “Kajian Yuridis *Lex Sportiva* Terhadap Pemidanaan Pemain Sepakbola”, *Novum: Jurnal Hukum* 9, no. 3 (2022): 1-7, <https://doi.org/10.2674/novum.v0i0.4230>.

Based on this principle, Indonesia cannot grant citizenship to foreign players arbitrarily, because if they do not meet FIFA's standards, they cannot play for the national team. Article 7 of the FIFA Statutes states that a player may represent the national team of his new country if he meets at least one of the four criteria specified in the naturalisation process. These criteria include being born in that country, having biological parents born in that country, having a grandparent born in that country, and having resided in that country for a certain period of time. ²¹

The criteria used by Indonesia for naturalising its players are having biological parents who were born in that country and/or having a grandparent who was born in that country. These criteria reflect Indonesia's long history, which has led to many Indonesians living abroad, such as in the Netherlands, where talented players have emerged. Based on the discussion above, it can be concluded that the process of naturalising football players under national law is based on Law No. 12 of 2006, while under sports law, it follows the provisions of the FIFA Statutes.

2. Implications Of FIFA Eligibility Regulations For Naturalised Players Representing Indonesia

FIFA, as the governing body for football-related matters worldwide, has its own policies on the naturalisation process carried out by its member nations. FIFA established these policies in Article 18 at its 33rd Congress in 1962. First, any player who is a naturalised citizen of a country under that country's laws is eligible to play for that country's national team or representative squad. Second, if a player has previously been a member of the national team or a national representative of a country for which he is eligible to play in accordance with paragraph (1), he will not be permitted to participate in international matches for another country. Third, the only players exempt from this provision are those whose citizenship was changed not voluntarily but as a result of an international decision, whether granting independence to a territory or ceding part of a country to it.¹⁷

This reaffirms that FIFA respects the citizenship laws in effect in each member association and leaves the naturalisation process, as well as eligibility to play for the national team, to the respective countries. As a result, players can switch national teams as long as they meet the requirements to represent a second country when they first play for the first country, even if they have already played in official competitions for the first country. This applies as long as they have not played more than three matches, including friendly matches, none of which took place in the FIFA World Cup finals or a

¹⁷ Lyu, D., and Leite, E. J, "Naturalization in Chinese Football Legal Issue, National, and Identity", *Movimento : Revista da Escola de Educação Física* no. 29 (2023), DOI:10.22456/1982-8918.125536.

confederation competition, and all of which occurred before the player turned 21¹⁸
Another change by FIFA clarifies its rules on residency.²²

The previous rule stated that players not born in the territory and without parents or grandparents born in the country where they hold citizenship had to reside there continuously for at least five years after turning 18 to be eligible for the national team. Another significant change FIFA made concerns residency requirements for players who wish to represent a national team. Under the previous regulations, a player who was not born in the territory of the country in question and did not have parents or grandparents born in that territory was required to have resided continuously for at least five years after turning 18 to be eligible to play for that country's national team.

This provision created a clear legal loophole: players under 23 could not qualify to play for the national team. FIFA's new eligibility rules aim to close this loophole pragmatically, without making sweeping or fundamental changes. Under the updated regulations, FIFA has added three new exceptions that allow a player to switch national teams. First, a player is now permitted to switch national teams even if he has competed at the senior level, provided he meets all of the following cumulative conditions: the player held the citizenship of his new association at the time of his first official appearance for his previous national team; the player has never appeared in more than three competitive senior matches before the age of 21; the player has never participated in the final stages of official tournaments such as the FIFA World Cup, the UEFA European Championship, the Copa América, or the AFC Asian Cup; and at least three years have passed since their last senior appearance for their former national team.

Second, a player may now also switch to a new national team even if, at the time of his first appearance for his former national team, he did not yet hold the citizenship of the new national team, provided that his last appearance for his former national team occurred before he turned 21. Furthermore, an exception based on the principle of legal certainty applies: the age limit of 21 does not apply to players who made their last appearance for their former national team before September 18, 2020, that is, before the new regulations officially took effect. Furthermore, competitive restriction provisions cannot be used to bind a player to a specific national team if the player loses his or her citizenship through no fault of his or her own or, in other words, finds himself or herself in an unwanted stateless situation.

Based on these provisions, it can be understood that, first, FIFA through Article 18 of the 33rd Congress in 1962 adheres to the principle of respecting the sovereignty of

18 Steve Price, "FIFA Eligibility Rule Change Offers World Cup Hopes For 'One-Cap Wonders'", FORBES, 2020, Accessed June 18, 2026 <https://www.forbes.com/sites/steveprice/2020/09/19/fifa-eligibility-rule-change-offers-world-cup-hopes-for-one-cap-wonders/>.

member nations' domestic laws, whereby any player who has acquired the citizenship of a country has the right to represent that country's national team without any FIFA intervention in the naturalization process, which has been legally regulated by national legislation. Second, FIFA has established a ban on switching national teams for players who have appeared in official international matches as an embodiment of the principle of legal certainty, with the exception of cases where a change in citizenship occurs not by the player's own volition but as a result of an international decision, such as the granting of independence to a territory. ²³

Third, the update to FIFA's regulations regarding residency requirements was implemented to close a legal loophole that previously disadvantaged players under the age of 23, through the addition of three new exceptions that allow for a change of national team, subject to cumulative conditions: holding the citizenship of the new national team since the first appearance; having no more than three competitive senior appearances before the age of 21; never having participated in the final stage of an official international tournament; and having exceeded a three-year period since the last appearance for the former national team and Fourth, FIFA's new regulations reflect the application of the principle of non-retroactivity by not imposing the 21 year age limit on players who made their last appearance before September 18, 2020, and by protecting players who have involuntarily lost their nationality as a form of human rights protection under international law.

Conceptually, FIFA's regulations regarding player eligibility highlight a fundamental distinction between citizenship under national law (*legal citizenship*) and sporting nationality. Citizenship under national law is a legal status granted by a state under statutory provisions and creates a relationship of rights and obligations between an individual and the state. In contrast, FIFA determines sporting nationality as an eligibility status to regulate a player's right to represent a football association in international competitions. Thus, holding the citizenship of a country is a necessary condition, but it is not sufficient to obtain the right to play for that country's national team. In the Indonesian context, this distinction has significant legal implications for the naturalisation policy regarding football players.

A player who has obtained Indonesian citizenship under Law No. 12 of 2006 is not necessarily automatically eligible to play for the Indonesian National Team if he or she does not meet the eligibility requirements set by FIFA. In addition to holding Indonesian citizenship, players must also prove a genuine link to Indonesia as stipulated in Articles 5 through 9 of the FIFA Statutes. This link can be demonstrated through place of birth, parental or grandparental lineage, or by meeting specific residency requirements. This principle is illustrated by the cases of Jordi Amat, Sandy Walsh, and Ragnar

Oratmangoen. These three players not only obtained Indonesian citizenship through naturalisation but also met FIFA's eligibility requirements because they have ancestral ties to Indonesia. 24

Consequently, FIFA's recognition adds legitimacy to the citizenship status granted by the state, allowing these players to be legally registered and fielded in international matches organised by FIFA or its affiliated confederations. This FIFA approval mechanism shows that a state's authority to grant citizenship and FIFA's authority to determine eligibility are distinct yet interrelated legal regimes. States retain sovereignty over who becomes their citizens, while FIFA has exclusive authority to determine who is eligible to represent a national team in international competitions. Consequently, the successful completion of the naturalisation process under Indonesian law does not always directly correlate with a player's eligibility to play for the Indonesian National Team if the sporting nationality requirements set by FIFA are not met.

From a legal certainty perspective, this regulatory dualism requires harmonisation between national citizenship laws and FIFA regulations. Harmonisation is necessary so the naturalisation process for football players is valid under Indonesian law and meets FIFA's international eligibility standards. Thus, naturalisation policies can be implemented effectively without disputes over players' eligibility in international competitions. The main legal implication of FIFA's eligibility regulations on Indonesia's naturalisation policy is the creation of a dual-requirement system that naturalised players must meet simultaneously. On the one hand, players must meet the citizenship requirements under Law No. 12 of 2006 to obtain Indonesian citizenship.

On the other hand, players must also meet the sporting nationality requirements set by FIFA in order to be registered as players on the Indonesian National Team. Consequently, state-granted citizenship does not automatically confer the right to international representation. This situation indicates that the effectiveness of Indonesia's naturalisation policy depends not only on the success of the naturalisation process but also on the state's ability to ensure that naturalised players meet FIFA's eligibility standards from the very beginning of the selection process. Therefore, any policy on the naturalisation of football players must consider both national law and international sports law to ensure legal certainty and effective national football development.

D. Conclusion

Citizenship is a fundamental right of every human being as enshrined in the Universal Declaration of Human Rights (UDHR) and the 1945 Constitution of the Republic of Indonesia. Citizenship provisions in Indonesia are regulated by Law No. 12 of 2006. Law No. 12 of 2006 governs the procedures for naturalisation, namely "normal" and "ordinary" naturalisation. Special naturalisation is often used for members of the

diaspora so they can play for the Indonesian national team. Although this does not strictly meet the requirements of Article 20 Law No. 12 of 2006, the causal relationship can satisfy the element of national interest. In addition to national law, the naturalisation of football players is also governed by the FIFA Statutes. Indonesia's criteria, based on the FIFA Statutes, require that the player's parents have a biological relationship to the player²⁵ and/or the player's grandparents were born in the relevant country.

FIFA's regulations regarding the eligibility of naturalised players reflect the dual legal regime between national citizenship and international sports regulations, in which holding the citizenship of a country is a necessary but not sufficient condition for obtaining the right to international representation, given that players must also meet FIFA's "sporting nationality" requirements, which mandate a genuine connection to the country in question. In the context of Indonesia, this dualism has given rise to a system of dual requirements based on Law No. 12 of 2006 and FIFA eligibility criteria, which must be met simultaneously as reflected in the cases of Jordi Amat, Sandy Walsh, and Ragnar Oratmangoen thereby necessitating harmonization between national naturalization policies and FIFA regulations to ensure legal certainty and the effectiveness of national football development on the international stage.

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