

**Dynamics of Mixed Marriages: Analysis of Legal Choices, Divorce Recognition, and Implications For Children's Status in Indonesia**

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**ABSTRACT**

*Cross-border marriages are increasingly common in the era of globalization, yet they introduce legal complexities, particularly concerning choice of law, recognition of divorce, and the status of children. Key issues that frequently arise include differences in legal systems between countries, inconsistencies in determining applicable law, challenges in recognizing foreign divorce decrees in Indonesia, and legal complications related to citizenship and child custody. This research aims to analyze the principles of choice of law, the mechanisms for divorce recognition, and their implications for the legal status of children post-divorce in cross-border marriages. This study employs a normative legal method with a statutory and conceptual approach. Primary data is sourced from Law Number 1 of 1974 concerning Marriage, Law Number 12 of 2006 concerning Citizenship, Law Number 7 of 1989 concerning Religious Courts, and Algemene Bepalingen (AB). Secondary data includes references from International Private Law, journals, and articles. Data was collected through literature review and analyzed descriptively-analytically. The research findings indicate that Indonesia adopts the principles of lex loci celebrationis, lex domicilii, and lex patriae in the choice of law for cross-border marriages, with an emphasis on Article 56 of the Marriage Law and the obligation of registration. The recognition of foreign divorces is not automatically valid in Indonesia; therefore, divorces generally must be settled through Indonesian courts based on Article 73 paragraph (3) of the Religious Courts Law and Article 18 AB. The legal status of children is highly complex due to legal vacuums in the Marriage Law regarding mixed marriages, as well as the application of the ius sanguinis principle which potentially causes children to lose Indonesian citizenship or face legalization difficulties, in addition to custody and administrative issues. Therefore, more adaptive and comprehensive legislation is urgently needed to protect the best interests of children in cross-border marriages.*

**Keywords : Choice of Law, Mixed Marriages, Recognition of Divorce, Status of Children**

**A. INTRODUCTION**

In the ever-evolving era of globalization, the mobility of people across countries is steadily increasing, driven by various factors such as education, work, business, and even tourism. This phenomenon inherently impacts social and cultural interactions, including fundamental aspects of human life like marriage. Marriages between citizens of different

countries or those performed in different jurisdictions, also known as cross-border marriages (mixed marriages)<sup>1</sup>, are no longer unfamiliar in Indonesia. This phenomenon is increasingly observed across various societal strata, including among public figures. Take for instance, several Indonesian artists and celebrities like MA, who married a Korean-American citizen, or the late BCL with her Malaysian husband, and MK, whose husband is a Dutch national. These examples further clarify that cross-border marriages are a rapidly growing social reality.

Although comprehensive national statistical data on the exact number of cross-border marriages is still limited and not widely available from official institutions, observations of social dynamics and reports from organizations like the Indonesian Mixed Marriage Community Institute (PERCA) indicate a significant upward trend.<sup>2</sup> High population mobility, as reflected in data from the Central Statistics Agency (BPS) which records millions of Indonesians undertaking lifelong migration, indirectly suggests a relatively high probability of inter-cultural or cross-border marriages occurring.

However, beyond the romance and cultural diversity they offer, cross-border marriages often become a complex arena for legal conflicts. Each country has its own legal system governing the validity of marriage, divorce procedures, and the rights and obligations of parents towards their children. These differences can create a "clash" of legal norms when the parties involved originate from different jurisdictions or when legal events (such as divorce) occur in a country different from where the marriage was performed.<sup>3</sup> For example, a marriage might be valid in one country but not recognized in another, or a divorce process valid abroad may be difficult to recognize in the country of origin.

This complexity further intensifies when such cross-border marriages end in divorce. Cross-border divorce proceedings not only involve emotions and personal dynamics but also a series of intricate legal challenges related to the applicable choice of law, the recognition of divorce decrees from one country to another, and most crucially, the legal status of children born from such marriages. Issues like child citizenship, custody rights, visitation rights, and maintenance obligations often become areas of dispute requiring clear

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<sup>1</sup> Sholikhawati dkk., “Problematisasi Hukum Akibat Perkawinan Campuran Terhadap Status dan Hak asuh Anak Dibawah Umur,” 59.

<sup>2</sup> *PENINGKATAN NIKAH CAMPURAN - Organisasi Perkawinan Campuran Indonesia*.

<sup>3</sup> Azizah Rima Gitacahyani dkk., “Akibat Hukum Yang Timbul Dari Perceraian Beda Kewarganegaraan Perspektif Hukum Perdata Internasional,” 192.

and fair legal resolution. The generally high divorce rate in Indonesia has significantly increased in recent years, according to data from the Central Statistics Agency,<sup>4</sup> though not specific to mixed marriages, indicating that divorce issues, including those with cross-border dimensions, require serious attention.

Therefore, the urgency to understand and analyze the legal conflicts arising in cross-border marriages becomes vital. This research will focus on the dynamics of international private law in the context of mixed marriages, specifically concerning the principles for determining applicable law (choice of law), the procedures and challenges in recognizing cross-border divorces, and their implications for the protection and determination of the legal status of children as the most vulnerable parties. A deep understanding of these aspects is expected to contribute to legal development and provide practical guidance for relevant parties.

Based on the background presented, this research identifies several key legal problems that require in-depth study. First, the differences in national legal systems between countries create disparities in marriage, divorce, and family regulations, potentially leading to significant legal conflicts in cross-border marriages. Second, the lack of uniformity in determining the applicable law (choice of law), or connecting factors, often leads to legal uncertainty. Third, there are challenges in recognizing foreign divorce decrees, given that a decree valid in one country is not necessarily automatically recognized and enforceable in another, especially in Indonesia which adheres to the principle of recognition without execution, often leaving legal status in limbo. Fourth, legal complications regarding the status of children also arise due to differences in laws concerning citizenship, custody rights, guardianship rights, and maintenance obligations post-divorce, which can potentially harm the best interests of the child.

Finally, a crucial question arises: how can existing laws, both national and international, provide adequate legal protection for parties involved in cross-border marriages, especially women and children, amidst the complexity of these legal conflicts? Based on the identification of these problems, this research formulates the following main questions: (1) How are the principles of choice of law applied in cross-border marriages? (2) How is divorce recognition in cross-border marriages regulated and legally recognized? (3) What

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<sup>4</sup> Lase dan Mahadewi, “ANALISIS PENYEBAB TINGGINYA ANGKA PERCERAIAN DI PENGADILAN AGAMA,” 10361.

is the legal status of children born from cross-border marriages after their parents' divorce?

## **B. METHOD**

This research adopts a normative legal research method, utilizing both statutory and conceptual approaches. Primary data sources include legal regulations such as Law Number 1 of 1974 concerning Marriage, Law Number 12 of 2006 concerning Citizenship, Law Number 7 of 1989 concerning Religious Courts, and the Algemene Bepalingen (AB). Meanwhile, secondary legal materials encompass International Private Law references like scholarly journals, articles, and various other legal documents related to mixed marriages, cross-border divorces, and the status of children. Data was collected through library research, involving the identification, review, and analysis of relevant legal materials.<sup>5</sup> Subsequently, the collected data was analyzed descriptively-analytically through a process of interpretation, correlation, and synthesis of legal data to address the formulated research questions and draw conclusions based on deductive reasoning.

## **C. ANALYSIS and DISCUSSION**

### **1. Basic Concepts of Cross-Border Marriage and Its Legal Basis in Indonesia**

Marriage, as the starting point of a new life, intertwines personal, social, and, crucially, legal dimensions. Juridically, it represents a sacred covenant that gives rise to a series of mutual rights and obligations between husband and wife.<sup>6</sup> In Indonesia, the legal foundation for marriage is enshrined in Law Number 1 of 1974, which also specifically encompasses regulations for marriages between citizens of different countries. Article 57 of Law No. 1 of 1974 explicitly defines "mixed marriage" as a bond between two individuals who are subject to different legal systems due to differing nationalities.<sup>7</sup> Essentially, this article emphasizes the disparity in legal status or citizenship, rather than differences in religion. Because it involves foreign elements, this type of marriage automatically enters the realm of International Private Law (IPL), which necessitates the simultaneous consideration of two or more legal jurisdictions.

In the rapidly accelerating era of globalization, the cross-border mobility of people has

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<sup>5</sup> Mestika, *Metode Penelitian Kepustakaan*.

<sup>6</sup> Ervina Martha Herawati, “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia.”

<sup>7</sup> *Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan*.

made international marriages an increasingly common phenomenon. The right to marry itself is recognized as a universal human right, as stipulated in Article 16 of the Universal Declaration of Human Rights, which affirms that this right should not be restricted by nationality or religion, as long as it is based on the free and full consent of both parties. However, despite the universality of this right, couples from different countries often face a labyrinth of legal challenges. When this marital bond reaches a crossroads, such as divorce, International Private Law (IPL) becomes the primary compass determining the competent court's jurisdiction, the applicable substantive law, and the distribution of rights and obligations post-divorce, all of which require careful legal navigation.<sup>8</sup>

In Indonesia, the main legal umbrella covering all aspects of marriage is Law Number 1 of 1974 concerning Marriage (Marriage Law). The philosophical foundation of this law promotes the principle of monogamy, a fundamental principle explicitly regulated in Article 3 paragraph (1). More than just a personal vow, the legal validity of a marriage absolutely requires official registration. Article 2 paragraph (2) of the Marriage Law clearly mandates this registration process: for Muslims, registration is carried out at the Office of Religious Affairs (KUA), while for non-Muslims, the Civil Registry Office (KCS) is the authorized institution. The recognition of marriage in its civil dimension is further strengthened by Article 26 of the Civil Code (KUHPerdota), which rigidly requires registration by an authorized official. Specifically for cross-border marriages performed outside Indonesian territory, Article 56 of the Marriage Law grants valid recognition, provided that the marriage meets the legal provisions of the country where it was performed and does not contradict the principles of law applicable in Indonesia.

## **2. Application of Choice of Law Principles in Cross-Border Marriages**

The application of choice of law principles in cross-border marriages is a crucial aspect of International Private Law (IPL) for resolving legal conflicts. Within the realm of IPL, determining the applicable law in mixed marriages involves several important principles or connecting factors.<sup>9</sup> First, the Principle of *Lex Loci Celebrationis* dictates that a marriage must adhere to the laws of the country where it's performed.<sup>10</sup> In other words, if a marriage

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<sup>8</sup> Ervina Martha Herawati, “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia,” 126.

<sup>9</sup> Robo dkk., “Perkawinan Antar Negara Berdasarkan Hukum Perdata Internasional,” 27.

<sup>10</sup> Fatahullah dkk., “Problematisasi Keabsahan Perkawinan Beda Agama Yang Dilakukan Di Luar Wilayah Hukum Indonesia.”

takes place in another country, its formal validity will be determined by the laws of that country. This principle is vital for providing legal certainty regarding the form and procedure of marriage.

Second, the Principle of *Lex Domicilii* states that the applicable law in a marriage is the law of the couple's permanent residence or domicile. This principle becomes relevant when the parties' domicile is considered a stronger connecting factor, for instance, in determining the material requirements for marriage. For example, if a couple chooses to reside in Indonesia, then Indonesian law will apply. Third, the Principle of *Lex Patriae* establishes that the applicable law is the law of each spouse's country of citizenship. This principle is very important in determining the material requirements for the validity of an individual's marriage, such as age limits, the necessity of obtaining permission from certain parties, or the existence of impediments to marriage.<sup>11</sup> As an illustration, an Indonesian citizen (WNI) will remain subject to Indonesian law in their marital affairs, regardless of their spouse's nationality.

The procedures for cross-border marriages conducted in Indonesia have several requirements that must be met. Generally, foreign nationals (WNA) must possess a valid stay permit in Indonesia. Additionally, if one of the prospective spouses is under 21 years old, written permission from a parent or guardian is required. The subsequent step is marriage registration, where prospective couples must submit a marriage notification at least 10 days before the wedding date to the Office of Religious Affairs (KUA) for Muslims or the Civil Registry Office (KCS) for non-Muslims, according to their respective religions. After the marriage takes place, it's essential to have it legalized to be valid internationally. This legalization is done at the Ministry of Law and Human Rights and the Ministry of Foreign Affairs, as well as by registering it at the Embassy of the foreign national's country of origin.<sup>12</sup>

For Indonesian citizens (WNI) who enter into cross-border marriages abroad, the marriage is considered valid if it has been performed in accordance with the laws of the country where the marriage took place and does not contradict Indonesian law.<sup>13</sup> This is

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<sup>11</sup> Fitriani dan Jaelani, “Pengaturan Keabsahan Perkawinan Campuran Ditinjau Dari Pespektif Hukum Perdata Internasional Dan Konvensi Den Haag 1978.”

<sup>12</sup> Ervina Martha Herawati, “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia,” 128.

<sup>13</sup> Ervina Martha Herawati, “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia,” 130.

regulated in Article 56 paragraph (1) of the Marriage Law. Furthermore, couples have an obligation to register their marriage at the Civil Registry Office in Indonesia within one year after returning to Indonesia. This provision is re-emphasized in Article 56 paragraph (2) of the Marriage Law, ensuring the legality and registration of the marriage within the Indonesian legal system.

### **3. Mechanisms for Recognizing Divorce in Cross-Border Marriages**

Divorce involving individuals of different nationalities presents a series of significant legal complexities from the perspective of International Private Law (IPL). The resulting legal consequences encompass crucial issues such as determining jurisdiction, relevant choice of law (*lex causae*), and the recognition and enforceability of judgments across various jurisdictions.<sup>14</sup> More specifically, the dynamics of these cross-national divorces are governed by several key IPL principles. First, jurisdiction determines the competent court, which can be based on domicile, nationality, or the location of the marriage, often regulated by bilateral agreements or international conventions. Second, the recognition of divorce decrees finalized in one country varies when applied to another; some countries recognize foreign judgments if they meet specific requirements. Third, the applicable law or choice of law (*lex causae*) is determined by IPL, where countries may adhere to the principle of *lex domicilii* (law of domicile), *lex loci celebrationis* (law of the place of marriage), or other principles. Lastly, international conventions, such as the Hague Convention of 1970 on the Recognition of Divorces and Legal Separations, provide a consistent legal framework for handling these cases globally.<sup>15</sup>

It is important to understand that despite the existence of IPL principles, a divorce decree established in one country is not necessarily automatically recognized and enforceable in another. This reality arises because various countries have their own legal requirements and procedures for recognizing a foreign divorce. This condition creates complexity and potential legal conflicts, given the differences in legal systems, IPL principles, and the public policies of each country regarding divorce. Therefore, the recognition of cross-border divorces often requires a careful process of legalization and adaptation so that the decree

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<sup>14</sup> Azizah Rima Gitacahyani dkk., “Akibat Hukum Yang Timbul Dari Perceraian Beda Kewarganegaraan Perspektif Hukum Perdata Internasional,” 193.

<sup>15</sup> Azizah Rima Gitacahyani dkk., “Akibat Hukum Yang Timbul Dari Perceraian Beda Kewarganegaraan Perspektif Hukum Perdata Internasional,” 196.



can have binding legal force in another jurisdiction.

For couples who married in Indonesia but subsequently reside abroad, the resolution of their divorce is subject to Indonesian legal provisions. Based on Article 73 paragraph (3) of Law Number 7 of 1989 concerning Religious Courts, divorce petitions must be filed in the court where the marriage was performed. This means that the divorce process must be conducted through the Religious Court for Muslims or the District Court for non-Muslims in Indonesia. Even if the couple lives abroad, a divorce petition can still be filed with the Central Jakarta Religious Court or a court in their place of residence, provided that the judgment obtains recognition under Indonesian law.<sup>16</sup> In this context, the principle of *statuta* in International Private Law plays a crucial role in determining the court's jurisdiction and the applicable law in handling cross-national divorce cases, ensuring a clear legal pathway despite the cross-border dimension.

The principle of determining the applicable law in cross-border divorces is reinforced by Article 18 of the *Algemene Bepalingen* (AB). This Article states that the form and legal effects of an act are subject to the law of the place where the act was performed. As a concrete illustration, consider the case of a couple consisting of an Indonesian citizen (WNI) and a Japanese citizen who married in Indonesia but subsequently decided to reside in Japan. If this couple later faces marital breakdown and chooses to finalize their divorce in Indonesia, this decision is legally very appropriate and logical. The main argument lies in the essence of Article 18 AB: because their marriage was legally performed and registered in Indonesia, all forms and legal consequences inherent in that marital bond, including its termination through divorce, should also be subject to Indonesian law. This aligns with the principle of *lex fori* (the law of the court where the case is heard), which often refers to the law of the place where the legal act was performed.

The application of Article 18 AB has high urgency within the framework of International Private Law (IPL). This Article serves as an important bridge to ensure legal certainty and justice for parties involved in cross-border marriages. Without such a clear principle, the legal status of marriage and divorce would be highly vulnerable to uncertainty. A marriage valid in one country could suddenly be considered invalid or difficult to dissolve in another country merely due to a change in the parties' domicile or nationality. By referring to the

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<sup>16</sup> Ervina Martha Herawati, “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia,” 130.



law of the place where the marriage was performed, Article 18 AB provides a stable and predictable framework, avoiding unfair "forum shopping" and ensuring that rights and obligations arising from the marriage can be processed consistently with the initial law that underpinned it. Thus, Article 18 AB not only resolves legal conflicts between jurisdictions but also upholds the principle of substantive justice for individuals in cross-border relationships.

#### **4. Legal Implications on the Status of Children in Cross-Border Marriages Post-Divorce**

In the context of mixed marriages, one of the most intricate and often problematic legal dimensions is the determination of a child's legal status, which encompasses both their citizenship and custody rights. While Law Number 1 of 1974 concerning Marriage comprehensively regulates the position of children through Chapter 9, Articles 42 to 44—explicitly defining categories of legitimate children, the legal status of children born outside marriage, and granting husbands the right to disavow a child's legitimacy under certain conditions—the scope of these regulations fundamentally addresses only the status of children born from marital bonds between fellow Indonesian citizens.<sup>17</sup> Consequently, there is a striking legal vacuum within the framework of the Marriage Law, as there are no specific provisions adequately accommodating and protecting the status of children born from mixed marriages. This inherent lack of clear regulation creates a legal loophole that becomes a source of complex and protracted problems for cross-border families.

The legal implications for children born from cross-border marriages, particularly after their parents' divorce, represent one of the most challenging aspects of International Private Law. The main issues that consistently surface concern the child's citizenship and custody. Regarding citizenship, Law Number 12 of 2006 concerning Indonesian Citizenship provides a crucial legal framework. Through Article 6 paragraph (1) of this law, it is stipulated that children born from mixed marriages can hold limited dual citizenship until they reach 18 years of age or get married.<sup>18</sup> After reaching this age limit, or after marriage, the child has a legal obligation to explicitly choose one of their nationalities to avoid a permanently unrecognized dual citizenship status.

Furthermore, an understanding of the principles of citizenship adopted by Indonesia is

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<sup>17</sup> *Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan.*

<sup>18</sup> *Undang-Undang Nomor 12 Tahun 2006 tentang Kewarganegaraan.*

vital. Law Number 12 of 2006, as an improvement on Law No. 62 of 1958, adopts several universal citizenship principles in regulating the status of children from mixed marriages.<sup>19</sup>

These principles include:

- a) Principle of *Ius Sanguinis* (Law Based on Descent): This principle fundamentally determines a person's citizenship based on their lineage from their parents, regardless of their place of birth.
- b) Limited Principle of *Ius Soli* (Law Based on Birth): This principle determines an individual's citizenship based on their place of birth, but its application in Indonesia is limited and only applies to certain conditions regulated by law.
- c) Principle of Single Citizenship: This principle establishes a single citizenship for each individual, which is the ultimate goal after a child with limited dual citizenship must choose.
- d) Principle of Limited Dual Citizenship: This principle specifically allows for dual citizenship for children born from mixed marriages, where one or both parents hold dual citizenship or one is an Indonesian citizen (WNI) and the other is a foreign national.

It is important to note that, fundamentally, Indonesia adheres to the principle of *ius sanguinis*. The implications of this principle are significant, as a child's citizenship will generally follow the father's nationality.<sup>20</sup> Consequently, if the child's father is a foreign national, there is a significant potential for the child to lose their status as an Indonesian citizen (WNI) after reaching 18 years of age or marrying, if they do not choose Indonesian citizenship. This situation becomes even more complex and difficult if the Indonesian mother assumes the child's care post-divorce. They often face various bureaucratic and legal difficulties in the process of legalizing the child's status as an Indonesian citizen, which can involve complex and time-consuming immigration procedures. Even the process of reporting the citizenship status of a child with foreign citizenship elements to the relevant foreign embassy and the Immigration Office in Indonesia is not simple. This process requires considerable cost and, in some countries, even requires the physical presence of a young child to report their citizenship status to the embassy.

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<sup>19</sup> Sholikhawati dkk., “Problematisasi Hukum Akibat Perkawinan Campuran Terhadap Status dan Hak asuh Anak Dibawah Umur,” 65.

<sup>20</sup> Sholikhawati dkk., “Problematisasi Hukum Akibat Perkawinan Campuran Terhadap Status dan Hak asuh Anak Dibawah Umur,” 60.

In line with the complexities of citizenship issues, the problem of child custody also faces a striking legal vacuum in Law Number 1 of 1974. Given that this law only regulates the custody of children from marriages between fellow Indonesian citizens, there are no specific and comprehensive regulations available to handle child custody in mixed marriages post-divorce. This legislative gap can place Indonesian mothers who care for their children in a very vulnerable legal position, especially if the child's father is a foreign national and no longer resides in Indonesia, or even refuses to cooperate. Furthermore, children with foreign citizenship, even if cared for by an Indonesian mother in Indonesia, face a series of ongoing administrative and financial problems related to the need to regularly renew their stay permits. This not only adds to the economic burden on the family but also creates uncertainty in the child's life. These conflicts are further exacerbated if the marriage does not go smoothly and is marked by domestic violence (KDRT), which then leads to divorce.

In this scenario, determining the child's citizenship status (whether they will follow the father or mother) becomes even more unclear and complicated by emotional trauma. Moreover, if the Indonesian wife followed her husband to live in his home country, the process of applying for and obtaining Permanent Resident (PR) status in her husband's country can take up to four years. If a divorce occurs before PR status is obtained, or if there is a cross-border custody dispute, the Indonesian mother and her children can be caught in legal limbo, facing great difficulty returning to Indonesia or determining a safe and legal permanent residence. All these dynamics underscore the urgency for more adaptive and comprehensive legislation to protect the best interests of children in cross-border marriages.

#### **D. CONCLUSION**

This research concludes that cross-border marriages introduce significant complexities regarding choice of law, recognition of divorce, and the status of children. In terms of choice of law, Indonesia adopts principles of International Private Law (HPI) such as *lex loci celebrationis*, *lex domicilii*, and *lex patriae*, with an emphasis on Article 56 of the Marriage Law and the obligation of registration. Regarding the recognition of divorce, foreign decrees are not automatically recognized with *executie* in Indonesia, meaning settlements generally must go through Indonesian courts based on Article 73 paragraph (3) of the Religious Courts Law and Article 18 AB. Finally, the legal status of children post-divorce becomes highly complex due to legal gaps in the Marriage Law concerning mixed marriages, as well as the

application of the *ius sanguinis* principle which potentially causes children to lose Indonesian citizenship or face legalization difficulties, in addition to custody and administrative issues.

The government or legislators need to revise regulations on mixed marriages, particularly concerning child custody and citizenship post-divorce, and consider ratifying international conventions to fill legal vacuums. Legal practitioners are advised to enhance their understanding of HPI for optimal client assistance. For the public, it's crucial to seek information and legal consultation, and consider pre/post-nuptial agreements before entering into cross-border marriages, to anticipate future conflicts.

## **BIBLIOGRAPHY**

### **Book**

Mestika, Zed. *Metode Penelitian Kepustakaan*. Yayasan Bogor Indonesia, 2004.

### **Journal**

Azizah Rima Gitacahyani, Bilqis Dewi P, Cherisanda Nesya, Regita Kisnanda Putri, dan Yasmine Erlisa. “Akibat Hukum Yang Timbul Dari Perceraian Beda Kewarganegaraan Perspektif Hukum Perdata Internasional.” *Depositi: Jurnal Publikasi Ilmu Hukum* 1, no. 4 (2023): 191–207. <https://doi.org/10.59581/deposisi.v1i4.1802>.

Ervina Martha Herawati, Vonny Fatikha Azzahra. “Kepastian Hukum Perkawinan Beda Negara Berdasarkan Hukum Perdata Internasional Indonesia.” *Socius: Jurnal Penelitian Ilmu-ilmu Sosial* 1 (November 2023). <https://doi.org/10.5281/ZENODO.10213731>.

Fatahullah, Fatahullah, Israfil Israfil, dan Sri Hariati. “Problematisasi Keabsahan Perkawinan Beda Agama Yang Dilakukan Di Luar Wilayah Hukum Indonesia.” *Jurnal Kompilasi Hukum* 5, no. 1 (2020): 41–55. <https://doi.org/10.29303/jkh.v5i1.36>.

Fitriani, Suci Emilia, dan Elan Jaelani. “Pengaturan Keabsahan Perkawinan Campuran Ditinjau Dari Perspektif Hukum Perdata Internasional Dan Konvensi Den Haag 1978.” *Jurnal Hukum dan Kewarganegaraan* 2, no. 7 (2024).

Lase, Efreem Hapi Warman, dan Kadek Julia Mahadewi. “ANALISIS PENYEBAB TINGGINYA ANGKA PERCERAIAN DI PENGADILAN AGAMA.” *Communnity Development Journal* 5, no. 5 (2024).

Robo, Sofianti Musa, Theresia Lianna Juwilanda, Yeni Fitriani Soi, dan Mohammad Hijir Ismail. “Perkawinan Antar Negara Berdasarkan Hukum Perdata Internasional.” *Jurnal Mahasiswa Karakter Bangsa* 1, no. 1 (2021)

Sholikhawati, Ajeng, Echa Nursyah Dani Sumadi, Ilham Firmansyah, dan Nugroho Dwi. “Problematisasi Hukum Akibat Perkawinan Campuran Terhadap Status dan Hak asuh Anak Dibawah Umur.” *Hakim: Jurnal Ilmu Hukum dan Sosial* 2, no. 1 (mendatang)

### **Law and Regulation**

Indonesia. *Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan*. t.t.

Indonesia. *Undang-Undang Nomor 12 Tahun 2006 tentang Kewarganegaraan*. t.t.

### **Web**

*PENINGKATAN NIKAH CAMPURAN - Organisasi Perkawinan Campuran Indonesia*. 31 Agustus 2017. <https://percaindonesia.com/?s=PENINGKATAN+NIKAH+CAMPURAN>.