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A review: Differences in halal food regulations in several countries in Asia

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ABSTRACT
Halal regulations have become a growing issue as the Muslim population continues to grow every year. This increase in the Muslim population is accompanied by a growing demand for halal products, given that the concept of halal is a fundamental aspect of Muslim life. The differences in halal regulations across countries have not yet been fully harmonised because these standards cannot be universally standardised. The method used in this study is a Systematic Literature Review (SLR) following the PRISMA 2020 guidelines. Data was obtained through the Scopus database to analyze halal regulations in several Asian countries, namely Indonesia, Malaysia, Singapore, Thailand, Japan, and South Korea. The results of the study indicate that muslim majority countries have absolute halal regulations because they are part of their citizens' rights, while non-Muslim majority countries have halal regulations that are not binding and voluntary. Each country has specific provisions related to halal product regulations.

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INTRODUCTION

According to data recorded in January 2023, the world's Muslims reached over 2 billion. The estimated Muslim community reaches 25% of the world's population, including Indonesia and Malaysia, as countries with the largest Muslim majority (Akbar et al., 2023). The growth of the world's Muslim community, which has increased significantly, has a positive impact on the global halal industry. This is a trigger for the government to accelerate the efficiency and effectiveness of the halal certification process, which will have an impact on the economic growth of a country (Rofi'ah et al., 2024). The growing halal industry in the world is related to halal food, halal travel, halal products, halal tourism, and halal cosmetics (Akbar et al., 2023; Nuraini & Sucipto, 2021). Halal products and services are important indicators for the Global Muslim Travel Index (GMTI) to be used as a "Muslim-friendly" country. Standard halal regulations are developed and legally established in regulation of more than one country (such as: Standard and Metrology Institute for the Islamic Countries (SMIIC) and GCC Standardization Organization (GSO)) or within the scope of government agencies (e.g. Indonesian Ulema Council (MUI), Department of Islamic Development Malaysia (JAKIM), Islamic Religious Council of Singapore (MUIS), the Central Islamic Council of Thailand (CICOT), and other Islamic institutions that regulate halal regulations (Al-Mahmood & Fraser, 2023).

Halal comes from the Arabic words halla and yahillu, which have the basic meaning of to be free or to release. Substantially, halal means to be freed and allowed to be eaten. The concept of halal is taken from the Islamic religion, which requires its adherents to consume halal food (Nazim & Yusof, 2023). Haram means forbidden or prohibited, which substantially means it is not allowed to be eaten (Arif & Sidek, 2015). Foods that are prohibited in the Qur'an are blood, carrion, swine, and animals slaughtered in the name of other than Allah (QS. 2:173), animals that die from strangulation, being hit,

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falling, being gored, and being attacked by wild animals (QS. 3:5), and alcoholic drinks (QS. 5:90). In addition to the concept of halal, there is the concept of *thayyib* which means good or holy. The concept of *thayyib* is often combined with halal because the concepts of both complement each other. The *thayyib* means that the food consumed must be safe, healthy, and clean (de Araújo et al., 2022). The existence of these prohibitions and restrictions makes a food product require regulations that protect the Muslim community so that they feel safe both physically and spiritually when consuming the food product.

Each country has different specifications in regulating halal regulations. Yet there are not many journals to compare the regulations among Asian countries that applied halal industry in their own country. This journal aims to compare various halal regulations for a product from several countries, including halal policies, halal food and ingredients, and the animal slaughtering process. Hopefully, this article can bring a more comprehensive understanding to consumers regarding the differences in regulations and halal standards for halal ingredient and materials products in several countries in Asia.

RESEARCH METHOD

Methods

This article is a systematic literature review (SLR) that refers to PRISMA (Preferred Reporting Items for Systematic Review and Meta-Analysis) (Figure 1). PRISMA is a review guideline that involves systematic steps in creating an SLR based on previously applied research. Several important points in writing SLR include identification, screening, eligibility, availability of access, quality assessment, abstraction, and data analysis. The use of PRISMA in SLR serves as a reference and guideline to clarify the work steps and the reasons for taking the references used. The advantages of using PRISMA 2020 compared to the previous version are that in PRISMA 2020, reference selection is more comprehensive (Page et al., 2021). The database source used in SRL is Scopus. Scopus is one of the largest database sources with more than 97.3 million abstracts and literature citations.

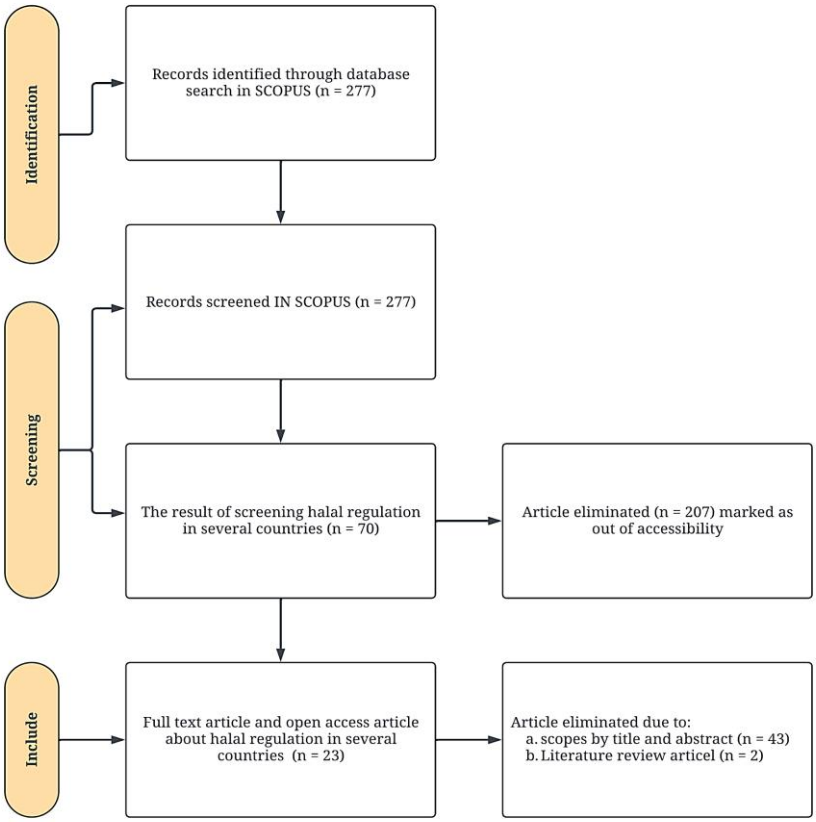

Figure 1. Flow chart of research article study selection process

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RESULT AND DISCUSSION

The following are regulations related to halal policies in several countries, as shown in Table 1.

Table 1. Regulations related to halal policies are set in several countries.

Country	Material	Regulation	Reference
Indonesia	Swine	MUI Fatwa No. 7 of 1980	Majelis Ulama Indonesia (1980)
		Law No. 33 of 2014, Chapter 17 concerning Halal Product Assurance	Republik Indonesia (2014)
	Carrion	MUI Fatwa No. 7 of 1980	Majelis Ulama Indonesia (1980)
		Law No. 33 of 2014, Chapter 17 concerning Halal Product Assurance	Republik Indonesia (2014)
	Blood	MUI Fatwa No. 7 of 1980	Majelis Ulama Indonesia (1980)
		Law No. 33 of 2014, Chapter 17 concerning Halal Product Assurance	Republik Indonesia (2014)
	Animal slaughtered	MUI Fatwa No. 7 of 1980	Majelis Ulama Indonesia (1980)
		Law No. 33 of 2014, Chapter 17 concerning Halal Product Assurance	Republik Indonesia (2014)
	Alcohol	MUI Fatwa No. 10 of 2018 concerning Food and Beverage Products Containing Alcohol/Ethanol	Majelis Ulama Indonesia (2018)
	Microbial	MUI Fatwa No. 01 of 2010 concerning Microbes and Microbial Products	Majelis Ulama Indonesia (2010)
		Law No. 33 of 2014, Chapter 17 concerning Halal Product Assurance.	Republik Indonesia (2014)
	Human parts	MUI Fatwa No. 2 of 2000 concerning the Use of Human Organs, Placenta, Urine for Medicines and Cosmetics	Majelis Ulama Indonesia (2000)
Malaysia	Swine	MS1500:2019	Malaysian Standards (2019)
	Carrion	MS1500:2019	Malaysian Standards (2019)
	Blood	MS1500:2019	Malaysian Standards (2019)
	Animal slaughtered	MS1500:2019	Malaysian Standards (2019)
	Alcohol	JAKIM Fatwa 14-16 July 2011 concerning Alcohol in Food, Beverages, Fragrances, and Medicines	JAKIM (2011)
		MS1500:2019	Malaysian Standards (2019)
	Microbial	MS1500:2019	Malaysian Standards (2019)
	Human parts	MS1500:2019 (Orifice only)	Malaysian Standards (2019)
Singapore	Swine	MUIS Guidelines	MUIS (2025a)
	Carrion	MUIS Guidelines	MUIS (2025a)
	Blood	MUIS Guidelines	MUIS (2025a)
	Animal slaughtered	MUIS Guidelines	MUIS (2025a)
	Alcohol	MUIS Guidelines	MUIS (2025a)
		MUIS Fatwa concerning Natural Ethanol in Halal food flavoring	MUIS (2025b)
	Microbial	-	
	Human parts	-	

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Country	Material	Regulation	Reference
Thailand	Swine	TISI 1701-2541 concerning Recommendations for the use of the term "Halal."	TISI (2000)
		Thai Agricultural Commodity and Food Standard (ACFS): 8400-2007 concerning Halal Product	Thai Agricultural Standard (2007)
		CICOT B.E. 2559 concerning the requirements for the certification process of Halal products	CICOT (2017a)
	Carrion	TISI 1701-2541 concerning Recommendations for the use of the term "Halal."	TISI (2000)
		Thai Agricultural Commodity and Food Standard (ACFS): 8400-2007 concerning Halal Product	Thai Agricultural Standard (2007)
		CICOT B.E. 2559 concerning the requirements for the certification process of Halal products	CICOT (2017a)
	Blood	TISI 1701-2541 concerning Recommendations for the use of the term "Halal."	TISI (2000)
		Thai Agricultural Commodity and Food Standard (ACFS): 8400-2007 concerning Halal Product	Thai Agricultural Standard (2007)
		CICOT B.E. 2559 concerning the requirements for the certification process of Halal products	CICOT (2017a)
	Animal slaughtered	TISI 1701-2541 concerning Recommendations for the use of the term "Halal."	TISI (2000)
		Thai Agricultural Commodity and Food Standard (ACFS): 8400-2007 concerning Halal Product	Thai Agricultural Standard (2007)
		CICOT B.E. 2559 concerning the requirements for Halal certification of slaughterhouse and eviscerated parts	CICOT (2017b)
	Alcohol	-	
	Microbial	-	
	Human parts	-	
Japan	Swine	NPO JHA Guidelines	NPO JHA (2019)
	Carrion	NPO JHA Guidelines	NPO JHA (2019)
	Blood	NPO JHA Guidelines	NPO JHA (2019)
	Animal slaughtered	NPO JHA Guidelines	NPO JHA (2019)
	Alcohol	NPO JHA Guidelines	NPO JHA (2019)
	Microbial	-	
	Human parts	-	
South Korea	Swine	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Carrion	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Blood	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Animal slaughtered	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Alcohol	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Microbial	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)
	Human parts	KS H 1061:2016 concerning Guidelines for production, processing & manufacturing, handling, and distribution of halal food	Korean Industrial Standards (2016)

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Indonesia

The Muslim population of Indonesia was recorded at 273.53 million people as of December 31, 2021. Comparable to 86.9% of the total human population in Indonesia (Zulfa et al., 2023). The data and percentage of the Muslim population in Indonesia can be a reference for the government and Islamic institutions. The legality of consumer safety in Indonesia generally begins with Law No. 8 of 1999 concerning consumer protection (Haryanti & Miru, 2024). Consumer protection is marked by the requirement to implement a halal regulation program that is applied from Micro, Small, and Medium Enterprises (MSMEs) to large industries in Indonesia (Rachman & Sangare, 2023).

Halal product assurance regulations are regulated by the Indonesian government through the Halal Product Assurance Organizing Agency (BPJPH) as state law, while fatwas regarding halal products are regulated by Islamic institutions through the Indonesian Ulema Council (MUI) by Islamic law, namely the Qur'an and Hadith (Rofi'ah et al., 2024) Consumers can find out the halal standards of products based on product certification issued by BPJPH through MUI Fatwas. Halal product certification and labels in Indonesia are regulated by BPJPH in Indonesian law, as the legality of halal regulations in Indonesia (Prayuti, 2020). The main regulations that cover haram materials such as pork and its derivatives, carrion, blood, slaughtering animals in the name of anything other than Allah, and materials with unclear status, such as microbial products, are regulated in Law No. 33 of 2014. Law No. 33 of 2014 contains the guarantee of halal products based on the foundation and joint design of the MUI institution (Kharrazi et al., 2024; Waluyo, 2020). In addition, the implementation of the Omnibus Law has accelerated the halal certification process in Indonesia with a special focus on micro and small companies. This is in line with Indonesia's ambitious goal to establish itself as a world halal business center (Dwiono et al., 2024).

In addition to the halal regulatory basis in Law No. 33 of 2014, the MUI issued a halal regulation fatwa in the MUI Fatwa No. 7 of 1980. The MUI Fatwa contains information about food and drinks mixed with haram/impure goods. Table 1**,** based on Law No. 33 of 2014 and MUI Fatwa No. 7 of 1980, can explain that haram substances in pork and its derivatives, carrion, blood, and animal slaughter without mentioning the name of Allah, if mixed with halal substances, then the final product will be haram without exception. Microbial products are basically halal, as clarified by the MUI Fatwa No. 01 of 2010 concerning the use of microbes and microbial products. Microbial products become haram when there is pork content in the microbial growth media. If it contains haram substances in the media, then the microbial results become haram. If the growth media contains unclean substances, if it can be purified according to Sharia (Islamic guidelines), and can be separated between the media and the microbes with clean water equivalent to 270 liters, then the microbes have a halal status.

Some halal product regulations are based on MUI fatwas in Table 1. MUI Fatwa No. 10 of 2018 regulates food and beverage products that contain alcohol/ethanol. Alcoholic beverages are categorized as *khamr* if they contain at least 0.5% alcohol; beverage products with alcohol below 0.5% from the non-*khamr* industry are permissible (may be consumed). Food products to which *khamr* is added are haram; however, the addition of non-*khamr* alcohol to fermented food products is said to be halal if there are no haram ingredients in the product. The use of alcohol as an intermediate product, if it comes from the non-*khamr* industry and the final alcohol result is less than 0.5%, is permissible (may be consumed). Vinegar derived from *khamr*, whether intentional or unintentional, is permissible and pure because it has changed chemically and physically. Furthermore, MUI Fatwa No. 2 of 2000 concerning the use of human organs, placenta, and urine for medicinal and cosmetic purposes is haram.

Malaysia

The Muslim population in Malaysia reaches 50%. Malaysia is a rapidly developing country for halal products. This is because the Malaysian state and government do not take on the role of halal certification authority only within the country. The positive impact of this is that certification and standardization of halal products abroad have a halal logo from Malaysia. The halal issue has finally developed rapidly in parts of Southeast Asian countries such as Malaysia, Singapore, Indonesia, and Thailand (Fischer, 2016).

Global Islamic Economy in 2019 stated that the estimated halal industry market in 2023 will reach transactions of around US$ 1,863 billion (Sari et al., 2021). Malaysia, as a member of the

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Organisation of Islamic Cooperation (OIC), has proposed to be promoted as a global halal centre for the OIC, but no joint agreement has been reached (Rahman et al., 2013). The Islamic institution in Malaysia that generally regulates halal regulations is the Malaysian Islamic Development Agency (JAKIM). Malaysia is strengthening its role in global halal regulations by introducing the Malaysia Halal Food Standard-MS1500. The regulation has been recognized by the United Nations as a benchmark for international halal standards. To date, MS-1500 is the only basic reference used by JAKIM (Sari et al., 2021). This is based on the progress of the world food industry, which causes consumers to have difficulty distinguishing between halal and haram products (Arif & Sidek, 2015). JAKIM will monitor and enforce the law on halal products. Halal products certified by JAKIM are a guarantee of the safety of Muslim consumers, and several countries have collaborated (Nazim & Yusof, 2023).

Halal product regulations in Malaysia are based on MS-1500, which has been revised three times in 2004, 2009, and 2019 (Sari et al., 2021). MS-1500: 2019 is the third version, which contains general provisions on halal food products. According to Table 1, products such as pork and its derivatives, carrion, blood, alcohol, animals slaughtered without mentioning the name of Allah, microbial products, and human body parts are used in food products. All of the previously mentioned ingredients are regulated by MS-1500: 2019 regarding the halal status and regulations of a product. Pork and its derivatives are absolutely haram according to Islamic law. Carrion is haram to consume according to Islamic law. Blood is categorized as najis al-mutawwasitah, which means moderately impure, and if it is found in a food product, then it is categorized as haram food according to Islamic law. Alcohol derived from *khamr* is categorized as najis al-mutawasitah, which means moderately najis, but when it is found in food and causes an intoxicating effect, then it is haram. The provisions of alcohol that are permitted in food, drinks, perfumes, and medicines are stated in the JAKIM Fatwa of July 14 – 16, 2011. The fatwa explains the provisions of alcohol. These provisions include, alcohol obtained from the process of making *khamr* is haram and najis, alcohol not from making *khamr* is haram because it is poisonous, soft drinks with an alcohol content below 1% are permissible (may be consumed), alcohol as an intermediate substance (stabilizer) does not come from *khamr* and is not intoxicating, the law is permissible with maximum alcohol of 0.5%, soft drinks that are intended to make *khamr*, then a little alcohol is haram, food, and drinks that produce alcohol by-products or originally contain alcohol are permissible and not najis. Slaughter must cut the veins of the animal by mentioning the name of Allah; if it is not done by the provisions, then it is considered a carrion that is haram to consume. All types of microorganisms (bacteria, algae, and fungi) and their products are halal, except those that have negative impacts on health. Food products that contain human body parts are haram.

Singapore

Singapore is a country with a majority ethnic Chinese, while the Muslims recorded are mostly from the Malay ethnic group. The Malay ethnic group in Singapore is a minority. The population of Singapore was around 3.77 million in 2010, with 74% Chinese, 13% Malay, and 9% Indian, and 4% other ethnic groups (Fischer, 2016). The Muslim community is required to consume halal products; this is a significant challenge, especially as an ethnic minority in a country (Dawoed et al., 2024). Before halal became part of the global market and developed, Singapore considered halal as an excessive religious expression. Considered economically beneficial, in the end, Singapore supports and approves of Islam with the halalness of its products, which is oriented towards Imam Syafi'i within the framework of a secular state (Muis & Aisyah, 2022). Islam is strictly regulated in Singapore. All Muslim affairs, including halal products, are under the supervision of an Islamic institution called the Islamic Ulama Council of Singapore (MUIS). MUIS also regulates halal regulations and certification, including the issuance of a halal logo on a product (Amini et al., 2023; Fischer, 2016).

MUIS was established by the Singapore government in 1968 as an advisor to the president on Islamic affairs and has been dealing with halal certification since 1978. Singapore further regulates "Halal Tourism," which is useful for improving its tourism economic sector. In 2013, Singapore was able to attract 15.6 million tourists with an income of around US$ 17.5 billion (Henderson, 2016). Halal products are regulated by MUIS entirely in the MUIS Guidelines. MUIS Guidelines regulate the halal and haram of a product based on Islamic law, the Qur'an, and Hadith. According to Table 1, such as

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pork and its derivatives, carrion, blood, alcohol, and animals slaughtered by mentioning the name of Allah. MUIS Guidelines have provisions including pork and its derivatives, which are forbidden to consume; all drinks are halal except those mixed with impurities such as alcohol, which can harm the body; carrion and blood are also forbidden to consume according to sharia, and animals that are slaughtered without mentioning the name of Allah are also forbidden and categorized as carrion. Alcohol products are regulated by MUIS based on the MUIS Fatwa about Natural Ethanol in Halal food flavoring. Some provisions of the MUIS fatwa are that alcohol in food as a solvent of less than 0.5% is allowed if it is not from *khamr*, and the final ethanol result in the product is a maximum of 0.1%, alcohol that is not produced from *khamr* products is not considered impure, and alcohol used as a flavoring in food and beverage products is allowed. Microbial products and products with the use of human body parts in food products until now there is no source of MUIS fatwa. So it is necessary to add the MUIS fatwa on microbial products and the use of human body parts.

Thailand

Thailand is a country that is included in the top 10 for non-pork and non-alcoholic food exports to the Organization of Islamic Cooperation (OIC). There was a 20% increase in products that applied for halal certification from 2011 to 2016 (Susetyo et al., 2019). The development of halal products in Thailand began in 1948, when the Thai Government wanted Thailand to be a halal hub country in Southeast Asia (Anggara, 2022). This rapid growth is because the Thai government upholds freedom of religion and guarantees that freedom. The freedom of religion guaranteed by the Thai government has encouraged the Muslim community in Thailand to form a halal product certification institution. The Islamic institution that oversees the supervision and certification of halal products in Thailand is the Central Islamic Council of Thailand (CICOT) (Lubis et al., 2022). CICOT, which was established in 2001, has the authority to form regulations and certify halal products for all regions in Thailand (Wannasupchue et al., 2019).

The Thai government has approved standards for products that wish to use the "halal" label on their products in the Thailand Industrial Standard (TIS): 1710-2541 issued by the Thailand Industrial Standard Institute (TISI). TIS 1710-2541 was issued in 2000 by TISI and contains Recommendations for the Use of the Word "Halal". The standard explains the ingredients that can be said to be "halal" so that they can label their products as "halal" and the haram ingredients that prevent their products from being labeled with the word "halal". Based on these standards, the Thai government then prepared standards for agricultural commodities and food products that are halal in the Thai Agricultural Commodity and Food Standard (ACFS): 8700-2007 concerning Halal Food. CICOT also prepared standards for the requirements for certification of halal products in the CICOT B.E. 2559 concerning "The requirements for certification process of halal products". The standards and regulations explain the haram ingredients as attached in Table 1. Pork and its derivatives are explained as haram ingredients and must not be present in halal products. Blood and carrion are impurities that must not come into contact with or be present in products because they will make the product impure and become haram.

TIS 1710-2541 ACFS 8700-2007 also explains how to slaughter animals according to Islamic law so that the meat obtained has halal status. The ACFS explains how to slaughter cattle, poultry, and other animals, such as that slaughter must be carried out by Muslims, slaughter must not be severed, must cut to the esophagus in one cut, and other guidelines by Islamic law. This animal slaughter is also the basis for CICOT to certify animal slaughterhouses so that they are always following Islamic law. The slaughter that is not under Islamic law will certainly make the resulting slaughtered meat not halal and not meet the criteria for halal products and commodities. The regulations issued by CICOT for certification of animal slaughterhouses are CICOT B.E. 2559 on "The requirements for Halal certification of slaughterhouse and eviscerated parts," which explains the requirements and halal status of a product in a slaughterhouse.

Japan

Japan is one of the countries with the fastest-growing halal tourism in Asia. It is recorded that 868 restaurants have been certified halal in Japan in 2020. The increase in halal commodities is comparable to the increase in Muslim tourists visiting Japan. In 2018, there was a 3% increase in

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Muslim tourists from the Middle East, Malaysia, and Indonesia to Japan (Rizki & Aminah, 2023). This increase is also a driving force for Japan to improve Muslim-friendly services for its tourism sector. The government and society that are receptive to foreign cultures are also important factors in why halal commodities can develop rapidly in Japan (Luthfiya et al., 2024). The development of halal commodities can also be seen from the emergence of non-governmental organizations (NGOs) that provide halal certification services, one of the oldest being the NPO Japan Halal Association (JHA), which was founded in 2010. Halal certification carried out in Japan is voluntary because Japan is a secular country that does not include religious rules in its government. The non-binding halal certification regulations in Japan mean that the regulations that have been drawn up are not as developed as those in Muslim-majority countries such as Malaysia and Indonesia.

The halal product assurance regulation implemented by NPO JHA to obtain halal product certification is determined as a guide to obtaining halal certification. The guideline that has been prepared is still limited to the basic regulations contained in the Qur'an and Hadith, such as products made from pork and its derivatives, blood, carrion, animals slaughtered other than in the name of Allah, and alcohol contained in drinks are haram, as attached in Table 1. In addition to the guidelines on ingredients, the halal and haram product guidelines prepared by NPO JHA also contain the criteria for halal and haram products, rules for implementing something halal and haram, and the priority of obeying the command to eat something halal. The lack of comprehensive regulations and guidelines prepared and developed by NPO JHA occurs due to the limitations of the non-profit organization as the rule maker. Its scope, which has not been able to establish rules, has hampered the process of developing halal certification rules in Japan. In addition, the absence of a dominant school of thought in Japan means that the certification carried out cannot meet all halal criteria in the world. These differences that have not been harmonized are one of the main factors hampering the development of regulations, especially for halal certification (Srifauzi & Surwandono, 2023; Yamaguchi, 2019).

South Korea

The growth of South Korea's popularity as a halal tourism country increased from 2015 to 2016 by 30.3%. The increasing number of Muslim tourists visiting South Korea has also increased the need for halal commodities in South Korea (Nuraini & Sucipto, 2021). This phenomenon was then greeted with regulations issued by the South Korean Government in collaboration with the Korean Muslim Federation (KMF) regarding the halal product certification system. This collaboration resulted in a regulation which is compiled in the Korea Industrial Standard (KS): H 1014-2541. Unlike Indonesia, halal product certification in South Korea is voluntary, considering that Islam in South Korea is not the majority religion. This voluntary regulation makes the certification carried out in South Korea carried out by non-governmental organizations (NGOs). Korea Halal Association (KHS) or KOHAS is one of the halal certification institutions in South Korea that plays an important role in improving halal commodities in South Korea (Samsudin & Chanifah, 2022).

The regulations contained in KS H 1014:2016 include various regulations according to Table 1, mainly regarding pigs and their derivatives, carrion, blood, and animals slaughtered in the name of anything other than Allah. In addition, there are regulations regarding microbes and human body parts, which in several other countries, such as Thailand and Japan, have not yet been determined as halal. Regulations on halal and haram materials are mentioned in point 5.1.1 of KS H 1014:2016, namely regarding food made from animals. This point states that pigs and their derivatives, animals that have become carrion, blood, and animals slaughtered in the name of anything other than Allah, are haram materials. Alcoholic beverages are also forbidden in this regulation, although the maximum limit of alcohol permitted has not been determined. This regulation also states that all microbes are halal materials, other than microbes that are harmful to the body, microbes grown in haram media, and microbes taken from the beer-making process. Human body parts such as the placenta, urine, blood, and other body parts are also declared haram by this regulation.

This comprehensive regulation is likely obtained from cooperation carried out by the KMF together with JAKIM Malaysia and MUI Indonesia, as two countries that have detailed halal product assurance regulations (Samsudin & Chanifah, 2022). Internal factors, such as the growing popularity of Islam in South Korea and the large target market that can boost the South Korean economy, can also be

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the reason why South Korea does so much to compile and develop this halal product certification system (Konety et al., 2023; Nidatya et al., 2023). The increasing global halal trend and competition between countries in creating halal tourism can also be external factors for South Korea in increasing halal commodities in its country (Kim, 2021).

Regulation and Harmonization of Halal Policies

Halal regulations in Muslim-majority countries such as Indonesia and Malaysia are already designed by national law. Meanwhile, in minority countries such as Singapore, Thailand, Japan, and South Korea, regulations are still regulated by NGOs that are not yet strictly bound. However, countries like Thailand and South Korea are already aware of the need for halal commodities to advance their halal industry sectors. This is certainly beneficial for the development of halal commodities globally, especially in Asia, which has the largest Muslim population in the world. However, the difference between regulations established by constitutional mandates and regulations established by institutions creates inequality and differences in the way regulations are implemented. Thus, harmonization of regulations is needed between Muslim majority and minority countries, especially in Asia, to support the creation of a halal industry that is equitable and has the same understanding. The necessary harmonisation requires structured cooperation among halal regulatory authorities across different countries. This harmonisation is expected to enhance the efficiency of halal food labelling systems by allowing products that have already obtained halal certification in one cooperating country to be mutually recognised across participating countries, thereby eliminating the need for repeated halal certification.

CONCLUSION

There are variations in the implementation of Islamic law due to differences in factors such as social and cultural differences in each country. Halal policies in Indonesia and Malaysia have even become a standard, such as in the Indonesian Constitution or Malaysian Standard for food products, so that the public can feel spiritually safe. Meanwhile, Singapore, Thailand, Japan, and South Korea have non-binding regulations and standards that are carried out voluntarily. The difference in regulations and standards for halal products will certainly be a gap in halal products produced by each country. The connection to be made is to harmonize halal standards on an international scale to facilitate the trade of halal products across countries. The harmonization needed is cooperation between halal regulatory agencies from one country to another. The harmonization is expected to facilitate halal labelling of food products, so that products already certified halal in the collaborating country do not need to be labelled halal again in the other collaborating country. This harmonization of standards for halal products can also strengthen the position of the halal industry in the global market.

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