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Systematic review: Comparison of halal regulations in Asia

Azzam Akbar Fadhillah[1*], Reza Saputra[1]
[1]Master of Food Science Study Program, Department of Food Science and Technology, Faculty of Agriculture Technology, Institut Pertanian Bogor University, Jl. Raya Dramaga, IPB Postgraduate School Building, Kampus IPB Dramaga, Bogor, West Java, 16680, Indonesia
**Corresponding author: intanhanafiah@apps.ipb.ac.id*

ABSTRACT
The harmonization of halal standards in Asia is crucial for boosting regional trade, ensuring consumer confidence, and meeting religious requirements in the growing halal industry. This systematic review employed a qualitative comparative analysis of 9 key journal articles and 8 major halal regulations in Asia, including Malaysia's MS 1500-2009, OIC/SMIIC 1:2019, Saudi Arabia's SASO 2172, and UAE.S 2055-1:2015, as well as recent changes in Indonesia's laws (Law No. 33/2014, Law No. 6/2023, PP No. 39/2021, and PP No. 42/2024). This analysis reveals significant differences in halal definitions, certification protocols, and the role of regulatory authorities, which hinder harmonization. Specifically, it was found that countries such as Indonesia, Malaysia, Saudi Arabia, and Brunei implement mandatory halal policies, while others like Japan, Thailand, and India adopt voluntary approaches. The review highlights that while countries share common goals of food safety and sharia compliance, cultural and technological variations, alongside certification costs for MSMEs, remain significant barriers. Mutual recognition agreements, cross-border compliance, and the adoption of technologies like blockchain are emphasized as essential for fostering transparency and an integrated halal market. This study provides fresh insights into the benefits of harmonizing halal standards for producers, consumers, and regulators, ultimately aiming to reduce trade barriers, increase trust, and support regional economic growth.

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INTRODUCTION

The demand for halal products continues to increase as Muslim consumers become more aware of the importance of a halal lifestyle. This is a profitable business opportunity in various parts of the world, including in Asia, which has the largest Muslim population. According to Yustianingsih et al. (2024), global halal food spending is expected to reach $1.38 trillion in 2024 after a slight decline in 2020 due to the COVID-19 pandemic. In the Asian region, especially in countries with large Muslim populations such as Indonesia, Malaysia, and the Gulf countries, halal standards have become the basis for regulation to protect and provide confidence to Muslim consumers in consuming halal products.

A crucial aspect in Asia, where a large portion of the global Muslim population resides, is ensuring food and other products comply with Islamic law. Halal, which signifies what is permissible for Muslims, is a major concern in the food industry, especially due to critical points of potential contamination that must be managed carefully. In Indonesia, the government has made halal product assurance mandatory through Law No. 33 of 2014, and a halal assurance system (HAS) is a requirement to achieve halal certification from LPPOM MUI. This has led to a greater focus on evaluating the effectiveness of these systems, as seen in studies analyzing the adherence of companies, such as CV. X

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in Semarang, to standards like HAS 23000. Research indicates that while many companies have implemented a halal assurance system, deficiencies often exist in areas like material sourcing, training, and internal audits, highlighting the need for a comprehensive comparative analysis of halal regulations across different Asian countries (Rifqi & Khairi, 2022).

The obligation to consume halal food is explicitly stipulated in the Qur'an, such as in Surah Al-Baqarah verse 168, which mentions the importance of eating good and halal food and avoiding the haram. This teaching is not only spiritual in nature but also has legal implications for Muslims to fulfill this obligation. Therefore, halal standards not only regulate the halalness of raw materials but also the production process to comply with the principle of "*halalan thayyiban*", i.e., halal and good. One of the critical points in products is the use of ingredients such as gelatin and alcohol. Gelatin, which is often used in products such as candies and capsules, is generally derived from cowhide, pigskin, cow bones, and pig bones (Sarbon et al., 2013). Similarly, alcohol is often used as a solvent in cosmetics and pharmaceutical preparations, which is also a concern in the review of product halalness (Albab & Mahfudh, 2020).

Halal standards play an important role in protecting consumers; in Asia, there is considerable variation in halal standards and regulations. Each country has regulations and certification procedures tailored to local needs and interpretations of Islamic law, e.g., HAS 23000 in Indonesia, MS 1500:2009 in Malaysia, and SASO 2172 in Saudi Arabia. These variations reflect the different approaches to halal standard setting in Asian countries. However, these differences also pose challenges for manufacturers looking to export their halal products to different countries in the region. Without harmonization of standards, manufacturers will have to face a recertification process in each country with different regulations, as is the case for imported products in Indonesia and Malaysia.

Indonesia is seeing a significant shift in consumer preferences toward halal products, reflecting a growing halal lifestyle that addresses not only basic needs but also emotional and spiritual ones tied to Islamic values. The demand for halal products is increasing, driven by the rise of the Muslim population and a broader lifestyle trend. As a result, the Indonesian government has enacted the Halal Product Guarantee Law (Law No. 33 of 2014), which mandates that all products sold in the country must be halal certified. This law provides a crucial standard for guaranteeing product safety and quality, which is particularly important for Indonesian consumers, most of whom are Muslim. While this presents a valuable opportunity for businesses, especially micro, small, and medium enterprises (MSMEs), to increase their competitive advantage in the global market, it also poses challenges, as many MSMEs lack the resources and administrative know-how to obtain certification. This gap highlights the need for a comprehensive understanding of halal regulations and how they compare across different Asian countries to support businesses in navigating these requirements (Ikawati & Rahman, 2022).

The urgency for harmonization of halal standards in Asia is increasingly felt amid globalization trends that accelerate the growth of the halal product market. With harmonization, harmony can be created (Syauqan et al., 2024), and trade flows of halal products between countries in Asia can be more easily achieved. In addition, harmonization of standards can help countries in the region to increase the competitiveness of their halal industry in the global market, considering that Asia is one of the largest markets for halal products. The growing digital era needs to be addressed with a halal digital transformation so that the development needs of the halal industry can be carried out easily, practically, and quickly (Dewi & Hakiki, 2023).

Based on this background, this study aims to evaluate and compare eight major halal regulations in Asia, namely PP No. 39 of 2021, PP No. 42 of 2024, Law No. 33 of 2014, Law No. 6 of 2023, SASO 2172, MS 1500: 2009, OIC/SMIC 1: 2019, and UAE.S 2055-1: 2015. This study also aims to identify aspects that require harmonization to create halal standards that can be widely adopted in Asia. The study is expected to provide insights into the benefits of harmonizing halal standards for producers, consumers, and regulators in the region.

The development of halal standards in Asia is crucial in meeting the needs of the growing Muslim consumers, who are expected to reach 2.2 billion people globally by 2030. As the demand for halal products increases, the halal market in Asia sees both opportunities and challenges. Halal standards ensure compliance with Islamic dietary laws, build consumer confidence, and ease market access for

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halal products. Major players such as Malaysia and Indonesia are leading the way in the development of halal standards, with Malaysia's comprehensive standard launched by JAKIM in 2004 becoming a global benchmark. This framework has driven the growth of Malaysia's halal industry, aligning the food supply chain with Islamic principles and strengthening international recognition.

Halal food is a fundamental aspect of a Muslim's life, as Islam places great importance on it to safeguard the well-being of humanity. This review analyzes the urgency of halal food from the perspective of *maqāshid al-syarî'ah*, or the objectives of Islamic law. This includes an exploration of the halal food concept based on the five core principles of *maqāshid al-syarî'ah*: preserving religion (*hifdzu al-Din*), the soul (*hifdzu al-Nafs*), the mind (*hifdzu al-Aql*), posterity (*hifdzu al-Nasl*), and wealth (*hifdzu al-Mal*). While various studies have examined halal food and *maqāshid al-syarî'ah*, few have investigated the relationship between the two in a comprehensive manner. This review, therefore, aims to bridge this gap by highlighting the importance of halal food as an inseparable part of human life and using *maqāshid al-syarî'ah* as a framework for a deeper understanding of halal food requirements (Wahyudi et al., 2021).

Indonesia, as the country with the largest Muslim population in the world, demonstrated its commitment through Law No. 33 of 2014, which requires halal certification for all food products. This law increases consumer confidence and supports industry growth. BPJPH, Indonesia's halal certification body, simplifies the certification process to help local businesses. These halal standards not only cater to Muslim consumers but also attract non-Muslims, which is in line with the demand for ethical and safe food. In sectors such as tourism, halal-certified services attract a diverse range of consumers, expanding the acceptance of halal certification. However, the lack of a unified global halal standard poses a challenge. Multiple standards in each country create inconsistencies that can erode trust and hinder market expansion. Efforts to harmonize standards are underway, which could ease global trade.

To ensure the authenticity of halal products, various analytical methods have been developed, such as the use of Fourier Transform Infra-Red (FTIR) combined with chemometrics methods to detect contamination of non-halal fats (Guntarti et al., 2015). In addition, DNA-based methods such as Polymerase Chain Reaction (PCR) are also very effective for halal authentication, for example, in detecting pig DNA in gelatin products (Amqizal et al., 2017). Effective halal logistics are also critical, ensuring compliance from production to consumption. If not taken care of, serious problems resulting from neglecting halal logistics include cross-contamination (Dwiputranti, 2020). Proper handling and tracking strengthen consumer confidence and help businesses compete effectively.

RESEARCH METHOD

Data Analysis

To analyze previous literature, this article utilized a systematic review, a methodology defined by its structured and comprehensive process for pinpointing key theoretical perspectives and leading practices (Waharini & Purwantini, 2018). The research was conducted through a literature review from September 2024 - November 2024. The tools used include a laptop and software from the Windows 365 operating system, namely Microsoft Word and Microsoft Excel. The materials used are articles on halal policies in the food sector and halal regulations in the Asian region. The approach used in this systematic review is qualitative comparative analysis to evaluate and compare various halal regulations in the Asian region related to food and beverages.

This research encompasses several regulations that are analyzed in depth to understand the similarities, differences, and key aspects that support halal standards in each country, particularly in the Asian region. The search for regulations was done through online searches on search engines such as Google and Bing, especially through the search engines and official websites of halal bodies in each country in Asia.

Journal articles were searched using keywords such as halal Asia, halal regulation Asia, and halal regulation Southeast Asia, with a search range from 2014 - 2024. The articles were then filtered to include only those that discussed food regulations in Asia. This process resulted in 9 articles that specifically addressed food regulations in Asia. In addition, a search for halal regulations was also conducted on the websites of halal regulatory bodies in various Asian countries. The halal regulations used are regulations that can be downloaded for free. This research is conducted through a content

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analysis of each regulation, which involves the process of reading, selecting key aspects, and identifying elements that play a significant role in maintaining halal standards, such as aspects of raw materials, production processes, packaging, and labeling. The halal label not only functions as an identifier but also as a guarantee of quality and trust for consumers. The halal label has a significant positive influence on Muslim consumer attitudes towards halal products. The existence of a halal label also affects consumer purchase intentions (Rakhmawati, 2019; Rusdianto & Ummah, 2022). The focus of this systematic review is halal regulation in the food sector, given that the food sector is one of the most relevant and sensitive sectors for Muslim consumers in ensuring the halal status of the product. The articles and regulations used are presented in Table 1.

Table 1. References used in the study.

No	Title	Countries/Organizations Mentioned	Reference
1	Halal certification in government and non-governmental organizations: A comparative analysis of Indonesia, Malaysia, and Thailand	Indonesia, Malaysia, Thailand	(Yakub & Zein, 2022)
2	Comparative analysis and harmonization of global halal standards	OIC/SMIIC*, UAE, Malaysia, Singapore, Indonesia, Bosnia and Herzegovina, Codex Alimentarius Commission, Halal Research Council, Brunei Darussalam, Thailand, Saudi Arabia, Egypt, Pakistan, Uganda, Austria	(Lutfika et al., 2022)
3	Comparative analysis of halal food product competitiveness in Southeast Asia: A case study of Singapore and Thailand	Singapore, Thailand	(Amini et al., 2023)
4	*Jaminan industri halal di negara Singapura dan Taiwan*	Singapore, Taiwan	(Anatasha & Malahayatie, 2024)
5	Halal Food in South East Asia: Are we looking forward?	Brunei Darussalam, Indonesia, Malaysia, Singapore, Philippines, Vietnam, Thailand	(Al-Fatih & Esfandiari, 2020)
6	*Tinjauan buku: Isu halal internasional dan regional: Perspektif hubungan internasional*	Indonesia, Brunei Darussalam, Malaysia, Singapore, Thailand, Brunei Darussalam	(Al-Fatih & Esfandiari, 2020)
7	*Industri makanan halal: Perbandingan Indonesia dan Malaysia*	Indonesia, Malaysia	(Fatonah et al., 2023)
8	Comparison of halal food regulation and practices to support halal tourism in Asia: A review	Malaysia, Indonesia, Japan, South Korea	(Nuraini & Sucipto, 2021)
9	Global trends in halal food standards: A review	Singapore, OIC/SMIIC*, Malaysia, Indonesia, GCC Standardization Organization, Pakistan, Brunei Darussalam, Iran, Thailand	(Akbar et al., 2023)

OIC: organization of Islamic cooperation, SMIIC: standards and metrology institute for the Islamic countries, GCC: Gulf Cooperation Council

RESULT AND DISCUSSION

Mapping Halal Regulations

The etymology of the word “halal” comes from Arabic, which literally means “allowed”. The term is generally associated with Muslims and refers to products that are made following Islamic law and do not contain haram ingredients (Nawawi et al., 2019). Halal products can consist of food, cosmetics, medicines, and others (Fatonah et al., 2023). The concept of halal goes beyond the scope of consumer products and extends to a broader lifestyle. This has led to the growing popularity of terms

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such as halal tourism and Islamic banking in society. These two sectors are essentially components of a broader system, namely "Islamic Economics".

Differences may occur in the application of existing laws. However, in general, Muslims view the halal lifestyle as very important in their lives. According to Dinar Standard (2020), this opens up the potential for an Islamic economy that could reach trillions of dollars. The Islamic economy consists of six main pillars, namely the halal food industry, Islamic financial services, Muslim-friendly tourism, Muslim fashion industry, halal pharmaceutical and cosmetic industry, and media and entertainment industry. Among the six halal industry sectors, the halal food sector is considered to have the most promising growth potential, driven by high market demand. In addition, halal food products are increasingly popular both in Muslim-majority countries and in countries with Muslim minorities. The popularity of halal products, especially food, is driven by the values contained in these products. The concept of *halalan thayyiban* in Islam makes halal products considered to have guaranteed quality because they are not only allowed, but also good for consumption. Consumers who choose halal products are guaranteed food safety and hygiene (IMARC, 2024). This factor is the main cause of the increase in demand for halal products.

The various halal standards found and collected can be seen in Table 1. The main data comes from official documents that have been downloaded and selected for analysis, namely Government Regulation Number 39 of 2021, Government Regulation Number 42 of 2024, Law Number 33 of 2014, Law Number 6 of 2023, and Saudi Regulation. Standards, Metrology, and Quality Organization (SASO) 2172, Malaysian Standard (MS) 1500:2009, Organization of Islamic Cooperation/Standards and Metrology Institute for Islamic Countries (OIC/SMIIC) 1:2019, and United Arab Emirates Standard (UAE.S) 2055-1:2015.

Explanation of Halal Regulations in Asia

A unified halal standards framework can simplify processes, reduce consumer confusion, and open market access for businesses. Efforts such as the ASEAN initiative for halal certification aim to address inconsistencies and encourage cross-border trade in halal products. The presence of halal certification can have positive impacts for consumers, such as document clarity, enabling traceability, and increasing competitiveness (Camelia et al., 2024). This analysis also explores the challenges SMEs face in achieving halal certification, such as high costs and complex requirements, which hinder their participation in the halal market. If these barriers are overcome, a more inclusive participation in the halal industry becomes more likely. The role of technology in improving the halal certification process also came into focus. Advancements such as blockchain can increase supply chain transparency (Lin et al., 2018), ensure compliance, and improve accountability. The integration of such technologies can simplify certification, strengthen consumer confidence, and support industry growth. Overall, this analysis evaluates regulatory strength, consumer perceptions, harmonization potential, SME challenges, and technological advancements, with the aim of creating a more unified halal certification framework that benefits consumers and businesses across Asia.

The role of the consumer should not be underestimated as a driving force for harmonization. With rising awareness and access to information, Muslim consumers are becoming increasingly sophisticated, demanding greater transparency and integrity in the products they consume. The halal label serves as a crucial heuristic for trust and influences purchase intentions significantly. However, the proliferation of numerous national standards and logos can lead to consumer confusion and potentially erode the very confidence that certification aims to build. An educated and digitally connected global consumer base can exert powerful bottom-up pressure on both industry players and regulators. Through purchasing power and social advocacy, consumers can demand more unified, recognizable, and mutually accepted halal standards, thereby simplifying their choices and reinforcing trust across the international halal supply chain.

Saudi Regulatory Standard. Standards, Metrology, and Quality Organization (SASO) 2172 stipulates that halal food must be prepared and stored separately from non-halal products. Animal products must be slaughtered according to Islamic law, as well as provisions on food additives derived from haram animals and plants. This standard regulates the general requirements of halal food in Saudi Arabia, focusing on the separation and processing of halal products from non-halal ones, ensuring

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cleaning according to Islamic standards. In addition, SASO 2172:2003 requires that products containing animal ingredients must come from sources permitted by sharia and be slaughtered according to Islamic rules.

Malaysian Standard (MS) 1500:2009 regulates the production, handling, and storage of halal food, with detailed guidelines for the slaughter, labeling, and handling of animal and non-animal products according to sharia law. This standard regulates the production, preparation, handling, and storage of halal food, ensuring that the products are shariah-compliant and safe for consumption. MS 1500:2009 covers aspects of certification, halal labeling, and hygiene guidelines for food processing, while considering health and food safety aspects. The main objective of the MS 1500:2009 standard is to increase consumer confidence in halal-certified products through a transparent and reliable certification process. This transparency is important as it protects consumers from potential misrepresentation of halal status and ensures that they can make informed choices based on legitimate certification (Sariah et al., 2023). As the global halal market continues to grow, this framework provides Malaysian businesses with significant advantages in meeting the growing needs of Muslim consumers (Yusoff et al., 2023).

The Organization of Islamic Cooperation/Standards and Metrology Institute for Islamic Countries (OIC/SMIIC) Regulation 1:2019 provides general guidelines for all stages of the halal food chain, including the source of halal ingredients, slaughtering methods, packaging, labeling, and traceability of product origin. Traceability is an important aspect in maintaining halal integrity (Wardiani, 2024). This strengthens the competitiveness of halal products among member countries. This standard was developed by the Standards and Metrology Institute for Islamic Countries (SMIIC) to provide general requirements for halal products in OIC member countries. This standard covers the source of ingredients, slaughtering rules, processing, and marking of halal products. OIC/SMIIC 1:2019 integrates the concept of halal into the food safety management system to ensure products that comply with Islamic requirements (Lutfika et al., 2022). The OIC/SMIIC standard prohibits products containing alcohol, but does not describe the source of alcohol used.

The International Islamic Fiqh Academy of the Organization of Islamic Cooperation (2018) explains that the SMIIC standard allows alcohol that is not derived from *khamr* on the condition that it does not cause intoxication. It can be concluded that all standards have the same requirements regarding the halalness of alcohol that is not derived from khamr. The Prophet Muhammad did not specifically mention the method of making vinegar or the source used (Harahap et al., 2020). So, if someone wants to make vinegar with a certain source, a discussion between scholars is needed, especially for making a fatwa (Lutfika et al., 2022). The Prophet Muhammad SAW also prohibited the companions from using khamr to make vinegar because the fermentation process was carried out with human assistance (Kashim et al., 2015).

The United Arab Emirates Standard (UAE.S) 2055-1:2015 regulates the acceptance, preparation, packaging, labeling, transportation, and presentation of halal food. The certification process involves an institution accredited by a valid authority in the UAE and includes genetically modified foods that must meet halal requirements. UAE.S 2055-1 covers the general requirements for halal products from receiving, preparation, packaging, to distribution. This standard emphasizes the importance of halal certification and accreditation by authorized institutions, as well as compliance with sharia provisions to ensure product halalness, including the use of halal raw materials, additives, and equipment.

Government Regulation of Indonesia covers all aspects of halal certification, production sites and equipment, halal assurance systems, and the role of BPJPH as a halal supervisory body. This standard requires physical separation of processes and tools between halal and non-halal products to avoid contamination. This regulation focuses on the implementation of Halal Product Guarantee (JPH) in Indonesia and requires products circulating in Indonesia to have a halal certificate. This PP also regulates the establishment of the Halal Product Guarantee Agency (BPJPH), which is responsible for formulating policies, accrediting halal inspection institutions, and issuing and revoking halal certificates according to procedures. BPJPH also has a role in certifying halal auditors (Nalawati et al., 2023). Based on this identification, the five standards were chosen to be used as comparative material in further research. Table 1 below shows several Asian countries that implement halal regulations in the food sector.

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Table 2. List of identification of halal standards in Asian Countries.

Country	Halal Certification Body	Halal Policies	Applied Sectors	Certification Process	References
Indonesia	MUI	Mandatory for products in the domestic market	Food, cosmetics, and pharmaceuticals	Verification of raw materials, production facilities, and processes	(Fatonah et al., 2023; Lutfika et al., 2022; Yakub & Zein, 2022)
Malaysia	JAKIM	Mandatory for products in domestic and international markets	Food, cosmetics, and pharmaceuticals	Verification of raw materials, production facilities, and processes	(Fatonah et al., 2023; Lutfika et al., 2022; Yakub & Zein, 2022)
Saudi Arabia	SFDA	Mandatory for products in domestic and international markets	Food, cosmetics, and pharmaceuticals	Verification of raw materials, production facilities, and processes	(Lutfika et al., 2022)
Japan	JHA, NAHA, JMA	Voluntary, but can be halal-certified	Food and cosmetics	Verification of raw materials, facilities & final product test	(Al-Fatih & Esfandiari, 2020; Nuraini & Sucipto, 2021)
South Korea	KHA, KMF	Voluntary, but can be halal-certified	Food and cosmetics	Verification of raw materials, facilities & final product test	(Nuraini & Sucipto, 2021)
Singapore	MUIS	Products sold to Muslims must be halal-certified	Food, cosmetics, and pharmaceuticals	Inspection of raw materials, facilities & supervision of production	(Amini et al., 2023; Lutfika et al., 2022)
Thailand	CICOT	Voluntary, food & cosmetic products can be halal certified	Food and cosmetics	Verification of raw materials, facilities & supervision of the production process	(Amini et al., 2023; Lutfika et al., 2022; Yakub & Zein, 2022)
Pakistan	PHA	Food & pharmaceutical products must be halal certified	Food and medicine	Raw material verification, facility, and final product audits	(Akbar et al., 2023; Lutfika et al., 2022)
India	JUH	Voluntary, halal certification of food & cosmetic products implemented	Food, cosmetics, and pharmaceuticals	Verification of raw materials, facilities, and production supervision	(Amini et al., 2023; Lutfika et al., 2022)
Bangladesh	BSTI	Voluntary, but food products must be of a halal standard	Food	Inspection of raw materials, facilities, and supervision of production	(Amini et al., 2023; Lutfika et al., 2022)
Kazakhstan	AHIK	Voluntary, but halal certification is in food & cosmetics	Food and cosmetics	Verification of raw materials, production facilities, and processes	(Amini et al., 2023; Lutfika et al., 2022; Yakub & Zein, 2022)
Brunei Darussalam	IHFCD	Products in the domestic market must be halal-certified	Food, cosmetics, and pharmaceuticals	Verification of raw materials, facilities, and final product tests	(Lutfika et al., 2022; Setyaningsih, 2022)
Afghanistan	ANSA	Food products in the domestic market must be halal-certified	Food	Raw material, facility, and final product audits	(Lutfika et al., 2022)

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Kyrgyzstan	ICBR	Voluntary, but food & cosmetic products must be halal certified	Food and cosmetics	Verification of raw materials, facilities & supervision of the production process	(Amini et al., 2023; Lutfika et al., 2022; Yakub & Zein, 2022)
Mongolia	MHA	Voluntary but essential for food & cosmetics	Food and cosmetics	Verification of raw materials, facilities, and production supervision	(Amini et al., 2023; Lutfika et al., 2022)
Laos	Private	Voluntary & mostly applied in food & cosmetics	Food and cosmetics	Verification of raw materials, facilities, and production supervision	(Amini et al., 2023; Lutfika et al., 2022)
Hong Kong	IHCCL	Voluntary, but essential for export products	Food and cosmetics	Verification of raw materials, facilities, and production supervision	(Amini et al., 2023; Lutfika et al., 2022)
UAE	ESMA	Prohibits materials that are haram, toxic, or harmful; require halal documentation for all ingredients	Food, agricultural products	Verification of raw materials, production processes, and facility cleanliness	(Lutfika et al., 2022)
Iran	ISIRI	Voluntary, emphasizes traceability and documentation of halal compliance	Food and beverages, pharmaceuticals	Includes inspection of raw materials, production facilities, and slaughtering practices, requires documentation and periodic audits.	(Akbar et al., 2023)
Taiwan	THIDA	Voluntary, follow international halal standards	Food and beverages, cosmetics	Audit of ingredients, production process, and facilities; certification granted after compliance verification	(Anatasha & Malahayatie, 2024)

*MUI: Majelis Ulama Indonesia; JAKIM: Jabatan Kemajuan Islam Malaysia; SFDA: Saudi Food and Drug Authority; JHA: Japan Halal Association; NAHA: Nippon Asia Halal Association; JMA: Japan Muslim Association; KHA: Korea Halal Authority; KMF: Korean Muslim Federation; MUIS: Majlis Ugama Islam Singapura; CICOT: Central Islamic Committee of Thailand; PHA: Pakistan Halal Authority; JUH: Jamiat Ulama-i-Hind; BSTI: Bangladesh Standards and Testing Institution; AHIK: Association Halal Industry of Kazakhstan; IHFDC: Islamic Halal Food and Development Centre; ANSA: Afghan National Standards Authority; ICBR: Islamic Center of the Kyrgyz Republic; MHA: Mongolia Halal Authority; IHCCL: International Halal Certification Center Limited; ESMA: Emirates Authority for Standardization & Metrology; ISIRI: Institute of Standards & Industrial Research of Iran; THIDA: Taiwan Halal Integrity Development Association.

Halal requirements are often integrated in other documents, such as Good Agriculture Practice (GAP), Good Manufacturing Practice (GMP), Good Handling Practice (GHP), Correct Food Processing Method (CPPB), Correct Drug Processing Method (CPOB), and Household Industry Food/Household Industry Food (IRTP/PIRT). This amalgamation provides safety assurance in terms of hygiene and sanitation (Othman et al., 2016). The application of a merged halal assurance system in large industries is also common. With the application of SJH, producers will produce halal and thayyib products (Prabowo & Rahman, 2016).

Indonesia is currently the second most populous Muslim country in the world with 236 million people (Dwi, 2024). The presence of large Muslim populations in Asian countries, including Pakistan, India, Bangladesh, and China, places the continent in a strategic position as the world's premier halal investment destination. The highly promising market in the Asian region has attracted the interest of global investors. In Indonesia, attention to halal issues has only developed in the last few decades. Based on Yakub & Zein (2022), public attention to this issue began to increase in 1988 when many food products on the market were found to contain pork. The finding of pork content in the research of Brawijaya University, Malang, became the main trigger for the Indonesian Ulema Council (MUI) to

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start halal certification for various products. As a follow-up, MUI, in collaboration with IPB, formed LPPOM. Halal certification is issued in the form of a written fatwa from MUI as a guarantee that a product meets halal standards.

As shown in Table 2, halal regulation in Asia reflects a complex dynamic based on domestic needs, Muslim consumer preferences, and strategies to capture the global market. Countries such as Indonesia, Malaysia, Saudi Arabia, and Brunei Darussalam implement mandatory policies that require all products circulating in the domestic market, especially in the food, cosmetics, and medicine sectors, to have halal certification. This policy aims to ensure product conformity with the principles of Islamic law, while providing a guarantee of trust for the majority Muslim population. Indonesia, through the Indonesian Ulema Council (MUI), takes a very comprehensive approach with thorough verification of raw materials, production facilities, and final processes, making it one of the most stringent halal regulation countries in the world. Malaysia, on the other hand, through JAKIM, not only regulates the domestic market but also focuses on exports, making it a global halal hub with extensive international certificate recognition.

Countries such as Japan, Thailand, and India adopt voluntary policies, which are generally applied to strategic sectors such as food and cosmetics. In Japan, for example, the Japan Halal Association (JHA) offers halal certification as a measure to increase the attractiveness of Japanese products in the international Muslim market. This voluntary policy reflects a flexible approach that adapts to the demographic composition of the domestic non-Muslim majority. Thailand also implements a voluntary policy through the Central Islamic Council of Thailand (CICOT), which provides halal certification for food and cosmetic products. Nonetheless, this regulation still provides great opportunities for manufacturers to target export markets to Muslim countries in the Middle East and Southeast Asia.

The complexity of regulation is also reflected in the certification process. Almost all countries implement a certification process based on inspection of raw materials and production facilities, but there are differences in the level of supervision. Countries such as Pakistan and Brunei, for example, not only conduct raw material verification but also add end-product audits to ensure the entire production process remains compliant with halal standards. Singapore, through the Majlis Ulama Islam Singapura (MUIS), takes a strict supervision-based approach involving the entire production chain. This not only provides quality assurance but also increases global confidence in halal products coming from the country.

Halal certification bodies in Asia also play a strategic role in building the reputation of halal products at the international level. JAKIM in Malaysia and MUI in Indonesia are two prime examples of certification bodies that are not only widely recognized but also serve as references for halal standards in many countries. On the other hand, countries with smaller Muslim populations, such as Hong Kong and Japan, use halal organizations as a tool to penetrate the global Muslim market. International Halal Certification Center Limited (IHCCL), for example, is an important factor in product exports to the Middle East, where demand for halal products continues to increase.

This halal regulation also has a significant economic impact, both at the national and international levels. Countries such as Malaysia and Singapore utilize halal regulations as an economic instrument to establish their position as the center of the world's halal industry. Malaysia, with its extensive JAKIM certification network, has succeeded in creating an integrated halal ecosystem from raw materials to end products, providing a competitive advantage for its exporters. On the other hand, countries with voluntary policies, such as Japan and Thailand, see halal certification as a strategic opportunity to expand their market to Muslim-majority countries, which is now one of the fastest-growing market segments in the world.

Halal policies in Central Asia are dominated by a voluntary approach, although the need for halal certification in certain sectors remains a major concern. Afghanistan is the only country in the group that requires halal certification for domestic food products through the Afghanistan National Standards Authority (ANSA), which includes audits of raw materials, production facilities, and final products. Meanwhile, countries such as Kyrgyzstan, Kazakhstan, Tajikistan, and Uzbekistan are implementing voluntary policies with a focus on food products and cosmetics, suggesting that while these sectors are

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not mandatory, there is a growing awareness of the importance of halal certification to support exports and meet Muslim consumer demand.

Halal regulations in Syria are mandatory for products circulating in the domestic market, covering the food and medicine sectors. The certification process involves verification of raw materials and close supervision of production facilities, which is handled by local religious institutions. Mongolia and Laos, despite having a majority non-Muslim population, have shown interest in halal standards through a voluntary approach. This reflects a strategic opportunity to meet the needs of local and international Muslim consumers, especially in the food and cosmetics sectors. Hong Kong, as a global trade hub, places halal certification in the context of exports, using the International Halal Certification Center Limited (IHCCL), to enhance the competitiveness of local products in international Muslim markets.

The certification process in these countries varies from simple to complex, depending on the interests and policies of each country. In Afghanistan and Syria, the certification process includes detailed audits, from raw materials to supervision of facilities and final products. Internal audits are conducted to check the implementation achievements of the halal assurance system policy (Saribanon et al., 2019). In contrast, in countries such as Mongolia, Laos, and Hong Kong, the certification process is more focused on verifying raw materials and production facilities without any legal obligations, but still provides added value for producers who want to expand their market reach to Muslim countries.

Countries such as Afghanistan and Syria, with mandatory regulations in the food and medicine sector, aim to protect domestic Muslim consumers while increasing control over products in circulation. On the other hand, countries with a voluntary approach, such as Kyrgyzstan and Kazakhstan, utilize halal certification as a tool to increase product competitiveness in export markets, especially to the Middle East and Southeast Asia. Hong Kong, as one of the global trade centers, uses halal certification to expand trade networks with Muslim-majority countries, making its products more competitive in the international market.

Overall, halal regulation in Asia reflects a variety of approaches tailored to domestic needs, demographic structure, and international market expansion strategies. Countries with Muslim-majority populations, such as Indonesia, Malaysia, Saudi Arabia, and Pakistan, have mandatory halal certification policies that focus on the food, cosmetics, and pharmaceuticals sectors. This aims to ensure compliance with Islamic law while maintaining domestic consumer confidence. In contrast, countries with minority Muslim populations, such as Japan, Hong Kong, and Laos, implement more flexible voluntary policies, making halal certification a strategic tool to attract the global Muslim market.

Various halal certification bodies in Asia, such as MUI in Indonesia, JAKIM in Malaysia, and MUIS in Singapore, have international reputations that help strengthen their countries' position in the global halal trade. The certification process, which includes verification of raw materials, production facilities, and final product audits, adds competitive value to halal products from the region. However, challenges remain in harmonizing halal standards among Asian countries, which currently have different approaches and levels of oversight.

Halal regulation serves not only as a religious guide but also as a significant economic instrument. Countries that utilize halal regulations as a trade strategy have successfully expanded their market share in Muslim-majority countries. Therefore, harmonization of halal standards at the regional level can be the key to creating a more integrated halal industry ecosystem, enhancing the competitiveness of Asian products, and strengthening Asia's position as a major hub of the world's halal industry.

The initiative to establish a global halal standard can come from SMIIC, which can be accepted by all members of the Organization of Islamic Cooperation (OIC) (International Trade Centre, 2015). As the second largest international organization after the United Nations, the Organization of Islamic Cooperation (OIC) has a very broad membership, covering 57 countries spread across the continents of Asia, Africa, Europe, and Australia (General Requirements for Halal Food OIC/SMIIC 1:2019, 2019). Research by Annisa (2020) also recommended SMIIC as an international halal standard harmonization institution by considering SMIIC's position as an OIC-affiliated institution, which has the authority to issue international halal standard harmonization.

While the benefits of harmonization are clear, achieving it faces significant political and economic hurdles. For many nations with established halal frameworks, such as Indonesia and

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Malaysia, their certification bodies and standards are not merely religious or technical instruments; they are strategic assets that project national influence and support economic competitiveness. There is often a reluctance to cede regulatory authority to a supranational body, as national standards are sometimes perceived as a "gold standard" that provides a competitive edge in the global halal market. This sense of "halal nationalism" can create friction against adopting a unified regional or global standard. These political-economic challenges are compounded by the existing cultural and interpretive differences across regions, as well as the practical implementation costs that disproportionately affect Micro, Small, and Medium Enterprises (MSMEs). Therefore, any successful harmonization effort must not only align technical requirements but also address these deeper strategic interests.

CONCLUSION

This systematic review highlights the urgent need for halal standard harmonization in Asia to enhance regional trade, strengthen consumer confidence, and meet the religious requirements of the growing halal industry. Its novelty lies in a comprehensive comparative analysis that examines well-established standards such as Malaysia's MS 1500:2009 and Saudi Arabia's SASO 2172, while also incorporating recent legislative changes like Indonesia's Law No. 6 of 2023 and Government Regulation No. 42 of 2024, offering a current and nuanced understanding of the evolving halal landscape. Despite significant differences in definitions, certification protocols, and regulatory roles across countries, the shared objective remains ensuring food safety and Sharia compliance. Key challenges include cultural variations, differing technological interpretations, and high certification costs for MSMEs, which can be addressed through mutual recognition agreements, supportive MSME policies, and advanced technologies such as blockchain for supply chain transparency. By fostering collaborative frameworks through ASEAN and the OIC and prioritizing consumer education, Asia can work toward an integrated halal market that reduces trade barriers, boosts competitiveness, and reinforces its global leadership in the halal industry. Nonetheless, this study is limited by its reliance on publicly available regulatory documents, possible exclusion of non-English sources, and its primary focus on food and cosmetics, with other sectors like pharmaceuticals, finance, and tourism remaining beyond its scope.

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