Bridging Regulatory Diversity: Halal Certification Frameworks in Indonesia, Malaysia, and Singapore and the Road to ASEAN Harmonisation

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ABSTRACT

With the growing significance of halal product assurance in ASEAN, the demand for regulatory harmonisation is alarming with the phenomenon of globalization. This study attempts to analyse and compare the regulatory frameworks of halal product assurance from countries in ASEAN to find similarities and differences and aspects that require development. In this study, a comparative method was used to compare the legal and policies of the halal product assurance in Indonesia, Malaysia and Singapore. This study demonstrates that mandatory certification under Indonesian JPH law does ensure comprehensive regulation but impedes several industry sizes as well as intricacies during implementation. In Malaysia, JAKIM has established a known voluntary scheme all over the globe. Its governance system is excellent and has enabled Malaysia to lead the halal market globally. On the other hand, Singapore's model is highly regulated and overseen by MUIS. It serves the global economy while ensuring strict halal standards. The differences in regulations should be harmonised as they could otherwise translate into trade barriers besides affecting consumer confidence. A more integrated, competitive, and visible halal industry in the ASEAN global market can be achieved by harmonising such differences through policy alignments, coordination among agencies, and technological utilisation.

Keywords: ASEAN, Halal Certification, Harmonisation, Law

INTRODUCTION

The growing global halal market is increasingly attracting the attention of countries around the world, which seek to establish their halal certification systems, regulations, and legal frameworks to stay competitive in the international market. Countries with minority Muslim populations, such as the US, Canada, Japan, Australia, New Zealand, and South Africa, are now important players in the global halal trade (Asa, 2019). Based on the Global Islamic Economy Indicator (GIEI) 2023/2024 report, Malaysia, Indonesia, and Singapore occupy the first, third, and eighth positions, respectively as countries with the largest Islamic economies in the world (Dinar Standard, 2023). This stance emphasises how important these organizations are in establishing halal standards both domestically in Southeast Asia and internationally.

Differences in halal certification systems among nations significantly affect intra-ASEAN commerce and regional economic integration. For example, Indonesia has a comparative advantage in producing halal food, but there are challenges because different ASEAN countries have different regulations, like ethanol content and other technical requirements (Pauzi et al., 2019). This leads to extra costs and logistical issues for businesses, and consumers are uncertain about product quality and consistency (Jalaluddin et al., 2024).

The varying regulatory approaches in ASEAN countries affect the halal industry's competitiveness (Kifli, 2023; Supriyadi et al., 2024). These differences make it hard to create a unified standard across the region (Jalaluddin et al., 2024). When each country has its own rules, businesses have to adapt to multiple standards, which increases costs and complicates logistics. This fragmentation can make the halal industry less competitive because companies might struggle to export efficiently, and consumers might not trust products from different countries due to inconsistent standards. This analysis is crucial to be conducted in order to create strategies to harmonise standards, which would reduce trade barriers and enhance the overall competitiveness of the halal industry in ASEAN.

Halal refers to products permissible under Islamic law. Certification ensures they meet those standards. It is not optional but a legal requirement in Indonesia. This is mandate (halal certification requirement) comes from Law No. 33 of 2014, with Government Regulation No. 39 of 2021 that provides more detailed guidelines on how to implement the law (Hasanuddin et al., 2024; Rahmah, 2020). Even though the laws and regulations are in place, there are still challenges that can prevent the halal certification process from being implemented effectively. The laws related to halal certification are not uniform or coherent. Different regions or sectors can lead to conflicting laws, or there are gaps in the legislation that create confusion. The rules and procedures for complying with halal standards are not well-defined. Businesses might not know exactly what they need to do to meet the requirements, leading to uncertainty and potential non-compliance (Prathama et al., 2024).

On the other hand, Malaysia is internationally recognised as a standard-setter in Halal certification. The framework falls under the supervision of the Department of Islamic Development Malaysia, known as Jabatan Kemajuan Islam Malaysia (JAKIM). As the governing body responsible for overseeing Halal certification (Bahagian Pengurusan Halal JAKIM, 2020), JAKIM ensures robust and adaptive regulations, which are key to sustaining the country's Halal certification system (Hasan & Abd Latif, 2024; Jalaluddin et al., 2024; Wahab et al., 2016). Efforts to promote innovation and expand the Halal industry's export potential have also been made through the establishment of the Halal Industry Development Corporation (HDC). Nevertheless, challenges persist, including the need to raise public awareness, ensure clear segregation between Halal and non-Halal products, and improve the consistent implementation of Halal regulations nationwide (Kadir et al., 2016). JAKIM remains the primary institution responsible for ensuring compliance with Sharia law, as well as establishing and enforcing stringent Halal certification standards (Hasan & Abd Latif, 2024). Meanwhile, Singapore has developed a comprehensive and globally recognised Halal certification system, managed by Majelis Ugama Islam Singapura (MUIS). This system ensures strict compliance with Halal standards. However, a key challenge lies in maintaining the integrity of Halal certification within its multi-religious and diverse society. MUIS plays a central role in certifying products, facilities, and processes to uphold consistent Halal standards (Fischer, 2016).

In Indonesia, the Halal Product Guarantee Law (UU JPH) mandates Halal certification for all products entering the market, overseen by the Halal Product Guarantee Agency (Badan Penyelenggara Jaminan Produk Halal–BPJPH, 2022) with support from the Indonesian Ulema Council (Majelis Ulama Indonesia–MUI) (Limenta et al., 2018; Mangruwa et al., 2024). Malaysia, meanwhile, is widely recognised as a pioneer in Halal certification, with institutions such as JAKIM setting stringent benchmarks (Badruldin et al., 2012; Muhammad et al., 2020).

Singapore, despite its smaller Muslim population, plays a significant role in Halal certification through MUIS, ensuring compliance within its multicultural context (Fischer, 2016; Saat, 2018). However, the divergent regulatory frameworks across these countries risk fragmenting the ASEAN Halal economy and limiting the region's influence in the global Halal market. Harmonisation efforts

must address disparities in interpretation, testing methodologies, and enforcement capacity. The lack of a standardised certification system creates substantial trade barriers, complicating cross-border commerce.

Achieving regulatory harmonisation remains a critical challenge, demanding enhanced regional cooperation to unlock economic, social, and consumer protection benefits (Abhimanyu & Faiz, 2023). Furthermore, inconsistent standards foster confusion and hinder international trade, highlighting the urgent need for greater alignment to facilitate seamless Halal product exchange across ASEAN (Zain et al., 2024). Previous studies have often focused on individual countries (Abimanyu & Faiz, 2023; Asa, 2019; Ridwan, 2020; Trivedi et al., 2024; Wahab et al. 2016) and provided no comparative legal analysis of halal product guarantees in Indonesia, Malaysia, and Singapore, offering a broader perspective on regulatory frameworks. Numerous studies have examined consumer behaviour or the expansion of the halal industry, but they have not thoroughly examined the institutional, legal, and certification frameworks that are important to regulators and policymakers. Prior research has not pointed out regulatory discrepancies, emphasized harmonisation issues, or suggested ways to enhance cross-border trade in the ASEAN area. Thus, the halal regulatory frameworks used in Malaysia, Singapore, and Indonesia are thoroughly compared in this study. In addition to providing insights into regional regulatory concerns and policy implications, the study emphasizes the parallels, discrepancies, and difficulties that each system faces. As a result, this study is distinct from others. Additionally, in order to promote greater cooperation and alignment within the ASEAN region, the study looks for possible routes to regional halal certification harmonisation.

METHOD

Design and Data

This study uses qualitative methods to conduct a comparative analysis of legal and policy frameworks for the process of ensuring goods comply with Islamic standards. It focuses specifically on the regulatory frameworks for halal certification in Indonesia, Malaysia, and Singapore. Primary data was collected from official sources, including:

a. BPJPH in Indonesia (https://bpjph.halal.go.id/)
b. JAKIM in Malaysia (https://myehalal.halal.gov.my/portal-halal/v1/index.php)
c. MUIS in Singapore (https://www.muis.gov.sg/halal/)

The study incorporates secondary sources comprising government regulations, legal documents, and official guidelines from national halal certification authorities. This approach ensures the analysis remains grounded in legally binding frameworks, enhancing the research's credibility and practical relevance (Ali, 2021).

Two other main sources are industry reports and academic literature. Two additional key source categories were industry reports and academic literature. Industry reports provide valuable practical insights into market dynamics, operational challenges, and emerging sector trends, while academic literature added critical analysis and broader significance. These combination leads to a multifaceted analysis to obtain more credible understanding of the halal sector's complexities in Southeast Asia. The analysis of data started with legal foundations for halal certification in three countries, then moved to the roles of certification authorities, enforcement strategies, and finally international recognition. Through this analysis, this study highlighted them and connected the points. Afterwards, the overall evaluation of halal certification system was presented.

RESULTS AND DISCUSSION

Delving into Halal Certification in Indonesia, Malaysia, and Singapore

Indonesia has established a comprehensive legal framework for mandatory halal certification through Law No. 33 of 2014 and Government Regulation No. 31 of 2019. Within this system, MUI serves as the religious authority, providing fatwas and guidance on halal standards. To enhance the certification process, the Indonesian government has implemented several technological innovations, including digital platforms for online applications, as well as blockchain technology to ensure transparency in the supply chain. Additionally, the government is expanding its capacity through specialised training programmes for halal compliance inspectors.

In October 2019, Indonesia implemented a significant regulatory shift from voluntary to mandatory halal certification for all consumer products (Hasanuddin et al., 2024; Supriyadi et al., 2024; Suryawan et al., 2022). This legislative requirement aims to ensure universal compliance with Islamic law while providing special provisions for small and medium enterprises (SMEs). All consumer products must obtain halal certification and the policy includes provisions to support SMEs, such as

family-run businesses and startups. SMEs benefit from a streamlined certification process designed to minimise bureaucratic requirements.

As the authoritative Islamic body, the MUI establishes halal standards through collaborative efforts with government agencies to formulate official guidelines. The future direction of Indonesia's halal certification system focuses on three key objectives as follows.

a. Harmonising halal standards across ASEAN member states to facilitate trade through mutual recognition agreements
b. Establishing Indonesia as a global halal hub by aligning with international standards and capitalising on its substantial domestic market
c. Addressing current challenges including regulatory inconsistencies and supply chain limitations to enhance halal exports

Table 1 provides a comprehensive overview of Indonesia's halal certification framework. The certification is mandatory for all products, which means every product sold in Indonesia must be Halal certified. That's stricter compared to some other countries where it's voluntary. The Law No. 33 of 2014 and Government Regulation No. 31 of 2019 make the certification compulsory. Another aspect is self-declaration for micro and small businesses. Indonesia's BPJPH has a self-declaration pathway for businesses. It still needs to meet standards but can self-certify with some oversight. In the aspect of Technological Solutions, Online Single Submission and Blockchain are utilised (Bux et al., 2022; Ridho, 2025; Sim, 2023). Blockchain, in particular, helps with tracking and verifying Halal status through the supply chain. Higher education involvement indicates that universities or institutions are involved in training and providing resources (Alim et al., 2024), which supports the system by creating qualified auditors and experts.

Table 1 Halal certification in Indonesia

Aspect	Details
Certification Requirement	Mandatory for all products
Governing Laws	Law No. 33 of 2014, Gov. Reg. No. 31 of 2019
Self-Declaration	Available for micro and small businesses
Role of Religious Bodies	Indonesian Ulama Council (MUI)
Technological Solutions	Online Single Submission, Blockchain
Higher Education Involvement	Significant role in training and resources

Note: Data compiled and analysed by author, 2024

In Malaysia, JAKIM operates as the principal regulatory body for halal certification (Hashim et al., 2017; Nordin et al., 2012; Samori et al., 2017). The nation's certification framework, established under the Trade Descriptions Act 2011, has gained international recognition and serves as a benchmark for numerous Organisation of Islamic Cooperation (OIC) member states (Nazim & Yusof, 2023; Supriyadi et al., 2024). There are operational challenges, such as inefficiencies in service quality, ingredient classification inconsistencies, and terminology issues between producers and auditors. Entrepreneurs do not always agree on terms, causing confusion (Rofiah et al., 2024). Enforcement is fragmented, leading to misuse of halal logos and expired certifications. Pharmaceuticals lack specific regulations, making certification in that sector difficult. These strategic improvements including stronger *sharia* governance, better procedures, and adapting to new tech like lab-grown meats are essential for maintaining Malaysia's competitive edge and preserving consumer confidence in its halal certification system.

Malaysia's halal certification process, while thorough in conducting site inspections and material checks, faces several systemic challenges. For example, verification requirements lead to significant delays (Badruldin et al., 2012; Hashim et al., 2017), while inconsistent terminology between producers and auditors complicates ingredient verification (Hashim et al., 2017). The system demonstrates weaknesses on both supply and demand sides, with manufacturers experiencing responsiveness issues (Badruldin et al., 2012) and a fragmented legal framework lacking unification (Nazim & Yusof, 2023). These shortcomings result in logo misuse, expired certifications remaining valid (Hasan & Abd Latif, 2024), and inconsistent quality control across the industry.

Ramli et al. (2017) argue that there are different challenges in various sectors of the halal industry. For example, the pharmaceutical sector lacks a legal framework, while the food industry must deal with internal and external factors. Without a comprehensive legal framework, creating halal medicines in the pharmaceutical sector is complicated. In the food industry, internal factors include a company's commitment to halal standards and its operations. External factors include government regulations and consumer preferences. Thus, the food sector is influenced by both internal efforts and external pressures (Sari et al., 2024).

Table 2 presents Malaysia's halal certification framework. Overseen by JAKIM and legally established under the Trade Descriptions Act 2011, the certification is a global benchmark due to its

stringent standards and recognition by OIC. However, the system faces structural challenges, including inconsistent enforcement, bureaucratic inefficiencies, and ambiguity in certain sectors, such as pharmaceuticals.

Table 2 Halal certification in Malaysia

Aspect	Details
Primary Authority	JAKIM
Legal Basis	Trade Descriptions Act 2011
Standards and Guidelines	Widely recognized, adopted by OIC
Certification Process	Involves site inspections, time-consuming
Operational Efficiency	Challenges in documentation, verification
Service Quality	Gaps in empathy, responsiveness, reliability
Enforcement and Compliance	Fragmented enforcement, quality control issues
Sector-Specific Insights	Pharmaceuticals, food industry challenges
Future Directions	Need for Shari'ah governance, adapting to new food technologies

Note: Data compiled and analysed by author (2024)

Samori et al. (2017) argue that for Malaysia to retain its competitive advantage, it must implement structural reforms, centralising governance under a unified Shariah framework, digitising procedures to improve efficiency, and updating standards to accommodate emerging technologies like lab-grown meat. Furthermore, Zakariah et al. (2024) emphasise the importance of collaboration between regulators, scholars, and industry stakeholders. Such cooperation is vital to harmonising Islamic principles with shifting market demands, ensuring that halal compliance remains both credible and adaptable in an increasingly complex global environment.

In Singapore, the government requires companies to have Halal Teams made up of Muslim members. That seems important because having a dedicated team within the company could ensure better compliance (Fischer, 2018). Products made in Singapore are available internationally, which shows they have a strong influence. The certification process by MUIS is meticulous, which builds consumer trust. Trust is crucial, especially in international markets where consumers might not be familiar with local brands. Nurcahaya et al. (2021) state that the halal supply chain involves multiple stakeholders (suppliers, manufacturers, and consumers). Ensuring compliance at every stage must be challenging. If any part of the supply chain fails to meet halal standards, the whole product could be compromised. For example, if a supplier provides non-halal ingredients, even if the manufacturer follows all protocols, the end product would not be halal. New trends like plant-based and organic halal products are becoming popular due to ethical and sustainable demands (Tubastuvi & Wiliantoro, 2023) an this is regarded an opportunity for innovation.

Table 3 Halal certification in Singapore

Aspect	Singapore	Comparison (Malaysia, Indonesia)
Regulatory Body	MUIS	JAKIM (Malaysia), BPJH and MUI (Indonesia)
Certification Process	Mandatory Halal Teams in companies	Similar structured processes
Global Market Reach	High, with state-certified products worldwide	Comparable, with strong global presence
Supply Chain Integrity	Emphasized, with rigorous standards	Similar emphasis on supply chain management
Innovation Trends	Focus on plant-based and organic halal products	Emerging trends in both countries

Note: Data compiled and analysed by author (2024)

Table 3 shows halal certification frameworks in Singapore and the comparison to Malaysia and Indonesia. The halal market in Singapore is thriving due to three main pillars; 1) a strong regulatory framework led by MUIS; 2) proactive government policies that promote compliance; 3) uncompromising adherence to strict halal standards. These elements collectively ensure that halal-certified products meet strict ethical, religious, and quality benchmarks, thereby fostering unparalleled consumer trust. For example, MUIS mandates an internal Halal Team within companies

to oversee compliance, conduct surprise audits, and impose strict penalties for violations. These measures, coupled with Singapore's strategic focus on innovation (for example, certification of plant-based and lab-cultured meat), have solidified its reputation as a global leader in halal trade, with its certification widely recognised in key markets such as the Middle East and ASEAN. The systematic integration of governance, accountability, and adaptability has made Singapore a trusted hub for halal products worldwide.

Key Differences and Similarities

1. In Light of Legal Frameworks and Implementation

As summarised in Table 4, the three nations exemplify distinct regulatory models: Indonesia's mandatory certification, Malaysia's structured voluntary system, and Singapore's state-managed approach. These frameworks highlight diverse strengths and challenges that shape the efficiency and competitiveness of halal trade across ASEAN.

Table 4 Comparison of legal frameworks and implementation

Aspect	Indonesia	Malaysia	Singapore
Certification	Mandatory	Voluntary	Mandatory Committees
Regulatory Body	BPJPH	JAKIM	State-managed Halal Teams
Implementation	Self-declaration for small businesses	Systematic and organized	State-managed training and compliance
Challenges	Quality control, normative ambiguity	Flexibility, dynamic regulation	Ensuring compliance through training
Consumer Protection	Building trust, economic growth focus	High consumer confidence	High standards and consumer confidence

Note: Data compiled and analysed by author (2024)

Indonesia mandates halal certification through Law No. 33 of 2014 and Government Regulation No. 31 of 2019 (Effendi et al., 2024; Supriyadi et al., 2024). The certification process is overseen by the BPJPH (Hasan & Abd Latif, 2024; Putra et al., 2024). However, implementation faces challenges such as regulatory ambiguities, overly broad product classifications, and gaps in enforcement mechanisms (Jalaluddin et al., 2024; Rofiah et al., 2024). In contrast, Malaysia operates a voluntary halal certification framework under the Trade Descriptions Act 2011, administered by the JAKIM. This system is recognised for its structured procedures and adaptability (Hasan & Abd Latif, 2024; Jalaluddin et al., 2024; Sofiana et al., 2021; Supriyadi et al., 2024). At the same time, Singapore adopts a state-regulated halal certification system, requiring companies to form Halal Teams led by Muslim members to ensure adherence to halal standards (Fischer, 2018). However, non-Muslim professionals can serve as Halal Team Leaders or Procurement Personnel if they complete a competency training programme to ensure compliance with halal requirements.

In the context of implementation, Indonesia provides a self-declaration mechanism for micro and small businesses to streamline halal compliance. However, misuse of the system and inadequate oversight have raised enforcement concerns (Hasan & Abd Latif, 2024; Supriyadi et al., 2024). Inconsistent quality control has also sparked proposals to integrate blockchain technology for enhanced traceability and regulatory efficiency. Subsequently, Malaysia's halal ecosystem enjoys high consumer trust, bolstered by rigorous quality assurance protocols, particularly in the food and beverage industry (Othman et al., 2016a; Sofiana et al., 2021). Meanwhile, Singapore combines state-driven compliance with market responsiveness to uphold the credibility of its halal certification framework (Fischer, 2018).

Comparing Singapore to Malaysia and Indonesia, Singapore's system is more structured and state-controlled. Malaysia's JAKIM is also strict, but Singapore's centralized control gives it an edge in consistency. The strategic approach includes regulation and market control, which reinforces Singapore's reputation. Being a trusted source globally is important for exports. Tubastuvi & Wiliantoro (2023) suggest that this system has been recognized as effective.

2. Enforcement Mechanism and Certification Process

In Indonesia, the BPJPH oversees the process and the MUI provides fatwas. There is a self-declaration mechanism for micro and small businesses, but issues, such as misuse and problems with enforcement, are inevitable (Hasan & Abd Latif, 2024; Huda et al., 2024). Enforcement includes legal mandates, the government agency, and religious authority, as well as self-declaration, which presents challenges in terms of oversight (Krisharyanto et al., 2019; Rofiah et al., 2024). In the certification process, BPJPH is responsible for overseeing certification, while MUI provides religious validation. Challenges include inconsistent quality control, limited public awareness, and inefficient enforcement. Proposed solutions include public education campaigns and technological upgrades, such as the use of blockchain for traceability (Huda et al., 2024; Wahyuni et al., 2024).

Divergent Standards and Regulatory Fragmentation: Challenges in ASEAN's Halal Certification Landscape

1. Halal Certification Requirements

Each country has its halal certification rules, which makes trading difficult. The varying standards and complex regulations cause problems. The JPH law in Indonesia is causing conflicts because institutions interpret Islamic principles differently (Iswanto & Koeswinarno, 2020). Fathoni et al. (2025) state high costs are a barrier, particularly for smaller companies.

Some countries have very strict rules about halal certification, while others are more flexible. Different interpretations in terms of *maslahah* (public interest) lead to different approaches. This creates inconsistencies because there is no uniform way of applying the standards (Al-Teinaz & Al-Mazeedi, 2020). Without unified halal standards in the region, there are multiple certification logos and bodies, leading to confusion and mistrust. Countries have different levels of strictness and interpretations of public interest, leading to inconsistent standards. These inconsistencies can act as a Technical Barrier to Trade (TBT), making it harder for businesses to operate across borders.

Indonesia's halal certification of food, beverages, and medicines, justified as compliance with Islamic law but potentially in violation of WTO agreements, is one such example. Critics argue that such measures may contravene World Trade Organisation (WTO) rules, particularly the TBT Agreement, which prohibits unnecessary barriers to trade (Ahamat & Rahman, 2018; Rahmah, 2020).

Cultural and market differences also hinder integration. Demand for halal certification varies significantly among consumers worldwide, reflecting differing levels of religious observance and market maturity (Osman, 2023). Muslim-majority nations such as Malaysia and Indonesia enforce stringent certification requirements, whereas Singapore's multicultural market adopts a more pragmatic approach.

2. Challenges to Mutual Recognition

The mutual recognition of halal standards in ASEAN faces multiple challenges arising from legal, jurisprudential, economic, and institutional gaps. One of the challenges is the different legal frameworks in the region, for instance. civil law systems favour harmonisation, whereas common law traditions lean towards mutual recognition, complicating the adoption of a unified regulatory approach (Hamanaka & Jusoh, 2018). This necessitates a hybrid model that strategically balances harmonisation and mutual recognition to accommodate ASEAN's diverse legal landscape. Table 5 summarises these barriers to halal standardisation.

Further complicating matters is the divergence in halal standards driven by varying interpretations of Islamic jurisprudence. Disputes over practices such as pre-slaughter animal castration, slaughter methods, and labelling requirements, where some countries allow non-Muslim slaughterers and pre-slaughter castration, while others do not undermine efforts to standardise certification (Akbar et al., 2023). These challenges are exacerbated by economic and technological disparities. For example, while Malaysia and Indonesia possess advanced halal infrastructure, member states with limited capacities struggle to meet stringent requirements, impeding implementation (Othman et al., 2016b). Finally, different organisations within a country can lead conflicting roles or policies. In Indonesia, differing interpretations by certification bodies create inefficiencies (Iswanto & Koeswinarno, 2020). This issue in the context of internal fragmentation and regional diversity create layers of complexity.

Legislative harmonisation of halal standards under ASEAN is still very complicated and gradual. Regional guidelines for halal certification have evolved because full standardisation relies entirely on member states adopting these frameworks into their domestic laws. ASEAN's consensus-based governance model means that it is moving at a very slow pace, so issues of mutual recognition agreements and unified labelling protocols are still awaiting further legislative action. In addition, harmonisation considerations are complicated by the influence of international standards from both Codex and the OIC. Despite their global legitimacy, negotiating with ASEAN's diverse national

regulations will require ongoing harmonisation efforts and adaptive policymaking to improve regulatory coherence (Johan & Plana-Casado, 2023).

Other factors that complicate the mutual recognition of halal standards under ASEAN are their legal traditions (civil law vs. common law), different certification criteria, economic and technological imbalances, and institutional fragmentation. Different permissible practices, e.g., qualifications for slaughter, which reflect a larger gap in jurisdictional space. Insufficient infrastructure capacity between developed countries (Malaysia, for example) and less developed countries exacerbates the implementation gap. Alignment efforts at the national level with regional and international standards are key not only to overcome these trade barriers but also to enable smooth cross-border halal trade and thereby increase ASEAN's share in the world halal economy.

Table 5 Challenges in regional halal standardization

Challenge	Description
Diverse Legal Frameworks	Varied legal systems necessitate a combination of harmonization and mutual recognition.
Inconsistent Halal Standards	Differences in halal practices and interpretations across countries.
Economic and Technological Disparities	Variations in infrastructure and capabilities among member states.
Institutional Conflicts	Internal conflicts within countries like Indonesia affecting policy alignment.
Legislative Harmonization	Need for national legislation to achieve full harmonization.
International Standards Influence	Adapting international guidelines to national regulations.

Note: Data compiled and analysed by author (2024)

3. ASEAN-Wide Halal Regulatory Cooperation: Opportunities and Pathways

Halal rules in ASEAN can boost trade and development by making regulations the same across countries. Even though there's progress with the guidelines, full harmonisation depends on each country adopting these into their own laws (Johan & Plana-Casado, 2023). The main challenges are mutual recognition and labelling. It implies that countries accept each other's certifications, and labelling practices need to be the same. Furthermore, adopting international standards could serve as a constructive starting point for ASEAN nations to align their halal regulations. However, despite these established benchmarks, significant variations persist in halal practices. Differences emerge in slaughter methods, certification procedures, and even fundamental interpretations of what constitutes halal compliance. Addressing these discrepancies is essential to establish a harmonised system.

A unified regional framework will allow products certified in one ASEAN country to be accepted without additional inspections, thus streamlining trade and reducing costs. This alignment will allow businesses to access a wider market while minimising compliance expenditure, which will ultimately strengthen ASEAN's global competitiveness in the halal industry (Abhimanyu et al., 2024).

Collaboration among different sectors is crucial for effective policy-making. The connection between inclusive governance and practical outcomes needs to be applied. One of the examples is animal stunning and certification reciprocity; balancing religious adherence with trade pragmatism works practically. As a result, aligning halal rules across ASEAN can really boost unity and economic strength. Despite existing challenges, ASEAN has a chance to lead in halal trade by harmonising regulations through collaboration, technology, and international standards.

Bridging Divergence: The Role of International Halal Certification Bodies in ASEAN Harmonisation

The role of international halal certification bodies in standardising products is pivotal to ensure that halal products meet Islamic standards globally. Jamaludin & Sugawara (2022) state that JAKIM is an example of approving 84 international halal certifiers, showing how trusted bodies collaborate to build a cohesive global system. Regional and global collaborations aim to bridge these gaps. The ASEAN Halal General Guideline and the Standards and Metrology Institute for Islamic Countries (SMIIC) provide frameworks for procedural alignment, while partnerships like Japan's reliance on Malaysian halal logistics expertise demonstrate cross-border trust-building (Akbar et al., 2023; Jamaludin & Sugawara, 2022).

Collaborations between regions and globally can bridge divergences. ASEAN Halal General Guideline must be a set of rules or standards that ASEAN countries follow for halal products, while SMIIC sets international standards for Islamic countries. They help align procedures so different countries can follow the same steps, making trade easier. For example, the partnership is conducted

between Japan and Malaysia (Akbar et al., 2023; Jamaludin & Sugawara, 2022). Japan works with Malaysia on halal logistics. Malaysia has expertise in handling halal products, and Japan trusts them. This partnership helps build trust between countries, making collaboration smoother.

Several strategies for accelerating progress in harmonising halal certification in Southeast Asia are evidence-based guidelines accepted regionally (Akbar et al., 2023), blockchain for supply-chain transparency and AI-driven platforms to streamline certification (Krisharyanto et al., 2019), and partnerships between certification bodies and regulators to foster mutual recognition (Kharrazi et al., 2024; Latif, 2020). Implementing these strategies will lead to a unified halal certification system that's respected worldwide.

CONCLUSION

The study compares halal certification approaches in three different countries in ASEAN. Indonesia has a mandatory system with its vast domestic industry and regulatory complexity. Malaysia's voluntary system is globally recognised. Singapore's model is business-driven but strict. These regulatory disparities highlight the urgent need for harmonisation across ASEAN, where fragmented standards create trade barriers, undermine consumer trust, and stifle regional competitiveness. Persistent inconsistencies in certification processes. To address these challenges, policymakers must prioritise three key initiatives: (1) institutional collaboration to align certification criteria, (2) adoption of digital tools like blockchain for transparent supply chain traceability, and (3) regional agreements to standardise accreditation and mutual recognition.

Without harmonisation in ASEAN, trade barriers and inefficiencies will persist. Thus, solutions are provided in this study, including policy adjustments, collaboration, and technology like blockchain. Cooperation is essential for a cohesive halal industry. The finding of this study provides implications in economic, regulatory, and strategic aspects. Harmonisation leads to better trade efficiency, which boosts ASEAN's global position. It also leads to the importance of collaboration and technology, as these are key recommendations.

This study acknowledges that its scope was limited to three countries, which represents a common methodological constraint. Consequently, the findings may not be generalisable to other ASEAN nations with differing contexts. Furthermore, the reliance on secondary literature and absence of primary data collection methods, such as surveys or interviews, potentially limits the depth of analytical insights. Additional limitations include potentially insufficient coverage of technological and cultural dimensions. While blockchain technology is referenced, its implementation challenges may not be comprehensively examined. Similarly, cultural factors like divergent Islamic jurisprudential interpretations might not receive thorough analysis. Economic considerations, particularly the cost implications of harmonisation for small and medium enterprises (SMEs), may also lack detailed treatment. The proposed solutions might furthermore not adequately address practical feasibility concerns. Lastly, geopolitical influences from extra-regional actors could represent an underexplored aspect.

Future research could adopt interdisciplinary approaches, potentially combining halal standardisation with sustainability frameworks or examining the geopolitical ramifications of ASEAN's harmonisation initiatives. Methodologically, such investigations might employ case studies, longitudinal analyses, or qualitative interviews with stakeholders. A mixed-methods research design could yield more comprehensive understanding.

Acknowledgements

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