

HALAL STANDARDS GLOBALLY: A COMPARATIVE STUDY OF UNITIES AND DIVERSITIES AMONG THE MOST POPULAR HALAL STANDARDS GLOBALLY

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ABSTRACT: The global Muslim community, with its fastest-growing size, has made the global *halal* industry to become one of the fastest-growing markets in the world. However, a number of inhibitors have slowed down the growth rate of the industry. One of the pressing issues within the *halal* industry is the lack of a universal *halal* standard. Today, many *halal* standards exist globally, and they vary from country to country. Hundreds of Halal Certification Bodies (HCBs) of many countries are using these standards as reference for *halal* certification after getting recognised by the respective organization. Additionally, the number of applications by HCBs is increasing globally due to the rising demand for *halal* products and services. Most of these HCBs have received recognition from more than one accrediting body. This is because of the consumer trust and reliability on different standards. A lot of commonalities are observable amongst these standards because of the same primary source of Islamic law, i.e. Al-Quran and Al-Hadith. On the other hand, a significant gap or diversity is found in the implementation of the definition of *halal* and *halal* standards globally. Such diversity and differences in these standards have become a major obstacle to market entry by the industry players and Small and Medium Enterprises (SMEs) to expand their business. To address this issue, the objective of this paper is to identify and realize the commonalities and differences among the four most popular *halal* standards, which are the standards of SMIIC, Malaysia, Indonesia, and Singapore. Simultaneously, it also reveals the factors of similarities and diversities. Such a realization will enable the policymakers and Islamic scholars to come forward and work together to develop a universal *halal* standard globally. To achieve the objective, this paper adopts the methodology of content analysis by reviewing the literature on *halal* standards globally. This study is the first to compare the *halal* standard of SMIIC with other well-established *halal* standards globally. Interviewing Islamic scholars from different countries for respective standards was beyond the scope of the study because of time and other constraints.

KEYWORDS: *Halal Standard; Unities; Diversities*

1. INTRODUCTION

The quest for *halal* consumption among the Muslim community started 1400 years ago after the revelation of the Quran. *Halal* products and services are the Muslim faith-based needs and

demands that create the global *halal* industry. Today, the global Muslim population is 2.2 billion which is 29.04% of the world's population (www.muslimpopulation.com). However, the quality, sustainability, and ethical aspect of the concept *halal* have convinced non-Muslim consumers as well (Pacific, 2010). Thus, the global *halal* industry has reached beyond its target consumer, i.e. the global Muslim community. Such expansion and demand of the industry create the necessity of having a standard. The development of the *halal* standard was initiated by the Department of Islamic Development Malaysia (JAKIM) in 1974. Malaysia as a leading country in the Islamic economy developed the first strong and comprehensive *halal* standard in the world.

Today, a number of different countries have developed their *halal* standard realizing the consumer demand and potential of the *halal* industry globally. The most popular and well-recognized *halal* standards globally are Malaysian Standard by JAKIM, the *Halal* Standard of Singapore by the Islamic Religious Council of Singapore (MUIS), the *Halal* Standard of Indonesia by the Indonesian Ulema Council (MUI), and the *Halal* Standard by the Standards and Metrology Institute for Islamic Countries (SMIIC) with the participation of Organizations of the Islamic Cooperation (OIC) member countries. Amongst these standards, OIC/SMIIC Halal Standard is the only initiative that ensures the participation and contribution of multiple OIC member states and the International Islamic Fiqh Academy (IIFA) with the aim of establishing a harmonized *halal* standard accepted globally.

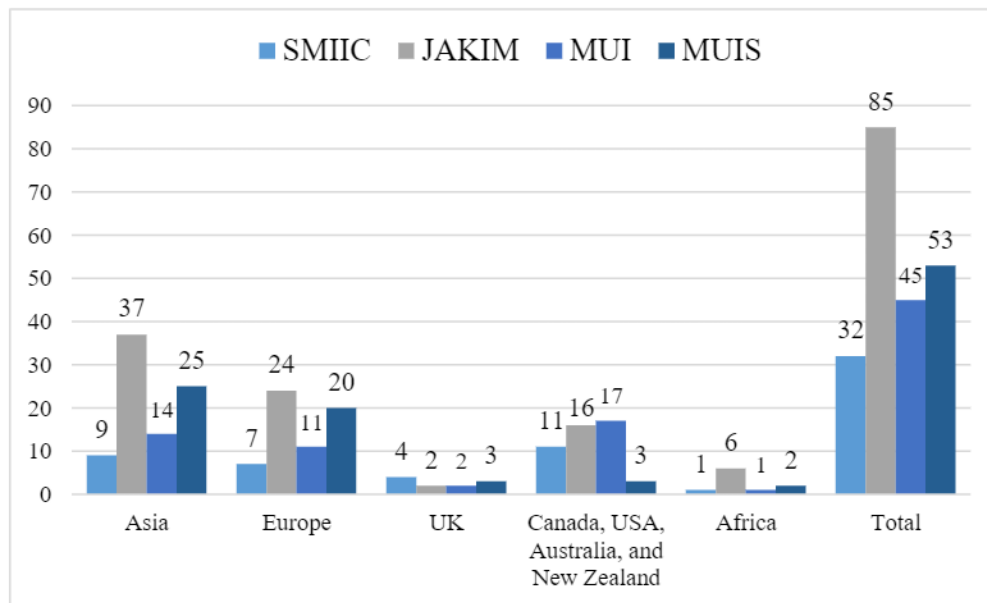


Fig. 1: Number of HCBs accredited in different continents.

Source: JAKIM (2020); Halal Industry Quest (2019); and MUI (2019).

The global recognition of different *halal* standards is realized from the accreditation of Halal Certifying Bodies (HCBs) in different countries across the world. Figure 1 and Figure 2 show the acknowledgment of the top four *halal* standards (JAKIM, MUIS, MUI, SMIIC) by different HCBs in different countries globally. The figures reveal that JAKIM accreditation has been received by the maximum number (85) of HCBs across 47 different countries globally. The second leading position is occupied by MUIS with accrediting 53 HCBs in 39 different countries. Meanwhile, the Indonesian *halal* certification (MUI) appears in 3rd position with 45 accredited HCBs in 26 different countries. However, the SMIIC standard was acknowledged by

the least number of 32 HCBs in 21 countries globally. These HCBs use one or more than one of the four standards as a reference to issue the *halal* certificate in their respective countries. However, they use their own *halal* logos in packaging and labelling which makes the consumer more confusing.

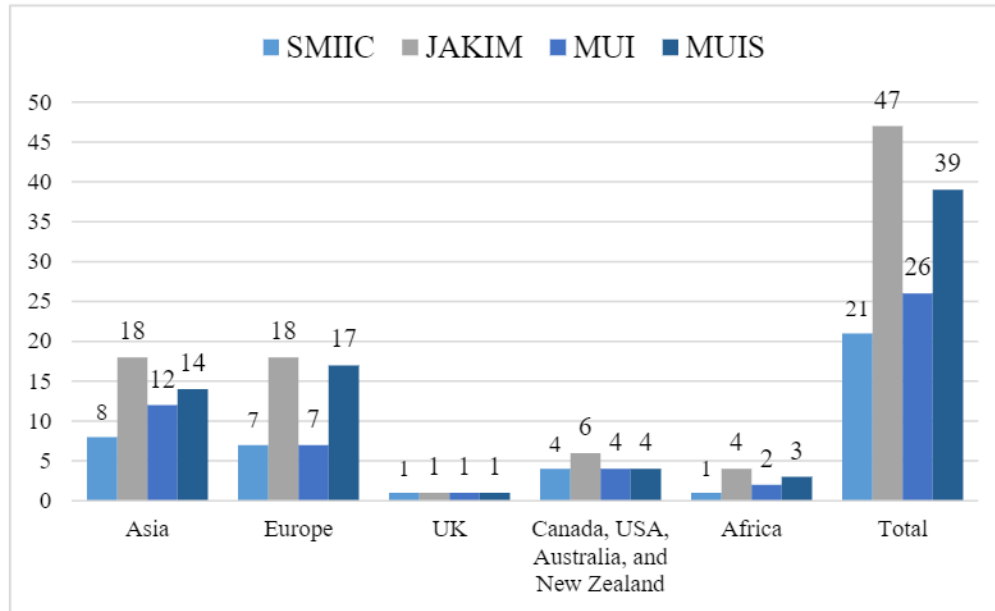


Fig. 2: Number of countries recognized Halal Standards.

Source: JAKIM (2020); Halal Industry Quest (2019); and MUI (2019).

The lack of a harmonized global *halal* standard has been identified as one of the major issues and challenges of the *halal* industry by many scholars, (Jaswir, 2019; Mahidin et al. 2016; Personal, Archive, Puah et al. 2009; Ramli et al., n.d. and Thomson Reuters & DinarStandard, 2019). However, limited research has attempted to compare the standards globally to identify similarities and differences. It is essential to realize the unities and diversities to develop a universal *halal* standard. In this regard, the main objective of this paper is to compare the four *halal* standards mostly acknowledged globally and reveal the unities and diversities among those standards. To achieve the objective, the prime reference for this paper was the four standards from the respective organizations. Additionally, an extensive review of previous research papers, reports from different organizations, and magazine articles were carried out.

2. HALAL STANDARD GLOBALLY

Presently, several *halal* standards exist in different countries globally that include standards of Malaysia, Indonesia, Brunei, Singapore, Saudi Arabia, Kuwait, Pakistan, UAE, OIC/SMIIC Standard, and some other countries. The rest of the countries on different continents like Europe and America use these existing standards as references for *halal* certification which is done by the HCBs accredited by one or more than one internationally accrediting body for *halal* standard. The following section reviews the four most popular and globally acknowledged *halal* standards.

2.1 *Halal* Standard by SMIIC

The Standards and Metrology Institute for the Islamic Countries (SMIIC) is an intergovernmental regional standardization organization headquartered in Turkey. The *halal* standard by SMIIC is the only initiative that aims to establish a universal standardization and accreditation system in *halal* certification so that *halal* products can move freely across different countries globally based on OIC/SMIIC standards and reference documents. The organization is not a certification body, but it accredits HCBs globally. The process of conformity assessment and accreditation of *halal* is based on *Syari'ah* principles and the standards adopt both International Organization for Standardization and the International Electrotechnical Commission (ISO/IEC), and Codex standards which are consistent with international standard (SMIIC, 2013). It is the only authorized organization to develop standards on behalf of OIC. The first edition of the standards was published in 2011 with the contribution of experts from 39 OIC member states and the International Islamic Fiqh Academy (IIFA). As of today, SMIIC has published the following 10 standards on different schemes (SMIIC, 2018 & 2020):

1. OIC/SMIIC 1:2011, General Guidelines on Halal Food
2. OIC/SMIIC 2:2011, Guidelines for Bodies Providing Halal Certification
3. OIC/SMIIC 3:2011, Guidelines for the Halal Accreditation Body Accrediting Halal Certification Bodies
4. OIC/SMIIC 4:2018, Halal Cosmetics – General Requirements
5. OIC/SMIIC 9:2019, Halal Tourism Services – General Requirements
 - a) Accommodation Premises with Halal Tourism Advanced Scale Services
 - b) Accommodation Premises with Halal Tourism Medium Scale Services
 - c) Accommodation Premises with Halal Tourism Basic Scale Services
6. OIC/SMIIC 24:2020, General Requirements for Food Additives and Other Added Chemicals to Halal Food
7. OIC/SMIIC 33:2020 Conformity Assessment – Example of a Certification Scheme for Halal Products
8. OIC/SMIIC 34:2020 Conformity Assessment - General Requirements for Bodies Operating Certification of Persons Involved in the Halal Related Activities
9. OIC/SMIIC 35:2020 Conformity Assessment - General Requirements for the Competence of Laboratories Performing Halal Testing
10. OIC/SMIIC 36: 2020 Conformity Assessment - General Requirements of Proficiency Testing for Halal Purposes

The general requirements of the standard are comprised of several different aspects of *halal* compliance. For example, 1) Rules of slaughtering, 2) Food processing, 3) Machinery, utensils, and production lines, 4) Storage, display, service and transport, 5) Hygiene, sanitation, and food safety, 6) Validation and verification, 7) Identification and traceability, 8) Presentation for the market (packaging and labelling), 9) Legal requirements, and others.

The legal requirements of the SMIIC standard depend on the respective country where the *halal* certification to be implemented. Thus, the requirements may vary according to different laws, regulations, and requirements in different countries globally. Additionally, the application of the standard requires the adoption of several international standards. For example, for *halal* food and beverage standard, the normative references are as follows:

- General Standard for Prepacked Foods (CODEX STAN1)
- International code of practice for general principles of food hygiene (CODEX-CAC/RCP1)
- Code of hygienic practice for meat (CODEX-CAC/RCP58)
- ISO 22000 for food safety management systems. It is a requirement for any organization in the food chain
- ISO 22005, Traceability in the feed and food chain - General principles and basic requirements for system design and implementation
- Other standards include ISO 22002-1, ISO 22002-3
- Good Manufacturing Practice (GMP) and Good Hygiene Practice (GHP)

The standard provides clarification on terms and definitions relevant to *halal* matters. The processed foods are *halal* given the conditions are fulfilled. The conditions which are similar to Malaysian Standard are- a) the processed products shall remain safe and are free from any non-*halal* ingredients or ingredients from non-halal source, b) no cross-contamination during preparation through the tools, machinery, and equipment, no cross-contamination during packaging, storage and transportation, and c) dedicated workers for *halal* products. i.e. workers for processing non-halal products cannot enter the premise of *halal* product processing. If necessary, they must go through a proper washing procedure, and such converting cannot be repeated.

To ensure *halal* integration in the logistics department, SMIIC *halal* standard includes the requirement of segregating the *halal* products in every stage of the supply chain from the farm to the shelves of the store. Additionally, dedicated vehicles should be used for transportation with proper hygiene practice. Simultaneously, the effective traceability system is ensured by adopting ISO 22000, ISO 22005, or Codex CAC/RCP 1 throughout the production process. The application of these standards in an organization ensures that the *halal* food status is controlled and the unique identification of the product is recorded at every critical stage of the supply chain (SMIIC, 2013).

The requirements and instructions are provided regarding the packaging and labelling of a *halal* product. One of the conditions is that the packaging materials shall be free from any non-halal source, or harmful stuff. Additionally, proper labelling must disclose the name of the product, list of all ingredients, expiry date, net content (in metric system), name and address of the manufacturer, importer and/or distributor trademark, traceability code number, country of origin, instruction to use, the animal source ingredients, GMO (if any), certificate number along with the *halal* mark, nature of the product (i.e. dry, fresh, frozen, smoked, etc.), and scaled/non-scaled fish and other information.

For meat products, the packaging must be clean and hygienic and comply with ISO 22000 or Codex CAC/RCP standard. It must imply all the relevant information, whichever is applicable, as mentioned earlier. Simultaneously, the labelling should disclose information about the date of slaughter and processing, the stamp should be clear and long-lasting showing the number of veterinary health reports/certificates and corresponding information on the carcass.

2.2 Malaysia Halal Standard

The journey of Malaysia Halal Standard began in 1974 by the research centre of the Islamic Affairs Division of Malaysia. The certification including the *halal* logo was started in 1994 and the audit inspection in 1998. The Halal Development Corporation (HDC) was given all the

management responsibility of *halal* certification in 2008. However, the *halal* certification management was handed over to JAKIM through a cabinet meeting on July 8, 2009 (“*Halal* History,” n.d.). Hence, the present study interchangeably uses both the Department of Malaysia Standard and JAKIM while referring to Malaysia Standard in later sections of this paper.

The Malaysian Standard was developed by the National Industrial Standardization Committee where JAKIM played the role of chairman of the technical committee. The standard was approved by the Department of Standardization Malaysia (DSM). The *Halal* Standard of Malaysia meets the requirements of the International Standardization Organization (ISO) adopts the ISO policy. Additionally, Malaysia standard (MS) of *halal* was recognized by SMIIC in 2017 during the 12th SMIIC general assembly meeting where DSM and JAKIM had been appointed as the permanent representative for the Board of Directors (BOD) of SMIIC as well as the members of Technical Committee for the SMIIC standard (JAKIM Status with SMIIC, 2019). As of today, the following *halal* standards in different fields are available in Malaysia:

1. MS 1500:2019 Halal Food Production, Preparation, Handling, and Storage (3rd Revision)
2. MS 2200: Part-1: 2008 Islamic Consumer Goods- Part 1: Cosmetics and Personal Care
3. MS 2200: Part-2: 2008 Islamic Consumer Goods- Part 2: Usage of Animal Bone, Skin and Hair
4. MS 2424: 2012 Halal Pharmaceuticals- General Guidelines
5. MS 2400: 2010 *Halalan-Toyyiban* Assurance Pipeline- Part1: Management System Requirements for Transportations of Goods and/or Cargo Chain Services
6. MS 2400: 2010 *Halalan-Toyyiban* Assurance Pipeline- Part2: Management System Requirements for warehousing and Related Activities
7. MS 2400: 2010 *Halalan-Toyyiban* Assurance Pipeline- Part3: Management System Requirements for Retailing
8. MS 1900:2014 Syari’ah-based Quality Management System- Requirements with guidance (1st Revision)
9. MS 2300: 2009 Value-Based Management Systems- Requirements from an Islamic Perspective

The development of *halal* standards of Malaysia adopts several country laws as well which are as follows:

1. Malaysia Food Act of 1983
2. Food Regulation 1985
3. Animal Act 1953 (Reviewed 2006)
4. Standards of Malaysia Act 1996 (Act 549)
5. Trade Description Act (Revision 2011)

Additionally, Malaysian Halal Standard adopts some other regulations that include:

- a) Guidelines for Halal Assurance Management System of Malaysia Halal Certification
- b) Malaysia Protocol for the Halal Meat and Poultry Production
- c) Guidelines for Islamic Cleansing

- d) Guidelines for Control of Cosmetic Products in Malaysia
- e) Guidelines on Cosmetic Good Manufacturing Practice
- f) Pharmaceutical Inspection Cooperation Scheme (PIC/S): Guide to Good Manufacturing Practices for Medicinal Products
- g) The procedure of issuance of the Islamic slaughtering Authorization by State Islamic Religious Departments

The standard defines all the critical terms relevant to *halal* matters, e.g. *halal*, *haram*, *najs*, *halal* slaughtering, the *halal* competent authority, premise, processing area, *sertu*, *Syari'ah* law, *fatwa*, etc. The standard is mainly based on the *Syari'ah* law of *Shafie Madhhab* (school of thought). However, laws from any other *Madhhabs* like *Hanafi*, *Maliki*, and *Hanbali* are allowed only if the law is approved by his majesty the king in the federal territory, or force by the ruler of a state.

The general requirements of the standard are outlined under eight main aspects of *halal* compliance. The general requirements of the standard are outlined under eight main aspects of *halal* compliance. These are, 1) management responsibility, 2) premises and facilities, 3) devices, utensils, machines, processing aids and equipment, 4) hygiene, sanitation and food safety, 5) processing of *halal* products, 6) storage, transportation, display, sale, and serving *halal* food, 7) packaging and labeling, and 8) legal requirements.

The legal requirements include registration with the Companies Commission Malaysia (SSM), a legal business license from the local authority, compliance with Good Manufacturing Practices (GMP) or Good Hygienic Practices (GHP), and legal acts relevant to respective products and services, (Department of Standards Malaysia, 2019; JAKIM, 2015).

The requirements under management responsibility are to establish an internal *halal* committee with one *halal* executive/supervisor and minimum of one/two Muslim workers depending on the size of the business. The premise should provide a separate praying area for men and women. Additionally, the layout of the premise should ensure smooth process flow, GHP, smooth loading and unloading, effective segregation and insulation from pig farm or its processing activities, pets, and other animals, and adequate sanitary facilities. The slaughtering and processing premise should be dedicated only to *halal* animals and products.

Devices, utensils, machines, processing aids, and equipment must be maintained clean, free from any contamination with *najs*, or perform *sertu* (Islamic cleansing) in case of contamination. The standard also restricts the use of appliances or brushes from animal hair. Additionally, clean and appropriate attire is a requirement for the workers in the processing area of the premise, (Department of Standards Malaysia, 2019; JAKIM, 2015).

Hygiene, sanitation, and food safety have been emphasized by adopting GMP, GHP, and veterinary hygiene practices (VHP). Malaysia Standard provides specific conditions to ensure *halal* sources in the process of any product. The animals are divided into two categories as land animals and aquatic animals. The prohibited animals are pigs and dogs as well as their descendants and derivatives; long pointed teeth animals like tiger, bear, elephant, cats, etc.; predatory birds; pets and/or poisonous animals; repulsive creatures; farmed *halal* animals (both land and aquatic) that are intentionally and continuously fed with *najs*. Simultaneously, amphibians and aquatic animals that are poisonous, intoxicating, or hazardous to health are prohibited. However, the hazardous aquatic animals are allowed only if the toxin or poison can be removed during the processing. Similarly, all plants, microorganisms, minerals and chemicals, and beverages are allowed except that are poisonous, intoxicating, and hazardous to health.

Malaysian standard provides detailed criteria and requirements on the permissibility of alcohol use. The use of alcohol is permissible only if the alcohol is not derived from the liquor production process. Simultaneously, for soft drinks, the alcohol percentage shall not be more than 1%, and not more than 0.5% for the food and beverages that contain colouring agents and need stabilization, (Ahmad et al., 2004).

The *halal* integration in logistics must be ensured. i.e. to prevent cross-contamination, labelling *halal*, and hygiene, safety, and sanitation maintenance for all products that are stored, transported, displayed, sold, and served. Additionally, the packaging material shall not be derived from a non-halal source. A proper label shall not mislead consumers to anything that is not *Syari'ah* compliant with the sign, symbol, logo, picture, or content. The label shall also disclose the list of all ingredients, product name, production, and expiry date, batch no., and name and address of the manufacturer, importer and/or distributor and trademark, (Department of Standards Malaysia, 2019; JAKIM, 2015).

2.3 *Halal* Standard of Indonesia

The *halal* standard and certification are governed and managed by the Assessment Institute for Foods, Drugs, and Cosmetics (LPPOM) of the Indonesian Council of Ulama (MUI). The journey of establishing a *halal* standard by LPPOM-MUI started in 1989 and it was recognized in 1996 by the signing of a memorandum of understanding between the Ministry of Religion, the Ministry of Health, and MUI (Hudaefi & Jaswir, 2019). As of today, MUI has issued 11 regulations of *halal* standards. The *halal* standard by MUI is called HAS-23000 which is applicable for business owners, manufacturers, as well as producers. The standard is comprised of two parts where the first part (HAS 23000-1) is for the criteria and general guidelines of Halal Assurance System (HAS), and the second part (HAS 23000-2) is for policies and procedures of *halal* certification.

LPPOM-MUI Halal Standard is established under the Halal Assurance Act (JPH) no. 33 of 2014, (Limenta et al., 2018). Similar to Malaysia, MUI also adopts a number of laws and country acts to make the implementation of *halal* standards effective. Some of these acts include Livestock and Animal Health Act No. 6 of 1967, Health Act No. 23 of 1992, Food Act No. 7 of 1996, No. 18 of 2012, Consumer Protection Act No. 8 of 1999, and Food Act No. 18 of 2012, (Hudaefi & Jaswir, 2019). The MUI *halal* standard is comprised of 68 articles under 11 different components of *halal* against the JPH Act 33/2014.

Every company must establish a *halal* management team led by a Muslim internal *halal* auditor (IHA) coordinator who is responsible to communicate with LPPOM-MUI. The other representatives of the management are from Research and Development (R&D), quality assurance/quality control (QA/QC), purchasing, and storage/warehouse. MUI standard is flexible for the company that has no Muslim personnel to appoint as IHU coordinator. Such a company can appoint one staff who knows Islamic Law based on LPPOM guidance (Indonesian Council Of Ulama, 2008). Additionally, the responsibility of the management team is to record and document each *halal* implementation activity like any corrective measure, review meeting, production and purchase record, cleaning and clearance record, QA/QC documents, etc.

The premise of *halal* product processing must be dedicated to only *halal* products. Any facility that was used for non-halal product processing should be gone through the *sertu* process before starting to use the facility for *halal* products, (Indonesian Council Of Ulama, 2008). The

facility should also be cleaned, free from contamination, and comply with GMP, and GHP, (Latif et al., 2014).

The slaughterman must be a Muslim who should slaughter the *halal* animal in the name of Allah by cutting the trachea, oesophagus, and both carotid arteries and jugular veins. The skinning can be started only after the death of the animal is ensured. Additionally, the knife must be sharp, and all the tools and equipment must be dedicated to processing only *halal* animals and stored safely (MUI, 2020).

The packaging material must not be from a non-halal source. The label must be long-lasting, well printed that display the *halal* logo, and both production and expiry date with batch no. A list of all ingredients is not a mandatory requirement, (Indonesian Council Of Ulama, 2008; Latif et al., 2014; MUI, 2020). Additionally, the standard confirms *halal* integration in the transportation and distribution system by confirming the cleansing and hygiene of tools, equipment, and vehicles, and preventing any cross-contamination.

The *fatwa* issued by MUI on November 18, 2009, prohibits the use of alcohol produced from the *khamar* industry and allows the use of alcohol produced from the chemical synthesis process, (Hudaefi & Jaswir, 2019). The MUI *fatwa* defines *khamar* as an intoxicating alcoholic drink, contains a minimum of 1% ethanol, and was produced through the same fermentation process of liquor. Vinegar is *halal* considering the *istihalah* (both physical and chemical transformation). Simultaneously, Yeast, which is separated from *khamar*, is *halal* only if the removal of taste, smell, and colour of *khamar* is ensured, (Indonesian Council Of Ulama, 2008). Similarly, Microbes are *halal* only if it is grown on *halal* media. The source of microbes of any consumer products (if it contains) must be traced back before certification.

2.4 *Halal* Standard of Singapore

In Singapore, the *halal* standard and certification services are provided by the Majlis Ugama Islam Singapura (MUIS), also known as the Islamic Religious Council of Singapore. MUIS is also under the purview of the Ministry of Culture, Community, and Youth and under the direct supervision of the Minister-In-Charge of Muslim affairs. The *halal* service by MUIS started in 1973 which was five years after its establishment under the Administration of Muslim Law Act (AMLA). However, it has been around 20 years since MUIS has started *halal* certification in Singapore which is not compulsory but voluntary, (Ira Sugita, 2017), although the *halal* standard was developed and became effective in 2017 (MUIS, 2017).

The MUIS standard follows the general principles of *Shafie Madhhab*. The standard is comprised of two parts namely i) General Guidelines for the Handling & Processing of Halal Food (MUIS-HC-S001), and ii) General Guidelines for the Development & Implementation of a Halal Quality Management System (MUIS-HC-S002). Additionally, the standard covers eight different schemes to provide *halal* certifications which are Eating Establishment (EE) scheme, Endorsement scheme, Food Preparation Area (FPA) scheme, Poultry Abattoir (PA) scheme, Product & Whole Plant scheme, Storage Facility (SF) scheme, and Whole Plant (WP) scheme. As of 2018, 4,630 premises and 53,060 products made in Singapore received a *halal* certificate from MUIS. As an HCB, MUIS has also been awarded ISO 17065, (MUIS, 2018).

According to the guidelines provided by MUIS, the applicant must have a local business license and each subsidiary or branch or premise in a new location of the company should have a separate *halal* certification. However, Muslim ownership is not a mandatory requirement given

that the owner has a proper understanding and knowledge about the guiding principles and requirements, (MUIS, 2017).

To certify a premise, MUIS puts high importance on hygiene maintenance and the management quality is benchmarked against international standards like ISO and Hazard analysis and critical control points (HACCP). A floor plan of the premise must be provided to the certification body and a similar copy shall be kept in the premise for audit purposes. Transportation of any items in the premise must be physically segregated from non-halal or doubtful items. Staff ID has to be displayed before entering the premises. In case of any change (size, layout, ownership, etc.), MUIS has to be informed at least 30 working days before the change. External parties (i.e. other than the certificate holder) should obtain written approval to use the premise. Finally, the *halal* certificate shall be displayed only within the premise, (MUIS, 2011, 2005b).

3. GLOBAL *HALAL* STANDARD: UNITIES AND DIVERSITIES

A comparative analysis was carried out by Latif et al. (2014) to see the differences between nine different certification bodies from seven different countries globally. The study investigated 44 items under nine different categories of certification requirements. The nine HCBs included JAKIM, MUIS, MUI, Islamic Food and Nutrition Council America (IFANCA), and others. IFANCA is an HCB in America accredited by Gulf Corporation Council (GCC) which is one of the representative organizations of SMIIC. It revealed JAKIM as the most rigid standard to provide *halal* certification covering 80% of all the critical requirements. The second (2nd) position was found to be occupied by MUIS with 70% coverage followed by MUI at fourth (4th) for 48%, and IFANCA at 7th position for 36% coverage score. The following section identifies the commonalities from different aspects of the *halal* standard.

3.1 Commonalities

1. Slaughtering: One of the critical issues in the *halal* industry is the slaughtering process. The similarities and differences are also observed among different standards in his matter. All the standards provide an explanation of the organs to be cut and the location of running the knife during slaughtering. All four standards are on the same page regarding the following requirements of the slaughtering process:

- The slaughterer must be Muslim and mature
 - Complete blood flow and death of the animal must be ensured before starting skinning
 - Slaughtering must be done in the name of Allah, i.e. pronouncing Bismillah
- (Latif et al. 2014; MUI, 2020; MUIS, 2017; JAKIM, 2015, Department of Standards Malaysia, 2019)

2. Consumption of aquatic animals: The ruling on the consumption of aquatic animals is the same for all standards. Simultaneously, all four standards agree on the prohibition of amphibians.

3. Genetically Modified Food (GMF): It is defined as any food and drink or ingredient containing product or by-product of Genetically Modified Organism (GMO). All standard prohibits the use of genetic material from a non-halal source. The non-halal genetic material will make the GMF non-halal as well (SMIIC, 2013; STANDARD, 2019). Simultaneously, all types of micro-organisms like yeast, fungi, bacteria are *halal* except those that are poisonous and harmful.

4. Certification requirement: Additionally, the similarities among the *halal* standards can be observed by examining the certification requirements imposed by the respective standard. Table 1 provides a list of thirteen commonalities against eight different components of *halal* certification requirements. All the four *halal* standards agree with these thirteen items as mandatory requirements for any product or service to be certified as *halal*.

Table 1: Commonalities among the standards against different certification requirements.

No.	Components of <i>halal</i> certification	Common requirements of certification for all four standards
1.	Business Profile	i. A local legal business license
2.	Premises	ii. Hygiene maintenance iii. Only <i>halal</i> food and beverage to be served
3.	Worker	iv. Certified Muslim slaughterer
4.	Equipment	v. Facilities and equipment are free from contamination
5.	Raw materials	vi. Only <i>halal</i> ingredients and ensure a <i>halal</i> source of all ingredients vii. Avoid critical ingredients like GMO
6.	Packaging and labelling	viii. Displaying <i>halal</i> logo ix. Production date and/or batch no. and expiry date x. Packaging material is free from non-halal and harmful materials
7.	Logistic	xi. No cross-contamination during handling, storage, transportation, and manufacturing xii. All suppliers are <i>halal</i> certified
8.	Management and documentation	xiii. Standard Operating Procedure (SOP) for investigating any complaint

Source: Latif et al. (2014); MUI (2020); MUIS (2017); JAKIM (2015); Department of Standards Malaysia (2019); Indonesian Council of Ulama (2008).

3.1.1 Factors of commonalities

There are several factors that are responsible for creating a common ground of all *halal* standards globally. Additionally, the similarities among the standards can be observed because of these factors. Some of these factors are listed below:

1. **Faith:** All four standards are developed from the same faith-based needs, i.e. Islam. Consumers around the world see the multiple and diversified *halal* standard as the same monolithic Islamic world, (Barbara, 2018).
2. **The primary source of Islamic law:** Islamic law, i.e. *Syari'ah*, is the ruling of all conducts related to every aspect of Muslim life. The primary source of *Syari'ah* the Al-Quran and Al-Hadith to declare anything as *halal* (permissible) or *haram* (prohibited) in Islam. All the *halal* standards are developed from the same primary source.
3. **Target consumers:** All the *halal* standards of the global *halal* industry target Muslim consumers around the world. According to the Global Islamic Economy (GIE) Report by Thomson Reuters and DinarStandard (2019), the current Muslim population is 1.9 billion. On the other hand, according to the website <http://www.muslimpopulation.com/>, as of 2018 the size of the global Muslim population is 2.2 billion which is 29.04% of the world's population. However, the concept of *Toyyib* (meaning good) which is associated with *halal* has made it a lifestyle choice for all consumers irrespective of religion. *Halal* is becoming a new benchmark in safety and quality assurance with the recognition of consumers from all faith globally, (Johan, 2018).

3.2 Diversities

While there are many similarities among the standards from different aspects of *halal*, a significant number of diversities can be observed within the *halal* standards, at the same time, from the same aspects of *halal*. After reviewing the four standards, the following differences were identified:

1. **Slaughtering:** The four *halal* standards are not on the same page regarding the following requirements of slaughtering procedure:
 - The *halal* standard of MS, MUI, and SMIIC agree that the trachea, oesophagus, and both carotid arteries and jugular veins should be cut during slaughtering. However, MUIS *halal* standard puts the cutting of the trachea (windpipe), and oesophagus (gullet) as a mandatory requirement during slaughtering and does not consider the cutting of carotid arteries and jugular veins as a must requirement.
 - Although all four standards allow stunning before slaughtering, only SMIIC and Malaysia *halal* standards provide detailed parameters for the stunning procedure. A detailed parameter of the stunning method was not found in the case of both MUIS and MUI *halal* standards.
 - All four standards agree that the slaughtering shall be done once only and quickly. However, only Malaysia's *halal* standard states that the 'sawing action' is allowed without any lifting of the knife during the slaughter.

Source: Latif et al. (2014); MUI (2020); MUIS, (2017); JAKIM (2015); Department of Standards Malaysia (2019)

2. **Different ruling on alcohol consumption:** Both Malaysia and Singapore standard accepts only the natural process of *istihalah* (substance transformation) to consume alcohol, i.e. both JAKIM and MUIS allow the use of alcohol at certain quantity as long as it is derived from a non-liquor production process. On the contrary, MUI accepts both natural and unnatural processes of transformation and prohibits alcohol from the *Khamar* industry, (*Halal*, n.d.; Man & Pauzi, 2017; MUI, 2020). MUI also specifies the percentage of ethanol presence which is 1% for both naturally and industrially formed ethanol. However, for industrial ethanol, it must be 0.05% in the final product, (Pauzi et al., 2019). In this regard, SMIIC has a similar opinion as other standards although it does not provide any specific percentage of ethanol present in the final products, (Ghanavi, 2018).
3. **Different ruling on land animals:** All the standards are unanimous in major parts of the ruling on both land and aquatic animals. However, SMIIC, MUIS, and MUI declare locusts and grasshoppers as *halal* to consume, (MUIS, 2005; Bugsolutely, n.d.). JAKIM, on the other hand, prohibits any pests, flies, and lice as they are repulsive, (Department of Standards Malaysia, 2019; NATION, 2013).
4. **Diversities in certification requirements:** The differences among the *halal* standards can also be observed by examining the certification requirements set by the respective standard. Table 2 provides a list of diversities against different components of *halal* certification requirements. The diversities were more than the commonalities against different components of *halal* certification requirements. 21 different rulings have been identified under seven components of *halal* certification where at least one of the four *halal* standards have a different ruling on each of the 21 items. For example, only MS of *halal* by the Department of Malaysia Standard, which is managed by JAKIM*, considers the following items as mandatory requirements under different components of *halal* certification. Whereas the other *halal* standards do not consider these requirements as compulsory for *halal* certification.
 - Special factory attire and clean clothing for workers in the premise
 - For the workers smoking, drinking, and food stores are prohibited in the production area
 - There should be an assigned area for the staffs
 - Good health of staffs must be ensured
 - For branding, the word '*halal*' cannot be used with the product name
 - For labelling, the sign, symbol, design, picture, or logo should not be misleading and must be *Syari'ah* compliant.
 - For the management, there must be an internal *halal* committee with at least one Muslim *halal* executive.

On the other hand, MUI alone does not consider staff training on roles and responsibilities, and the disclosure of a list of all ingredients as a mandatory requirement. Similarly, SMIIC gives flexibility in *halal* certification for avoiding high-risk ingredients,

random testing of raw materials by an approved laboratory, clear, prominent, and long-lasting printing, and *halal* file as non-mandatory requirements. Interestingly, MUIS always follows at least one or more than one of the three standards to consider any item as mandatory or not mandatory except the requirement of GMP and GHP which is compulsory for all three standards (Table 2). Another interesting observation is, for a number of criteria MUIS pairs with JAKIM to oppose both MUI and SMIIC together.

Table 2: Diversities among the standards against different certification requirements.

Requirements under different components of <i>halal</i> certification		Consider as a mandatory requirement	Do not consider as a mandatory requirement
A. Business Profile			
1.	Each subsidiary or branch would require separate certification	JAKIM, MUIS	MUI, SMIIC
B. Premises			
2.	Two Muslim workers	JAKIM, MUIS	MUI, SMIIC
3.	GMP and GHP	JAKIM, MUI, SMIIC	MUIS
4.	Special factory attire and clean clothing	JAKIM	MUIS, MUI, SMIIC
C. Worker			
5.	Staff training on roles and responsibilities	JAKIM, MUIS, SMIIC	MUI
6.	Good personal hygiene	JAKIM, SMIIC	MUIS, MUI
7.	Smoking, drinking, and food stores are prohibited in the production area	JAKIM	MUIS, MUI, SMIIC
8.	Only assigned area of staffs	JAKIM	MUIS, MUI, SMIIC
9.	Good health of staffs	JAKIM	MUIS, MUI, SMIIC
D. Equipment			
10.	Safekeeping of tools and equipment	JAKIM, MUIS	MUI, SMIIC
E. Raw materials			
11.	Avoid high-risk ingredients	JAKIM, MUIS, MUI	SMIIC
12.	Random testing of raw materials by an approved laboratory	JAKIM, MUIS, MUI	SMIIC
F. Packaging and Labelling			
13.	Disclose list of all ingredients	JAKIM, MUIS, SMIIC	MUI
14.	Clear, prominent, and long-lasting printing	JAKIM, MUIS, MUI	SMIIC
15.	Mention name of the manufacturer, and country of origin as a trademark	JAKIM, MUIS	SMIIC, MUI
16.	A complete prohibition on the use of the word ' <i>halal</i> ' with the product name	JAKIM	MUIS, MUI, SMIIC
17.	No use of misleading and non-	JAKIM	MUIS, MUI, SMIIC

Requirements under different components of <i>halal</i> certification	Consider as a mandatory requirement	Do not consider as a mandatory requirement
syari'ah compliant sign, symbol, design, picture, or logo.		
G. Management and documentation		
18. <i>Halal</i> file	JAKIM, MUIS, MUI	SMIIC
19. An internal <i>halal</i> committee with at least one Muslim <i>halal</i> executive	JAKIM	MUIS, MUI, SMIIC
20. Inspection to all <i>halal</i> certified store including the suppliers of raw materials	JAKIM, MUIS	MUI, SMIIC
21. Consistency in the listed items as mentioned in the application form	JAKIM, MUIS	MUI, SMIIC

Source: Latif et al. (2014); MUI (2020); MUIS (2017); JAKIM (2015); Department of Standards Malaysia (2019); Indonesian Council Of Ulama (2008).

*Note: In the table, JAKIM refers to MS of *halal* by the Department of Malaysia Standard, which is managed by the Department of Islamic Development Malaysia (JAKIM).

3.2.1 Factors of diversities

While several factors are responsible for the commonalities of all four *halal* standards, the following factors are responsible for the diversities within these standards globally.

- 1. Different cultures:** Religion is a key factor of a culture (e.g. Islamic culture) that identifies people's behaviour, social conducts and practices, the demand for a particular dietary consumption, lifestyle, and others, (Beyers, 2017). Additionally, the demand for such cultural practices leads to the establishment of a religious body, (e.g. JAKIM, MUIS, MUI, etc.). Therefore, the different religions that create cultural differences also create diversity among the *halal* standards because of a few reasons. Firstly, SMICC *halal* standard involves contributions from multiple OIC member states and the headquarter is in Turkey. The standard highly considers being recognized in the European Union (EU) countries. Europe, as a secular continent, is not familiar with religious bodies like JAKIM, MUIS, and MUI, (Barbara, 2018). Islam remains largely a foreign phenomenon in such a secular continent. This makes several requirements or practices of *halal* standard foreign as well for European citizens. For example, matters related to stunning, restraining, facing *Kibla* direction, pronouncing *bismillah* during every slaughtering, etc. Moreover, the lack of an official religious body of Europe, and the reluctance of the EU to include all the religious matter in its regulatory or legal documents have created a significant gap in institutional relationships and dialogue with OIC-SMIIC and other regulatory bodies, (Barbara, 2018). Additionally, the cultural differences become an obstacle for *halal* standards in Europe because of the established rules of Kosher certification which are also popular in Europe,

(Gazizov, 2018). Kosher certification is the result of the demand of Jewish dietary law which is a major part of the Jewish culture under the religion of Judaism.

2. **Different *halal* policy:** In terms of implementing the *halal* standards, different policies can be observed under different standards in respective states. Standards can be either voluntary or compulsory based on the *halal* policy of different countries. For example, in Malaysia and Singapore *halal* standard is still voluntary. On the other hand, in Indonesia it is compulsory. It is also compulsory in Kyrgyzstan for meat consumption.

All the *halal* standards, (JAKIM, MUIS, MUI, SMIIC) are national or federal standards that are published by the National Standards Body of the respective countries. However, in other countries, that do not have their own *halal* standard, these standards are used as a reference standard. Different countries adopt different standards (one or more) as a reference.

Additionally, different policies are adopted to implement the *halal* standards. Malaysia, for example, establishes *halal* hubs in multiple states across the country. The Department of Standard Malaysia (DSM) which was established under the Standards of Malaysia Act 1996 (Act 549) is the National Standards Body (NSB) and National Accreditation Body (NAB) of Malaysia. However, JAKIM has the sole authority of *halal* certification. Similarly, in Singapore, *halal* certification is managed by MUIS with the Administration of Muslim Law Act (AMLA) 1968. Likewise, in Indonesia, the responsibility of implementing *halal* standards and certification is shouldered on Lembaga Pengkajian Pangan, Obat-obatan dan Makanan (LPPOM), which is under the control of MUI, (Man & Pauzi, 2017). However, SMIIC invites organizations from any country across the world to become its partner organization with the aim of implementing its *halal* standard and reduce work overlaps. At present, it has 11 member organizations that accredit HCBs in different countries globally. For example, The Gulf Accreditation Centre (GCC) approved by the Governments of the Gulf Cooperation Council (GCC) is one of the 11 member organizations of SMIIC. It has accredited 46 HCBs in 21 different countries and continents globally (http://www.gac.org.sa/en/approved_provider/).

3. **Different schools of thought (*madhhabs*):** There are eight different school of thought (*Madhhab*) recognized by the International Islamic Fiqh Academy (IIFA) of the Organization of Islamic Cooperation (OIC) which are available to Muslims around the globe as reference documents. These are *Hanafi*, *Maliki*, *Shafie*, *Hanbali*, *Ithnaashary*, *Zaidy*, *Ibady*, and *Zahiry madhhabs*. SMIIC adopts all eight *madhhabs* in its *halal* standards, (SMIIC, 2018). Whereas, both JAKIM and MUIS standards are based on *Shafie madhhab* only. On the other hand, the MUI standard considers *Hanafi*, *Maliki*, *Shafie*, and *Hanbali madhhabs*, (Man & Pauzi, 2017). Such differences in the adoption of different *madhhabs* are reflected in the rulings of certification requirements by all four standards, where in many cases, JAKIM and MUIS are on one side, and MUI and SMIIC are on the other side (Table 2).

Additionally, Islam is an official religion for JAKIM in Malaysia. On the contrary, for MUIS and MUI Islam is not an official religion in their respective countries. Simultaneously, some of the member states of SMIIC have multiple official religion.

4. **Different country laws and regulations:** Every country has its own laws and regulations (i.e. trade act, export, and import regulations, etc.) which differ in certain aspects from the laws and regulations of other countries. For example, the number of laws, national and international acts, regulations, and standards adopted by the *halal* standard of Malaysia is much more as compared to MUIS and LPPOM-MUI *halal* standards. Simultaneously, SMIIC as an organization comprised of multiple OIC member nations, emphasizes more to comply with international regulations like ISO/IEC, codex standard, and others.
5. **Different public interest (*maslaha*):** *Halal* standards are diversified due to the consideration of public interest. The conditions become flexible when it comes to *dharuriyat* which is the basic level of human need in *Maqasid Al-Syari'ah*. In this regard, JAKIM permits the use of vaccines from or containing non-halal derivatives (e.g. Meningococcal vaccination derives from pig derivatives) in case of *dharuriyat* situation (i.e. life and death situation). On the other hand, MUI prohibits the use of such vaccines completely due to the *haram* source. It is to mention that Indonesia has already formulated *halal* vaccines for meningitis.
6. **Different Logo:** The logo design is another difference that can be observed easily. However, one common aspect is the use of the word '*halal*' both in Arabic and English by all standards except SMIIC (Figure 3). SMIIC does not have any specifically designed logo for *halal* certification. It uses the institute's logo together with the OIC log for the accreditation of HCBs.

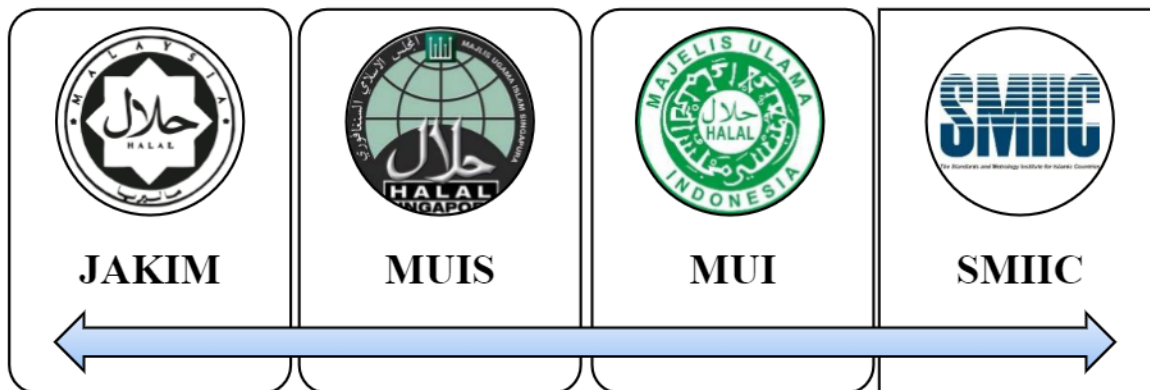


Fig. 3: Logos of different *halal* standards.

Source: Author's generated

4. CONCLUSION

This study investigates and compares the top four *halal* standards recognized and accepted globally. The Malaysia *halal* standard was found to be very comprehensive and securing the number one position in terms of the number of accrediting HCBs and acknowledging countries globally. In this regard, MUIS is in the second position competing with MUI standard in third and SMIIC in the fourth position. However, comparing to the age of the standard, SMIIC, (developed the standard in 2011) has shown impressive performance to certify HCBs and being recognized by different countries globally. Out of the three countries, only Malaysia has been recognized as one of the BOD and TC members of SMIIC. The Malaysian standard was found to be the strictest *halal* standard providing detailed conditions and requirements based on mainly *Shafie Madhhab* which is in line with the findings of Latif et al. (2014). On the contrary, the SMIIC standard seems to be the most flexible one as it considers all the eight *Madhhab* of Islam.

All the standards have so many aspects in common as all of them are originated from the same faith-based need, the same primary source of Islamic ruling, and targeting the same consumer segment globally, i.e. the global Muslim population. Simultaneously, a number of factors have created numerous diversities within these standards in certain aspects of rulings and implementation practices. Some of these factors include different culture, *halal* policy, country laws and regulations, schools of thought (*madhhab*), and public interest (*maslaha*). Most of the *fiqh* related differences are because of following one or two *madhhabs*, specifically. SMIIC has developed its *halal* standard with the objective of harmonizing all the existing standards globally by considering all eight *madhhabs* of Islam.

Islam, as a religion (i.e. the way of life), is bestowed to not just the Muslim community but all humanity. Hence, *halal* as a lifestyle should be presented in a way so that it becomes easy to be adopted and can reach every corner of the world. As in the Quran, it is mentioned- "*Allah intends for you ease, and does not want to make things difficult for you*" [2:185]; and "*Allah does not want to place you in difficulty*" [5:6]. Some other verses of the Quran and a number of Hadiths imply Islam as a simple and easy religion and recommend Muslims to practice and present it in the same manner so that it does not become difficult for others to accept and follow. Therefore, it is the duty and responsibility of the Muslim scholars, governments, and policymakers of the countries, that have developed a *halal* standard, to come in common terms within their standards, eradicate the differences, and deliver one single *halal* standard to the whole world.

Future studies should carry out an in-depth investigation to look into the influential role of different factors, that have been identified in this present study, on the similarities and differences of *halal* standards in different countries. For example, besides religion, what are the other components of a culture that influence the *halal* policies, regulations, and standards in respective countries, especially the non-Muslim majority countries. Additionally, future studies should investigate, and identify the potential factors of Kosher certification that have enabled the Kosher products to be adopted significantly among the consumers in Europe and the United States of America. Such research may identify and reveal the factors of Kosher certification that are *Syari'ah* compliant and can be adopted in the development of *halal* policy and standard in respective countries in Europe and the US.

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