

Harmonizing Sharia-Based Halal Standards with International Trade Law: A Comparative Legal Study

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Article Info	Abstract
<p>Keywords: Halal certification; International trade law; Sharia law; WTO.</p> <p>DOI: 10.25041/lajil.v7i1.4468</p>	<p><i>The globalization of trade has elevated Islamic halal standards within the domain of international economic law. While halal certification is rooted in Sharia, World Trade Organization (WTO) law is governed by secular principles, including non-discrimination, Most-Favored Nation (MFN) treatment, and national treatment. This article conducts a comparative legal analysis of the potential tensions and compatibilities between these normative systems. Drawing on doctrinal and comparative methods, it examines how halal regulations in Muslim-majority and non-Muslim countries interact with WTO rules, particularly the SPS Agreement, TBT Agreement, and GATT 1994. The study argues that halal requirements, while potentially constituting non-tariff barriers, can be justified under WTO exceptions when aligned with legitimate objectives such as public morals and consumer protection. It also highlights the risk of discriminatory treatment when certification is applied selectively or instrumentally. The paper concludes with normative recommendations to reconcile Sharia-based halal frameworks with global trade norms, emphasizing mutual recognition, standard harmonization, and dialogue between religious and secular legal systems.</i></p>

A. Introduction

In recent decades, the global halal economy has highlighted the role of religious norms in shaping international trade. Halal, an Arabic term meaning "permissible" under Islamic law (Sharia), has expanded from a theological concept into a regulatory framework with legal, economic, and geopolitical significance. With the global Muslim population approaching two billion, demand for halal-certified goods and services has surged across sectors including food, pharmaceuticals, cosmetics, logistics, and finance¹. This growth has raised questions about how

¹ D. Yuanitasari et al., "Digitalization of Halal Certification for Smes: Between Hope and Reality," *Jurnal Bina Mulia Hukum* 9, no. 2 (2025): 179–196.

halal standards align with World Trade Organization (WTO)² rules, where principles such as non-discrimination, Most-Favored Nation treatment, and national treatment are fundamental.

The intersection of religious norms and secular trade law presents both opportunities and tensions. Halal certification can promote consumer protection, ethical consumption, and cultural expression, yet it may also act as a non-tariff barrier, potentially conflicting with WTO obligations by favoring certain products or countries. As more nations, including non-Muslim majority states, adopt or recognize halal certification schemes, reconciling these systems with multilateral trade rules becomes increasingly important.

This article examines whether and how Sharia-based halal principles can be harmonized with international trade law, particularly the WTO framework. While prior scholarship has focused on halal in the context of Islamic law, food security, or consumer ethics, few studies address the legal tensions and compatibilities between halal norms and global trade obligations. This study fills that gap by analyzing how halal certification regimes are regulated, recognized, or challenged under WTO law, with emphasis on the Technical Barriers to Trade Agreement (TBT), the Sanitary and Phytosanitary Agreement (SPS), and the General Agreement on Tariffs and Trade 1994 (GATT).

Controversies arise when countries impose halal certification requirements on imports, raising concerns about discrimination, protectionism, and respect for religious diversity. Exporters from Muslim-majority countries seek greater recognition of halal standards, advocating mutual recognition and harmonization to ensure fairness and market access. The legal challenge is to balance the objectives of halal certification, including consumer information, religious freedom, and public morals, with core international trade commitments. This article argues that the WTO framework can accommodate halal principles if measures are non-discriminatory, scientifically justified when relevant, and transparent.

The article proceeds in five parts. Part II provides a conceptual overview of halal in Islamic jurisprudence and its contemporary regulatory forms. Part III examines WTO principles relevant to halal certification, focusing on non-discrimination, the TBT and SPS Agreements, and dispute settlement cases. Part IV compares how selected countries, both Muslim-majority and non-Muslim-majority, regulate halal and synthesizes findings to propose legal and policy recommendations for reconciling Sharia-based halal principles with trade obligations.³

This discussion is not merely theoretical. As trade relations become more pluralistic, legal systems must integrate normative frameworks outside the secular, Western tradition. The rise of the halal economy represents both a market phenomenon⁴ and an assertion of Islamic values in the global legal space. This article offers a framework to navigate the intersection of Sharia and trade law in a way that respects religious pluralism while maintaining predictability in the international economic order.

This research is particularly significant for Indonesia, the world's second-largest Muslim-majority country, which faced international scrutiny in the WTO dispute *Indonesia Measures Concerning the Importation of Chicken Meat and Chicken Products (DS484)*. The study's findings can inform the refinement of Indonesia's halal certification regime to ensure compliance with WTO principles of non-discrimination, transparency, and necessity. Aligning Sharia-based halal governance with international trade obligations will strengthen Indonesia's credibility in the global halal market while safeguarding regulatory autonomy to uphold public morals and consumer protection within a legally defensible framework.

² Daffa Brillliandana Pratama, "The Analysis of World Trade Organization Panel Decision of Indonesia Measures Relating to Raw Materials," *JUSTICES: Journal of Law* 3, no. 3 (2024): 215–37, <https://doi.org/10.58355/justices.v3i3.121>.

³ E. Lieblich, "How to Do Research in International Law? A Basic Guide for Beginners," *Harvard International Law Journal* 62 (2021), <https://doi.org/10.2139/ssrn.37047>.

⁴ P.B. Putera and T.M. Rakhel, "Halal Research Streams: A Systematic and Bibliometrics Review," *Cogent Social Sciences* 9, no. 1 (2023): 2225334, <https://doi.org/10.1080/23311886.2023.2225334>.

The central research question is how Sharia-based halal principles can be reconciled with the normative frameworks of international trade law, particularly under the WTO. This study goes beyond describing national halal regulations to explore how harmonization of halal standards and trade law compliance can coexist without compromising religious authenticity or legal obligations.

The study offers a novel perspective by examining Sharia-based halal principles through the WTO legal framework, focusing on potential harmonies and tensions with non-discrimination, Most-Favored Nation, and national treatment principles. Unlike previous research that addresses halal certification from a purely national legal or *fiqh* perspective, this study situates halal standards within international trade law using a comparative approach, contributing new insights to both academic discourse and global policy development.

The non-doctrinal approach used in this research combined comparative legal analysis with international policy review. Data sources include international legal instruments, WTO documents, halal certification policies across jurisdictions, and recent academic literature. This approach allows for a contextual and practical examination of the relationship between Sharia-based halal principles and WTO rules.⁵ The comparative method focuses on the application of halal standards in selected countries, aiming to identify areas of convergence and potential normative conflicts with international trade law

B. Discussion

1. Overview of Halal in Islamic Jurisprudence and Contemporary Regulatory Practice

Halal occupies a central role in Islamic jurisprudence⁶, functioning as a comprehensive ethical-legal framework rather than a simple classification of permissible and impermissible acts. Derived from the Arabic root *ḥalal*, meaning lawful or permitted, halal encompasses all actions, objects, and practices allowed under Sharia. Its opposite, haram, denotes what is prohibited, while intermediate categories such as *makruh* (discouraged), *mubah* (neutral), and *mustahabb* (recommended) provide a nuanced moral-legal landscape for conduct.

In classical Islamic law, determining what is halal involves structured legal reasoning grounded in primary and secondary sources⁷. The Qur'an provides explicit injunctions, particularly regarding dietary law, financial transactions, and acts of worship. The Sunnah, recorded in Hadith literature, clarifies these directives. Jurists also employ *ijma* (consensus), *qiyas* (analogy), and other tools such as *istihsan* (juristic preference) and *maslahah mursalah* (consideration of public interest) to address matters not explicitly covered in the texts.⁸

Dietary law is the most widely recognized manifestation of halal. The Qur'an prohibits consumption of pork, carrion, blood, and animals slaughtered in the name of any deity other than God. Islamic law prescribes the method of slaughter (*dhabihah*) to ensure ritual purity, humane treatment, and hygienic handling. This requires invoking God's name at slaughter, swiftly severing the throat, windpipe, and blood vessels, and fully draining the blood. Interpretations vary among schools of jurisprudence on issues such as stunning before slaughter or acceptance of meat from People of the Book (Ahl al-Kitab).

Halal principles extend well beyond food. In finance, they prohibit *riba* (interest), *gharar* (excessive uncertainty), and transactions involving haram goods or services. In pharmaceuticals and cosmetics, prohibited ingredients such as porcine-derived gelatin or alcohol raise

⁵ Muhammad Abdulkadir, *Hukum Dan Penelitian Hukum* (Citra Aditya Bakti, 2004), 112.

⁶ M.I. Khan et al., "Analysing Barriers towards Management of Halal Supply Chain: A BWM Approach," *Journal of Islamic Marketing* 13, no. 1 (2022): 66–80, <https://doi.org/10.1108/JIMA-09-2018-0178>.

⁷ S. Zailani et al., "Halal Logistics Service Quality: Conceptual Model and Empirical Evidence," *British Food Journal* 120, no. 11 (2018): 2599–614, <https://doi.org/10.1108/BFJ-07-2017-0412>.

⁸ Mohammad Sulthon, "Peranan Maslahah Mursalah Dan Maslahah Mulghah Dalam Pembaruan Hukum Islam," *Al-Qanun: Jurnal Pemikiran Dan Pembaharuan Hukum Islam* 25, no. 1 (2022): 59–70, <https://doi.org/10.15642/alqanun.2022.25.1.59-70>.

permissibility questions. Even sectors like tourism, logistics, and fashion have adopted halal standards, reflecting broader cultural and ethical alignment with Islamic values. In this sense, halal represents a comprehensive lifestyle paradigm rather than a dietary restriction.⁹

Historically, halal determination and enforcement were localized, overseen by religious scholars, jurists, and market inspectors (*muhtasibs*). Their authority stemmed from expertise in Islamic law, moral standing, and community recognition. Global trade and mass production, however, created challenges for authenticity, consistency, and recognition, leading to the institutionalization of halal certification systems as formal mechanisms for verifying Sharia compliance.

Contemporary halal regulation varies across Muslim-majority countries.¹⁰ Malaysia pioneered a centralized system under the Department of Islamic Development Malaysia (*JAKIM*), integrating religious authority with state oversight. Its detailed standards cover food, beverages, pharmaceuticals, cosmetics, logistics, and hospitality services, enforced through legal mandates and market incentives. Malaysia's active role in international forums has enhanced the global credibility of its certification.

Indonesia, the world's largest Muslim-majority nation, has also developed a mandatory halal certification system administered by the Halal Product Assurance Agency (*BPJPH*) in coordination with the Indonesian Ulema Council (MUI). Indonesia's phased implementation reflects the size of its domestic market and the significance of halal certification for exports, while still allowing time for businesses to comply.

In the Gulf, countries such as the United Arab Emirates and Saudi Arabia have developed national halal standards often integrated with broader food safety and quality frameworks. The Emirates Authority for Standardization and Metrology (ESMA) administers the UAE Halal National Mark for a wide range of products and services. Saudi Arabia's Saudi Food and Drug Authority (SFDA) oversees halal certification, particularly for imported food and pharmaceuticals. In these countries, halal regulation aligns with national economic strategies, positioning them as hubs for the global halal trade.¹¹

In non-Muslim-majority countries, halal systems have developed to serve domestic Muslim communities and export markets. Australia, a major meat exporter to Muslim countries, maintains a network of accredited halal certifiers recognized by importing nations, overseen by both government agencies and religious authorities. The European Union does not have a unified halal standard but accommodates certification through private organizations and national frameworks under general EU food safety and animal welfare rules. Conflicts can arise, for example, when mandatory pre-slaughter stunning conflicts with traditional *dhabahah* practices.

The proliferation of halal standards creates both opportunities and challenges for international trade. Multiple certification schemes enhance consumer trust, market differentiation, and cross-border trade but also create fragmentation, requiring exporters to obtain multiple certifications for different markets. Efforts toward harmonization include the Standards and Metrology Institute for Islamic Countries (SMIIC)¹² under the OIC and the Gulf Standards Organization (GSO) within the GCC. At the global level, the Codex Alimentarius

⁹ Diana Susanti, "Kebijakan hukum produk halal di Indonesia," *Sinar Grafika*, 2021, 12.

¹⁰ D. Yuanitasari et al., "The Implications of Halal Regulations in Indonesia: A Consumer Protection's Legal Perspective," *Padjajaran Jurnal Ilmu Hukum* 11, no. 3 (2024): 385–404.

¹¹ Harati, A., & Farzaneh, P. (2024). The advancement in global halal industry from farm to fork. *Journal of Halal Product and Research (JHPR)*, 7(2), 113–124. <https://doi.org/10.20473/jhpr.vol.7-issue.2.113-124>

¹² SMIIC, "History of SMIIC. The Standards and Metrology Institute for Islamic Countries," XXXX, <https://www.smiic.org/en/history-of-smiic>.

Commission provides voluntary halal guidelines, while ISO standards such as ISO 22000 can be adapted to incorporate halal requirements.¹³

Differences in religious interpretation, national interests, and commercial priorities continue to hinder the development of a universally accepted halal standard. Some jurisdictions allow mechanical slaughter under supervision, while others mandate manual slaughter for all halal-certified meat. Disputes also persist over permissible ingredients, stunning practices, and the recognition of certifying bodies. These divergences reflect deeper theological, cultural, and political dynamics.

The global halal economy, valued in the trillions of dollars annually, is therefore a complex space where religious norms, state regulation, market forces, and international trade law intersect. Halal certification functions as a religious guarantee, a commercial asset, and potentially a non-tariff barrier to trade.¹⁴ Legally, this raises questions about compliance with WTO principles of non-discrimination, market access, and fair competition. As halal regulation becomes more formalized and globally significant, reconciling religious legitimacy with trade law obligations grows increasingly urgent.

A comprehensive understanding of halal must account for its scriptural foundations, interpretive diversity, and moral-ethical dimensions, as well as its evolution into a codified regulatory system with transnational implications. Examining contemporary halal regulation requires situating national practices within the global landscape, recognizing both points of convergence that enable mutual recognition and divergences that generate friction. Engaging with halal as both a juristic construct and a regulatory phenomenon is essential for scholars, policymakers, and trade negotiators to navigate the integration of Sharia-based principles into international commerce.

2. Halal Certification within the WTO Framework: Non-Discrimination, TBT and SPS Disciplines, and Dispute Settlement Jurisprudence

The WTO provides the primary multilateral framework for international trade, promoting predictability, transparency, and non-discrimination among Members. Halal certification, as both a religious observance and a regulatory instrument, raises complex legal questions because it can affect market access, consumer confidence, and competitive conditions. Assessing its compatibility with WTO law requires examining core non-discrimination principles, the obligations under the Technical Barriers to Trade (TBT) and Sanitary and Phytosanitary (SPS) Agreements¹⁵, and relevant dispute settlement jurisprudence.

Non-discrimination lies at the heart of the WTO system, operationalized through two key disciplines: Most-Favored-Nation (MFN) treatment under Article I of GATT 1994 and national treatment under Article III. MFN requires that any advantage or privilege granted to the products of one country be extended immediately and unconditionally to like products of all other Members. National treatment mandates that imported products receive no less favorable treatment than domestic products with respect to internal taxation and regulation. These rules prevent both overt and covert discrimination, ensuring fair competition regardless of origin.¹⁶

In the context of halal certification, MFN concerns may arise if a country recognizes certificates only from certain states, conferring a commercial advantage on select exporters. For instance, a Muslim-majority country that accepts halal certificates solely from OIC Member States while rejecting equivalent certifications from non-OIC Members could be challenged

¹³ M.S.E. Azam and M.A. Abdullah, "Halal Standards Globally," *Halalshere* 1, no. 1 (2021): 11–31, <https://doi.org/10.31436/hs.v1i1.20>.

¹⁴ Trimulato and A. Mustamin, "Halal Economy as a Driver of Global Development: Literature Review VoS Viewer," *Maaliyah: Journal of Islamic Economic Law and Islamic Finance* 1, no. 1 (2025): 1–24.

¹⁵ N. Ruhaeni and E.an Aqimuddin, "Halal Food Certification as an Exception Clause under the Rule of the WTO-GATT: An Indonesia Experience," *Cogent Social Sciences* 9, no. 2 (2023), <https://doi.org/10.1080/23311886.2023.2260160>.

¹⁶ SESRIC, "Halal Industry in OIC Member Countries Challenges and Prospects," in *Organisation of Islamic Cooperation Statistical Economic And* (2021).

under Article I:1 of GATT as discriminatory. Such scenarios illustrate the legal tensions at the intersection of religious norms and trade obligations.

National treatment concerns may arise when a country imposes halal certification requirements on imports while exempting domestic products or designing the process to be more burdensome for foreign suppliers. For example, requiring all meat products to be certified by a state-approved domestic certifier without recognizing foreign certificates could be challenged as less favorable treatment if it imposes extra costs, delays, or administrative burdens that affect competition. WTO jurisprudence emphasizes that national treatment analysis focuses on whether a measure alters competitive conditions to the detriment of imports, rather than its formal designation.

Understanding the relationship between halal certification and WTO law requires mapping relevant principles and their jurisprudential development. The table below consolidates the core WTO disciplines intersecting with halal measures, key dispute settlement cases, and implications for designing non-discriminatory halal policies.

Table 1. WTO Legal Principles Relevant to Halal Certification

WTO Principle / Agreement	Key Provision	Relevant Dispute Settlement Case(s)	Implications for Halal Certification Policies
Most-Favoured-Nation (MFN) – GATT Art. I	Equal treatment for all WTO members regarding market access	<i>EC — Seal Products</i> (DS400/DS401)	Selective recognition of foreign halal certifiers could violate MFN if based on origin rather than objective criteria
National Treatment – GATT Art. III	Imported products must not be treated less favourably than like domestic products	<i>Indonesia — Chicken Import Measures</i> (DS484)	Domestic halal rules must apply equally to domestic and imported goods; discriminatory testing or certification burdens could breach this ¹⁷
Technical Barriers to Trade (TBT) Agreement	Technical regulations must be non-discriminatory and based on international standards where possible	<i>US — Tuna II (Mexico)</i> (DS381)	Halal standards should reference OIC/SMIIC or Codex to avoid being challenged as unnecessary trade barriers
Sanitary and Phytosanitary (SPS) Agreement	Measures to protect human/animal health must be based on scientific evidence and risk assessment	<i>Australia — Salmon</i> (DS18)	If halal rules include health or hygiene claims, they must be justified scientifically to comply with SPS

¹⁷ World Trade Organization, “Indonesia - Measures Concerning the Importation of Chicken Meat and Chicken Products,” *Dispute Settlement Reports*, 2018, 3769–4128, <https://doi.org/10.1017/9781108609906.001>.

<p>Transparency Obligations (TBT & SPS)</p>	<p>Members must notify and consult on new measures affecting trade</p>	<p><i>Japan – Apples (DS245)</i></p>	<p>Any new halal regulation affecting imports should be notified to WTO to allow feedback and prevent disputes</p>
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Source : Data Analysis Results by the Authors

Halal measures that deviate from MFN or national treatment principles, impose unjustified technical barriers, or lack transparency risk triggering WTO disputes. This highlights the need to design regulations that maintain religious authenticity while complying with global trade rules.

When halal measures concern product characteristics, labeling, certification procedures, or other technical specifications, they may fall under the TBT Agreement. The TBT seeks to ensure that technical regulations, standards, and conformity assessment procedures do not create unnecessary trade obstacles while recognizing Members’ right to pursue legitimate objectives. Article 2.1 enshrines a non-discrimination obligation similar to MFN and national treatment, requiring that imported products receive treatment no less favorable than domestic or foreign equivalents. Article 2.2 mandates that technical regulations be no more trade-restrictive than necessary to achieve legitimate objectives, considering the risks of non-fulfillment. Recognized objectives include protecting human, animal, or plant health, and preventing deceptive practices, though the list is illustrative rather than exhaustive.

WTO jurisprudence supports a broader interpretation of legitimate objectives. In *US COOL* (Country of Origin Labeling), the Appellate Body acknowledged that consumer information objectives can justify measures. In *EC – Seal Products*, it confirmed that public morals may constitute a legitimate objective. These rulings suggest that halal certification can be justified as a measure protecting public morals or preventing deceptive practices, provided it is non-discriminatory and proportionate.

Halal certification schemes typically include both substantive requirements, such as slaughter methods and prohibited ingredients, and procedural requirements, including certification by approved bodies and use of specific labels. When mandatory, these constitute “technical regulations” under the TBT Agreement; when voluntary, they remain subject to transparency and good-practice obligations. Conformity assessment is particularly important, as recognition of foreign certificates affects the trade-restrictiveness of a halal regime. Article 5 of the TBT Agreement requires that conformity assessment procedures grant foreign suppliers access on terms no less favorable than domestic suppliers. Refusing to recognize foreign halal certificates or imposing duplicative domestic re-certification could be challenged unless justified.¹⁸

The SPS Agreement may apply where halal measures overlap with food safety, especially hygiene standards in slaughtering, handling, or processing. The SPS Agreement governs measures to protect human, animal, or plant life or health from risks such as contaminants, pests, or disease. While halal prohibitions on pork or alcohol are religious rather than scientific, certain practices like *dhabiha* slaughter may be linked to hygiene or disease control. Measures characterized as SPS must be based on scientific principles, supported by evidence, proportionate, and grounded in risk assessment under Article 5. In practice, Members often classify halal requirements under the TBT to avoid the heavier evidentiary burden of the SPS Agreement, though hybrid measures may trigger obligations under both frameworks.

¹⁸ M. Hafiz et al., “Pemberlakuan Wajib Sertifikasi Halal Pada Produk Luar Negeri Di Indonesia Berdasarkan Peraturan Pemerintah Nomor 39 Tahun 2021 Terhadap Technical Barrier To Trade Agreement,” *Jurnal Ilmiah Wahana Pendidikan* 10, no. 24 (2024): 169–87.

WTO dispute settlement jurisprudence provides guidance on the scrutiny of halal-related measures.¹⁹ In *EC – Seal Products*, the Appellate Body upheld a ban on moral grounds but found discriminatory application where exceptions favored certain suppliers. In *US – Tuna II (Mexico)*, it emphasized that labelling requirements must be no more trade-restrictive than necessary and cannot disadvantage imports. While not directly about halal, these cases illustrate how WTO adjudicators balance Members' regulatory autonomy with non-discrimination and proportionality requirements.

For halal certification, GATT Article XX offers potentially relevant justifications. Article XX(a) permits measures "necessary to protect public morals," while Article XX(b) allows measures "necessary to protect human, animal or plant life or health." WTO jurisprudence interprets "public morals" broadly, encompassing ethical, cultural, and religious considerations. The "necessity" test, however, requires weighing the importance of the objective, the measure's contribution, and its trade-restrictiveness, including consideration of less restrictive alternatives. A halal measure must therefore genuinely protect Muslim consumers' religious rights and moral convictions while minimizing trade barriers. Transparency, recognition of equivalent foreign measures, and clear certification criteria strengthen its defensibility under WTO law.²⁰

Divergence in halal standards across jurisdictions poses a persistent legal challenge. Although the OIC's Standards and Metrology Institute for Islamic Countries (SMIIC) promotes harmonization²¹, many countries maintain their own definitions and protocols. From a WTO perspective, such divergence can increase trade restrictiveness, requiring exporters to meet multiple, sometimes inconsistent, requirements. The TBT Agreement encourages the use of relevant international standards and participation in standardization bodies. In the absence of a universal halal standard, Members have flexibility to develop their own measures but must ensure they do not unduly fragment markets. Mutual recognition agreements for halal certificates can mitigate these issues if open to all Members and not restricted in violation of MFN obligations.

Overall, WTO law does not prohibit halal certification but disciplines how such measures are designed and applied.²² Legal risks arise when requirements discriminate based on origin, impose disproportionate burdens, or lack transparency. TBT jurisprudence provides guidance: measures should pursue legitimate objectives, be applied without discrimination, and be no more trade-restrictive than necessary. While public morals can justify halal requirements, Members must ensure measures are coherent, consistent, and free from arbitrary or unjustifiable discrimination.

A key jurisprudential reference involving Indonesia is the *Indonesia – Measures Concerning the Importation of Chicken Meat and Chicken Products (DS484)* case, brought by Brazil before the WTO. The dispute focused on Indonesia's import restrictions, including halal-related requirements, which were challenged as inconsistent with national treatment and necessity obligations under GATT 1994 and the Agreement on Agriculture. The WTO Panel and Appellate Body found several measures to be more trade-restrictive than necessary and insufficiently justified under Article XX(a) and (b). The case highlights the tension between

¹⁹ K. Koesrianti, "Rule-Based Dispute Settlement Mechanism for ASEAN Economic Community: Does ASEAN Have It?," *Hasanuddin Law Review* 1, no. 2 (2016): 182, <https://doi.org/10.20956/halrev.v1n2.303>.

²⁰ World Trade Organization, *WTO Analytical Index: Guide to WTO Law and Practice*, vol. 1 (Cambridge University Press, 2007).

²¹ F. Baetens, "World Trade Organization Rules before Investment Tribunals: Facilitating Cross-Fertilisation While Appreciating Particularities," *The Journal of World Investment & Trade* 24, no. 1 (2023): 1–36, <https://doi.org/10.1163/22119000-12340277>.

²² Hakim, L., & Putri, A. K. N. (2022). Implementation of the Halal Product Guarantee Law in Indonesia by the Department of Industry and Trade Cooperatives of Bima City. *Nurani: Jurnal Kajian syari'ah Dan Masyarakat*, 22(1), 133-144. <https://doi.org/10.19109/nurani.v22i1.11099>

protecting public morals and religious values, such as halal integrity, and meeting trade liberalization commitments. For Indonesia, it emphasizes the importance of framing halal regulations in a transparent, non-discriminatory, and evidence-based manner to withstand WTO scrutiny.

Reconciling halal principles with WTO law requires both legal and policy considerations. Legally, Members should design halal measures consistent with non-discrimination, necessity, and transparency obligations, leveraging flexibilities such as Article XX exceptions. Policy measures, including greater harmonization of halal standards through bodies like OIC/SMIIC and wider recognition of foreign certification via mutual recognition agreements, can reduce trade friction while respecting religious norms. In this way, the WTO framework can accommodate diverse moral and cultural preferences without undermining its core trade principles.

3. Comparative Regulatory Approaches to Halal Certification and Their Reconciliation with International Trade Obligations

Halal certification, as both a religious and regulatory construct, has become a significant element of contemporary trade governance.²³ While earlier sections examined its jurisprudential foundations and interface with WTO law, this part analyzes how selected Muslim-majority and non-Muslim-majority jurisdictions regulate halal and draws insights for reconciling Sharia-based principles with international trade obligations.²⁴

Muslim-majority countries have historically embedded halal certification within domestic law, linking it to food safety, trade, and religious administration. At the regional level, the Organisation of Islamic Cooperation (OIC) through the Standards and Metrology Institute for Islamic Countries (SMIIC) promotes harmonized halal standards and mutual recognition among member states. Within ASEAN, the Working Group on Halal Food advances gradual harmonization through consensus, while the European Union maintains a voluntary, market-based halal system aligned with food safety and animal welfare regulations. These regional frameworks show that reconciling halal principles with trade law involves broader transnational negotiation of values, norms, and market access.²⁵

Malaysia is often cited as a global leader in halal governance. Its Department of Islamic Development Malaysia (JAKIM) administers a highly institutionalized system, underpinned by the Trade Descriptions Act and Halal Standards (MS 1500:2019). Certification is legally voluntary, but in practice functions as a market requirement. Malaysia integrates Sharia-based substantive requirements with modern conformity assessment procedures, including audits, supply chain traceability, and accreditation of foreign certifiers. While this centralization enhances credibility and international brand recognition, it may raise WTO concerns if foreign certifiers are restricted to JAKIM-approved bodies, potentially implicating TBT obligations on non-discrimination and necessity.

Indonesia has implemented a mandatory halal certification regime under the Halal Product Assurance Law (Law No. 33/2014) and its implementing regulations. Unlike Malaysia's largely voluntary system, Indonesia requires halal certification for a broad range of goods and services, with phased implementation. The Halal Product Assurance Agency (BPJPH) oversees the process, coordinating with the Indonesian Ulema Council (MUI) for fatwa issuance. This mandatory approach reflects consumer protection and religious rights objectives but can create

²³ A. Hamid et al., "Potency and Prospect of Halal Market in Global Industry: An Empirical Analysis of Indonesia and United Kingdom," *Business and Management Studies* 5, no. 2 (2019): 54, <https://doi.org/10.11114/bms.v5i2.4167>.

²⁴ M. Limenta et al., "Disabling Labelling in Indonesia: Invoking WTO Laws in the Wake of Halal Policy Objectives," *World Trade Review* 17, no. 3 (2018): 451–76, <https://doi.org/10.1017/S1474745617000167>.

²⁵ Sukma Hidayatun, Annisa Romadhonia, & Miftakhul Janah. (2024). Urgency of Implementing Indonesian Halal Certification in International Trade (Case Study of Chicken Meat Imports from Brazil). *JUSTICES: Journal of Law*, 3(3), 155–174. <https://doi.org/10.58355/justices.v3i3.106>

regulatory burdens for foreign exporters, particularly if domestic procedures do not align with the TBT Agreement's transparency and equivalence requirements. The model highlights potential tensions between religious autonomy and WTO obligations, as preferential treatment could arise if domestic applicants face fewer procedural hurdles than foreign counterparts.

Saudi Arabia represents another approach, embedding halal certification within its import control system. The Saudi Food and Drug Authority (SFDA) requires halal compliance for all meat products, including slaughter according to Islamic rites and certification by approved bodies. Although some foreign certifiers are recognized, the list is tightly controlled, often limited to organizations with formal agreements or accreditation recognized by Saudi authorities. From a WTO perspective, selective recognition could be challenged under GATT Article I (MFN) and Article III (national treatment), though Saudi Arabia may justify its measures under Article XX(a) on public morals, provided the chapeau conditions are met to avoid arbitrary or unjustifiable discrimination.

In non-Muslim-majority countries, regulation is typically market-driven rather than legally mandated.²⁶ In Australia, halal certification is largely private, with various organizations providing services for domestic producers and exporters targeting Muslim markets. The government accredits certifiers for export purposes through the Department of Agriculture, Fisheries and Forestry, especially for meat exports. This approach aligns more closely with WTO principles, as market access is not contingent on halal compliance unless required by the importing country. However, reliance on multiple certifiers can raise consumer protection concerns and create inconsistencies for both consumers and trade partners.

In New Zealand, halal regulation is primarily private-sector-led, focused on export certification to Muslim markets. The government works with approved certifiers to satisfy foreign import requirements but does not mandate a domestic halal regime. New Zealand's use of equivalence agreements, recognizing foreign standards that achieve comparable Sharia compliance, offers a practical model for reconciling religious requirements with WTO non-discrimination principles while reducing trade friction.

Within the European Union, halal certification is decentralized, leaving regulation to member states. In France and Belgium, certification is voluntary and managed by private associations, whereas in the Netherlands, state agencies oversee the accuracy of halal claims under consumer protection laws. EU internal market rules prohibit unjustified restrictions on the free movement of goods, requiring that any mandatory halal requirements be justified under recognized public interest grounds consistent with WTO obligations. This decentralized approach avoids direct WTO conflict but creates variability in standards that can complicate intra-EU and external trade.

In the United States, federal halal regulation is minimal, limited to truth-in-labeling laws enforced by the Federal Trade Commission and some state statutes, such as in New Jersey and Illinois, which require disclosure of halal standards and practices. The absence of substantive federal definitions grants certifying bodies significant discretion. From a WTO perspective²⁷, this system poses minimal trade barriers, as compliance is voluntary, but it offers limited facilitation for exporters targeting Muslim markets.

The following table summarizes key regulatory characteristics across these jurisdictions, highlighting differences in legal basis, certification authority, recognition of foreign certificates, and alignment with international trade obligations.

²⁶ Rachmania Nurul Fitri Amijaya et al., "Risk Assessment of Trade Barriers: The Implications of Indonesia's Halal Certification Law on International Commerce," *International Journal of Islamic Economics* 6, no. 02 (2024): 132–45, <https://doi.org/10.32332/ijie.v6i2.9028>.

²⁷ SE Azzam et al., "Halal Standards Globally: A Comparative Study of Unities and Diversities among the Most Popular Halal Standards Globally," *Halalsphere* 1, no. 1 (2021), <https://doi.org/10.31436/hs.v1i1.20>.

Table 1. Comparative Overview of Halal Regulatory Frameworks in Selected Jurisdictions

Country / Jurisdiction	Legal Basis	Competent Authority	Recognition of Foreign Halal Certificates	Alignment with International Trade Obligations
Malaysia	Trade Descriptions Act 2011; MS 1500:2019 Halal Standard	Department of Islamic Development Malaysia (JAKIM)	Selective recognition through JAKIM's approved foreign certifiers list	Partial alignment; mutual recognition limited; SPS/TBT compliance through standardization efforts
Indonesia	Halal Product Assurance Law (Law No. 33/2014)	Halal Product Assurance Agency (BPJPH), with MUI role in fatwa issuance	Conditional recognition based on bilateral agreements	Strong domestic compliance; limited MFN application due to selective recognition
Saudi Arabia	GCC Standards; SFDA Halal Regulations	Saudi Food and Drug Authority (SFDA)	Recognition via GCC-wide approved certifiers	Broad regional harmonization within GCC; partial WTO alignment
Turkey	Halal Accreditation Law (2017)	Halal Accreditation Agency (HAK)	Recognition under OIC/SMIIC framework	High alignment due to adherence to OIC/SMIIC standards; promotes harmonization
Australia	Voluntary halal certification; general food law	Multiple private certifiers accredited by Department of Agriculture for exports	Recognition of importing countries' requirements; case-by-case compliance	Strong WTO alignment; no religious mandate, purely market-driven
European Union	General Food Law Regulation (EC No. 178/2002); voluntary halal certification	Private certifiers regulated under EU food safety laws	Recognition subject to importer's rules; no EU-wide halal law	Strong WTO and SPS/TBT alignment; no discrimination principle issues

Source : Data Analysis Results by the Authors

As illustrated in the table, while jurisdictions share a commitment to religious legitimacy and market access, differences in legal basis, certification authority, and recognition of foreign

certificates create potential friction with WTO non-discrimination principles²⁸. This comparative insight informs the synthesis of legal and policy recommendations. Key dimensions of variation include the mandatory versus voluntary nature of certification, degree of state involvement, centralization versus decentralization of authority, and the extent of recognition or equivalence arrangements with foreign certifiers.

Muslim-majority countries generally embed halal certification in public law frameworks, often with mandatory requirements and centralized authority, reflecting both religious significance and consumer protection objectives. Non-Muslim-majority countries typically adopt voluntary, market-driven models, with state involvement focused on fraud prevention or facilitating export compliance.

These divergences have clear WTO implications. Under MFN (GATT Article I), any advantage granted to one Member must be extended immediately and unconditionally to all others. Restricting recognition of foreign certifiers to select countries without objective justification risks violating this principle. Similarly, national treatment (GATT Article III) prohibits less favorable treatment of imported products; domestic certification procedures that are easier, cheaper, or faster than those applied to foreign products could breach this obligation.

The TBT Agreement further disciplines halal regulation²⁹ by requiring that technical regulations, including mandatory certification schemes, do not create unnecessary obstacles to trade, align with relevant international standards where available³⁰, and are applied non-discriminatorily. For voluntary certification, the TBT Code of Good Practice emphasizes transparency, stakeholder participation, and impartiality. The SPS Agreement may also apply when halal requirements intersect with sanitary or phytosanitary measures³¹, such as slaughtering practices that ensure both religious compliance and food safety. In these cases, measures must be based on scientific principles and supported by sufficient evidence, although integrating religious norms introduces unique interpretive challenges under WTO law.

WTO dispute settlement jurisprudence provides indirect guidance for halal measures. Panels and the Appellate Body have interpreted non-discrimination and the necessity test under GATT Article XX in ways that could apply analogously to halal certification. In *EC – Seal Products*³², the Appellate Body recognized animal welfare as a public morals objective under Article XX(a), suggesting that religiously grounded halal measures could similarly qualify. The measure was ultimately found inconsistent with the Article XX chapeau due to arbitrary and unjustifiable discrimination, highlighting the importance of designing halal measures that are not disguised protectionism.³³

Synthesizing comparative and legal insights points to several policy pathways. First, jurisdictions with mandatory regimes, particularly Muslim-majority countries, should enhance transparency and procedural fairness in recognizing foreign certifiers, for example through mutual recognition agreements or equivalence determinations based on objective criteria. This aligns with TBT obligations while preserving halal integrity. Second, both Muslim and non-Muslim countries could benefit from an international reference standard for halal, potentially developed under the OIC or SMIIC, providing a benchmark for TBT compliance and

²⁸ Suri, J. P. (2023). SUBSTANTIVE V EXCEPTION PROVISION DALAM GATT: STUDI KASUS INDONESIA DI WTO. *Collegium Studiosum Journal*, 6(2), 360-371. <https://doi.org/10.56301/esj.v6i2.1093>

²⁹ WTO, "WTO 1994 TBT Agreement b," 1994, https://www.wto.org/english/docs_e/legal_e/.

³⁰ Eva Johan and Hanna Schebesta, "Religious Regulation Meets International Trade Law: Halal Measures, a Trade Obstacle? Evidence from the SPS and TBT Committees," *Journal of International Economic Law* 25, no. ue 1 (2022): 61-73, <https://doi.org/10.1093/jiel/jgac003>.

³¹ WTO, "WTO 1994 SPS Agreement a," 1994, https://www.wto.org/english/docs_e/legal_e/.

³² CONCONI, P., & VOON, T. (2016). *EC–Seal Products: The Tension between Public Morals and International Trade Agreements*. *World Trade Review*, 15(2), 211–234. doi:10.1017/S1474745615000725

³³ Pablo Lizarreta Barrios, "'Halal Certification and Labelling Requirements and the TBT Regime: A Case Study of the Indonesian Halal Act 33/2014,'" 45, *Legal Issues of Economic Integration*, no. ue 3 (2018): 271-287, <https://kluwerlawonline.com/journalarticle/Legal+Issues+of+Economic+Integration/45.3/LEIE2018015>.

facilitating equivalence negotiations. Third, dispute avoidance mechanisms, such as WTO Trade Facilitation Committee consultations or bilateral technical working groups, can address halal-related trade issues before escalation into formal disputes.

Halal certification serves religious, cultural, and consumer protection purposes while also being trade-relevant. Reconciling these dimensions requires legal frameworks that respect Sharia principles and comply with WTO obligations. Through transparent, non-discriminatory, and scientifically grounded regulation, supported by international cooperation and mutual recognition, halal certification can bridge faith-based market requirements and the liberalized trade order of the WTO.

This comparative mapping highlights the diversity of halal regulatory approaches and the complex interaction between domestic requirements and WTO obligations.³⁴ It also underscores the risk of de facto or de jure discrimination when halal policies are applied selectively or serve as disguised protectionism, particularly when certification schemes impose disproportionate burdens on foreign producers without legitimate WTO justification. To mitigate these risks, three measures are proposed: establishing mutual recognition arrangements among states, harmonizing halal standards through internationally recognized bodies, and fostering inclusive dialogue between religious legal systems and international trade law.³⁵ These steps can reconcile Sharia-based halal principles with the non-discrimination and transparency obligations of the global trading system.

The novelty of this research lies in its normative reconciliation approach, bridging the gap between Sharia-based regulatory logic and the secular framework of WTO law. Rather than viewing halal regulations solely as trade barriers or religious exceptions, this study positions halal certification as a legitimate expression of public morals under GATT Article XX(a), provided it adheres to non-discrimination and proportionality. This framework offers a fresh perspective to existing literature, which has largely focused on descriptive or doctrinal analyses without presenting a systemic model for integration into global trade governance.

Sharia-based halal principles can be reconciled with WTO obligations, including non-discrimination, MFN, and national treatment, provided implementation does not constitute a disguised trade restriction. Normative conflicts may arise if halal standards are used for market protection or import limitation without valid justification. Comparative insights from Indonesia, Malaysia, and the EU indicate that successful integration requires mutual recognition and alignment with WTO agreements. National halal regulations should therefore harmonize with international trade principles to ensure broader acceptance and reduce potential trade disputes.

C. Conclusion

This study demonstrates that halal certification operates at the intersection of Sharia-based law and international trade regulation. It offers opportunities for market expansion while also presenting potential trade disputes. Halal certification safeguards religious authenticity and consumer trust, particularly among Muslim populations. However, selective application or use as a disguised trade restriction can raise legitimate concerns about discrimination under WTO principles. This tension highlights the broader challenge of reconciling religiously grounded regulatory systems with secular, rules-based trade regimes that prioritize non-discrimination and market liberalization.

Reconciliation between Sharia-based halal principles and WTO law requires practical strategies supported by international cooperation. Mutual recognition arrangements among OIC member states and their trading partners could facilitate acceptance of halal certificates without violating WTO non-discrimination rules. Integrating halal standardization into

³⁴ A.M. Suherman, "Hukum Perdagangan Internasional: Lembaga Penyelesaian Sengketa WTO dan Negara Berkembang," *Sinar Grafika*, 2022, 23.

³⁵ S. Aprita and R. Adhitya, *Hukum Perdagangan Internasional* (Rajawali Pers, 2020, n.d.).

regional frameworks, such as ASEAN’s Halal Task Force or the OIC’s SMIIC, could enhance coherence and reduce regulatory fragmentation. Future research should explore digital technologies, including blockchain-based halal traceability systems, to improve transparency, ensure compliance with WTO obligations, and preserve religious integrity. These approaches can translate normative reconciliation into actionable policy and institutional reform.

REFERENCES

- Abdulkadir, Muhammad. *Hukum Dan Penelitian Hukum*. Citra Aditya Bakti, 2004.
- Akay, A. (2025). THE HALAL INDUSTRY’S IMPACT ON INTERNATIONAL TRADE LAW. CHALLENGES BEFORE KAZAKHSTAN. *Scientific and Legal Journal «Bulletin of the Institute of Legislation and Legal Information of the Republic of Kazakhstan»*, 80(1). https://doi.org/10.52026/2788-5291_2025_80_1_283
- Amijaya, Rachmania Nurul Fitri, Asa Prayarsni Korina, Rochmatulloh Alaika, and Hilda Lutfiani. “Risk Assessment of Trade Barriers: The Implications of Indonesia’s Halal Certification Law on International Commerce.” *International Journal of Islamic Economics* 6, no. 02 (2024): 132–45. <https://doi.org/10.32332/ijie.v6i2.9028>.
- Aprita, S., and R. Adhitya. *Hukum Perdagangan Internasional*. Rajawali Pers, 2020, n.d.
- Azam, M.S.E., and M.A. Abdullah. “Halal Standards Globally.” *Halalpsphere* 1, no. 1 (2021): 11–31. <https://doi.org/10.31436/hs.v1i1.20>.
- Azzam, SE, M Moha, and A Abdullah. “Halal Standards Globally: A Comparative Study of Unities and Diversities among the Most Popular Halal Standards Globally.” *Halalpsphere* 1, no. 1 (2021). <https://doi.org/10.31436/hs.v1i1.20>.
- Baetens, F. “World Trade Organization Rules before Investment Tribunals: Facilitating Cross-Fertilisation While Appreciating Particularities.” *The Journal of World Investment & Trade* 24, no. 1 (2023): 1–36. <https://doi.org/10.1163/22119000-12340277>.
- Barrios, Pablo Lizarreta. “Halal Certification and Labelling Requirements and the TBT Regime: A Case Study of the Indonesian Halal Act 33/2014.” *45, Legal Issues of Economic Integration*, no. ue 3 (2018): 271–287. <https://kluwerlawonline.com/journalarticle/Legal+Issues+of+Economic+Integration/45.3/LEIE2018015>.
- CONCONI, P., & VOON, T. (2016). EC–Seal Products: The Tension between Public Morals and International Trade Agreements. *World Trade Review*, 15(2), 211–234. doi:10.1017/S1474745615000725
- Hafiz, M., Z. Jayakusuma, and E. HZ. “Pemberlakuan Wajib Sertifikasi Halal Pada Produk Luar Negeri Di Indonesia Berdasarkan Peraturan Pemerintah Nomor 39 Tahun 2021 Terhadap Technical Barrier To Trade Agreement.” *Jurnal Ilmiah Wahana Pendidikan* 10, no. 24 (2024): 169–87.
- Hakim, L., & Putri, A. K. N. (2022). Implementation of the Halal Product Guarantee Law in Indonesia by the Department of Industry and Trade Cooperatives of Bima City. *Nurani: Jurnal Kajian syari’ah Dan Masyarakat*, 22(1), 133–144. <https://doi.org/10.19109/nurani.v22i1.11099>
- Hamid, A., M. Said, and E. Meiria. “Potency and Prospect of Halal Market in Global Industry: An Empirical Analysis of Indonesia and United Kingdom.” *Business and Management Studies* 5, no. 2 (2019): 54. <https://doi.org/10.11114/bms.v5i2.4167>.

- Harati, A., & Farzaneh, P. (2024). The advancement in global halal industry from farm to fork. *Journal of Halal Product and Research (JHPR)*, 7(2), 113–124. <https://doi.org/10.20473/jhpr.vol.7-issue.2.113-124>
- Hsieh, P.L., and B. Mercurio. “ASEAN Law in the New Regional Economic Order: An Introductory Roadmap to the ASEAN Economic Community.” *ASEAN Law in the New Regional Economic Order: Global Trends and Journal of ASEAN Studies 65 Shifting Paradigms*, Cambridge University Press, 2019, 3–21. <https://doi.org/10.1017/9781108563208.002>.
- Johan, E., and M.J. Plana-Casado. “Harmonizing Halal in ASEAN: Analysis of Halal Food Guidelines under the ASEAN Way Approach.” *JAS (Journal of ASEAN Studies)* 11, no. 1 (2023): 43–67. <https://doi.org/10.21512/jas.v11i1.9682>.
- Johan, Eva, and Hanna Schebesta. “Religious Regulation Meets International Trade Law: Halal Measures, a Trade Obstacle? Evidence from the SPS and TBT Committees.” *Journal of International Economic Law* 25, no. ue 1 (2022): 61–73,. <https://doi.org/10.1093/jiel/jgac003>.
- Khan, M.I., S. Khan, and A. Haleem. “Analysing Barriers towards Management of Halal Supply Chain: A BWM Approach.” *Journal of Islamic Marketing* 13, no. 1 (2022): 66–80. <https://doi.org/10.1108/JIMA-09-2018-0178>.
- Koesrianti, K. “Rule-Based Dispute Settlement Mechanism for ASEAN Economic Community: Does ASEAN Have It?” *Hasanuddin Law Review* 1, no. 2 (2016): 182. <https://doi.org/10.20956/halrev.v1n2.303>.
- Lieblich, E. “How to Do Research in International Law? A Basic Guide for Beginners.” *Harvard International Law Journal* 62 (2021). <https://doi.org/10.2139/ssrn.37047>.
- Limonta, M., B.M. Edis, and O. Fernando. “Disabling Labelling in Indonesia: Invoking WTO Laws in the Wake of Halal Policy Objectives.” *World Trade Review* 17, no. 3 (2018): 451–76. <https://doi.org/10.1017/S1474745617000167>.
- Pratama, Daffa Brillliandana. “The Analysis of World Trade Organization Panel Decision of Indonesia Measures Relating to Raw Materials.” *JUSTICES: Journal of Law* 3, no. 3 (2024): 215–37. <https://doi.org/10.58355/justices.v3i3.121>.
- Putera, P.B., and T.M. Rakhel. “Halal Research Streams: A Systematic and Bibliometrics Review.” *Cogent Social Sciences* 9, no. 1 (2023): 2225334. <https://doi.org/10.1080/23311886.2023.2225334>.
- Ruhaeni, N., and E.an Aqimuddin. “Halal Food Certification as an Exception Clause under the Rule of the WTO-GATT: An Indonesia Experience.” *Cogent Social Sciences* 9, no. 2 (2023). <https://doi.org/10.1080/23311886.2023.2260160>.
- Sagita, Alda Meydiyana and Sasmini. “The Halal Certification Policy in Indonesia and the World Trade Organization.” *International Journal of Integrated Science and Technology* 2, no. 9 (2024). <https://doi.org/10.59890/ijist.v2i9.2396>.
- SESRIC. “Halal Industry in OIC Member Countries Challenges and Prospects.” In *Organisation of Islamic Cooperation Statistical Economic And*. 2021.
- SMIIC. “History of SMIIC. The Standards and Metrology Institute for Islamic Countries.” XXXX. <https://www.smiic.org/en/history-of-smiic>.
- Suherman, A.M. “Hukum Perdagangan Internasional: Lembaga Penyelesaian Sengketa WTO dan Negara Berkembang.” *Sinar Grafika*, 2022, 23.
- Sukma Hidayatun, Annisa Romadhonia, & Miftakhul Janah. (2024). Urgency of Implementing Indonesian Halal Certification in International Trade (Case Study of Chicken Meat Imports from Brazil). *JUSTICES: Journal of Law*, 3(3), 155–174. <https://doi.org/10.58355/justices.v3i3.106>

- Sulthon, Mohammad. "Peranan Masalah Mursalah Dan Masalah Mulghah Dalam Pembaruan Hukum Islam." *Al-Qanun: Jurnal Pemikiran Dan Pembaharuan Hukum Islam* 25, no. 1 (2022): 59–70. <https://doi.org/10.15642/alqanun.2022.25.1.59-70>.
- Suri, J. P. (2023). SUBSTANTIVE V EXCEPTION PROVISION DALAM GATT: STUDI KASUS INDONESIA DI WTO. *Collegium Studiosum Journal*, 6(2), 360-371. <https://doi.org/10.56301/cs.j.v6i2.1093>
- Susanti, Diana. "Kebijakan hukum produk halal di Indonesia." *Sinar Grafika*, 2021, 12.
- Trimulato, and A. Mustamin. "Halal Economy as a Driver of Global Development: Literature Review VoS Viewer." *Maaliyah: Journal of Islamic Economic Law and Islamic Finance* 1, no. 1 (2025): 1–24. <https://ejournal.darunnajah.ac.id/index.php/Maaliyah/article/view/515>
- World Trade Organization. "Indonesia - Measures Concerning the Importation of Chicken Meat and Chicken Products." *Dispute Settlement Reports*, 2018, 3769–4128. <https://doi.org/10.1017/9781108609906.001>.
- World Trade Organization. *WTO Analytical Index: Guide to WTO Law and Practice*. Vol. 1. Cambridge University Press, 2007.
- WTO. "WTO 1994 SPS Agreement a." 1994. https://www.wto.org/english/docs_e/legal_e/.
- WTO. "WTO 1994 TBT Agreement b." 1994. https://www.wto.org/english/docs_e/legal_e/.
- Yuanitasari, D., A. Sardjono, and H. Susetyo. "Digitalization of Halal Certification for Smes: Between Hope and Reality." *Jurnal Bina Mulia Hukum* 9, no. 2 (2025): 179–96.
- Yuanitasari, D., A. Sardjono, and H. Susetyo. "The Implications of Halal Regulations in Indonesia: A Consumer Protection's Legal Perspective." *Padjadjaran Jurnal Ilmu Hukum* 11, no. 3 (2024): 385–404.
- Zailani, S., S. Jafarzadeh, M. Iranmanesh, D. Nikbin, and N.I.I. Selim. "Halal Logistics Service Quality: Conceptual Model and Empirical Evidence." *British Food Journal* 120, no. 11 (2018): 2599–614. <https://doi.org/10.1108/BFJ-07-2017-0412>.