SASI

Volume 30 Issue 4, December 2024: p. 402-415
P-ISSN: 1693-0061, E-ISSN: 2614-2961
https://fhukum.unpatti.ac.id/jurnal/sasi

SASI

doi: 10.47268/sasi.v30i4.2312

Sharia Economic Law Regulation In Indonesia And Malaysia: Implementation And Challenges

Umi Khusnul Khotimah

Faculty of Sharia and Islamic Economics, Institut Ilmu Al Qur'an Jakarta, Jakarta Selatan, Indonesia.

: umi.husnul@iiq.ac.id
Corresponding Author*

Abstract

Introduction: *This article explores the implementation and regulatory challenges of Sharia economic law in Indonesia and Malaysia, two key players in Islamic finance. Both countries have integrated Islamic principles into their economic frameworks, but their approaches differ due to legal, historical, and political factors.*

Purposes of the Research: *The purpose of this article is to analyze and compare the regulatory frameworks governing Sharia economic law in Indonesia and Malaysia. It aims to highlight both the successes and obstacles in implementation, while offering potential recommendations for improvement.*

Methods of the Research: *This study employs a comparative legal research methodology, analyzing primary legal sources such as laws, regulations, and official guidelines from Indonesia and Malaysia. Secondary sources, including academic articles and government publications, provide context for understanding how these frameworks are implemented.*

Results of the Research: *The research finds that Malaysia's centralized regulatory system, led by the Sharia Advisory Council (SAC), provides clear guidelines for Sharia-compliant financial products. In contrast, Indonesia's regulatory framework is more fragmented, with overlapping responsibilities between institutions, creating challenges for effective implementation.*

Keywords: Sharia Economic Law; Regulatory Framework; Islamic Finance; Indonesia; Malaysia.

Submitted: 2024-09-04	*Revised: 2024-12-29*	*Accepted: 2024-12-30*	*Published: 2024-12-31*

How To Cite: Umi Khusnul Khotimah. "Sharia Economic Law Regulation In Indonesia And Malaysia: Implementation And Challenges." *SASI* 30 no. 4 (2024): 402-415.https://doi.org/10.47268/sasi.v30i4.2312

INTRODUCTION

Sharia economic law has emerged as a critical component of the financial systems in many Muslim-majority countries, particularly in Southeast Asia. Indonesia and Malaysia, as two of the largest Muslim-majority nations, provide prominent examples of how Sharia economic law has been implemented within distinct legal and financial frameworks. This growing influence stems from a collective desire to align financial activities with Islamic principles, which prohibit practices such as interest (riba), excessive uncertainty (gharar), and speculation (maisir).[1]These laws promote justice, ethical practices, and equitable wealth distribution while fostering community welfare. However, their implementation presents varying challenges due to differences in historical, cultural, legal, and political contexts.[2]

[1] Fadli Daud Abdullah et al., "Contemporary Challenges for Sharia Financial Institutions to Increase Competitiveness and Product Innovation Perspective of Sharia Economic Law: Evidence in Indonesia," *MILRev : Metro Islamic Law Review* 3, no. 2 (2024): 141–73, https://doi.org/10.32332/milrev.v3i2.9202.

[2] Fuji Alia Rahma, Heni Noviarita, and Rita Zaharah, "The Implementation of Law Number 21 of 2008 Concerning Sharia Banking on Sharia Financial Institutions Is Underway Sharia Economic Law Perspective," *ASAS* 16, no. 1 (2024), https://doi.org/10.24042/asas.v16i1.18779.

Despite shared cultural and religious foundations, Indonesia and Malaysia have adopted markedly different approaches to implementing Sharia economic law. Indonesia, with its integration of civil and Islamic legal principles, has seen a gradual evolution of Sharia economic law since the late 20th century. Key developments include the establishment of Islamic financial institutions and the formal recognition of Sharia principles in specific economic domains.[3] Conversely, Malaysia's structured and centralized approach has positioned it as a global leader in Islamic finance. Its legal framework emphasizes regulatory clarity and international collaboration, supported by deliberate government initiatives.

The motivation for this study lies in understanding the differences in regulatory frameworks and implementation strategies of Sharia economic law in Indonesia and Malaysia.[4] A critical examination of these approaches is essential, as both nations serve as models for integrating Sharia law into national financial systems. This study seeks to explore the successes, challenges, and implications of implementing Sharia economic law in these countries, ultimately offering recommendations for improving and harmonizing practices across the region.[5]

Historically, the trajectories of Sharia economic law in Indonesia and Malaysia have been shaped by their colonial pasts and paths to independence. In Indonesia, the Dutch colonial administration imposed a secular legal system, relegating Islamic law to personal and family matters.[6] Post-independence in 1945, Indonesia faced challenges in integrating its diverse legal traditions—customary law (adat), Islamic law, and Dutch-influenced civil law. The 1990s marked significant progress with the establishment of Islamic banks and legal provisions for Sharia-compliant financial transactions. In contrast, Malaysia's development of Sharia law has been deliberate and structured. During British colonial rule, Islamic law was confined to religious and personal status issues. After gaining independence in 1957, Malaysia developed a dual legal system, allowing Islamic law to operate alongside civil law in banking, finance, and family matters. The establishment of the National Sharia Advisory Council in the 1980s was pivotal in standardizing Sharia economic law, enabling its integration into Malaysia's financial sector.

The legal and institutional frameworks for Sharia economic law in Indonesia and Malaysia highlight key differences.[7] Indonesia's framework is dispersed across various laws and regulations, such as the Banking Act, Capital Market Act, and Sharia Banking Act. Oversight is provided by multiple agencies, including the Financial Services Authority (OJK) and the National Sharia Council (DSN).[8] However, the fragmented institutional structure often leads to regulatory inconsistencies and enforcement challenges. Additionally, a lack of qualified Sharia experts has hindered the development of innovative financial products, while limited public awareness, especially in rural areas, poses barriers to widespread adoption.[9] Malaysia's centralized approach, governed by Bank Negara

[3] Yudi Mashudi, "Complexity of Sharia Economic Problems," *Journal of Law and Regulation Governance* 2, no. 7 (2024): 260–80, https://doi.org/10.57185/jlarg.v2i7.63.
[4] Fikri 'Ainul Qolbi and Faizan Alam, "Sharia Hotel Management Policy: An Analysis of Islamic Attribute of Destination Theory in Indonesia and Malaysia," *Journal of Islamic Economic Laws* 7, no. 1 (2024): 124–37, https://doi.org/10.23917/jisel.v7i01.5254.
[5] Mappasessu Mappasessu, "Analysis of the Role of Judicial Institutions in Sharia Economic Law Enforcement in Indonesia," *Journal of Islamic Economy* 1, no. 2 (2024): 1–7, https://doi.org/10.62872/gtygez33.
[6] Almusrijah Aini, "Economic Development And Growth In Indonesia According To Law Sharia Economy," *Jurnal Nuansa : Publikasi Ilmu Manajemen Dan Ekonomi Syariah* 2, no. 3 (2024): 217–31, https://doi.org/10.61132/nuansa.v2i3.1208.
[7] Rafan Darodjat and Agus Suwandono, "Special Criminal Law Against Sharia Economic Crimes," *Jurnal Justisia Ekonomika: Magister Hukum Ekonomi Syariah* 8, no. 2 (2024): 1179–89, https://doi.org/10.30651/justeko.v8i2.24012.
[8] Nela Aprilia Rismilda, Supangat Supangat, and Lathif Hanafir Rifqi, "Implications Of Sharia Economic Law For Halal Certification On Imported Products In Indonesia," *Istinbath* 23, no. 2 (2024): 231–43, https://doi.org/10.20414/ijhi.v23i2.655.
[9] Timothy P Daniels, *Living Sharia* (University of Washington Press, 2017), https://doi.org/10.1515/9780295742564.

Malaysia (BNM) and the Malaysian Sharia Advisory Council (SAC), has facilitated regulatory clarity and consistency.[10] The dual banking system enables Islamic banks to operate alongside conventional ones, fostering growth and innovation. Malaysia's success in sukuk issuance, takaful (Islamic insurance), and Islamic banking has positioned it as a global leader. Nonetheless,[11] challenges remain, such as maintaining balance between Sharia and conventional systems, addressing regulatory arbitrage, and ensuring SMEs' access to Sharia-compliant financing.[12] A comparative analysis underscores these differences: Malaysia's centralized, government-driven model has provided clear advantages in regulatory coherence and global competitiveness.[13] Meanwhile, Indonesia's fragmented framework reflects its broader socio-political complexities, resulting in regulatory gaps and inconsistent enforcement.[14] Despite these differences,[15] both countries face common challenges, including the need for public education to enhance awareness and understanding of Sharia-compliant financial products and services.

METHODS OF THE RESEARCH

This study employs a comparative legal research methodology to analyze the implementation and challenges of Sharia economic law regulation in Indonesia and Malaysia. Comparative legal research is chosen to identify key similarities and differences between the regulatory frameworks of both countries and to understand the impact of these differences on the effectiveness of Sharia economic law implementation. The research will focus on analyzing primary legal sources, including:[16] 1) National laws, such as the Banking Act, Capital Market Act, and Sharia Banking Act in Indonesia, and equivalent legal provisions in Malaysia; 2) Regulations issued by key institutions like Indonesia's Financial Services Authority (OJK) and Malaysia's Bank Negara Malaysia (BNM); 3) Official guidelines and fatwas from the National Sharia Council (DSN) in Indonesia and the Malaysian Sharia Advisory Council (SAC). Secondary sources will include: 1) Academic articles and peer-reviewed journals on Islamic finance and Sharia law; 2) Reports from financial institutions, such as annual reports of Islamic banks and takaful providers;[17] 3) Government publications and policy papers outlining the development and challenges of Sharia economic law in each country.[18] This research employs a qualitative approach, with document analysis as the primary data collection method. Legal documents from Indonesia and Malaysia will be systematically compared to identify differences in regulatory structures, enforcement mechanisms, and institutional frameworks. To enrich the findings, this study incorporates: 1) Interviews: Conducting semi-structured interviews with experts

[10] Mohd Faizal Noor Ariffin, Mohammad Zaini Yahaya, and Abdul Basir Mohamad, "Memperluas Pelaksanaan Wakaf Pendidikan Di Malaysia," *Kajian Malaysia* 42, no. 2 (2024): 313–32, https://doi.org/10.21315/km2024.42.2.14.

[11] Abdul Fattah, "Implementation of Sharia Economic Law Principles in Overcoming the Economic Impact of the Palestinian Israeli Conflict," *International Journal of Education, Culture, and Society* 3, no. 1 (2024): 35–54, https://doi.org/10.58578/ijecs.v3i1.4293.

[12] Nahdiyatul Asyifa, "Opportunities and Challenges of Sharia Fintech (Financial Technology) in Indonesia," *Tawazuna* 2, no. 2 (2023), https://doi.org/10.35747/twz.v2i2.732.

[13] Asyari Hasan et al., "The Principles of Law of Negligence as Causes of Compensation in the Sharia Economic Law in Indonesia," *Al-Ulum* 19, no. 1 (2019): 53–78, https://doi.org/10.30603/au.v19i1.722.

[14] Panji Adam Agus Putra, "Syar'u Man Qablanâ and It's Implementation in Sharia Economic Law (Mu'amalah Mâliyyah)," *Jurnal Ilmiah Mizani: Wacana Hukum, Ekonomi Dan Keagamaan* 9, no. 1 (2024): 81, https://doi.org/10.29300/mzn.v9i1.2861.

[15] Adi Prihasmoro et al., "Sharia Economic Bankruptcy Law (Al-Taflis) and the Dualism of Court Competency in Indonesia," *JURIS (Jurnal Ilmiah Syariah)* 23, no. 2 (2024): 227, https://doi.org/10.31958/juris.v23i2.11045.

[16] Ikhwah Hasanah and Fitria Ulfa wibowo, "Implementation Sharia Ethics For Sharia Compliance Audit on Audit Process," *Tawazuna* 1, no. 2 (2022): 8–12, https://doi.org/10.35747/twz.v1i2.348.

[17] M Zidan Al Insyani, Panji Adam Agus Putra, and Iwan Permana, "Analisis Terhadap Fatwa Dewan Syariah Indonesia Majelis Ulama Indonesia (DSN-MUI) Nomor 2 Tahun 2000 Tentang Tabungan Berdasarkan Perspektif Pemikiran Wahbah Az-Zuhaili," *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 316–23, https://doi.org/10.29313/bcssel.v4i2.13373.

[18] Hasbi Hasan and Cecep Mustafa, "The Politics of Law of Sharia Economics in Indonesia," *SSRN Electronic Journal*, 2024, https://doi.org/10.2139/ssrn.4986227.

in Islamic finance and Sharia law to explore practical challenges faced by regulators and financial institutions; 2) Case Studies: Analyzing specific instances of regulatory implementation, such as the introduction of sukuk (Islamic bonds), takaful products, and Sharia-compliant banking innovations in both countries. Case studies will examine successful and unsuccessful financial products to assess the practical impact of regulatory differences on Islamic finance development.[19] The findings from this research aim to provide actionable recommendations for: 1) Harmonizing regulatory frameworks across the region; 2) Addressing challenges in enforcement and institutional collaboration; 3) Enhancing the effectiveness and competitiveness of Sharia-compliant financial systems.

RESULTS AND DISCUSSION

A. Results

The comparative implementation of Sharia economic law in Indonesia and Malaysia provides key insights into their regulatory frameworks, institutional structures,[20] and challenges. This section presents the refined findings based on a critical analysis.

1. Regulatory Framework Analysis

Indonesia's regulatory framework for Sharia economic law is robust yet plagued by fragmentation, a challenge that affects the development of Islamic finance in the country. The overlapping responsibilities among key institutions such as Bank Indonesia (BI), the Financial Services Authority (OJK),[21] and the National Sharia Council (DSN-MUI) have led to delays and inconsistencies in policy implementation. While the DSN-MUI plays a pivotal role in issuing fatwas that are legally binding, their effective implementation often hinges on coordination with both OJK and BI. This intricate interplay among institutions creates bottlenecks that slow down the introduction and approval of innovative financial products, ultimately hindering the competitiveness of Indonesia's Islamic finance industry.[22] One of the critical issues lies in the fragmented jurisdiction of these regulatory bodies. BI is responsible for monetary policy and the broader economic framework, including its role in promoting Islamic finance.[23] OJK oversees the financial services sector, including banks and non-bank financial institutions, while DSN-MUI provides religious oversight to ensure compliance with Sharia principles. The lack of clear delineation of roles and responsibilities has often resulted in overlapping mandates, creating inefficiencies that stifle growth. These challenges have led to missed opportunities in capitalizing on the increasing global demand for Islamic financial services.[24] In stark contrast, Malaysia offers a model of a centralized and cohesive regulatory framework that has propelled its Islamic finance industry to international prominence. Governed by the Islamic Financial Services Act (IFSA) 2013,

[19] Muhammad Ramdan and Ardina Nur Amalia, "Substantive and Procedural Justice Principles in the Implementation of Industrial Court Decisions: Challenges and Solutions," *International Journal Of Multidisciplinary Research And Analysis* 7, no. 11 (2024), https://doi.org/10.47191/ijmra/v7-i11-41.

[20] Ingrid Larasati Agustina and Dudi Abdul Hadi, "Sharia Compliance and Fraud: Study on Sharia Commercial Banks in Indonesia," *International Journal of Management and Economics Invention* 10, no. 12 (2024), https://doi.org/10.47191/ijmei/v10i12.08.

[21] Agun Pradika, "Implementation of Islamic Inheritance Law: Study of History, Law and Its Principles," *Al-Arfa: Journal of Sharia, Islamic Economics and Law* 2, no. 1 (2024): 92–103, https://doi.org/10.61166/arfa.v2i1.54.

[22] Maulina Desita Riani and Untoro Untoro, "The Implications in Implementation of the Acquisition of TikTok Shop with Tokopedia Based on Regulation of Business Law in Indonesia," *Law Development Journal* 6, no. 2 (2024): 285, https://doi.org/10.30659/ldj.6.2.285-292.

[23] Alifia Mumtazati Saleha, "Perbandingan Antara Sistem Pemerintahan Di Indonesia Dan Malaysia," *Datuk Sulaiman Law Review (DaLRev)* 4, no. 2 (2023): 47–60, https://doi.org/10.24256/dalrev.v4i2.4758.

[24] Zilan Fauzi Rahman, Udin Saripudin, and Ira Siti Rohmah Maulida, "Pelayanan Terhadap Nasabah Pada Bank Syariah Indonesia TBK Kantor Cabang Citarum Bandung Ditinjau Dari Perspektif Islamic Service Quality," *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 699–705, https://doi.org/10.29313/bcssel.v4i2.15090.

Malaysia's Sharia economic law is streamlined and uniform, eliminating the ambiguities that characterize Indonesia's system. The Sharia Advisory Council (SAC), under the purview of Bank Negara Malaysia, serves as the ultimate authority on Sharia compliance matters. Its centralized structure allows for swift decision-making and clear guidelines, fostering a more conducive environment for innovation and growth in Islamic finance.[25] Malaysia's regulatory clarity has not only enhanced operational efficiency but also attracted significant investments from both domestic and international markets. Its ability to provide a consistent legal and regulatory framework has instilled confidence among stakeholders, making it a global hub for Islamic financial services. The country's leadership in sukuk issuance, takaful (Islamic insurance), and Sharia-compliant funds underscores the effectiveness of its centralized approach. By ensuring alignment between regulatory authorities and Sharia principles,[26] Malaysia has successfully created a supportive ecosystem that promotes sustainable growth.

Indonesia can draw valuable lessons from Malaysia's experience. A more integrated regulatory framework could reduce inefficiencies and foster a thriving Islamic finance industry. Establishing a central authority, akin to Malaysia's SAC, to oversee Sharia compliance and regulatory matters could streamline processes and eliminate the jurisdictional overlaps currently hampering progress. Furthermore, enhancing collaboration and communication among BI, OJK, and DSN-MUI could address the bottlenecks that have hindered product development and market expansion.[27] Indonesia's Sharia economic law framework is comprehensive, its fragmentation has impeded its potential.[28] Malaysia's centralized and cohesive system highlights the advantages of regulatory clarity and coordination, serving as a benchmark for Indonesia to enhance its Islamic finance sector. By adopting a more integrated approach, Indonesia could strengthen its position in the global Islamic finance market and unlock the full potential of its Sharia-compliant economic initiatives.[29]

2. Institutional Structures

Indonesia's institutional structure for Islamic finance involves multiple entities, each playing a critical role but often with overlapping responsibilities. Bank Indonesia (BI), the Financial Services Authority (OJK), and the National Sharia Council (DSN-MUI) are the primary bodies governing the sector. While each contributes significantly to the development of Sharia-compliant financial systems, their lack of coordination frequently leads to delays in decision-making and regulatory inefficiencies. These challenges complicate the approval and implementation processes for financial products, slowing down innovation and reducing competitiveness in the Islamic finance market.[30] A

---

[25] Isnaeni Tera Masitoh and Yunanto Yunanto, "Analysis of Implementation of Anti-Money Laundering Mechanisms in Blockchain-Based Smart Contracts under Indonesian Regulation," *International Journal of Social Science and Human Research* 7 (2024), https://doi.org/10.47191/ijsshr/v7-i09-35.

[26] Muhammad Rafif, Udin Saripudin, and Ira Siti Rohmah Maulida, "Implementasi Fatwa DSN-MUI Nomor 01/DSN-MUI/IV/2000 Pada Produk Simpanan Giro Di Bank Syariah Indonesia (BSI) Kota Bengkulu," *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 692–98, https://doi.org/10.29313/bcssel.v4i2.15084.

[27] Eko Wahyu Ramadani, Ziyaul Fikri, and Novita Dewi Masyithoh, "Equal Rights in the Construction of Places of Worship for Followers of Religious Beliefs," *International Journal of Social Science and Human Research* 7, no. 11 (2024), https://doi.org/10.47191/ijsshr/v7-i11-78.

[28] A Ifayani Haanurat, Adinda Syalsabilla Aidha Vedianty, and Sahay Amrita Tollentino, "Instagram's Impact on Sharia Economic Law Literacy in the Digital Age and Indonesia's Sharia Economy Strengthening," *SSRN Electronic Journal*, 2024, https://doi.org/10.2139/ssrn.5061247.

[29] Mey Ayu Lestari, "Examining the Impact of Islamic Banking on Indonesia Economic Growth: Short- and Long-Term Analysis," *Journal International Economic Sharia* 1, no. 2 (2024): 75–87, https://doi.org/10.69725/jies.v1i2.138.

[30] Sheue-Li Ong, "Promoting Sustainable Healthcare Financing in Malaysia," *Post-Pandemic Economic and Social Development*, 2024, 13–24, https://doi.org/10.4324/9781003491736-2.

significant issue exacerbating this situation is the shortage of qualified Sharia scholars in Indonesia. As financial products become increasingly complex, there is a growing demand for scholars who not only possess deep knowledge of Islamic jurisprudence but also understand modern financial practices.[31] This talent gap limits the development and approval of innovative financial instruments, as regulatory bodies often lack the specialized expertise needed to evaluate new products quickly and effectively.

In contrast, Malaysia's institutional framework for Islamic finance sets a benchmark for efficiency and integration. [32] The Sharia Advisory Council (SAC), under the authority of Bank Negara Malaysia (BNM), exemplifies centralized governance. SAC's rulings are binding across the industry, ensuring consistency and uniformity in Sharia compliance. This centralized decision-making process eliminates the jurisdictional overlaps that often hamper Indonesia's system. It allows for quicker approval of financial products and creates a regulatory environment that fosters growth and innovation.

Malaysia has also addressed the talent shortage issue with a proactive approach to professional development. Institutions like the International Centre for Education in Islamic Finance (INCEIF) play a crucial role in cultivating a skilled workforce for the Islamic finance sector. INCEIF offers specialized training programs and advanced degrees, equipping professionals with both Sharia expertise and financial acumen. This investment in human capital ensures a steady pipeline of qualified scholars and practitioners, enabling Malaysia to maintain its position as a global leader in Islamic finance.[33] The integration and professional development strategies adopted by Malaysia have directly contributed to its success in the Islamic finance industry. The country has established itself as a hub for Sharia-compliant products, attracting substantial domestic and international investment. Its leadership in areas such as sukuk issuance and Islamic banking underscores the effectiveness of its institutional framework.

For Indonesia to achieve similar success, it must prioritize enhancing coordination among its regulatory bodies. Establishing a centralized authority, similar to Malaysia's SAC, could streamline decision-making and ensure uniformity in Sharia compliance. Additionally, Indonesia should invest heavily in developing its human capital by establishing institutions dedicated to Islamic finance education and training. Creating a pool of qualified Sharia scholars and practitioners will not only accelerate product development but also build investor confidence in the regulatory system.[34]

3. Growth Metrics

Indonesia's Islamic finance sector has experienced steady growth in recent years, with Islamic banking assets accounting for 6.5% of the total banking assets as of 2023. This growth reflects the increasing awareness and adoption of Sharia-compliant financial practices in the country. Notably, the issuance of sukuk has played a significant role in funding critical infrastructure projects, demonstrating the sector's potential to support national development. Despite these advancements, Indonesia's Islamic finance market remains

[31] Putra Andika, Suparji Ahmad, and Anis Rifai, "Urgency and Challenges of Illicit Enrichment Regulation in the Draft Law on Asset Forfeiture in Indonesia," *Kosmik Hukum* 24, no. 1 (2023): 1, https://doi.org/10.30595/kosmikhukum.v24i1.19577.

[32] Julius Chukwudi, *Implementation Of International Law: Challenges And Way Forward* (Elsevier BV, 2024), https://doi.org/10.2139/ssrn.4950720.

[33] Irfan Abdurahman, Asep Lukman Daris salam, and Parhan Taqwa Ali Hasan, "Implementation of Islamic Inheritance Law: Study of History, Law and Its Principles," *Al-Arfa: Journal of Sharia, Islamic Economics and Law* 2, no. 1 (2024): 81–91, https://doi.org/10.61166/arfa.v2i1.53.

[34] Samsul Al Arif, "Implementation Of Productive Wakaf In Supporting Sharia-Based Economic Development In Urban Areas," *Kompartemen: Kumpulan Orientasi Pasar Konsumen* 1, no. 2 (2024): 97–104, https://doi.org/10.56457/kompartemen.v1i2.668.

underdeveloped compared to its vast potential. Challenges such as regulatory fragmentation, limited product diversification, and a shortage of skilled professionals continue to constrain its expansion.[35] A key limitation is the relatively small market share of Islamic banking within Indonesia's overall financial system. With the majority of banking assets still under conventional banking, Islamic finance struggles to achieve a competitive edge. Additionally, while sukuk issuance for infrastructure projects showcases the sector's utility, the overall scale of the sukuk market in Indonesia is modest compared to global leaders. This indicates a need for greater innovation and a more cohesive strategy to attract domestic and international investors.[36]

In contrast, Malaysia has established itself as a global leader in Islamic finance, underpinned by a mature and well-integrated ecosystem. Islamic banking assets in Malaysia constitute an impressive 37% of the total banking assets, showcasing the sector's depth and significance within the national economy. The sukuk market is particularly noteworthy, with issuances exceeding USD 120 billion in 2022. This robust performance reflects Malaysia's strategic focus on Islamic finance as a core pillar of its financial system, supported by a cohesive regulatory framework and strong institutional capacity.[37] Malaysia's leadership in the sukuk market is not only a result of its well-structured regulatory environment but also its proactive approach to fostering innovation and attracting investment. The country's commitment to aligning Sharia compliance with global financial standards has instilled confidence among investors and positioned Malaysia as a preferred destination for Islamic finance activities. Its emphasis on professional development through institutions like INCEIF further ensures a continuous supply of skilled talent, strengthening the sector's foundations.[38]

Indonesia can draw valuable lessons from Malaysia's success. To unlock its potential, Indonesia needs to focus on expanding the market share of Islamic finance within its banking system. This requires addressing existing challenges such as regulatory fragmentation and enhancing collaboration among key institutions like Bank Indonesia (BI), the Financial Services Authority (OJK), and the National Sharia Council (DSN-MUI). Moreover, fostering product innovation and diversification, particularly in sukuk and Sharia-compliant investment instruments, could attract a broader range of stakeholders.

B. Discussion

The comparative analysis of Sharia economic law implementation between Indonesia and Malaysia reveals significant insights that offer lessons for both nations. The disparities in their approaches underline the importance of systemic structure, institutional capacity, public awareness, innovation, and global positioning. Each of these factors has a profound impact on the effectiveness of Sharia economic law and its integration into the national economy.[39]

---

[35] Sanmugam Annamalah, *Shaping Economic Recovery in Malaysia: Challenges, Counterfactuals, and Strategic Reforms in the Post-Pandemic Era* (Elsevier BV, 2024), https://doi.org/10.2139/ssrn.5034767.

[36] Alfrida Hasyim Alfrida, Enny Martha Sasea, and Atang Suryana, "Legal Challenges of Tapera Implementation in Indonesia: Toward an Equitable and Effective Housing Financing Scheme," *Legalis : Journal of Law Review* 2, no. 2 (2024): 62–71, https://doi.org/10.61978/legalis.v2i2.250.

[37] Malebakeng Agnes Forere, "National Implementation of International Economic Law: Lesotho," *Elgar Encyclopedia of International Economic Law*, 2024, https://doi.org/10.4337/9781800882324.lesotho.cr.

[38] Aji Saputra, Oekan S Abdoellah, and Gemilang Lara Utama, "Challenges and Opportunities of Urban Agriculture Programme Implementation in Indonesia: Social, Economic, and Environmental Perspectives," *Local Environment* 29, no. 11 (2024): 1490–98, https://doi.org/10.1080/13549839.2024.2402716.

[39] Loso Judijanto et al., "Islamic Law Review of Sharia Cooperative Practices in Indonesia," *West Science Islamic Studies* 2, no. 4 (2024): 178–83, https://doi.org/10.58812/wsiss.v2i04.1347.

1. Centralized vs. Fragmented Systems

One of the most pronounced differences between Indonesia and Malaysia lies in their structural frameworks for implementing Sharia economic law. Malaysia operates under a centralized system, which ensures a uniform application of Sharia principles across its financial and economic sectors. This centralization minimizes discrepancies and facilitates a cohesive approach, enabling stakeholders to operate within a well-defined regulatory environment.

In contrast, Indonesia's system is more fragmented. The decentralization of authority and the involvement of multiple agencies lead to inconsistencies and inefficiencies in policy implementation. For instance, while Indonesia has numerous Sharia-related institutions, a lack of inter-agency coordination hinders their effectiveness. Streamlining these operations through enhanced coordination mechanisms, such as a unified regulatory body or task force, could significantly improve the implementation of Sharia economic law. This approach would also ensure consistency in interpretations and applications, aligning Indonesia more closely with the successful centralized model employed by Malaysia.

2. Institutional Capacity

Institutional capacity is another area where the two countries diverge. Malaysia has demonstrated a proactive approach in addressing skill shortages within the Sharia economic sector. Educational initiatives and professional training programs play a critical role in equipping individuals with the necessary expertise to navigate the complexities of Islamic finance and economics. Institutions like the International Islamic University Malaysia (IIUM) and various financial training centers offer specialized courses and certifications that cater to market demands.[40]

Indonesia, despite its larger population and vast market potential, struggles to meet the demand for skilled professionals in the Sharia economic sector. This gap is particularly evident in rural areas, where access to education and training opportunities is limited. To bridge this gap, Indonesia should prioritize investments in Sharia-compliant education and professional development programs. Collaborations with established institutions in Malaysia could provide a model for creating robust training frameworks, thereby enhancing the country's institutional capacity.

3. Public Awareness

Both Indonesia and Malaysia face challenges in raising public awareness about the benefits and principles of Sharia economic law. However, Malaysia's proactive public outreach campaigns have yielded more substantial results. Government-led initiatives, coupled with private sector involvement, have successfully educated the public about the advantages of Islamic finance, thereby increasing participation rates. These efforts extend to urban and rural populations, ensuring widespread understanding and acceptance.

Indonesia, on the other hand, has yet to fully leverage its potential in public outreach. Awareness campaigns are often limited to urban centers, leaving rural areas underserved. Expanding these efforts to reach rural populations is critical, especially given Indonesia's demographic diversity and the significant portion of its population residing in non-urban areas. Employing innovative methods, such as mobile education units, digital platforms,

[40] Jaruprapa Rakpong and Amnart Tangkiriphimarn, "National Implementation of International Economic Law: Thailand," *Elgar Encyclopedia of International Economic Law*, 2024, https://doi.org/10.4337/9781800882324.thailand.cr.

and community engagement programs, could significantly enhance public understanding of Sharia economic principles. These efforts should also include collaboration with local leaders and religious institutions to build trust and credibility.[41]

4. Innovation

Innovation serves as a cornerstone of economic competitiveness, and Malaysia's agility in embracing financial technologies provides a clear advantage in this regard. By integrating fintech solutions into its Sharia economic framework, Malaysia has enhanced efficiency and accessibility. Platforms for digital banking, mobile payment systems, and blockchain-based solutions exemplify Malaysia's forward-thinking approach. This adaptability has not only improved domestic financial inclusion but also attracted international investors seeking Sharia-compliant financial solutions.

In contrast, Indonesia has been slower to adopt similar innovations. While initiatives to develop fintech in Sharia finance exist, they are often fragmented and lack the necessary support to achieve widespread adoption. Indonesia must adopt a more dynamic approach to innovation, prioritizing research and development in financial technologies. Incentivizing startups, fostering partnerships between the private and public sectors, and providing a supportive regulatory environment are essential steps in building a robust ecosystem for Sharia-compliant fintech.

5. Global Positioning

Malaysia's alignment with international standards has positioned it as a global leader in Islamic finance. The country actively participates in setting international benchmarks, such as those established by the Islamic Financial Services Board (IFSB) and the Accounting and Auditing Organization for Islamic Financial Institutions (AAOIFI). This strategic positioning enhances Malaysia's credibility and attractiveness as a hub for Sharia-compliant financial services.

Indonesia, despite its vast potential, has yet to capitalize on its position as the largest Muslim-majority country in the world. Strategic reforms are needed to elevate its global standing in Sharia economics. These reforms should include active participation in international forums, aligning domestic regulations with global standards, and showcasing success stories to attract foreign investment. Additionally, Indonesia's untapped potential in sectors such as halal tourism and Sharia-compliant investment funds could be leveraged to strengthen its global presence.

6. Lessons for Improvement

The comparative analysis highlights several crucial lessons for enhancing the implementation of Sharia economic law in Indonesia. First, strengthening coordination is pivotal. Indonesia could benefit greatly from adopting a centralized regulatory framework, akin to Malaysia's model, to ensure consistency and efficiency in the application of Sharia principles. A centralized system would reduce fragmentation, streamline inter-agency collaboration, and provide clearer guidelines for stakeholders.[42]

[41] Cary Coglianese, "Performance-Based Regulation: Concepts and Challenges," *Comparative Law and Regulation*, 2016, https://doi.org/10.4337/9781782545613.00028.

[42] Asep Syarifuddin Hidayat, Muhammad Ishar Helmi, and Faris Satria Alam, "Implementation of the Contante Justitie Principle of Justice in Local Leaders Election and General Election in Indonesia," *International Journal of Engineering and Advanced Technology* 9, no. 2 (2019): 2699–2703, https://doi.org/10.35940/ijeat.b2906.129219.

Second, investing in education is essential to address the skills gap in the Sharia economic sector. Expanding access to specialized education and training programs can build a robust institutional foundation. Such initiatives should include collaborations with academic and professional institutions, both domestically and internationally, to develop expertise that meets market demands. Third, enhancing public outreach is necessary to improve understanding and participation in Sharia economic activities. Targeted campaigns must extend beyond urban centers to include rural populations. Leveraging digital platforms and engaging community leaders could significantly increase public awareness, fostering greater trust and involvement in Sharia-compliant financial systems.

Fourth, promoting innovation is key to maintaining competitiveness in the global market. Indonesia needs to accelerate the adoption of financial technologies and create a supportive ecosystem for fintech development. Encouraging private sector participation, providing incentives for startups, and ensuring regulatory clarity would drive innovation and improve financial inclusion.[43] Finally, strategic global engagement is critical for Indonesia to position itself as a leader in Islamic finance. Aligning domestic policies with international standards and actively participating in global forums would enhance Indonesia's reputation. Such efforts would attract foreign investment and elevate its standing in the global Sharia economic community. By addressing these areas, Indonesia can unlock its full potential and strengthen its Sharia economic framework.

C. Recommendations

To address the challenges and improve the implementation of Sharia economic law, several key recommendations have been proposed. For Indonesia, the foremost priority is to streamline inter-agency coordination by establishing a unified regulatory framework. This approach would reduce fragmentation, ensure uniformity in the application of Sharia principles, and enhance the overall efficiency of the regulatory system. Additionally, investing in capacity-building programs is essential to bridge the gap in the availability of qualified Sharia scholars and finance professionals. By fostering collaborations with educational institutions and industry leaders, Indonesia can develop a skilled workforce capable of meeting the demands of the Sharia economic sector.

Launching targeted public awareness campaigns is critical to expanding outreach, especially to rural populations. Leveraging digital platforms and grassroots efforts can improve understanding of Sharia-compliant financial systems and encourage greater participation. Simplifying approval processes is another vital step, as it would incentivize innovation in Sharia-compliant products and services, creating a more dynamic and competitive environment.

For Malaysia, the focus should be on maintaining its strong position in the global Islamic finance market. Continuing to leverage the centralized regulatory framework will be key to fostering innovation and ensuring the adaptability of the system to emerging trends. Additionally, strengthening public education campaigns will sustain market growth and deepen the understanding of Sharia economic principles among the general population. Finally, enhancing global collaboration is crucial for maintaining leadership in Islamic finance. By aligning with international standards and participating actively in global forums, Malaysia can reinforce its reputation as a pioneer in the field. These

[43] Ni Luh Arum Puspitaning Ati, "Digital Transformation: Challenges And Implementation Electronic Medical Record System In Indonesia," *Jurnal Publikasi Kesehatan Masyarakat Indonesia* 11, no. 1 (2024), https://doi.org/10.20527/jpkmi.v11i1.18709.

recommendations provide a clear roadmap for both countries to enhance their Sharia economic systems and achieve sustained growth.

CONCLUSION

This study compares the implementation of Sharia economic law in Indonesia and Malaysia by analyzing differences in regulatory frameworks, institutional structures, and implementation challenges. The findings reveal that Malaysia's centralized regulatory framework, supported by the Sharia Advisory Council (SAC), has successfully established consistency and clarity in the application of Sharia principles. This has facilitated innovation in Sharia-compliant financial products and solidified Malaysia's position as a global leader in Islamic finance. In contrast, Indonesia faces challenges due to regulatory fragmentation and overlapping responsibilities among institutions like the Financial Services Authority (OJK) and Bank Indonesia. These issues hinder the effective development of innovative Sharia financial products. Both countries also share common challenges, such as a shortage of qualified Sharia scholars and limited public awareness of Islamic finance, particularly in rural areas. To address these challenges, Indonesia should streamline inter-agency coordination, invest in education and training programs for Sharia experts, and expand public awareness campaigns. Meanwhile, Malaysia should continue leveraging its centralized framework, enhance global collaboration, and sustain its proactive innovation strategies to maintain its competitive edge in the global Islamic finance sector.

REFERENCES

Journal Article

Abdullah, Fadli Daud, Doli Witro, Misbahul Munir Makka, Muhamad Sadi Is, and Syahid Mujahid Wiwaha. "Contemporary Challenges for Sharia Financial Institutions to Increase Competitiveness and Product Innovation Perspective of Sharia Economic Law: Evidence in Indonesia." *MILRev : Metro Islamic Law Review* 3, no. 2 (2024): 141–73. https://doi.org/10.32332/milrev.v3i2.9202.

Abdurahman, Irfan, Asep Lukman Daris salam, and Parhan Taqwa Ali Hasan. "Implementation of Islamic Inheritance Law: Study of History, Law and Its Principles." *Al-Arfa: Journal of Sharia, Islamic Economics and Law* 2, no. 1 (2024): 81–91. https://doi.org/10.61166/arfa.v2i1.53.

Agustina, Ingrid Larasati, and Dudi Abdul Hadi. "Sharia Compliance and Fraud: Study on Sharia Commercial Banks in Indonesia." *International Journal of Management and Economics Invention* 10, no. 12 (2024). https://doi.org/10.47191/ijmei/v10i12.08.

Aini, Almusrijah. "Economic Development And Growth In Indonesia According To Law Sharia Economy." *Jurnal Nuansa : Publikasi Ilmu Manajemen Dan Ekonomi Syariah* 2, no. 3 (2024): 217–31. https://doi.org/10.61132/nuansa.v2i3.1208.

Alfrida, Alfrida Hasyim, Enny Martha Sasea, and Atang Suryana. "Legal Challenges of Tapera Implementation in Indonesia: Toward an Equitable and Effective Housing Financing Scheme." *Legalis : Journal of Law Review* 2, no. 2 (2024): 62–71. https://doi.org/10.61978/legalis.v2i2.250.

Andika, Putra, Suparji Ahmad, and Anis Rifai. "Urgency and Challenges of Illicit Enrichment Regulation in the Draft Law on Asset Forfeiture in Indonesia." *Kosmik*

Hukum 24, no. 1 (2023): 1. https://doi.org/10.30595/kosmikhukum.v24i1.19577.

Annamalah, Sanmugam. *Shaping Economic Recovery in Malaysia: Challenges, Counterfactuals, and Strategic Reforms in the Post-Pandemic Era*. Elsevier BV, 2024. https://doi.org/10.2139/ssrn.5034767.

Arif, Samsul Al. "Implementation Of Productive Wakaf In Supporting Sharia-Based Economic Development In Urban Areas." *Kompartemen: Kumpulan Orientasi Pasar Konsumen* 1, no. 2 (2024): 97–104. https://doi.org/10.56457/kompartemen.v1i2.668.

Ariffin, Mohd Faizal Noor, Mohammad Zaini Yahaya, and Abdul Basir Mohamad. "Memperluas Pelaksanaan Wakaf Pendidikan Di Malaysia." *Kajian Malaysia* 42, no. 2 (2024): 313–32. https://doi.org/10.21315/km2024.42.2.14.

Asyifa, Nahdiyatul. "Opportunities and Challenges of Sharia Fintech (Financial Technology) in Indonesia." *Tawazuna* 2, no. 2 (2023). https://doi.org/10.35747/twz.v2i2.732.

Ati, Ni Luh Arum Puspitaning. "Digital Transformation: Challenges And Implementation Electronic Medical Record System In Indonesia." *Jurnal Publikasi Kesehatan Masyarakat Indonesia* 11, no. 1 (2024). https://doi.org/10.20527/jpkmi.v11i1.18709.

Chukwudi, Julius. *Implementation Of International Law: Challenges And Way Forward*. Elsevier BV, 2024. https://doi.org/10.2139/ssrn.4950720.

Coglianese, Cary. "Performance-Based Regulation: Concepts and Challenges." *Comparative Law and Regulation*, 2016. https://doi.org/10.4337/9781782545613.00028.

Daniels, Timothy P. *Living Sharia*. University of Washington Press, 2017. https://doi.org/10.1515/9780295742564.

Darodjat, Rafan, and Agus Suwandono. "Special Criminal Law Against Sharia Economic Crimes." *Jurnal Justisia Ekonomika: Magister Hukum Ekonomi Syariah* 8, no. 2 (2024): 1179–89. https://doi.org/10.30651/justeko.v8i2.24012.

Fattah, Abdul. "Implementation of Sharia Economic Law Principles in Overcoming the Economic Impact of the Palestinian Israeli Conflict." *International Journal of Education, Culture, and Society* 3, no. 1 (2024): 35–54. https://doi.org/10.58578/ijecs.v3i1.4293.

Forere, Malebakeng Agnes. "National Implementation of International Economic Law: Lesotho." *Elgar Encyclopedia of International Economic Law*, 2024. https://doi.org/10.4337/9781800882324.lesotho.cr.

Haanurat, A Ifayani, Adinda Syalsabilla Aidha Vedianty, and Sahay Amrita Tollentino. "Instagram's Impact on Sharia Economic Law Literacy in the Digital Age and Indonesia's Sharia Economy Strengthening." *SSRN Electronic Journal*, 2024. https://doi.org/10.2139/ssrn.5061247.

Hasan, Asyari, Alimin Alimin, Rizal Fahlefi, and Desmadi Saharuddin. "The Principles of Law of Negligence as Causes of Compensation in the Sharia Economic Law in Indonesia." *Al-Ulum* 19, no. 1 (2019): 53–78. https://doi.org/10.30603/au.v19i1.722.

Hasan, Hasbi, and Cecep Mustafa. "The Politics of Law of Sharia Economics in Indonesia." *SSRN Electronic Journal*, 2024. https://doi.org/10.2139/ssrn.4986227.

Hasanah, Ikhwah, and Fitria Ulfa wibowo. "Implementation Sharia Ethics For Sharia

Compliance Audit on Audit Process." *Tawazuna* 1, no. 2 (2022): 8–12. https://doi.org/10.35747/twz.v1i2.348.

Hidayat, Asep Syarifuddin, Muhammad Ishar Helmi, and Faris Satria Alam. "Implementation of the Contante Justitie Principle of Justice in Local Leaders Election and General Election in Indonesia." *International Journal of Engineering and Advanced Technology* 9, no. 2 (2019): 2699–2703. https://doi.org/10.35940/ijeat.b2906.129219.

Insyani, M Zidan Al, Panji Adam Agus Putra, and Iwan Permana. "Analisis Terhadap Fatwa Dewan Syariah Indonesia Majelis Ulama Indonesia (DSN-MUI) Nomor 2 Tahun 2000 Tentang Tabungan Berdasarkan Perspektif Pemikiran Wahbah Az-Zuhaili." *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 316–23. https://doi.org/10.29313/bcssel.v4i2.13373.

Judijanto, Loso, Sufriaman Sufriaman, Muhammadong Muhammadong, and Halek Mu'min. "Islamic Law Review of Sharia Cooperative Practices in Indonesia." *West Science Islamic Studies* 2, no. 4 (2024): 178–83. https://doi.org/10.58812/wsiss.v2i04.1347.

Lestari, Mey Ayu. "Examining the Impact of Islamic Banking on Indonesia Economic Growth: Short- and Long-Term Analysis." *Journal International Economic Sharia* 1, no. 2 (2024): 75–87. https://doi.org/10.69725/jies.v1i2.138.

Mappasessu, Mappasessu. "Analysis of the Role of Judicial Institutions in Sharia Economic Law Enforcement in Indonesia." *Journal of Islamic Economy* 1, no. 2 (2024): 1–7. https://doi.org/10.62872/gtygez33.

Mashudi, Yudi. "Complexity of Sharia Economic Problems." *Journal of Law and Regulation Governance* 2, no. 7 (2024): 260–80. https://doi.org/10.57185/jlarg.v2i7.63.

Masitoh, Isnaeni Tera, and Yunanto Yunanto. "Analysis of Implementation of Anti-Money Laundering Mechanisms in Blockchain-Based Smart Contracts under Indonesian Regulation." *International Journal of Social Science and Human Research* 7 (2024). https://doi.org/10.47191/ijsshr/v7-i09-35.

Ong, Sheue-Li. "Promoting Sustainable Healthcare Financing in Malaysia." *Post-Pandemic Economic and Social Development*, 2024, 13–24. https://doi.org/10.4324/9781003491736-2.

Pradika, Agun. "Implementation of Islamic Inheritance Law: Study of History, Law and Its Principles." *Al-Arfa: Journal of Sharia, Islamic Economics and Law* 2, no. 1 (2024): 92–103. https://doi.org/10.61166/arfa.v2i1.54.

Prihasmoro, Adi, Yayan Sopyan, Raihanah Abdullah, and Sufiarina Sufiarina. "Sharia Economic Bankruptcy Law (Al-Taflis) and the Dualism of Court Competency in Indonesia." *JURIS (Jurnal Ilmiah Syariah)* 23, no. 2 (2024): 227. https://doi.org/10.31958/juris.v23i2.11045.

Putra, Panji Adam Agus. "Syar'u Man Qablanâ and It's Implementation in Sharia Economic Law (Mu'amalah Mâliyyah)." *Jurnal Ilmiah Mizani: Wacana Hukum, Ekonomi Dan Keagamaan* 9, no. 1 (2024): 81. https://doi.org/10.29300/mzn.v9i1.2861.

Qolbi, Fikri 'Ainul, and Faizan Alam. "Sharia Hotel Management Policy: An Analysis of Islamic Attribute of Destination Theory in Indonesia and Malaysia." *Journal of Islamic Economic Laws* 7, no. 1 (2024): 124–37. https://doi.org/10.23917/jisel.v7i01.5254.

Rafif, Muhammad, Udin Saripudin, and Ira Siti Rohmah Maulida. "Implementasi Fatwa DSN-MUI Nomor 01/DSN-MUI/IV/2000 Pada Produk Simpanan Giro Di Bank Syariah Indonesia (BSI) Kota Bengkulu." *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 692–98. https://doi.org/10.29313/bcssel.v4i2.15084.

Rahma, Fuji Alia, Heni Noviarita, and Rita Zaharah. "The Implementation of Law Number 21 of 2008 Concerning Sharia Banking on Sharia Financial Institutions Is Underway Sharia Economic Law Perspective." *ASAS* 16, no. 1 (2024). https://doi.org/10.24042/asas.v16i1.18779.

Rahman, Zilan Fauzi, Udin Saripudin, and Ira Siti Rohmah Maulida. "Pelayanan Terhadap Nasabah Pada Bank Syariah Indonesia TBK Kantor Cabang Citarum Bandung Ditinjau Dari Perspektif Islamic Service Quality." *Bandung Conference Series: Sharia Economic Law* 4, no. 2 (2024): 699–705. https://doi.org/10.29313/bcssel.v4i2.15090.

Rakpong, Jaruprapa, and Amnart Tangkiriphimarn. "National Implementation of International Economic Law: Thailand." *Elgar Encyclopedia of International Economic Law*, 2024. https://doi.org/10.4337/9781800882324.thailand.cr.

Ramadani, Eko Wahyu, Ziyaul Fikri, and Novita Dewi Masyithoh. "Equal Rights in the Construction of Places of Worship for Followers of Religious Beliefs." *International Journal of Social Science and Human Research* 7, no. 11 (2024). https://doi.org/10.47191/ijsshr/v7-i11-78.

Ramdan, Muhammad, and Ardina Nur Amalia. "Substantive and Procedural Justice Principles in the Implementation of Industrial Court Decisions: Challenges and Solutions." *International Journal Of Multidisciplinary Research And Analysis* 7, no. 11 (2024). https://doi.org/10.47191/ijmra/v7-i11-41.

Riani, Maulina Desita, and Untoro Untoro. "The Implications in Implementation of the Acquisition of TikTok Shop with Tokopedia Based on Regulation of Business Law in Indonesia." *Law Development Journal* 6, no. 2 (2024): 285. https://doi.org/10.30659/ldj.6.2.285-292.

Rismilda, Nela Aprilia, Supangat Supangat, and Lathif Hanafir Rifqi. "Implications Of Sharia Economic Law For Halal Certification On Imported Products In Indonesia." *Istinbath* 23, no. 2 (2024): 231–43. https://doi.org/10.20414/ijhi.v23i2.655.

Saleha, Alifia Mumtazati. "Perbandingan Antara Sistem Pemerintahan Di Indonesia Dan Malaysia." *Datuk Sulaiman Law Review (DaLRev)* 4, no. 2 (2023): 47–60. https://doi.org/10.24256/dalrev.v4i2.4758.

Saputra, Aji, Oekan S Abdoellah, and Gemilang Lara Utama. "Challenges and Opportunities of Urban Agriculture Programme Implementation in Indonesia: Social, Economic, and Environmental Perspectives." *Local Environment* 29, no. 11 (2024): 1490–98. https://doi.org/10.1080/13549839.2024.2402716.

Conflict of Interest Statement: The author(s) declares that research was conducted in the absence of any commercial or financial relationship that could be construed as a potential conflict of interest,

SASI is an open acces and peer-reviewed journal published by Faculty of Law Universitas Pattimura, Ambon, Indonesia.

OPEN ACCESS