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Dynamics of Halal Tourism Policy in Muslim- and Muslim-Minority Countries

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Abstract: This study analyzes and compares the formulation and implementation of halal tourism policies in Indonesia, Malaysia, and Cambodia using public policy analysis. The analysis combines Kingdon's Multiple Streams Framework, Dror's policy-making models, and the implementation framework developed by Mazmanian and Sabatier with concepts from Islamic law. The study draws on data from document analysis, interviews, and comparative policy review. The findings indicate that Indonesia adopts a decentralized halal tourism governance model characterized by multiple regulatory and institutional actors. By comparison, Malaysia implements a centralized model under JAKIM that enables stronger institutionalization of Islamic legal principles, greater legal certainty (al-yaqin), and greater consistency in halal standards and less uncertainty about halal compliance. Cambodia, by contrast, applies a Muslim-friendly tourism approach which, from the perspective of fiqh mu'amalat, may be understood as a form of rukhshah at the level of hajiyyat, providing essential religious accommodation in a Muslim-minority context. The article interprets these differences as reflecting varying degrees of institutional capacity and different ways of translating Islamic legal principles into public policy. The study contributes to interdisciplinary debates by bringing public policy analysis into dialogue with siyāsah sharʿiyyah, taqnīn al-aḥkām, fiqh muʿāmalāt, and maqāṣid al-sharīʿah.

Abstrak: Penelitian ini menganalisis perumusan dan implementasi kebijakan pariwisata halal di Indonesia, Malaysia, dan Kamboja melalui pendekatan kebijakan publik yang mengintegrasikan Multiple Streams Framework dari Kingdon, model pembuatan kebijakan Dror, kerangka implementasi Mazmanian dan Sabatier, serta konsep hukum Islam. Data diperoleh melalui analisis dokumen, wawancara, dan tinjauan kebijakan komparatif. Hasil penelitian menunjukkan bahwa Indonesia menerapkan tata kelola desentralistis dengan beragam aktor regulasi dan kelembagaan, sedangkan Malaysia mengadopsi model terpusat di bawah JAKIM yang mendukung pelembagaan prinsip hukum Islam, kepastian hukum (al-yaqin), dan konsistensi standar halal. Sementara itu, Kamboja mengembangkan pariwisata ramah Muslim yang, dalam perspektif fiqh mu'amalat, merepresentasikan rukhshah pada tingkat hajiyyat untuk mengakomodasi kebutuhan keagamaan esensial minoritas Muslim. Perbedaan tersebut mencerminkan variasi kapasitas kelembagaan dan penerjemahan prinsip hukum Islam ke dalam kebijakan publik. Penelitian ini berkontribusi pada kajian interdisipliner dengan menghubungkan analisis kebijakan publik dan konsep siyāsah sharʿiyyah, taqnīn al-aḥkām, fiqh muʿāmalāt, serta maqāṣid al-sharīʿah.

Keywords:
Halal tourism; Public policy; Siyasah syar'iyyah; taqnin al-ahkam; Maqasid al-shariah

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Introduction

Halal tourism is increasingly in demand in Muslim-majority and Muslim countries (Rasul, 2019). The number of Muslim tourists continues to grow, prompting many countries to capitalize on the potential (Vargas-Sanchez & Moral-Moral, 2019). Southeast Asia is a major destination region for Muslim-friendly and halal tourism. This region is known for its natural beauty, cultural diversity, biodiversity of flora and fauna, and delicious cuisine, which attracts tourists from many countries.

Historically, the concept of halal tourism was introduced in 2000 at the OIC (Organization of Islamic Cooperation) meeting in Qatar as sharia tourism (Kamarudin & Ismail, 2012, p. 2). The concept of sharia tourism in Indonesia began to develop in 2012, marked by a memorandum of understanding between the Ministry of Tourism and Creative Economy (Kemenparekraf) and the National Sharia Council-Indonesian Ulama Council (DSN-MUI) on the Development and Socialization of Sharia Tourism. That same year, the government, through the Ministry of Tourism and Creative Economy, released a sharia tourism guidebook. However, officially, the concept of sharia tourism was introduced to the public at the Indonesia Halal Expo (Indhex) and Global Halal Forum organized by the Ministry of Tourism and Creative Economy from 30 October to 2 November 2013, at JIExpo Kemayoran, Jakarta (Baidlowi, 2018, p. 7; Surur, 2020, p. 163).

Meanwhile, halal tourism in Indonesia was formally recognized in 2014, with the introduction of Sharia tourism (see Permenparekraf No. 2 of 2014 concerning Guidelines for the Implementation of Sharia Hotel Business). However, in 2015, the use of sharia tourism nomenclature began to shift to halal tourism (See West Nusa Tenggara Governor Regulation No. 51 of 2015 concerning Halal Tourism). The term halal tourism appears in various regional laws and regulations, including regional regulations (Peraturan Daerah/Perda), governor regulations, and regent/mayor regulations. Examples of regional regulations include West Nusa Tenggara Governor Regulation No. 51 of 2015; Siak Regency Regulation No. 2 of 2017 on the Implementation of Halal Tourism; Qanun of Aceh Jaya Regency No. 10 of 2019 on Halal Tourism; Banjarmasin City Regulation No. 2 of 2021 on Halal Tourism; Muara Enim Regency No. 15 of 2019 on Halal Tourism; Bandung Regency Regulation No. 6 of 2020 on Halal Tourism; and Qanun of Banda Aceh City No. 3 of 2022 on the Implementation of Halal Tourism. At the provincial level, relevant instruments include Governor Regulation No. 51 of 2015 on Halal Tourism and Riau Governor Regulation No. 18 of 2019 on Halal Tourism. At the regency and municipal levels, examples include Mayor Regulation No. 59 of 2019 on Halal Tourism and Pesisir Selatan Regency Regulation No. 21 of 2021 on the Implementation of Halal Tourism. In addition to the use of halal tourism nomenclature, the term Muslim-friendly tourism can also be found in several laws and regulations, for example, West Java Governor's Regulation No. 1 of 2022 concerning Sharia Economic and Financial Development and Central Java Governor's Regulation No. 40 of 2023 concerning Muslim-Friendly Tourism in the Context of Economic Development.

Malaysia's halal regulatory framework began developing earlier than Indonesia's; however, halal-tourism policy development should be distinguished from halal certification development. The Malaysian government began issuing formal halal regulations in the early 1960s. Furthermore, in 1974, the Research Center of the Islamic Affairs Division under the Prime Minister's Office began issuing halal certificates for products that comply with sharia principles, laying the foundation for Malaysia's halal industry. Malaysia then introduced a systematically documented halal assurance system in 2000 (Ihwan & Syarifuddin, 2021).

In 2005, the development of halal certification in Malaysia also prompted the Department of Islamic Development Malaysia (JAKIM) to expand its halal section into a larger organization known as the JAKIM Halal Hub. JAKIM became the world's first halal certification body responsible for monitoring the halal industry, leading to an amendment to the Malaysian Trade Description Act in 2011 that gave JAKIM a stronger mandate to regulate it. JAKIM's recognition program for international halal bodies is the most rigorous and sought-after in the world, with more than 50 international bodies registered to date (Yustianingsih et al., 2024).

In the early 2000s, Malaysia began to expand the concept of halal to the tourism sector. The Malaysian government sees great potential in attracting Muslim tourists from around the world by offering tourism experiences aligned with Islamic principles (Goeldner & Ritchie, 1972). In 2004, the launch of the Malaysia International Halal Showcase (MIHAS) marked an important step in promoting halal tourism. It made Malaysia a global trade and reference center in the halal industry. In the years that followed, Malaysia consistently promoted itself as a major halal tourism destination through international campaigns and exhibitions. In 2015, Malaysia was recognized as the world's best halal tourism destination by the Global Muslim Travel Index (GMTI). This recognition stems from its strong infrastructure, including halal-certified restaurants, sharia hotels, and worship facilities that are easily accessible to tourists.

The halal tourism industry is not limited to countries with a majority Muslim population (Crescentrating, 2023a, pp. 60–64). The industry also develops in countries with Muslim minorities, such as Cambodia (Al-Khraisha et al., 2024, pp. 221–225). In 2016, Cambodia began formulating more concrete policies to develop halal tourism. The Cambodian government began working with countries such as Malaysia and Turkey to build a reliable halal certification system to attract more Muslim tourists to Cambodia (Editor, 2016). In 2018, the Government of Cambodia, through various relevant ministries, developed a halal certification system for restaurants and food manufacturers. This step helps ensure that food served in Cambodia complies with Islamic law (Editor, 2018).

A key initiative in developing Cambodia's halal ecosystem is the Cambodian Halal Park. The park is designed as a hub that integrates businesses, consumers, and communities in a fully halal-friendly environment, aiming to support MSME growth and promote halal standards in Cambodia (Zain, 2020). Several hotels in major cities such as Phnom Penh and Siem Reap have started providing Muslim-friendly facilities, including in-room Qibla directions, prayer mats, and halal food. Mosques have also been built or repaired in various locations to meet Muslim tourists' worship needs (Salama, 2016).

The 2023 Global Muslim Travel Index (GMTI) assessment shows that Indonesia ranks first as the world's best halal tourist destination, followed by Malaysia, while Cambodia ranks eighth in Southeast Asia (Crescentrating, 2023b). Based on the above background, halal tourism in parts of Southeast Asia is not only developed by countries with a majority Muslim population, but countries with Muslim minority populations also participate in developing halal tourism. This research examines the existence of policies, internal and external factors, and the implementation of halal tourism industry development policies in Indonesia, Malaysia, and Cambodia.

Although halal tourism has generally been examined through the perspectives of public policy, governance, and tourism management, its development cannot be separated from the normative framework of Islamic law. From the perspective of Siyāsah Sharʿīyah, state policies concerning halal tourism represent a legitimate governmental effort to realize maṣlaḥah ʿāmmah (public welfare) through regulations that accommodate the religious needs of Muslim travelers while promoting sustainable economic development (Al-Syatibi, 2015). In this context, halal tourism policies constitute a form of taqnīn al-aḥkām, namely the transformation of Islamic legal principles into positive law through legislation (siyāsah tashrīʿiyyah) and their implementation by state institutions (siyāsah tanfīdhiyyah) (Ismail et al., 2020; Trishananto et al., 2024). Therefore, the effectiveness of halal tourism policies should be evaluated not only on administrative performance but also on their consistency with the objectives of Islamic law (Trishananto et al., 2024).

Furthermore, the implementation of halal tourism can be assessed through the framework of maqāṣid al-sharīʿah, particularly the protection of religion (ḥifẓ al-dīn), wealth/ property (ḥifẓ al-māl), and honor/dignity (ḥifẓ al-ʿirḍ) (Toha Andiko, Suansar Khatib, 2018). This perspective enables a more comprehensive analysis of how Indonesia, Malaysia, and Cambodia's regulatory approaches contribute to legal certainty, consumer protection, and the fulfillment of Muslim travelers' religious needs. Accordingly, this study integrates public policy theories with the perspectives of siyāsah sharʿiyyah and maqāṣid al-sharīʿah to provide a more comprehensive

understanding of halal tourism policy development in Muslim-majority and Muslim-minority countries.

Method

This study employs qualitative field research, complemented by conceptual, statutory, and comparative approaches (Marzuki, 2017, pp. 29–36; ND & Achmad, 2010, p. 51). A qualitative approach was used to gather empirical data on policy modeling, implementation, and the impact of halal tourism in Indonesia, Malaysia, and Cambodia as the study's geographical and substantive focus (Bachtiar, 2019, p. 84). Primary data were collected from policymakers and industry stakeholders involved in the halal tourism sector in Indonesia, Malaysia, and Cambodia. Data sources included representatives from Sani Hotel Kuala Lumpur, Padang Restaurant Kuala Lumpur, and Saron Muslim Food Cambodia Restaurant in Svay Khleang, Krauch Chmar, Cambodia. Interviews were also conducted with H.E. Thorn Sarorn, an adviser to the Royal Government of Cambodia, and Dato' Haji Kamarudin Yusof of the Highest Council for Islamic Religious Affairs in Cambodia. Information on halal criteria and regulatory requirements was obtained from officials responsible for overseeing the halal industry, whose expertise encompassed halal regulations, as well as from business practitioners directly involved in the sector.

Secondary data were drawn from primary legal materials, including laws, regulations, and policy documents governing the development of the halal tourism industry in Indonesia, Malaysia, and Cambodia. Additional sources comprised secondary legal materials, such as academic journal articles, books, legal scholars' opinions, reports on halal tourism industry development, and other documents relevant to the research topic.

Data were collected through interviews and documentary analysis. The study ensured data validity and credibility by triangulating sources, methods, and analytical perspectives and comparing interview findings with policy documents, legal regulations, and relevant literature. Further verification involved confirming information with informants, cross-checking findings across sources, and systematically documenting the research process. The data were analyzed iteratively through data reduction, data display, and conclusion drawing.

The data were analyzed using three complementary analytical frameworks: the Multiple Stream Frameworks, Ezequiel Dror's policy analysis model, and the policy implementation models developed by Mazmanian and Sabatier. These frameworks were used to examine policy formulation, decision-making, and implementation in developing the halal tourism industry across the three countries.

Results and Discussion

The Existence of Halal Tourism Industry Development Policies in Indonesia, Malaysia, and Cambodia

The existence of halal tourism industry development policies in Indonesia, Malaysia, and Cambodia can be analyzed using the Multiple Streams Framework (MSF) from John W. Kingdon, which consists of three streams: the problem stream, the policy stream, and the politics stream (Berut, 2023; Yamamoto & Iversen, 2024; Fowler, 2019). The problem stream is the flow of problems identified as public problems (De Wals et al., 2019). The policy stream consists of policy solutions or alternatives proposed by experts, academics, and policymakers (Beland, 2016). Meanwhile, the political stream includes the dynamics of political power, public opinion, leadership changes, and pressure from interest groups (Shephard et al., 2021).

First, the problem stream. The development of halal tourism in Indonesia is driven by growing awareness among Muslim tourists, both domestic and foreign, of the need for tourist facilities that align with sharia principles (KNEKS, 2018, p. 78). This is supported by data on Indonesia's Muslim population, which reaches around 207 million out of a total **population of**

238.5 million. This demographic profile suggests substantial potential demand for halal tourism. In addition, the Global Muslim Travel Index (GMTI) 2023 ranks Indonesia among the top countries, alongside Malaysia, reflecting the country's commitment to providing Muslim-friendly facilities (Crescentrating, 2023b). Additional data show that only 49 (1.2%) of 4,125 hotels reported having halal-certified restaurants, indicating a strong need for further development in the sector (Halalmui.org, 2026).

On the other hand, in Malaysia, rising demand among Muslim tourists has created a policy problem or opportunity that the government has sought to address, arising from the increasing demand of global Muslim tourists. Based on GMTI 2023 data, Malaysia continues to rank among the top destinations for Muslim tourists (Crescentrating, 2023b). In 2017, 273 three- to five-star hotels in Malaysia were reported to have obtained halal certification, enabling them to provide more comprehensive services for Muslim tourists (Musthofa et al., 2023; Peristiwo, 2020). Malaysia is also known for its trusted halal certification system through JAKIM, which is internationally recognized, making it a destination of choice for global Muslim tourists.

Meanwhile, Cambodia is seeing growing interest from global Muslim tourists seeking new destinations with halal facilities. Data shows that Cambodia already has 64 halal-certified restaurants, although only 3 restaurants have active certificates (Editor, 2024b). Cambodia has a relatively small Muslim population, about 2-3% of the total population (Editor, 2024a). The country has begun developing Muslim-friendly infrastructure, such as the Al-Serkal Grand Mosque in Phnom Penh and other mosques in Siem Reap, to meet the growing needs of Muslim tourists (Research team interview with H.E. Thorn Sarorn, Advisor to the Royal Government of Cambodia, 5 June 2024, Phnom Penh, Cambodia).

Second, the policy stream. Indonesia has shown its commitment to developing halal tourism through various policies. One indicator of this commitment is the existence of Regional Regulations (Perda) in several main provinces, such as West Sumatra, West Nusa Tenggara, and West Java, that regulate halal tourism implementation. In addition, Indonesia has built significant halal infrastructure. This is a challenge in expanding Muslim-friendly infrastructure. Several provinces, such as Aceh and West Nusa Tenggara (NTB), have also developed into halal tourism centers by providing complete facilities for Muslim tourists (Crescentrating, 2023c).

Meanwhile, in Malaysia, the policy stream was formed through the implementation of the halal certification program by the internationally recognized Department of Islamic Development Malaysia (JAKIM). The Halal Master Plan, which was launched in 2008, is the foundation for the development of Muslim-friendly facilities in Malaysia, with integrated policies in various tourism sectors such as food, accommodation, and places of worship.

In Cambodia, halal tourism is still in its early stages. The country began by establishing the Cambodian Halal Steering Committee (CHSC) and issuing halal certificates for more than 1,300 food and beverage products. However, of the 64 existing halal restaurants, only 3 remain active in their certification (Interview with Dato' Haji Kamarudin Yusof, Highest Council for Islamic Religious Affairs, Cambodia, 4 June, 2024. Phnom Penh, Cambodia). In addition, the government's efforts to promote Muslim-friendly tourism are also evident in the preparation of the Muslim-Friendly Tourism Book and its promotion through various media. However, Cambodia is still not included among the top 20 destinations for Muslim tourists in the 2023 Global Muslim Travel Index (GMTI).

From the perspective of Islamic legal theory, the policy stream identified in Indonesia, Malaysia, and Cambodia may also be understood as taqnīn al-aḥkām, namely the transformation of Islamic legal norms into binding state regulations (Ridwan et al., 2023). In the context of halal tourism, Islamic principles concerning halal products, worship facilities, ethical services, and consumer protection are no longer confined to religious guidance or fatwas; instead, they are increasingly incorporated into statutory regulations, administrative policies, and technical standards governing the tourism sector (Lestari & Amsari, 2019). Consequently, halal tourism

policy is not merely a public policy instrument but also a legal mechanism through which the state institutionalizes Islamic values within contemporary governance.

Nevertheless, the degree of taqnīn al-aḥkām differs across the three countries. Specify the legislation and explain how it applies to tourism, rather than treating certification and tourism regulation as equivalent, centralized institutional authority under JAKIM and nationally recognized halal standards. Indonesia adopts a more decentralized model in which Islamic legal principles are transformed into a combination of national regulations, regional regulations, and administrative guidelines, resulting in a more fragmented regulatory framework. In contrast, Cambodia reflects an emerging form of taqnīn al-aḥkām, where the incorporation of Islamic legal principles remains limited to basic halal certification and Muslim-friendly tourism initiatives aimed at accommodating Muslim visitors in a Muslim-minority context.

Third, the political stream. Indonesia has strong support from the central government and various related institutions, including the Ministry of Tourism and Creative Economy and the Indonesian Ulama Council (MUI) (Dinar Standard & Indonesia Halal Life Style Center, 2021). Through this ministry, the government is actively developing and promoting Indonesia as a halal tourist destination, as reflected in Indonesia and Malaysia's joint top ranking in the 2023 Global Muslim Travel Index (GMTI). This data reflects strong political support for Indonesia's halal tourism industry. In addition, MUI plays an active role by issuing sharia fatwas and tourism-related guidelines, such as DSN-MUI Fatwa No. 108/DSN-MUI/X/2016, which sets out the principles for implementing sharia-based tourism. With cross-agency coordination, this support creates a conducive environment for the sustainable development of halal tourism.

In addition, political commitment is also reflected in the formation of regional and provincial regulations related to halal tourism, such as NTB Regional Regulation No. 2 of 2016 concerning Halal Tourism and Central Java Governor Regulation No. 40 of 2023 concerning Muslim-Friendly Tourism. These regulations strengthen the legal basis for implementing halal tourism across regions. For example, in West Nusa Tenggara (NTB) and West Sumatra, halal tourism development efforts include providing special facilities for Muslim tourists, such as halal-certified restaurants and Muslim-friendly hotels.

In Malaysia, the political stream is supported by institutions such as the Islamic Tourism Center (ITC) and the Department of Islamic Development Malaysia (JAKIM). These institutions play a key role in ensuring that halal tourism policies are implemented properly. Malaysia has had a Halal Master Plan since 2008, which focuses on three phases of development to make Malaysia a global halal hub. The promotion of Malaysia as a halal tourist destination is carried out globally, strengthening its position as one of the main destination countries in GMTI 2023. This support shows the government's seriousness in maintaining and improving its ranking in the world's halal tourism industry.

In Cambodia, although the political stream is still limited, the Cambodian Halal Steering Committee (CHSC) under the Ministry of Trade has begun to play a role in supporting the development of the halal industry. The CHSC aims to coordinate various stakeholders, including relevant ministries and religious authorities, to promote halal products and services. Data shows that 64 halal restaurants have obtained certification. However, only 3 restaurants still have active halal certificates (Interview with Dato' Haji Kamarudin Yusof, Highest Council for Islamic Religious Affairs, Cambodia, 4 June 2024, Phnom Penh, Cambodia**).** This support, although smaller than in Indonesia and Malaysia, shows that Cambodia has begun to see this sector's potential to boost the country's economy, especially through the development of Muslim-friendly tourist destinations.

Of the three countries discussed, policy entrepreneurs play a key role in encouraging halal tourism development in Indonesia, Malaysia, and Cambodia. In Indonesia, policy entrepreneurs come from various circles, including the government and religious institutions. The Ministry of Tourism and Creative Economy, BPJPH, and the Indonesian Ulama Council (MUI) are key actors that encourage the implementation of sharia-based and halal policies in the tourism business

sector. This is reflected in Indonesia's achievements in the Global Muslim Travel Index (GMTI) 2023 report, where Indonesia and Malaysia rank among the top Muslim-friendly destinations.

In addition, national and regional regulations have been issued, such as NTB Regional Regulation No. 2 of 2016 and West Sumatra Regional Regulation No. 1 of 2020, showing local government initiatives to develop halal tourism. However, although Indonesia has more than 4,000 hotels, only 49 hotels, or about 1.2%, are halal-certified according to data from the Halal Product Assurance Agency (BPJPH). This data shows that Indonesia still faces challenges in increasing the number of halal-certified facilities to support the growth of halal tourism.

In Malaysia, policy entrepreneurs also play a significant role, especially institutions such as the Malaysian Islamic Development Department (JAKIM) and the Islamic Tourism Center (ITC). These institutions develop internationally recognized halal certification and ensure adequate halal infrastructure for Muslim tourists. Interview evidence suggests that Muslim tourists could access services aligned with Islamic principles (Interview with Sany, Hotel Waitress, 2 June 2024, Kuala Lumpur, Malaysia). In addition, the Halal Master Plan, which was introduced in 2008, is a strategy and program to make Malaysia the center of world halal tourism. The policy promoted by policy entrepreneurs in Malaysia demonstrates the country's success in positioning itself as a top destination for global Muslim tourists.

Meanwhile, Cambodia is still in the early stages of halal tourism development. Although it is not yet included in the top 20 halal tourist destinations according to GMTI 2023, Cambodia is starting to show development potential. Policy entrepreneurship in Cambodia is government-led through the Cambodian Halal Steering Committee, which oversees the development and promotion of halal products and services (Interview with H.E. Thorn Sarorn, Advisor to the Royal Government of Cambodia, 5 June 2024, Phnom Penh, Cambodia). Currently, Cambodia has 64 halal-certified restaurants, but only 3 remain active. In addition, although the Muslim population in Cambodia is only about 2-3%, some mosques, such as the Al-Serkal Grand Mosque in Phnom Penh, are already available to support Muslim tourists' worship needs. Cambodia is also compiling a Muslim-Friendly Tourism guidebook that aims to improve the readiness of Muslim-friendly services and facilities in various tourist destinations.

In Indonesia and Malaysia, the three streams in the Multiple Streams Framework (MSF) converged faster because of strong synergy among the problem, policy, and political streams. In Indonesia, the increasing need of Muslim tourists for facilities in accordance with sharia principles (problem stream) was immediately responded to by the government through various policies, such as the implementation of Regional Regulations (Perda) related to halal tourism in several provinces, and supported by national policies that regulate the halal industry (policy stream). In addition, political support from the central and regional governments, as well as religious institutions such as the Indonesian Ulema Council (MUI), further strengthens the implementation of halal tourism policies (political stream). Cross-agency coordination and support from the Ministry of Tourism and Creative Economy also create a conducive environment for developing halal tourism in Indonesia, as shown by Indonesia's top position in the Global Muslim Travel Index (GMTI) 2023.

Malaysia also showed a similar dynamic, where the three streams met effectively. The Malaysian government has long identified high demand from global Muslim tourists (problem stream) and responded with comprehensive policies, including JAKIM's halal certification and the development of halal infrastructure (policy stream). Political support is also reflected in the implementation of the Halal Master Plan since 2008, allowing Malaysia to continue to lead the global halal tourism market (political stream). Malaysia's success in maintaining its position as one of the best halal tourism destinations shows that the country has leveraged policy and political support to advance the halal tourism industry.

In contrast, Cambodia is still in the early stages of halal tourism development and has not yet reached the same level of consolidation as Indonesia and Malaysia. Although the problem stream has been identified, namely the increasing interest of global Muslim tourists in new destinations with Muslim-friendly facilities, existing policies are still in the early stages, such as the

establishment of the Cambodian Halal Steering Committee (policy stream). Political support to strengthen the policy is also limited. However, the Cambodian government has begun compiling a Muslim-Friendly Tourism Book and promoting the halal industry (Interview with H.E. Thorn Sarorn, Advisor to the Royal Government of Cambodia, 5 June 2024, Phnom Penh, Cambodia). Nonetheless, the potential for developing Cambodia's halal tourism industry remains, especially if political and policy support continues to grow to support the country's Muslim-friendly infrastructure.

The existence of halal tourism industry development policies in Indonesia, Malaysia, and Cambodia was analyzed using John W. Kingdon's Multiple Streams Framework (MSF), which looks at policy formation through three main dimensions, namely problem, policy, and political streams. This approach is used to explain that the emergence of halal tourism policies is not only influenced by the increasing needs of Muslim tourists but also determined by the readiness of regulations, institutional capacity, and political support of each country.

In terms of problem streams, the three countries share similarities in the increasing global demand for Muslim-friendly tourism services. However, the problems differ in nature. Indonesia and Malaysia have large Muslim markets, so the need for halal facilities is growing both domestically and as a global economic opportunity. Indonesia responded by developing halal destinations and supporting regulations, while Malaysia earlier identified opportunities in the global Muslim tourism market and made them a national economic strategy. In contrast, Cambodia sees halal tourism not as a need of the majority of the population, but as a strategy to diversify the tourism market to attract international Muslim tourists. Thus, the pressure of problems in Indonesia and Malaysia is internal-demand-driven, while Cambodia is more external-market-driven.

In the policy stream, policy readiness differs. Indonesia develops halal tourism policies through an incremental approach, combining national and regional regulations. Various regional regulations show local governments' commitment to developing halal tourism, although they are not fully integrated into a single national system. Malaysia demonstrates a more systematic policy model by integrating halal certification, JAKIM institutions, Islamic Tourism Centers, and the Halal Master Plan as a national strategy. Meanwhile, Cambodia is still building policy foundations by establishing the Cambodian Halal Steering Committee and developing basic halal standards. These differences show that policies depend not only on regulations, but also on institutionalization and the state's ability to translate policies into an industrial ecosystem.

In terms of political streams, Indonesia and Malaysia have relatively strong political support, although with different characteristics. Indonesia develops policies through collaboration between the government, Islamic economic institutions, and religious authorities such as the Ministry of Tourism and Creative Economy, KNEKS, BPJPH, and MUI. Malaysia has more structured political support because the halal policy has become part of the national development strategy through the Halal Master Plan and JAKIM's institutional strengthening. Meanwhile, Cambodia's political support is still in its early stages, marked by the establishment of a halal coordination institution that serves as an embryo for halal industry development. This condition shows that the success of halal tourism policies is greatly influenced by the state's ability to connect economic interests, regulations, and political legitimacy.

Table 1.
Comparative Matrix of the Existence of Indonesia's Halal Tourism Policy, Malaysia, and Cambodia

MSF Dimensions	Indonesia	Malaysia	Cambodia
Problem Stream	Domestic and global Muslim tourist demand: The Need for Tourism Facilities According to Halal Principles	Global Muslim tourist demand is used as a strategic economic opportunity	The need to attract international Muslim tourists as a new market

Policy Stream	Regulations develop gradually through central and regional regulations and are not fully integrated.	The most established policy system is through JAKIM, halal certification, and the Halal Master Plan	The policy is still in the early stages through CHSC and the development of halal standards.
Political Stream	Government and religious institutions strongly support the policy, but coordination still needs strengthening.	Political support is very strong and integrated into the national strategy.	Political support is growing, but institutional capacity remains limited.
Policy Character	Adaptive and incremental	Structured and strategic	Experimental and phased
Stages of Development	Consolidation and expansion of the ecosystem	Leading global halal tourism governance	Early development stage

Based on this matrix, it can be seen that there are three main patterns of halal tourism policy development in Southeast Asia. First, countries with a Muslim-majority base do not automatically have the most advanced policies. This is evident in the comparison between Indonesia and Malaysia. Although Indonesia has the largest Muslim population and ranks highly in the global halal tourism index, Malaysia has a more integrated institutional and certification framework, according to the indicators used in this study, because it has built a more integrated certification and institutional system.

Second, the success of halal tourism policies depends more on institutional capacity than on religious demographic factors alone. Malaysia has shown that institutional strengthening, halal standardization, and national strategies are able to transform the concept of halal tourism into an instrument of economic development. In contrast, Indonesia still faces challenges in expanding certification and integrating actors despite its huge market potential.

Third, Muslim minority countries such as Cambodia show that halal tourism can develop through adaptation mechanisms to the global market. Cambodia does not build a halal policy based on the needs of the majority of the population, but as a competitive strategy to enter the international Muslim tourism market. However, institutional and infrastructure limitations keep the policy in its early stages. Thus, from MSF's perspective, the meeting of the problem stream, policy stream, and political stream is the main factor determining the maturity of halal tourism policies**.** Malaysia shows the strongest policy coupling condition because the three streams have run simultaneously. Indonesia has brought the three streams together but still needs to strengthen implementation and institutional integration. Meanwhile, Cambodia is only at the stage of establishing a policy window, where market opportunities have emerged but have not yet been fully supported by adequate policy and political capacity.

From the perspective of fiqh muʿāmalāt, the differences in terminology adopted by Indonesia, Malaysia, and Cambodia should not merely be understood as semantic variations but as distinct legal-policy approaches that correspond to their respective socio-religious contexts. The transition from sharia tourism to halal tourism, and more recently to Muslim-friendly tourism (Hanin Nur Laili, 2025), reflects a process of term compromise aimed at harmonizing Islamic legal principles with the realities of multicultural societies and the global tourism market. Such a compromise does not necessarily indicate a departure from Sharia principles; rather, it may constitute a legitimate form of legal adaptation (ijtihād siyāsah) as long as it preserves the essential objectives of Islamic law (maqāṣid al-sharīʿah) (Iqbal et al., 2023).

In Cambodia, where Muslims constitute a minority, the Muslim-friendly tourism approach may be understood as a form of rukhṣah (legal concession) within the level of ḥājiyyāt (complementary needs) (Al-Syatibi, 2015). Under these circumstances, providing access to halal food, prayer facilities, and basic religious accommodation is sufficient to remove hardship and help Muslim travelers fulfill their religious obligations (Battour & Ismail, 2016). Conversely, Indonesia and Malaysia have progressed beyond this stage. As Muslim-majority countries with well-

established halal governance systems, their regulatory frameworks increasingly reflect taḥsīniyyāt (embellishment and refinement), or even kamāliyyāt (comprehensive standardization), where halal tourism extends beyond meeting minimum religious needs to institutionalizing comprehensive halal standards through legislation, certification systems, and integrated governance. Accordingly, the variation in terminology among the three countries should be interpreted not as inconsistency in Islamic legal principles, but as different manifestations of maqāṣid al-sharīʿah adapted to their respective legal, institutional, and demographic contexts.

Internal and External Factors Influencing the Halal Tourism Industry Development Policy in Indonesia, Malaysia, and Cambodia

To analyze the internal and external factors that affect halal tourism industry development policies in Indonesia, Malaysia, and Cambodia, the researcher uses Yehezkel Dror's policy model theory (Dror, 2017a). These models help explain how these policies are formed and developed. Yehezkel Dror explained several models in policy-making, including 1) pure rationality; 2) economically rational; 3) sequential-decision (experimental-alternative decisions); 4) incremental (policy evolution); 5) satisficing (the most satisfactory decision selection); 6) extra-rational (the most rational and optimal); and 7) optimal model (integrative model) (Dror, 2017b; Sharkansky & Ripley, 1969).

First, Indonesia applies a combination of Sequential-Decision and Incremental models in the development of its halal tourism policy. Both models show policy dynamics oriented towards gradual adaptation and continuous improvement, without making sudden major changes. (Henderson et al., 2022a) Halal tourism policy in Indonesia is strongly influenced by internal factors, including government structures, regulatory frameworks, and the involvement of various related institutions. One of these institutions is the National Committee for Sharia Economics and Finance (KNEKS), which helps formulate Islamic economic and financial policies, including in the halal tourism sector. In addition, the Ministry of Tourism and Creative Economy actively promotes and develops halal tourist destinations across regions. This can be seen from the gradual policies taken by the government, such as the use of the nomenclature "sharia tourism" in 2014, which then switched to "halal tourism" in 2016.

The sequential-decision approach is evident in the government's gradual steps. This policy is not implemented suddenly, but through a continuous evaluation process. For example, the initial policy on sharia tourism was aimed at accommodating Muslim tourists by providing facilities that are in accordance with sharia principles. When the policy was evaluated, the terminology changed to "halal tourism," which is more inclusive and globally accepted.

The incremental model is also reflected in the way the government continues to improve halal tourism policies (Jones & Baumgartner, 2005). There are no revolutionary changes in policy, but improvements and adjustments are carried out on an ongoing basis, such as the establishment of halal tourism regulations in every province and district/city, the improvement of halal tourism facilities, the development of halal certification for hotels and restaurants, and training for tourism industry players. This approach helps maintain stability and supports better risk management, given that halal tourism policies in Indonesia are still evolving.

External factors also play a major role in encouraging the development of halal tourism in Indonesia. One of the main influences is the global trend of increasing demand from international Muslim tourists. The Global Muslim Travel Index (GMTI) 2023 ranks Indonesia among the most Muslim-friendly halal tourist destinations, indicating growing Muslim tourist interest in Indonesia.

In addition, international competition is a significant external factor. Malaysia, as a major competitor in the halal tourism industry, has become a benchmark for Indonesia in developing international promotion and branding strategies. This branding effort is important to help Indonesia remain competitive in the global Muslim-tourism market and attract the global Muslim

tourist segment. Therefore, the development of halal destinations in Indonesia continues to be pursued by paying attention to trends and competition at the international level.

Pressure from these external factors forces Indonesia to promote itself more aggressively as a halal tourist destination and to strengthen infrastructure and services that meet Muslim tourists' needs. Thus, Indonesia's halal tourism policy results from the interaction between internal factors that encourage gradual development and external influences that pressure Indonesia to keep innovating and competing in the global market.

Second, Malaysia uses a combination of economically rational and extra-rational models to develop halal tourism policies. These two models allow Malaysia to balance economic efficiency with social, cultural, and religious factors to create strong, competitive policies.

Malaysia adopts an economically rational model, where the government proactively supports halal tourism development through efficient strategic measures based on economic analysis (Zafirovski, 2003). One of the most striking examples of the application of this model is through the Halal Master Plan, which has been implemented since 2008. The master plan consists of three structured phases, aiming to optimize available resources to make Malaysia a global hub for the halal industry, including tourism.

In addition to an economically rational approach, Malaysia also adopts an extra-rational model by considering national identity and Islamic image in halal tourism policy. Islamic identity is an important factor of Malaysia's tourism appeal, where Islamic values are comprehensively integrated into public policy, including in the tourism sector (Subramaniam, 1970).

Malaysia is taking advantage of its image as a Muslim-majority country to attract Muslim tourists from the Middle East, Asia, and other parts of the world. Malaysia promotes this continuously and aggressively through international campaigns highlighting Muslim-friendly facilities such as halal food, worship facilities, and accommodation that align with sharia principles**.** In addition, Malaysia ensures that halal certification standards are widely recognized globally, providing trust and comfort for international Muslim tourists.

Another external factor that strengthens this policy is global competition in attracting Muslim tourists. Malaysia competes with other countries such as Indonesia and Turkey, which are also seeking to attract the same market segment. To meet these challenges, Malaysia continues to update and expand its tourism facilities, including by improving service facilities in accordance with sharia principles in various tourist attractions, hotels, and shopping malls.

Malaysia's success in implementing halal tourism policies cannot be separated from its ability to combine economically rational and extra-rational approaches. On the one hand, policies are designed to optimize resources and generate economic benefits for the country. On the other hand, this policy also considers social and cultural aspects, where the image of Islam as a national identity is emphasized and used as the main attraction for global Muslim tourists. Together, these two models make Malaysia a competitive and internationally recognized halal tourism destination. Malaysia is making massive investments in halal infrastructure, including sharia hotels**,** halal food facilities, and halal certification managed by the Malaysian Department of Islamic Development (JAKIM)**.** Malaysia's halal certification is internationally recognized, giving global Muslim tourists confidence in the halal standards applied in Malaysia. This approach shows how Malaysia is rationally maximizing its economic potential in halal tourism, focusing on cost efficiency and long-term benefits to the national economy. Malaysia has used institutional and financial resources to strengthen its position in the halal tourism market.

Third, Cambodia adopts a combination of the satisficing and sequential-decision models in developing halal tourism policies. This approach reflects the gradual steps the country is taking to meet Muslim tourists' needs. However, Cambodia is still in the early stages of developing the halal tourism sector compared to countries such as Indonesia and Malaysia.

As a country that has just entered the realm of halal tourism, Cambodia uses a pragmatic approach: the main goal is not to achieve optimal or ideal results, but to meet the basic needs of Muslim tourists with adequate, satisfactory services (Mogensen & Thorstad, 2022). This approach

aligns with Cambodia's still-limited capacity in infrastructure and resources to support halal tourism.

Cambodia's first step was establishing the Cambodian Halal Steering Committee (CHSC), a body tasked with overseeing the development and promotion of halal products and services. By establishing this committee, Cambodia is laying the groundwork for broader future policies, albeit on a small, experimental scale. In addition, Cambodia has implemented halal service criteria as a basic step to serve Muslim tourists, for example, by providing halal food in several restaurants in major cities such as Phnom Penh and Siem Reap.

The sequential-decision model is also evident in Cambodia's policies, where development steps are taken gradually (Henderson et al., 2022b). For example, the government is preparing a Muslim-Friendly Tourism Book to guide the private tourism sector in offering Muslim-friendly services. Cambodia also implements training programs to build human resources' understanding of halal tourism trends and needs. This shows that Cambodia prefers a phased approach, where each policy is tested and evaluated before further steps are taken.

The development of halal tourism in Cambodia is also heavily influenced by global trends and international partnerships with Islamic countries. Global trends showing an increase in the number of Muslim tourists are an external factor that encourages Cambodia to enter the halal tourism sector. With rising global demand for halal services, Cambodia sees an opportunity to attract more Muslim tourists. However, it is not yet at the same stage as more developed countries in the sector.

In addition, international cooperation with Islamic countries is another important external factor. Cambodia is actively building partnerships to advance the halal industry in both products and services. These partnerships include cooperation with various Islamic countries to build attractive destinations for Muslim tourists, such as Muslim community tourism and mosque tourism. By following international standards and practices, Cambodia can strengthen its position as a Muslim-friendly destination.

The pressure from the needs of international Muslim tourists also forces Cambodia to provide services in accordance with sharia principles, such as halal food, worship facilities, and Muslim-friendly accommodation. Although it is not optimal, Cambodia continues to strive to improve these facilities in line with growing global demand.

Overall, Cambodia's satisficing approach lets it focus on initial steps it can implement well, without needing to achieve optimal results. Sequential decision-making helps the country adjust and develop halal tourism policies gradually, while leveraging external influences such as global trends and international cooperation to build a strong long-term foundation.

Implementation of Halal Tourism Industry Development Policy in Indonesia, Malaysia, and Cambodia

This section applies the policy-implementation framework developed by Daniel Mazmanian and Paul Sabatier (Mubarok et al., 2020). The framework identifies three main categories of factors that determine policy implementation, namely: 1) clarity and quality of policies; 2) social, economic, and political conditions; and 3) the ability to implement policies (Hidajat et al., 2024; Hutagalung & Kurnani, 2021).

First, policy clarity and quality (Haryaningsih et al., 2022): Indonesia has established a halal tourism policy through clear, measurable regulations. In 2014, the government introduced Permenparekraf No. 2 of 2014, which regulated sharia hotel business guidelines, but later revoked it with Permenparekraf (Regulation of the Minister of Tourism and Creative Economy) No. 11 of 2016. In addition, DSN-MUI issued a fatwa on sharia principles in tourism, which was later strengthened by regional regulations in provinces such as NTB and Aceh, as well as district/city regulations in areas such as Banda Aceh and Bandung. This policy aims to improve accessibility and Muslim-friendly services, such as providing prayer facilities in halal-certified hotels and

restaurants. Indonesia also has thousands of hotels by early 2024, but only 49 hotels are halal certified. This shows that the policy is already in place, but implementation still needs to be accelerated to reach all related industries.

In marketing and communication, Indonesia uses various digital strategies and halal tourism guides to promote Muslim-friendly destinations. Provinces such as Aceh, DKI Jakarta, and West Nusa Tenggara (NTB) have provided tour guides and training to help them understand Muslim tourists' needs. Aceh and NTB also excel in providing halal food services and worship facilities, making them the main destinations for halal tourism in Indonesia. The government also supports halal tourism development through various incentives and training for industry players, although infrastructure and information technology still need further improvement.

Malaysia, by contrast, has a more established system for developing halal tourism through the Halal Master Plan, which began in 2008. Through JAKIM, the country has developed a halal certification system that covers not only food but also hotels and travel agents. Malaysia has also banned alcohol service in these hotels and ensured adequate worship facilities. Malaysia's policy clarity is underpinned by stringent, internationally recognized regulations, making the country a global leader in halal tourism.

Malaysia's halal tourism policy is also supported by major investment in Muslim-friendly infrastructure, including shopping malls and hotels that cater to tourists from the Middle East. The Malaysian government has also established institutions such as the Islamic Tourism Center to regulate halal tourism development and ensure halal standards are applied across sectors. Its strategic approach and aggressive promotion make Malaysia a top destination for Muslim tourists.

In Cambodia, halal tourism development is still in its early stages. The establishment of the Cambodian Halal Steering Committee in 2016 was the first step in coordinating the promotion and development of halal products in the country. In 2023, Cambodia is recorded to have 64 halal-certified restaurants, although only 3 still have active certificates. This shows that, despite existing policies, implementation still needs improvement, especially in expanding halal certification in the food and accommodation sector. The Cambodian government is also drafting a Muslim-Friendly Tourism Book that will provide guidelines for the tourism sector to welcome Muslim tourists. However, this policy is immature and will take longer to be fully implemented.

Second, social, economic, and political conditions.(Mardani et al., 2021) As the country with the largest Muslim population in the world, Indonesia has around 207 million Muslims out of a total population of 238.5 million, creating a strong domestic market base for halal tourism. This is supported by government regulations and policies, such as the Minister of Tourism and Creative Economy Regulation on sharia hotel guidelines and halal tourism promotion. Indonesia's success is reflected in the Global Muslim Travel Index (GMTI) 2023, where it ranks alongside Malaysia as the best halal tourism destination. Government support is also evident in the growing number of halal certifications in hotel, although only 49 hotels.

However, challenges remain in international branding, as Indonesia's halal tourism branding is not yet on par with competing countries. In addition, the quality of halal tourism infrastructure in several competing countries is also considered better. This shows the need to improve technology and information systems, as well as develop regulations and research on halal tourism. From an economic perspective, halal tourism in Indonesia has the potential to have a major impact on the Gross Domestic Product (GDP), because the tourism sector is one of the main contributors to the country's economy.

Malaysia, with its multicultural social background and nationally promoted Islamic identity, has strong social and political support for developing halal tourism. GMTI 2023 ranks Malaysia at the top alongside Indonesia as a leading halal tourism destination, with strong support from institutions such as the Malaysian Islamic Development Department (JAKIM), which manages an internationally recognized halal certification system.

The number of halal-certified hotels in Malaysia shows that the country has met international standards for halal tourism services. In addition, infrastructure such as airports, places

of worship, and Muslim-friendly facilities is widespread across tourist attractions. The Halal Master Plan, which was launched in 2008, is also the strategic basis for the development of the halal sector, which consists of three main phases, with a focus on strengthening Malaysia's position as the world's halal hub. Malaysia's economic stability allows it to continue investing resources in the halal tourism sector.

In Cambodia, with a Muslim population of only about 2-3% of the total population, the development of halal tourism faces greater challenges compared to Indonesia and Malaysia. However, the Cambodian government has taken initial steps to support halal tourism growth by establishing the Cambodian Halal Steering Committee (CHSC) in 2016. CHSC oversees the promotion and development of halal products in Cambodia and has issued halal certifications for more than 1,300 food and beverage products. However, only 3 of 64 halal restaurants with active certificates show challenges in monitoring halal standards in the culinary sector.

Although Cambodia began developing Muslim-friendly tourism facilities in major cities such as Phnom Penh and Siem Reap, progress has been relatively slow compared to Indonesia and Malaysia. The country is not yet among the top 20 destinations for Muslim tourists based on GMTI 2023, indicating that Cambodia is still in the early stages of developing the halal tourism sector. Political support exists, but limited economic and infrastructure conditions slow halal tourism development.

Third, policy implementers' capacity (Alamoush et al., 2022; Paramarta et al., 2023)**:** Indonesia already has institutions that support halal tourism policy implementation, such as the National Committee for Sharia Economics and Finance (KNEKS) and the Halal Product Assurance Agency (BPJPH). However, a special certification body for the halal tourism industry has not yet been formed. This institutional capacity shows strong potential, but significant challenges remain, especially in coordinating government agencies and expanding halal certification in sectors such as accommodation and restaurants.

Malaysia has stronger, more established institutional capacity. The Department of Islamic Development Malaysia (JAKIM) plays an important role in managing the internationally recognized halal certification system. JAKIM's role is not limited to food certification; it also covers tourism products and services, such as hotels and travel agencies. Strong coordination between the government and the private sector makes Malaysia a model for halal tourism development, as reflected in the Global Muslim Travel Index (GMTI) 2023.

In Cambodia, halal tourism policy implementation is still in development. The establishment of the Cambodian Halal Steering Committee (CHSC) in 2016 was the first step in developing the halal sector in the country. Currently, 64 restaurants are halal-certified, but only 3 remain active. Efforts to promote halal tourism and improve Muslim-friendly facilities are still in the early stages. Institutional capacity remains limited in both certification and supporting infrastructure, so Cambodia needs to strengthen coordination and develop relevant institutions to support more significant growth in halal tourism.

Comparative Institutional Analysis

From the perspective of siyāsah sharʿiyyah, religious authorities in Indonesia, Malaysia, and Cambodia function not merely as halal certification bodies but also as institutional guardians of Islamic legal principles within the tourism sector. Their role extends beyond issuing halal certifications to ensuring tourism governance remains consistent with the objectives of Sharia (maqāṣid al-sharīʿah), particularly by safeguarding religion (ḥifẓ al-dīn), protecting Muslim consumers from prohibited products, and strengthening public confidence in halal services (Akmal et al., 2021). Consequently, the effectiveness of halal tourism governance depends not only on the existence of regulations but also on religious authorities' institutional capacity to embed Islamic legal norms in public policy implementation.

Malaysia demonstrates the strongest institutional model because JAKIM functions as a centralized religious authority with clear legal mandates, nationally integrated halal standards, and

direct coordination with relevant governmental agencies (Abdul Salam, 2019). From the perspective of Siyāsah Tanfidziyyah, this centralized governance enables Islamic legal principles to be translated into administrative practice through a unified certification system, standardized auditing procedures, and consistent regulatory enforcement (Suaib, 2025). This institutional integration strengthens legal certainty (al-yaqīn), reduces regulatory fragmentation, and enhances the credibility of halal tourism governance at national and international levels.

In contrast, Indonesia adopts a more pluralistic institutional arrangement involving the Ministry of Religious Affairs through BPJPH, the Indonesian Ulema Council (MUI), regional governments, and the Ministry of Tourism (Surwandono et al., 2020). While this collaborative model reflects broader stakeholder participation, it also creates overlapping authorities and variations in policy implementation across regions. As a result, the internalization of Islamic legal principles tends to be less uniform than in Malaysia, since responsibilities for fatwa issuance, halal certification, regulatory supervision, and tourism development are distributed among multiple institutions. Nevertheless, this decentralized approach also reflects Indonesia's constitutional and administrative structure, which accommodates regional autonomy and diverse local contexts in implementing halal tourism policies.

Cambodia represents a different institutional context. The Cambodian Halal Standard Committee (CHSC) and other Islamic organizations primarily focus on meeting the basic religious needs of Muslim visitors rather than establishing a comprehensive national halal governance system. Within the framework of siyāsah sharʿiyyah, this institutional model may be understood as an adaptive mechanism designed to protect Muslim interests in a Muslim-minority country. Accordingly, although CHSC's institutional authority is more limited than that of JAKIM or MUI, its existence helps fulfill the level of ḥājiyyāt by providing essential halal assurance and religious accommodation for Muslim travelers.

Islamic Legal Implications for Muslim Travelers

From the perspective of fiqh muʿāmalāt, differences in halal tourism regulations among Indonesia, Malaysia, and Cambodia have significant implications for the legal certainty (al-yaqīn) Muslim travelers experience. Legal certainty in halal tourism is not merely tied to the existence of regulations but also to the consistency, institutional integration, and enforceability of halal standards across the tourism ecosystem (Rachmiatie et al., 2024). A comprehensive, harmonized regulatory framework enables Muslim tourists to confidently identify halal products, accommodation, food services, and worship facilities without excessive doubt about their compliance with Islamic principles (Anwar, 2026).

Malaysia demonstrates the highest degree of al-yaqīn because its halal governance is centralized under JAKIM, which integrates halal certification, regulatory supervision, and national standards within a single institutional framework (Kamil & Hatta, 2025). This centralized model substantially minimizes gharar (legal uncertainty) and syubhat (doubt concerning halal compliance), thereby enhancing consumer confidence and strengthening legal protection for Muslim travelers (Sofiana et al., 2021). In contrast, Indonesia has established a comprehensive legal framework through the Halal Product Assurance Law, BPJPH, and various regional regulations; however, the coexistence of multiple institutions and regional policy variations may still create implementation inconsistencies, potentially generating limited areas of gharar and shubuhāt for visitors unfamiliar with local regulatory arrangements.

Cambodia presents a different situation. As a Muslim-minority country, its halal tourism policies primarily aim to provide essential religious accommodation rather than comprehensive halal standardization (Hasram, 2022). Consequently, while halal-certified restaurants, prayer facilities, and Muslim-friendly services reduce practical difficulties for Muslim travelers, the absence of an integrated national halal tourism regulatory framework may still leave certain aspects of tourism services within the domain of syubhat. Nevertheless, from the perspective of maqasid

al-shariah, this approach remains justifiable as it fulfills the level of hajiyyat by facilitating the basic religious needs of Muslim visitors under minority-Muslim conditions (Chookaew et al., 2015).

Conclusion

The comparative analysis suggests that the development of halal tourism policy cannot be adequately understood through religious demographics or market potential alone. Rather, its institutional effectiveness depends on how legal norms, political priorities, administrative arrangements, and implementation capacity are translated into coherent governance practices. The comparison demonstrates that the institutionalization of halal tourism requires more than formal regulatory recognition; it also depends on coordination among relevant authorities, clarity of regulatory responsibilities, and the capacity to translate policy objectives into consistent practices across the tourism sector.

The principal theoretical contribution of this study lies in connecting public policy analysis with Islamic legal reasoning. By bringing together the Multiple Streams Framework, Dror's policy-making model, Mazmanian and Sabatier's implementation framework, and concepts from siyāsah sharʿiyyah, taqnīn al-aḥkām, fiqh muʿāmalāt, and maqāṣid al-sharīʿah, the study offers an integrated perspective for evaluating halal tourism governance. From this perspective, policy effectiveness should be assessed not only in terms of administrative performance and economic development but also in terms of legal certainty, the protection of Muslim travelers' religious interests, and the realization of maṣlaḥah ʿāmmah. The analysis further indicates that institutional arrangements should be evaluated in relation to their respective legal, political, and socio-religious contexts rather than against a single universal model of halal tourism governance.

These findings have practical implications for policy development. Policymakers should prioritize institutional coordination, clearly defined regulatory mandates, credible halal assurance mechanisms, and implementation arrangements appropriate to their national contexts. For Indonesia, this entails strengthening coordination among institutions and improving consistency in policy implementation. For countries adopting more centralized governance, institutional integration should remain accompanied by accountability and responsiveness to stakeholders. In Muslim-minority settings, policy development may instead emphasize feasible religious accommodations and gradual institutional capacity-building, provided that information concerning halal standards and available services remains transparent to Muslim visitors.

This study is limited by its comparative focus on three Southeast Asian countries and the institutional and documentary evidence available for analysis. Its findings should therefore be interpreted within the contexts examined rather than generalized to all Muslim-majority and Muslim-minority countries. Future research could investigate how national policy frameworks are implemented at the destination level, how tourism businesses and Muslim travelers experience regulatory arrangements in practice, and how differences in institutional design affect consumer confidence and the realization of maqāṣid al-sharīʿah. Such research would help establish a stronger empirical basis for evaluating the relationship between public governance, Islamic legal principles, and the long-term development of halal tourism.

Declaration of Generative AI

This manuscript received limited assistan-ce from an AI-based language tool (Grammarly and ChatGPT) for language refinement and grammar checking. The authors critically reviewed and fi-nalized all content and accept full responsibility for the published work. No AI tools were used in data analysis or the interpretation of findings.

Declaration of Competing Interest

The authors report no known competing financial interests or personal relationships that could have influenced the work presented in this paper.

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