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Beyond Free Certification: Administrative Burdens and Market Inclusion in Indonesia's 2026 Halal Transition

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Abstract
This qualitative documentary study examines how Indonesia's halal-certification transition distributes administrative responsibilities and subsidized access across micro and small enterprises and public institutions. A purposive case analysis compares enacted regulations, technical decrees, January and April 2026 SEHATI allocation schedules, a dated October government announcement, and relevant peer-reviewed studies. Findings distinguish waived application charges from eligibility checks, documentation, facilitator work, and enforcement review. The original 1,350,000 SEHATI allocation was formally revised to 1,090,891 places on 8 April 2026; these are budgeted facilitation slots, not measured certifications. On 16 October, the government announced an extended compliance schedule for selected categories, but the operative amending government regulation could not be independently authenticated by the evidence cut-off. We propose a bounded burden-incidence framework linking information clarity, procedural usability, facilitation capacity, assurance quality, and reviewability. The evidence establishes policy design and administrative assignments, not applicant costs, realized market inclusion, causal business effects, or equitable provincial access. The contribution is a time-specific institutional diagnosis and an auditable agenda for subsequent firm- and agency-level evaluation.

Keywords: halal certification, administrative burden, micro and small enterprises, transaction costs, market inclusion.

INTRODUCTION

Certification policy sits at the intersection of consumer protection, religious assurance, industrial organization and enterprise formalization. For small producers, a certification rule can make a quality signal more credible and strengthen the information available to buyers. The same rule can also require documentation, a classification of production processes, verification of ingredients and interactions with an administrative system. The economic importance of such requirements extends beyond a published certification price. Even where the direct charge is zero, entrepreneurs must learn which procedure applies, establish eligibility, assemble records and coordinate with service providers. These activities may entail time and organizational attention that would otherwise be

allocated to production or sales. Their magnitude is an empirical question; their potential existence is an analytical reason to distinguish a fee waiver from frictionless access.

Indonesia offers a distinctive, changing regulatory setting. Government Regulation No. 42 of 2024 established a phased halal-product-assurance framework, including a 17 October 2026 completion date for the relevant micro- and small-enterprise (MSE) staging period (Government of Indonesia, 2024). Earlier communications from the Badan Penyelenggara Jaminan Produk Halal (BPJPH) consequently described an 18 October 2026 implementation milestone (BPJPH, 2026g). Crucially, on 16 October 2026 the Coordinating Ministry for Economic Affairs announced a proposed extension of selected staging periods to 2028 following assessments of ecosystem readiness. Because the operative amending Government Regulation was not independently verified at the document cut-off, this study separates the enacted 2024 rule from the October policy announcement (Coordinating Ministry for Economic Affairs, 2026). The research question is how legal timing, subsidy availability, and paperwork responsibilities interact in the policy design, not whether any specific enterprise was sanctioned after the announcement.

Sertifikasi Halal Gratis (SEHATI) is the central financial assistance channel. The originally promulgated Head-of-BPJPH Decree No. 1/2026 allocated 1,350,000 facilitated certification slots and published provincial quotas. However, Head-of-BPJPH Decree No. 117/2026, dated 8 April, amended the second dictum and replaced the province-level annex, reducing the national quota to 1,090,891 in the context of stated budget optimization and efficiency (BPJPH, 2026b, 2026d). Thus, the often-publicized 1.35 million figure remains a historical launch allocation, not the revised operative quota under the documents examined. Neither amount is a count of completed certificates or a denominator for firms receiving services.

The two revisions change the meaning of the October case. The SEHATI budget adjustment preceded the 16 October 2026 announcement that selected certification staging would be extended to 2028; it would be inaccurate to read the later announcement as evidence that the full 2024 legal schedule had already been formally superseded without the amending text. Equally, it would be inaccurate to infer that certificate services were fully accessible because the government announced subsidies. The administrative records needed to determine submission rates, withdrawal, elapsed processing time, fee incidence, and post-certification sales were not part of the reviewed evidence (BPJPH, 2026d; Coordinating Ministry for Economic Affairs, 2026).

The instruments provide complementary rather than interchangeable types of evidence. Government Regulation No. 42/2024 establishes the statutory staging framework. BPJPH Regulation No. 5/2025 and Head-of-BPJPH Decree No. 146/2025 specify applicant eligibility and the assisted self-declaration procedure. Decree No. 1/2026 established SEHATI's initial financial rules and geographic allocation; Decree No. 117/2026 legally revised the quota and provincial distribution. October 2026 official communications establish a changed stated policy intention but are analytically distinguished from an enacted amendment to Government Regulation No. 42/2024 (Government of Indonesia, 2024; BPJPH, 2025a, 2025b, 2026c, 2026d; Coordinating Ministry for Economic Affairs, 2026).

The geographic analysis uses the amended 38-province schedule in Decree No. 117/2026. Its entries sum to 1,090,891, identical to the declared amended total. The original schedule under Decree No. 1/2026 is retained solely as a historical comparison. A revised quota is a statement of funding allocation rather than a measure of actual facilitator availability, programme delivery, or

equitable access. Demand-weighted provincial inclusion cannot be inferred without eligible-firm counts, product profiles, nonapplicant information, and transaction logs (BPJPH, 2026b, 2026d).

The existing literature constrains broad novelty claims. Widigdo and Triyanto (2024) examine certification knowledge and intentions; Fathoni et al. (2025) prioritize barriers to halal certification; and Azizah et al. (2025) study associations between certification and enterprise performance. Daniel et al. (2026) examine organizational capabilities and compliance. These contributions already address procedural obstacles, business capabilities and economic outcomes. The narrower opportunity addressed here is to reconstruct how administrative duties and subsidized slots were assigned across institutions during the specific sequence of 2026 policy changes, with no claim that actual enterprise burdens or distributional effects have been measured.

Contemporaneous scholarship narrows the contribution further. Sucipto et al. (2026) discuss risks and safeguards of the self-declaration route, Najmudin et al. (2026) assess legal postponement and the reliability of that route, and Badriyah and Fachruddin (2026) highlight consumer protection and compliance burdens. Our theoretical contribution is therefore not to discover that certification may be burdensome. It is to specify a source-auditable incidence map of who is formally required to perform, finance or review certification-related tasks after two distinct 2026 policy events: a funded-service quota revision and a government-announced timing adjustment. This is a modest, contextual analytical contribution, not a tested new theory or evidence of a globally unstudied problem.

Administrative-burden scholarship offers an appropriate conceptual vocabulary. Moynihan et al. (2015) distinguish learning, compliance and psychological costs in interactions with the state, while Herd and Moynihan (2018) emphasize that policy design distributes burdens rather than merely creating neutral procedures. Applying these ideas to certification is not a claim that all documented requirements are gratuitous or harmful. Product assurance depends on credible evidence about ingredients and manufacturing. The research problem concerns whether procedures are appropriately calibrated, how much of the burden can be supported through public services, and which kinds of enterprises may be unable to use an ostensibly free route.

The theoretical distinction between an obligation and its incidence is especially relevant to producer-facing regulation. Learning costs concern identifying an applicable route, deadline and eligibility condition; compliance costs concern time, documentary work and the adaptation of everyday production practices into verifiable records; psychological costs may arise from uncertainty and sanction exposure, but remain unobserved unless elicited from applicants (Moynihan et al., 2015). Fee subsidies directly affect an identifiable public charge yet do not logically eliminate the other components. A related assurance constraint must be retained: documentation may also protect customers against unverifiable halal claims. Accordingly, an efficient process is not one without substantive checks, but one whose information requests are necessary, clear, proportionate and contestable.

The analysis asks: RQ1, how do the 2024–2026 legal instruments allocate applicant and administrative duties, including changes in subsidy capacity and compliance timing? RQ2, which learning, compliance, and potential psychological costs are grounded in the paperwork and assisted-verification design, and which remain unmeasured? RQ3, what evidence and governance conditions would be needed to infer economically meaningful market inclusion from a nominally free certification route? The contribution is a dated documentary account that explicitly separates

legal obligations, amended budget allocations, contemporaneous policy announcements, and hypothesized economic effects.

The paper fits an economic-studies readership because it reconnects halal-product governance to transaction costs, asymmetries in enterprise capacity and the distributional consequences of administrative design. In the Islamic-economics dimension, reliable halal verification can be understood as protection of legitimate consumer and producer interests. In the conventional-economics dimension, the same architecture is a market institution that may reduce information asymmetry while requiring resources for compliance. These perspectives are complementary but not identical: a reliable assurance mechanism and an equitable access mechanism must each be evaluated rather than assumed to follow automatically from the other.

RESEARCH METHOD

The study uses a qualitative documentary policy-case design. Documents are treated as institutional evidence concerning the rules, announced allocations, stated intentions and procedural definitions that constitute Indonesia's 2026 halal-certification transition. Following Bowen (2009), analysis separates the authenticity and purpose of a document from the substantive inference it permits. A regulation can establish an operative rule; a public agency statement can substantiate what the agency announced; a programme criteria page can describe the conditions publicly communicated to applicants. None of these source types, individually or in combination, establishes beneficiaries' actual time expenditure, error rates, business outcomes or the adequacy of on-the-ground implementation.

The core legal corpus comprises six instruments: Government Regulation No. 42/2024 (the baseline phased obligation); BPJPH Regulation No. 5/2025 (self-declaration eligibility and assistance); Head-of-BPJPH Decree No. 146/2025 (the technical route for eligible micro and small enterprises); Decree No. 1/2026 (original SEHATI facilitation); Decree No. 117/2026 (its amendment); and BPJPH Regulation No. 2/2026 (administrative enforcement and objections). The 16 October 2026 statement from the Coordinating Ministry for Economic Affairs was analysed separately as an announcement, rather than added to the enacted-rule corpus.

The observation window covers October 2024 to 20 October 2026. Each legal source is recorded with its number, date, institution, official URL, relevant clause or annex, operative temporal reach, and highest permissible inference. Institution-issued news is treated as evidence that a policy position or event was publicly stated, not as a substitute for law or a validated operational metric. The unit of analysis is a discrete documented proposition (for example, who submits an application, which budgetary total is authorized, or whether an extension was announced), not a representative sample of firms or provinces.

Documents were purposefully included when they bore on the formal certification stage, the applicant-facing self-declaration route, the financed facilitation channel, or contemporaneous rule changes. Superseded quotas were retained as historical data but excluded from descriptions of the revised allocation. Scope was restricted to documents examined within the cut-off, avoiding the assertion that all legal and scholarly materials had been exhaustively searched. Secondary peer-reviewed studies were selected as theoretical and empirical comparators, not counted as regulatory evidence; the discovery process was not a Scopus- or Web of Science-based systematic review.

Inclusion was governed by a document's relevance to one of four predefined case functions: (i) mandatory-compliance timing, (ii) eligibility and verification in the self-declaration route, (iii) the financial and geographic allocation of SEHATI facilitation, and (iv) enforcement and review. Earlier versions of current instruments were retained only to reconstruct temporal change. Legal texts, contemporaneous government statements, and academic comparators were kept in separate analytic strata. Neither all halal-related rules nor all published studies were claimed to be exhaustively sampled; alternative product categories enter the account only to delimit the micro- and small-enterprise case.

The authentication protocol privileged the title, number, and operative provisions within the official legal text over the descriptive filename of a downloaded copy. For Head-of-BPJPH Decree No. 146/2025, the decision heading establishes its scope as the technical halal-certification service for micro and small enterprises using an entrepreneur declaration (BPJPH, 2025a). This is a source-authentication control, not independent verification of how consistently the procedure is implemented.

Two source crosswalks structure the second-cycle analysis. The procedure crosswalk assigns documented actions to applicants, halal-product-process facilitators and their institutions, BPJPH, and the Halal Product Fatwa Committee. The allocation crosswalk retains both 38-province schedules: Decree No. 1/2026 as the historical January baseline and Decree No. 117/2026 as the amended April authorization. The latter provincial entries were re-summed against the official 1,090,891 total; the former has a one-slot inconsistency between its provincial subtotal and declared headline, recorded as a documentary discrepancy rather than interpreted as a disbursement error. Absolute allocation shares are not equated with equal access or regional need.

First-cycle coding identified documentary propositions in six categories: rule status and effective date; announced supply of subsidized certification; applicant eligibility; documentation and verification; institutional assistance; and enforcement or transition qualifications. The second analytic pass mapped the applicant-facing propositions onto the three administrative-burden dimensions: the cost of discovering applicable information and understanding categories; procedural work in producing records and undergoing verification; and potential uncertainty associated with unclear acceptance or enforcement conditions. Only the first two can be partly inferred from the existence of stated procedures. Psychological costs are retained as a question for future research, not reported as a demonstrated experience of Indonesian applicants.

Normative timing provisions were coded as administrative rules rather than observations of actual service duration. A legal time limit can identify a compliance design, but cannot establish the distribution of application processing times, exceptions, or completed cases. The quota analysis is likewise descriptive: the 38 provincial entries in the 8 April annex were transcribed and re-summed, while quota shares are treated as allocations, not service utilization rates. A one-slot arithmetic discrepancy in the earlier January annex is logged as a documentary issue; the amended annex reconciles exactly and is the operative object of analysis.

A claim-permission rule was applied before synthesis: an enacted rule supports the existence of a formal requirement, a signed quota amendment supports a changed allocation, an institutional announcement supports a statement issued on its publication date, and an academic study is relevant within its own study design and sample. None of these categories alone demonstrates firms' actual work hours, experienced psychological costs, service completion, market inclusion, or

causal changes in sales. Negative cases and rival interpretations were retained when they challenged a simplified free-certification narrative.

Literature comparison is purposive rather than exhaustive. Comparable studies are classified by unit of analysis and outcome: certification intention (Widigdo & Triyanto, 2024), obstacle prioritization (Fathoni et al., 2025), organizational implementation capability (Daniel et al., 2026), enterprise outcomes (Azizah et al., 2025), self-declaration assurance (Sucipto et al., 2026), and legal postponement or compliance burdens (Najmudin et al., 2026; Badriyah & Fachruddin, 2026). Each comparator is evaluated for overlap and competing explanations, and that overlap is explicitly acknowledged. No direct Scopus or Web of Science export, deduplication log, or reproducible database coverage assessment was completed; no claim of a systematic search or globally unique research gap is made.

The inferential standard is deliberately conservative. An enacted instrument establishes a stated normative rule, an official announcement documents the position publicly communicated on a particular date, and an academic empirical study reports results within its own sample and method. The study does not infer completion rates or processing success from budgeted places, actual compliance costs from the presence of forms, market impact from certification objectives, or sanctions from a sanctions regulation. The official legal register for BPJPH Regulation No. 5/2025 has an internal inconsistency between its displayed signing and promulgation dates; until the promulgated image resolves it, the analysis uses the regulation number and verified substantive title without reproducing the contested chronology. The coding was carried out by one analyst without independent double-coding, administrative logs, or interviews.

Rival-explanation testing explicitly examines five alternatives: R1, fees are the dominant barrier and waived charges may be sufficient for eligible users; R2, eligibility screens and supporting evidence protect integrity rather than create avoidable friction; R3, fewer subsidized slots reflect budget adjustments without necessarily lowering realized participation; R4, a longer compliance period can improve readiness even if subsidy coverage narrows; and R5, proposed changes announced publicly are not equivalent to promulgated legal amendments. Each rival is evaluated only for documentary congruence, never accepted as a causal account of applicant behavior. Stage 4 adds two further analytic challenges: whether procedural objections operate as meaningful safeguards rather than merely formal rules, and whether a burden theory developed for citizen–state services can be transferred without qualification to producer-facing assurance regulation.

For every central finding, the source-to-claim log records the legal or documentary identifier, the observation date, a pinpoint provision when available, the highest defensible inference, and a rival interpretation. The review deliberately retains the outdated January allocation as a historical comparator, distinguishes the October governmental communication from verified promulgation, and treats risk-screening requirements as potentially necessary safeguards rather than automatically wasteful costs. It does not use announcements of desired benefits as observations of achieved outcomes.

Methodological credibility rests on traceable public URLs, dated legal hierarchy, source-specific inference restrictions, arithmetic reconciliation of both published subsidy schedules, and consideration of rival explanations. The audit trail assigns each important assertion a document class, observation date, permissible inference and unresolved verification task. These measures strengthen transparency but do not amount to independent investigator triangulation or validation of applicants' experiences. The sample is a purposive legal-policy case, not a statistical sample of

producers or a completed systematic literature review; no saturation, intercoder reliability, or causal identification is claimed.

Table 1. Documentary legal hierarchy and permissible inference

Source	Type and period	Analytical use	Inference ceiling
PP 42/2024	Enacted regulation	Baseline JPH staging	Law at cut-off unless formally amended
BPJPH 5/2025 and 146/2025	Regulation + technical decree	Self-declaration conditions	Normative applicant and facilitator tasks
BPJPH 1/2026	Original budget decree (2 Jan)	Initial 1,350,000 places	Historical funding authorization only
BPJPH 117/2026	Amending decree (8 Apr)	Revised 1,090,891 places, 38 provinces	Updated nominal allocation, not throughput
Coordinating Ministry 16 Oct	Government press release	Announced 2028 staging adjustment	Announcement; amending PP not located
BPJPH Regulation 2/2026	Enacted regulation (5 Jun 2026)	Sanction procedures and formal objections	Normative enforcement design; no sanctions observed

Source: Official legal register and BPJPH institutional releases; see references.

RESULTS

The documentary results identify four observations: (1) six primary instruments define different kinds of legal obligation and service administration; (2) the assisted self-declaration route distributes documentary and verification tasks across firms and institutions; (3) the subsidized quota changed formally between January and April 2026; and (4) the October deadline adjustment is documented in a government announcement but its separate operative amendment was not independently authenticated at the evidence cut-off. The material does not include enterprise-level outcomes or measured burden incidence.

Regulatory staging, amendment announcement and subsidy revision

The official legal register places Government Regulation No. 42/2024 in force from 17 October 2024; it superseded Government Regulation No. 39/2021. Its staged schedule included an October 2026 milestone for specified micro and small enterprises. BPJPH communications before 16 October 2026 repeated that scheduled date. The 16 October coordinating-ministry statement subsequently announced a policy adjustment, describing an intended extension through 17 October 2028 for MSE food, beverage, slaughter-product and slaughter-service categories, and other adjustments. The full promulgated amending regulation was not independently identified in the examined record (Government of Indonesia, 2024; BPJPH, 2026g; Coordinating Ministry for Economic Affairs, 2026).

On 2 January 2026, BPJPH announced and formally allocated 1,350,000 SEHATI slots through Decree No. 1/2026. Decree No. 117/2026 dated 8 April replaced the national figure with 1,090,891 and amended all province-level allocations, explicitly citing budget optimization and efficiency. The difference is 259,109 slots (approximately 19.19% of the original allocation). These are two

successive budget-authorization states, not rival estimates of issued certificates. The documents do not provide a completion numerator, unused balance, or applicant rejection denominator (BPJPH, 2026a, 2026b, 2026d).

The amendment creates an institutional counterexample to reading headline certificate supply as a fixed policy promise: the publicised January aggregate and its legal April replacement refer to two dates and different budget envelopes. The adjustment is not itself evidence of rationing at individual application level, since the record has no contemporaneous data on applications, unfilled provincial slots or funding disbursements. Nonetheless, any model that treats January allocation as the policy capacity throughout 2026 would misclassify the exposure under study.

The April amendment provides a positive source-integrity check: all 38 provincial entries can be reconciled to the declared total of 1,090,891. A manual addition of the January provincial annex yields a one-slot difference from its printed national total; the original line items are retained without conjectural correction, and this does not measure a contemporary programme deficit. No assumption about the reason for the discrepancy is made.

The self-declaration route contains substantive eligibility filters

The BPJPH eligibility communication lists conditions that are more specific than enterprise size alone. Applicants are expected to hold a business identification number (NIB) corresponding to micro or small status; use materials whose halal status can be assured; have sufficiently simple production processes; and satisfy requirements concerning products, production facilities, permissible inputs and prescribed forms. The same communication identifies annual turnover up to IDR 15 billion, a maximum of one production facility and one business outlet, and verification by a halal-process facilitator among the named conditions for the SEHATI self-declaration route (BPJPH, 2026c). These are documented entry criteria for that route and should not be generalized to all possible certification pathways.

The announced documentary package includes a request for certification, statements concerning the halal status of materials and products, information on a halal supervisor, a list of inputs, processing steps, product identity and photographs, and a halal assurance manual, with online submission through SIHALAL (BPJPH, 2026c). Some items refer to information that a well-organized enterprise may already maintain; others require the producer to translate everyday practices into standardized administrative representations. The existence of the forms and stated verification process is established. The extent to which applicants obtain ready-to-use templates, live help, delegated data entry or acceptance on the first attempt is not documented in the reviewed public corpus.

Assistance is organized through a mediated service channel

The public facilitation design places Halal Product Process assistants between qualified applicants and the verification pathway. BPJPH's announcement says the programme aims to provide application support and certification without direct fees for qualifying enterprises (BPJPH, 2026a). Its criteria page specifies that the halal properties of the product are verified by an authorized

assistant (BPJPH, 2026c). This institutional arrangement acknowledges a role for intermediaries beyond the digital application form. It also provides a plausible channel for explaining eligibility, checking documents and translating informal production knowledge into the procedural categories required by the service.

The documentary corpus does not provide a locality-by-locality map of active assistants, variation in quality of assistance, distance to support, waiting times or frequency of resubmission. A national statement about the number of facilitators, where supplied, does not resolve geographic distribution or the amount of effective attention available per enterprise. Evidence of capacity and use should therefore be distinguished: the existence of a publicly organized support channel is not evidence that every eligible microenterprise can access assistance at low effort or at a similar service standard.

Primary regulations map tasks and service-stage controls

BPJPH Regulation No. 5/2025 sets out the assisted self-declaration framework, including product and producer criteria and the roles of registered facilitating institutions. Its Article 3 describes the declaration, facilitator verification and validation, and subsequent halal-determination and certificate-issuance steps. The regulation defines normative deadlines for selected stages, which in this case serve as a basis for future audit rather than evidence of fulfilled turnaround targets (BPJPH, 2025b, Articles 3–9). Its provisions also differentiate between commercial producers and product processes compatible with simplified verification; therefore, a product falling outside the route is not necessarily in breach of the general halal obligation merely because it cannot use this facilitated procedure.

Decree No. 146/2025 gives more granular documentary rules. The main application package specifies business-registration information, product identity and photos, ingredients and menus or input lists, and an account of the halal production process. It differentiates the maximum number of product names from permitted menu counts for certain food-service establishments. Its accompanying verification provisions refer to inspection of declarations, products, ingredients, process narratives and the halal assurance manual, with supporting photographs uploaded to the administrative platform. The decree thus assigns record-making obligations to businesses and checking obligations to intermediaries. It does not report the typical time entrepreneurs spend preparing those documents (BPJPH, 2025a, Annex I, pp. 6–9).

Decree No. 1/2026 makes the facilitation chain explicit: an applicant opens an account in an integrated information system, including SIHALAL or HalalMax; submits identity and business records, product information, production information and a halal assurance manual; receives facilitator verification and validation; undergoes BPJPH document review; and, if accepted, proceeds to a fatwa determination and certificate issuance. The decree also allocates programme disbursements among facilitator institutions, individual facilitators and BPJPH's service entity using the document-receipt number as an administrative reference (BPJPH, 2026b, Annex I, pp. 8–9). These are prescribed work stages and funding flows. They cannot be recoded as evidence of a functioning integration or a measured burden shift at every service location.

Amended provincial allocation and its evidentiary limits

The amended April annex enumerates 38 provinces totaling 1,090,891 slots; independent addition of its entries matches the declared total. For illustration, West Java receives 222,476, Central Java 183,679, East Java 175,324, and West Nusa Tenggara 18,333 slots. Their values replace the larger January figures for any analysis referring to the amended programme. This is a distribution of planned service financing; without counts of eligible firms, applications, submitted products, and qualified facilitators, no valid statement can be made about province-level fairness or treatment intensity (BPJPH, 2026d, annex).

The original January decree specifies a funding and workflow arrangement involving BPJPH, facilitators and other participating institutions, but its April amendment changes the aggregate and provincial allocation. It is therefore necessary to describe relevant financial terms with their operative date rather than treating all January provisions as immutable. The documented multi-actor funding design creates a framework for assessing who absorbs registration and verification work, but no expenditure audit or cost-by-firm record has been examined (BPJPH, 2026b, 2026d).

Formal enforcement and contestability: a further layer of administrative design

BPJPH Regulation No. 2/2026, stipulated on 11 May and officially recorded as effective on 5 June 2026, provides a formal framework for administrative sanctions in halal-product assurance. The official register describes categories and stages of violations and sanctions, supervisory follow-up, and procedures for filing objections to administrative measures (BPJPH, 2026e). For this study, the observation is the existence of a stated enforcement and objection architecture, not the incidence of penalties among microenterprises. Without enforcement case files or administrative decisions, it is impossible to determine whether sanctions were routinely imposed, whether objections were successfully resolved, or whether enforcement affected applicant behavior. The rule is analytically relevant because predictable notice, reasons and review channels can change the institutional character of a regulatory requirement without removing the underlying assurance obligation.

Legal-status verification at the 20 October cut-off

An official-register review at the 20 October 2026 evidence cut-off located the record of Government Regulation No. 42/2024, listed as in force, with a supersession entry for Government Regulation No. 39/2021. The inspected index did not identify the numbered 2026 amendment mentioned by the coordinating ministry. Neither this absence from a particular index nor the existence of an announcement proves that a draft has not been signed or will not be published. For the purpose of this manuscript the defensible wording is that the amendment's number, promulgation date and operative text were not independently verified at the evidence cut-off. This limitation applies specifically to the announced adjustment, not to the separately authenticated April BPJPH Decree No. 117/2026 (Government of Indonesia, 2024; Coordinating Ministry for Economic Affairs, 2026).

The mid-October announced compliance extension

BPJPH's 9 October communication described the approaching 18 October mandatory-certification phase and preparation of easing measures (BPJPH, 2026g). A subsequent coordinating-ministry announcement dated 16 October reported an intended amendment of the staging periods, including a later 2028 deadline for named MSE food and slaughter categories and additional product classes. The chronological disagreement is resolved as two distinct institutional positions at different dates. A press release substantiates the government's announcement, not the precise legal effect of an as-yet-unlocated promulgated amendment (Coordinating Ministry for Economic Affairs, 2026).

The September 2026 BPJPH coordination account is evidence that readiness and cross-agency cooperation were publicly discussed ahead of the scheduled deadline (BPJPH, 2026f). Coupled with the October announcement, it supports the conclusion that government discourse recognized implementation capacity as a policy consideration. It cannot independently demonstrate that a specific extension increased application completion or that sanctions were postponed for every affected firm.

The documentary timeline also demonstrates a potentially asymmetric effect of a longer announced compliance period combined with fewer subsidized slots. More time might permit preparation of business registration, ingredient documentation and supervision, while a smaller quota could change the funded route available to prospective applicants. Neither effect can be inferred from timing and financing texts alone. The resulting task for empirical evaluation is to distinguish eligibility to apply, receipt of facilitation, completed certification and continued market participation.

Table 2. Central claims and prohibited inferential leaps

Claim	Best available source	Conclusion withheld
Jan SEHATI 1,350,000	BPJPH Decree 1/2026	Does not describe revised annual allocation
Apr SEHATI 1,090,891	BPJPH Decree 117/2026	Not completed certificates or unmet demand
38 amended quotas	Decree 117/2026 annex	Not province-level access or equity
2026 staging framework	PP 42/2024	Not final status after an unverified amendment
2028 adjustment announced	Coordinating Ministry 16 Oct	Not independently confirmed as promulgated PP
Procedural tasks	BPJPH 5/2025; 146/2025	No time-cost estimate or rejection rate
Certificate market value	Prior literature and policy intent	Not causal market effect in this study
Sanctions and objections	BPJPH Regulation 2/2026	Not observed penalty incidence or functioning of appeals

Source: The bounded document analysis undertaken for this manuscript.

DISCUSSION

The initial assumption of a single, settled October 2026 mandatory-certification transition does not survive a date-ordered review of the public documents. The evidence instead shows a 2024 staging framework, the April 2026 revision of the financed SEHATI programme, and an October 2026 governmental announcement concerning later compliance dates. These are different kinds of institutional changes. An amendment to a technical facilitation decree changes authorized programme capacity but not by itself the Government Regulation's statutory deadline. Similarly, the

16 October press statement establishes the government's announced policy position, but the present review has not independently inspected a numbered, promulgated amendment to Government Regulation No. 42/2024. The period should therefore be analysed as a policy transition with a remaining legal-document verification issue, not as unqualified implementation of a fully verified 2028 rule.

The first conceptual mechanism is learning burden. An enterprise may need to distinguish which products are covered, when the legal phase applies, and whether it qualifies for self-declaration or must use an alternative certification pathway. The 2026 communication provides detailed screening criteria that can make the system more transparent, but knowledge of those criteria must itself reach applicants. In Moynihan et al.'s (2015) terms, discovering and interpreting the steps necessary for an entitlement or regulatory service is a learning cost. This article does not report entrepreneurs' levels of understanding. Rather, the density and differentiation of eligibility rules reveal why comprehension, information channels and clear comparisons between pathways warrant empirical measurement.

The second mechanism is procedural compliance burden. The service requirements require producers to represent ingredient choices, equipment, production flows and supervisory arrangements in prescribed forms. For a firm already using standardized supplier records and digital accounting, this may be routine. For another enterprise, the same requirements may demand a new information system or assistance from an intermediary. The difference cannot be inferred solely from enterprise classification; it depends on the condition of the enterprise's existing records and process complexity. This is why assessments of implementation should examine distributions of application time and repeated submissions rather than merely average certification costs.

The third mechanism involves uncertainty and policy legibility. An applicant exposed first to October 2026 guidance and then to a mid-October announcement concerning 2028 could face questions about the applicability, timing and formal legal status of requirements. This is a plausible learning or psychological cost, not a documented applicant experience. The legal distinction is central: an announcement of a proposed amendment cannot be coded as a promulgated regulation without its identifying number and operative text (BPJPH, 2026g; Coordinating Ministry for Economic Affairs, 2026).

The burden incidence can be understood at four institutional locations. Government and programme funders finance subsidized certification slots and system operation. Verification institutions and certified intermediaries undertake process checks and administrative support. Enterprises prepare and correct applications, organize production evidence and maintain the processes represented in their declarations. Buyers and consumers benefit from an assurance signal only if the system is credible and recognizable. Thus, apparently free certification may redistribute economic work rather than eliminate it. Whether redistribution is progressive, regressive or neutral depends on which enterprises receive useful support and how resource-intensive the remaining steps are. The present documentary case identifies the locations at which effort occurs, not their monetary value.

This perspective is distinct from the literature on certification intention and business performance. Widigdo and Triyanto (2024) study the relationship between awareness, compliance and intention. Fathoni et al. (2025) prioritize barriers and strategies using a decision-analytic approach informed by stakeholder assessments. Azizah et al. (2025) evaluate certification and enterprise performance in a broad MSME sample, while Daniel et al. (2026) focus on firm-level governance, risk and

compliance capabilities. The present case does not replicate any of these empirical designs. Its more modest addition is to map the 2026 programme's formal tasks against a public-administration burden framework and to clarify how these tasks might create different effective access conditions when the official fee is waived. The novelty claim remains provisional pending a systematic bibliographic search and full-text comparison with additional studies.

The closest new comparator, Sucipto et al. (2026), warns that accelerated self-declaration without appropriate verification may erode assurance credibility. That argument is not contradicted here; it supplies a substantive constraint on administrative simplification. Najmudin et al. (2026) analyse the legality of a previous 2026 phase and verification responsibilities, whereas the present case separately records the April subsidy-amendment instrument and treats the mid-October timing change as a dated government announcement pending legally operative verification. Badriyah and Fachruddin (2026) examine consumer protection and compliance in a normative legal frame. The comparative distinction is not that these works omitted burden entirely, but that this paper organizes cost incidence across firms, intermediaries and public funders while retaining the temporal hierarchy of the 2026 documents.

A possible counterargument is that the documentation and supervisory conditions are a necessary cost of honest halal assurance; reducing them could invite opportunistic applications and erode consumer trust. This objection is important. It suggests that the policy objective should not be the absence of verification but the relocation of routine clerical effort away from the least capable applicants without sacrificing decision integrity. Illustrative possibilities include reusable supplier information, standardized ingredient taxonomy, pre-application screening, simplified explanations, automatically populated fields, guided error correction and assisted digital access. None of these instruments is claimed to be nationally implemented or empirically proven by this case. They are testable design options arising from the burden framework.

A fourth institutional consideration is the economics of reviewability. Sanction procedures and a formal route for objections, codified in BPJPH Regulation No. 2/2026, may reduce arbitrary enforcement if applied predictably and made intelligible to regulated enterprises. Conversely, the need to prepare an objection may itself introduce procedural work and uncertainty. Neither welfare effect follows from the existence of a regulation. Evidence would require notices, dates, outcomes, applicant characteristics and independent verification of how administrative decisions were reached. The addition of this instrument sharpens the distinction between the existence of protective rules and the experience of procedural justice in practice (BPJPH, 2026e).

A second rival explanation concerns the size of the free-certification quota. The January 1.35 million figure cannot be used to characterize the revised April allocation, which is 1,090,891. Yet a smaller allocation also cannot establish reduced take-up: there is no verified record of eligible demand, unused places, completed certifications, or reallocations. The policy-evaluation task is to relate budgeted slots to an appropriate demand denominator, distinguishing planned capacity from administrative throughput and actual certificates (BPJPH, 2026b, 2026d).

A third counterargument concerns fairness across certification routes. The simplified self-declaration pathway is intentionally limited to particular types of products and production processes. Excluding a complex process from that pathway need not be discriminatory if more extensive verification is required to protect integrity. The relevant fairness comparison is therefore conditional: among enterprises that are substantively eligible for the same route, does administrative capacity influence take-up and completion beyond what risk-based verification justifies? Among enterprises

assigned to different routes, do the procedures accurately reflect substantive product risks rather than irrelevant differences in firm size, digital capability or access to intermediaries? These are more precise questions than whether everyone can use one universal free-certification procedure.

A further alternative account is policy accommodation rather than administrative exclusion: the October 2026 extension announcement could represent a precautionary response to sectoral readiness rather than evidence of demonstrated barriers within SEHATI. The coordinating ministry cited implementation readiness and stakeholder input; it did not publish in that communication a microenterprise-level causal analysis of certification delays. We therefore avoid translating a revised schedule into a measured administrative-burden outcome.

A budget-specific rival hypothesis is similarly viable. The April decree attributes the downward change to optimization and efficiency, and the revised provincial shares broadly follow the earlier distributional pattern. It is possible that the same completion outcomes would have been obtained from fewer funded slots, or that unmet demand increased; neither proposition can be adjudicated without programme-level utilization and eligible-demand data.

The economics of halal assurance also includes information asymmetry. Certification is valuable partly because buyers cannot easily verify all ingredients and production conditions of a product themselves. A trusted third-party or public verification system can reduce that asymmetry, but only if certification is reliable, visible and maintained. There is a tension between lowering entry friction and preserving screening quality. Administrative-burden theory makes this tension explicit rather than declaring verification redundant. An effective policy can simultaneously require truthful assurance and economize on repeated data requests, duplicate travel and unclear decision notices. Its effectiveness cannot be inferred from the mere presence of a website or an announced facilitator network.

The Islamic-economics contribution is similarly qualified. Halal assurance is associated with trustworthy exchange and the protection of legitimate consumer interests; equal treatment and the avoidance of unnecessary exclusion are relevant principles in the design of public economic services. Yet these principles do not replace an empirical assessment of whether a policy meets its aims. A producer's formal eligibility, the correctness of halal assessment and the commercial consequences of certification are distinct dimensions. A commitment to ethical commerce should motivate better evidence on each dimension, not a shortcut from religiously valuable objectives to presumed economic benefits.

The new legal crosswalk refines burden incidence in at least three respects. First, producer obligations are substantive: a halal declaration must be credible, a product may be ineligible for a simplified route and even a subsidised applicant must specify input and process information. A blanket recommendation to eliminate documentary checks would undermine the public-assurance purpose of certification. Second, the system can move work rather than remove it: a trained facilitator may translate production practices into formal submissions, but the facilitator's assessment, agency review and fatwa determination still consume organisational resources. Third, the institutionally prescribed one- and ten-day stages offer potential audit benchmarks but cannot proxy observed waiting time, particularly when intake completeness, resubmission and system availability have not been measured (BPJPH, 2025a, 2025b, 2026c).

Geographic variation in the amended April quota is observable but not interpretable as equity by itself. Decree No. 1/2026 originally specified allocation weights for population, food and beverage

firms, active assistants and prior certificates; Decree No. 117/2026 replaced the quota annex and preserved province-by-province differences. Such weighting can be defended as capacity sensitive or criticized as favoring areas with stronger existing certification networks. These are rival allocation logics, not findings of distributional injustice. Testing them requires reconstructed eligibility denominators and independent transaction logs (BPJPH, 2026b, 2026d).

The rule hierarchy also permits a more precise statement of novelty. Fathoni et al. (2025) have already identified financial, procedural and information barriers using an analytic network process, while Widigdo and Triyanto (2024) examined knowledge and compliance intentions. Daniel et al. (2026) focus on enterprise governance capabilities, and Azizah et al. (2025) report associations between certification and performance. The distinct contribution here is the institutional task-allocation map across three regulatory levels together with the geographically explicit subsidy-design boundary. This is an incremental documentary and conceptual contribution; it is not an original finding that administrative costs exist and it does not duplicate the empirical authority of enterprise-level studies.

The revised burden-sensitive inclusion proposition has five conditions. Product scope and transition timing must be accurately communicated; subsidized capacity must be adequate relative to eligible demand; documentary steps must remain feasible for firms with differing capabilities; facilitator verification must protect halal integrity and permit corrections; and market access must be assessed separately from certification issuance. The October policy announcement introduces a further temporal condition: effective communication of the legal status of transitions, including when an announced extension becomes an enforceable amendment.

Mechanism propositions for subsequent empirical tests

P1 (information clarity): conditional on product category and firm capacity, applicants receiving timely, authoritative and intelligible scope-and-deadline guidance should require fewer clarification contacts and corrective submissions. Supporting evidence would require dated guidance exposures and individual application histories; neither is available here. An opposite or null result would weaken the learning-burden proposition.

P2 (facilitation capacity): conditional on eligible local demand, a higher effective assistant-to-applicant ratio should be associated with shorter service delays and fewer abandoned applications, without weakening documented verification standards. Provincial budget allocations are not a valid substitute for the effective ratio. A null association after accounting for demand, caseload and case complexity would challenge the capacity mechanism.

P3 (contestability and assurance): effective correction routes and consistent application of verification standards should permit lower procedural uncertainty without raising verified integrity failures. Testing this requires linked case-level reasons for correction, appeal outcomes and quality-audit results, not merely the existence of a sanctions regulation. The three propositions are falsifiable research directions and are not presented as observed causal effects.

Policy evaluation should therefore produce a small set of indicators at three levels. At the applicant level, observe screening outcome, time to complete each step, the number of correction cycles, help sought and actual expenditures. At the programme level, record the proportion of applications

completed, the reasons for rejection or withdrawal, the time to facilitator contact, and completion rates disaggregated by enterprise type and location. At the market level, collect comparable sales channels, buyer contracts, prices and revenue trajectories with appropriate control for other business changes. Attribution to the certification programme would require a defensible comparison design or longitudinal model, rather than a before–after anecdote. Such indicators would convert an institutional documentary diagnosis into a test of economic inclusion.

This case illustrates a specific legal-status hazard. Government Regulation No. 42/2024 and BPJPH's Decree No. 117/2026 are identifiable instruments with legal dates and operative text; the 16 October coordinating-ministry statement identifies a government intention to amend the staging periods. The documentary corpus does not establish the final number, promulgation date, and operative text of the prospective amendment. Policy interpretation therefore uses the announced 2028 schedule only as an announcement and does not assert a legally definitive replacement of the 2024 schedule. This distinction should be revisited immediately if an official amendment appears (Government of Indonesia, 2024; BPJPH, 2026d; Coordinating Ministry for Economic Affairs, 2026).

This temporal and source hierarchy has a further policy implication. A firm deciding whether to initiate certification may face two distinct information problems: identifying what is currently binding and understanding how financial assistance can be accessed. The primary sources establish that these questions arise at different institutional levels, but not whether any individual firm misunderstood them or postponed investment. This is why the burden-incidence model remains diagnostic. Its predictions could be evaluated by comparing applicant cohorts exposed to different announcements and levels of facilitator access, conditional on product category, enterprise size, and locally available service capacity.

The documentary sample is deliberately nonrepresentative and relies heavily on official documents. It cannot quantify nonapplication, exclusion, work hours, opportunity costs, online submission failure, facilitator quality, litigation, penalties, or market outcomes. The amended regulation to Government Regulation No. 42/2024 has not been independently located for full-text legal validation; this remains an open verification gate. The scholarly literature was purposefully compared, not retrieved with a reproducible Scopus/Web of Science search. Coding was single-analyst and has not been replicated independently. These limits preclude causal and incidence claims even though the amended quotas and dated policy statements are source verifiable.

A further limitation concerns external validity of the core administrative-burden construct: the framework originated in citizen–state interactions, often involving benefit applicants, whereas halal certification is a producer-facing obligation coupled with public assurance. This transposition is analytically useful but not an empirical equivalence. In a business-regulation setting, appropriate risk screening can generate socially valuable compliance work, not only inefficient friction. Future studies should therefore separate procedural demands required for verification from duplicative, poorly communicated or avoidable demands before assessing distributive effects.

Despite these limits, the research design offers a feasible foundation for a more comprehensive study without fabricating field evidence. A subsequent version could expand the purposive documentary sample to official technical decisions and audited programme reports, incorporate documented nonstate perspectives, and register contradictory evidence as well as favorable cases. A second coder could independently analyze a frozen sample of provisions and reconcile discrepancies in a transparent log. Administrative-data research could then estimate whether

procedural improvements reduce time, rejections or voluntary withdrawal. Survey and interview evidence would be required to assess perceived uncertainty and enterprise burden directly. None of these future steps is represented here as already completed.

Table 3. Burden-sensitive inclusion framework

Stage	Documented institutional input	Empirical test needed
Clarity	Scope, dates and SEHATI criteria announced	Correct understanding by intended applicants
Usability	NIB, production records, digital submission	Time/cost by firm type and capacity
Assistance	Halal-process facilitator role	Contact time, quality, geographic variation
Assurance	Ingredient/process verification conditions	Error detection and consistency of review
Market participation	Competitiveness is an expressed objective	Causal effect on channels, sales and survival
Reviewability	Formal sanction and objection procedure	Notice quality, actual appeals and reversal rates

Source: Authors' analytical synthesis of official documents and Moynihan et al. (2015).

CONCLUSION

The 2024–2026 halal-certification record distinguishes subsidized access, administrative eligibility, and changing compliance timing. The January SEHATI authorization of 1,350,000 slots was formally amended on 8 April 2026 to 1,090,891, with an updated 38-province distribution. On 16 October, the government announced an intended extension of selected mandatory-certification staging periods to 2028, but the operative amending regulation was not verified in the examined corpus. The rules also assign registration, documentary, verification and assurance tasks among firms and institutions. These observations do not show that certification increased income, that burden caused exclusion, or that reduced quotas necessarily reduced realized uptake. The proposed burden-sensitive inclusion framework specifies what should be measured before making those economic claims: legal clarity, eligible demand, service processing, indirect applicant costs, access to reliable assistance and actual market opportunities.

BPJPH Regulation No. 2/2026 additionally establishes a formal enforcement and objection framework. Its existence makes contestability part of the documentary institutional architecture, without revealing how many enterprises received sanctions, sought review, or obtained relief. Studies published in 2026 already analyze self-declaration credibility and postponement, so the article's distinct contribution remains a bounded comparison of subsidized capacity, assigned administrative work and the status of contemporaneous rules.

This documentary case offers a time-specific baseline rather than an impact evaluation. Distinguishing the original and amended quota, the legal force of enacted rules, and the status of subsequent announcements makes the policy sequence auditable. The three conditional propositions can later be tested using applicant cohorts, eligibility records, correction cycles, verified service-time and cost logs, facilitator caseloads, and independently measured market access. Causal inference would additionally require a defensible design accounting for simultaneous reforms and applicant selection. For now, the burden-incidence framework is an institutional diagnostic, not a measured finding of unequal market inclusion.

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