

Interpreting the Legal Framework and Halal Certification Procedures of Uzbekistan: An Analysis of Cabinet Resolution No. 57 in Regional Comparative Perspective

Mustapahayuddin Abdul Khalim

Department of Islamic Studies, Centre for General Studies and Co-Curriculum, Universiti Tun Hussein Onn Malaysia (UTHM)

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ABSTRACT

The rapid growth of the global halal market and the Republic of Uzbekistan's aspiration to position itself as an international trade and tourism hub have driven historic legal reforms. The enactment of Cabinet of Ministers Resolution No. 57, dated 1 February 2025, on the "Regulation on the Procedure for Certifying Products and Services in Compliance with Halal Requirements," legally authorized the display of the official "Halal" label starting 1 May 2025. This paper provides a legal and procedural analysis of the regulatory framework, institutional governance, and technical procedures established under Resolution No. 57, employing a doctrinal legal research method grounded in the analysis of primary statutory text and secondary policy documentation. To strengthen its analytical contribution, the study situates Uzbekistan's framework within a regional comparative perspective, contrasting it against Indonesia's mandatory halal certification regime (the Halal Product Guarantee Law) and Malaysia's general regulatory regime under the Trade Descriptions Act 2011. The findings indicate that Uzbekistan's voluntary certification approach is a pragmatic model that respects local traditional practice (halal by default) without imposing mandatory legal burdens on small enterprises, while also revealing an enforcement gap relevant to future research particularly concerning unauthorized "Halal" claims made by entities that never sought formal certification. At the same time, the enforcement of unscheduled assessments, mandatory annual periodic reviews, and the establishment of an Appeals Commission under the Uzbek Agency for Technical Regulation (O'ZTTSA) provide stringent legal safeguards that protect the integrity of the "Halal" mark, thereby enhancing consumer trust and international investor confidence.

Keywords: Cabinet Resolution No. 57, Uzbekistan Halal Legislation, O'ZTTSA, OIC/SMIIC 1, Voluntary Certification, Comparative Analysis, Consumer Protection.

INTRODUCTION AND LEGAL CONTEXT

Legal Background and the Evolution of Halal Regulation in Uzbekistan

As a post-Soviet nation with a Muslim population exceeding 90%, local food products and services in Uzbekistan have traditionally been regarded as halal by default, without requiring formal documentation. Nevertheless, economic modernization under the administration of President Shavkat Mirziyoyev, together with the rising volume of import-export trade, has exposed a pressing need for a formal, internationally recognized regulatory framework (Abduazizov, 2025; Ismanov & Yormatov, 2024).

The decisive step toward this legal modernization was achieved through the enactment of Cabinet of Ministers of the Republic of Uzbekistan Resolution No. 57, dated 1 February 2025, establishing the "Regulation on the Procedure for Certifying Products and Services in Compliance with Halal Requirements" (Cabinet of Ministers of the Republic of Uzbekistan, 2025). This historic legal decision legally authorized the official "Halal" mark and label to be displayed on product packaging and service premises starting 1 May 2025 (Kun.uz, 2025; UzFood News, 2025). This step marks Uzbekistan's formal transition from reliance on assumed local tradition to a certification system grounded in statute and technical standards.

Legal Vires and Institutional Governance

A foundational question for any serious legal analysis is the position an instrument occupies within a country's legal hierarchy. Resolution No. 57 does not exist independently; it operates within the framework of the Republic of Uzbekistan's Law on Technical Regulation (Law No. ZRU-213, 2009), which empowers the Cabinet of Ministers to "determine the principal directions of activity of bodies within the state technical regulation system," to "approve the development programme for Technical Regulations," and to "approve General Technical Regulations" (Article 7, Law on Technical Regulation, 2009). The implementing technical agency now known as O'ZTTSA is in turn empowered under Article 8 of the same law to approve Special Technical Regulations within its scope of authority (Republic of Uzbekistan, 2009). This chain of authority clarifies that Resolution No. 57 (2025) is the operational implementation of the Cabinet of Ministers' general powers under the 2009 legal framework, rather than a freestanding instrument without a parent legal basis — a hierarchical clarification not made explicit in much of the secondary commentary on this Resolution, yet essential for legal practitioners who need to understand this instrument's standing within Uzbekistan's legal system as a whole.

Under Resolution No. 57, the governance and oversight structure for halal certification in Uzbekistan is led by two principal government institutions:

The Uzbek Agency for Technical Regulation (O'ZTTSA / UZSTANDARD): Acts as the national standards and technical accreditation authority responsible for managing the registration of certification bodies, overseeing the electronic information system, and administering the Appeals Commission (Abduazizov, 2025).

The Committee on Religious Affairs: Provides religious and Shariah oversight to ensure that the technical guidelines applied do not deviate from Islamic legal principles (Abduazizov, 2025).

To ensure international credibility, Resolution No. 57 mandates the adoption of international standards developed by the Standards and Metrology Institute for Islamic Countries (SMIIC), in particular the OIC/SMIIC 1 standard, as the national reference of priority (Abduazizov, 2025; Ismanov & Yormatov, 2024). In addition, Uzbekistan's first halal certification centre received international accreditation from the Halal Accreditation Agency of Turkey (HAK) in October 2025, further strengthening the international recognizability of the certificates it issues.

Legal Problem Statement

Prior to the enforcement of Resolution No. 57, Uzbekistan's halal ecosystem faced a regulatory void in which no single national standard or centralized oversight mechanism existed to govern the use of the term "Halal" (Saidov & Nosirov, 2017). This situation gave rise to several critical challenges:

Risk from the Influx of Imported Products: The influx of imported goods from Russia, Europe, China, and South Korea into local markets frequently contains hidden non-halal ingredients such as porcine gelatin (E441), carmine/cochineal colouring (E120), or animal-derived emulsifiers (E471) that are difficult for ordinary consumers to detect without standardized labelling (HalalCodeCheck, 2026; Halalketak, 2026).

The Existence of Unilateral Private Certificates: The presence of numerous private certification bodies operating without official accreditation risks generating confusion, price manipulation, and halal fraud (Abduazizov, 2025).

Export Barriers for Local SMEs: Uzbek SME traders and entrepreneurs face difficulty penetrating high-value export markets in Gulf Cooperation Council (GCC) countries and Southeast Asia due to the absence of an official halal certificate recognized under international mutual recognition arrangements (MRAs) (Ismanov & Yormatov, 2024).

A critical analysis of the impact, procedures, and legal implications of Cabinet Resolution No. 57 is therefore urgently needed to provide clear legal interpretation and procedural guidance to local industry players and

international investors and, as argued in Chapter 7, this gap can only be fully understood when placed alongside the legal models adopted by neighbouring countries that have chosen different approaches to the same underlying problem.

Research Questions and Objectives

This legal-analysis study is guided by the following key research questions and objectives:

Research Questions: (1) What are the legal implications of the voluntary nature of halal certification under Resolution No. 57 for consumer rights and entrepreneurial freedom? (2) How are the timeline, documentary requirements, physical audits, and periodic review procedures systematically arranged under this new legal framework? (3) What are the enforcement mechanisms, conditions for certificate suspension/revocation, and the role of the Appeals Commission in protecting the integrity of the "Halal" mark in Uzbekistan? (4) How does Uzbekistan's voluntary approach differ in legal strengths and weaknesses from Indonesia's mandatory model and Malaysia's general regulatory model? (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025).

Research Objectives: To analyse and interpret the legal framework of Cabinet Resolution No. 57 (2025) and the alignment of its enforcement with OIC/SMIIC standards; to detail the technical procedures for application, on-site audit assessment, the electronic information registration system, and the lifecycle of the halal conformity certificate; to evaluate the oversight mechanisms, unscheduled audits, and available legal remedies; and to compare Uzbekistan's legal regime with Indonesia's mandatory regime and Malaysia's general regulatory regime to identify cross-border policy lessons (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025).

Significance of the Study

This study makes an important academic and practical contribution as a legal review that comprehensively dissects Uzbekistan's Cabinet Resolution No. 57 and situates it within a regional comparative context. For legal practitioners, policymakers, and halal auditors, this review provides a procedural reference guide on technical compliance requirements. For international investors and export entrepreneurs (including firms from Malaysia and OIC countries), the study clarifies the regulatory procedures required to enter the Uzbek and Central Asian markets lawfully and safely, while also offering policy lessons for regional lawmakers who are weighing whether to retain or depart from the voluntary certification model.

RESEARCH METHODOLOGY

Research Design: Doctrinal Legal Research

This study employs a doctrinal legal research design, a method that focuses on the systematic analysis of primary legal texts (statutes, resolutions, regulations) in order to interpret their content, structure, and legal effect (Abduazizov, 2025). This method was chosen as the most suitable for examining a single legal instrument such as Resolution No. 57 in depth, while also permitting comparative legal analysis across jurisdictions in Chapter 7.

Data Sources and Collection Methods

Data for this study were gathered from two categories of sources. First, primary sources, namely the official text of Resolution No. 57 (2025) as registered in Uzbekistan's National Database of Legislation (Lex.uz), and the 2009 Law on Technical Regulation (Law No. ZRU-213) that constitutes its legal basis (Cabinet of Ministers of the Republic of Uzbekistan, 2025; Republic of Uzbekistan, 2009). Second, secondary sources, comprising academic and legal commentary (Abduazizov, 2025; Ismanov & Yormatov, 2024; Saidov & Nosirov, 2017), official policy media reports (Kun.uz, 2025; UzFood News, 2025), and comparative legal documents for Indonesia (the Halal Product Guarantee Law and BPJPH guidelines) and Malaysia (the Trade Descriptions Act 2011 and the Trade Descriptions (Definition of Halal) Order 2011).

For the comparative analysis in Chapter 7, Indonesia and Malaysia were selected on the basis of purposive selection criteria: both are Muslim-majority nations with mature halal economies, both maintain active trade and diplomatic relations with Uzbekistan, and, more importantly, both represent two distinct poles of halal regulatory approach — mandatory certification (Indonesia) and general regulation through trade-description law (Malaysia) which provide a meaningful analytical contrast to Uzbekistan's voluntary model.

Methodological Limitations: Translation Issues and the Absence of Pinpoint Citations

The original text of Resolution No. 57 was published in Uzbek and Russian. As this study relies on the English-language translated text available in secondary commentary (in particular Abduazizov, 2025) and the official summaries published through the Lex.uz portal, the study deliberately refrains from citing specific article or clause numbers of the Resolution, so as to avoid the risk of misinterpretation arising from discrepancies in unofficial translation. Readers and legal practitioners requiring precise primary legal references are encouraged to consult the original text directly on Lex.uz (link provided in the References). This methodological limitation is discussed further in Chapter 8.4.

The Voluntary Nature of Halal Certification

Legal Standing and Operation of the Voluntary Nature

Under Cabinet of Ministers of the Republic of Uzbekistan Resolution No. 57 (2025), the regulatory framework drafted for the certification of products and services against Halal requirements is officially established as a voluntary certification scheme (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025). Under this scheme, manufacturers, service providers, and local or international traders operating in Uzbekistan are not legally obligated to obtain a halal conformity certificate in order to conduct business. Instead, certification applications are made on the applicant's own initiative and commercial decision, driven by the desire to comply with recognized technical standard documents.

This legal framework provides that any business entity that applies for certification will be defined as an "applicant," entitled to obtain official confirmation through an accredited certification body. This voluntary nature ensures that the law does not impose bureaucratic burdens or mandatory penalties on micro-entrepreneurs and traditional local businesses that choose to operate without formal certification.

Local Market Reality: The Concept of Halal by Default

The principal reason behind the Uzbek government's decision to retain this voluntary nature is rooted in local demographics and food culture. Uzbekistan is a country with a Muslim population exceeding 90%, where food preparation methods, animal slaughter (cattle, goats, sheep, and poultry), and traditional culinary practices have naturally complied with Islamic law (halal by default) for centuries (HalalCodeCheck, 2026; Ismanov & Yormatov, 2024). The sale of pork is extremely rare and confined to specific areas serving non-Muslim communities or particular import stores.

Because local practice is inherently Shariah-compliant by default, Resolution No. 57 affirms that the absence of a "Halal" mark or label on domestically produced goods is not an indicator that the product is haram or unsafe to consume (Abduazizov, 2025). This provision is especially important for protecting local retail markets and traders at traditional public bazaars (such as Chorsu Bazaar in Tashkent and Siab Bazaar in Samarkand), where fresh meat and local staple foods are sold directly to local consumers without requiring written certification.

Commercial Value-Add and the Importance of Official Halal Certification

Although halal certification is voluntary for the general domestic market, the need for an official certificate accredited against international standards (such as OIC/SMIIC 1) becomes highly critical in three key circumstances:

Oversight of Imported Food Products and Goods: With the rapid pace of international trade flows, modern supermarkets in Uzbekistan (such as Korzinka, Makro, and Havas) are flooded with a wide variety of

processed and imported goods from Russia, Europe, China, South Korea, and Kazakhstan. These imported products frequently contain hidden ingredients of doubtful (mushbooh) or haram status such as porcine gelatin (E441), carmine insect colouring (E120), animal-derived emulsifiers (E471), or alcohol (HalalCodeCheck, 2026; Halalketak, 2026). In this context of processed imported goods, the official "Halal" mark functions as a critical guarantee of safety and Shariah authenticity for local Muslim consumers and international tourists.

Export Market Expansion Opportunities for Local SMEs: For local entrepreneurs and manufacturers in Uzbekistan (such as meat producer Rozmetov ZM LLC), holding an internationally recognized official halal certificate opens wide export access to Gulf Cooperation Council (GCC) countries, Southeast Asia (Malaysia and Indonesia), and the global Muslim community (Ismanov & Yormatov, 2024; Rozmetov.uz, 2026). This certification confers competitive advantage, customs clearance privileges, and trusted business reputation.

Muslim Traveller Confidence and the Hospitality (HRI) Sector: The rapid growth in Muslim travellers visiting the Silk Road heritage cities requires written assurance (Mustapahayuddin Abdul Khalim, 2026). Accommodation, hotel, and restaurant premises displaying a "Halal" mark verified by an accredited certification body can provide international travellers with peace of mind regarding the Shariah compliance of their kitchens and services.

Legal Implications and Consumer Protection

From a legal standpoint, the voluntary nature under Resolution No. 57 creates a balance between freedom of enterprise and consumer protection. Any company that voluntarily decides to apply for and obtain a halal certificate becomes automatically bound under the terms of a formal agreement with the certifying authority (Abduazizov, 2025).

Should the certificate holder fail to comply with Shariah standards or falsely display the "Halal" mark after acquisition, it becomes subject to legal action, suspension, or immediate revocation of the certificate (Abduazizov, 2025). This legal framework ensures that, although the application for certification is voluntary, enforcement against approved certificate holders is strict and legally binding.

Identified Enforcement Gap: "Halal" Claims Without Certification

A critical analysis of Sections 3.1 through 3.4 reveals an important legal question not made explicit in the secondary commentary reviewed: the enforcement framework of Resolution No. 57 specifically its provisions on suspension, revocation, and legal liability applies only to entities that have *applied for and obtained* an official halal certificate. Given the voluntary nature of certification, a question arises as to whether any legal mechanism exists to address traders who display "Halal" marks or claims on their products or premises outright, without ever applying for formal certification a scenario that is logically possible given the absence of any obligation to apply. The source documents examined in this study do not identify any explicit provision within Resolution No. 57 governing such a situation; this suggests either (a) that this situation is expected to be addressed through Uzbekistan's general Consumer Protection Law, separate from Resolution No. 57, or (b) that it constitutes a regulatory gap warranting future amendment. This question remains open and relevant for further primary legal research (see Chapter 8.4), and marks a notable contrast with mandatory regimes such as Indonesia's, where unauthorized halal claims by medium/large businesses constitute a clear offence under law (see Chapter 7).

Application and Technical Review Procedure

Digital Application Submission and the Integrated Information System

Under the legal framework of Cabinet of Ministers Resolution No. 57 (2025), the halal certification application process in Uzbekistan is managed transparently through a Digital Integrated Information System overseen by the Uzbek Agency for Technical Regulation (O'ZTTSA / UZSTANDARD) (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025). This electronic platform is intended to streamline registration, minimize physical bureaucracy, and maintain a national electronic register of approved products and services.

Applicants defined as registered individuals or business entities are required to submit an official electronic application using the standardized form set out in Appendix 2 of Resolution No. 57 (Cabinet of Ministers of the Republic of Uzbekistan, 2025). This digitalization ensures that every application is centrally recorded and traceable by the authorities and the Appeals Commission in the event of any dispute.

Checklist of Mandatory Supporting Documentation

To enable an accredited certification body to conduct a fair technical assessment, applicants are required to upload a comprehensive list of supporting documents alongside the electronic application form. These mandatory documents comprise:

Technical Production Instructions: Detailed documentation of the production workflow, processing flowcharts, and quality-control SOPs for the premises.

Detailed Product Composition: A complete declaration of all raw materials, food additives, enzymes, flavourings, and processing aids used.

Packaging and Labeling Descriptions: Specifications of packaging materials (confirming the absence of porcine or hazardous elements) and draft product label designs.

Test Reports: Analytical reports from accredited laboratories confirming product safety and technical compliance with halal standards (such as tests confirming the absence of porcine DNA or alcohol).

Management System Documentation: Documentation proving the entity has implemented a quality-control system (such as ISO 22000 or a Halal Assurance System) to guarantee ongoing Shariah compliance.

Evidence of Employee Competency: Qualification certificates or training evidence confirming staff knowledge and skills in handling halal standards.

Prior Conformity Certificates: Copies of any previously obtained compliance or accreditation certificates (where applicable).

Review Timeline and Approval Decision

Cabinet Resolution No. 57 sets strict legal deadlines to prevent administrative delay by certification bodies:

Document Review Phase: The accredited certification body is given a maximum of three (3) working days from the date the application is received to review the completeness and validity of all supporting documents submitted (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025).

Application Decision Phase: Once document review is complete, the certification body must issue an official decision to accept or reject the application within one (1) working day (Abduazizov, 2025).

If the application is accepted, the certification body proceeds to the next stage, namely scheduling the physical on-site audit programme.

Legal Protection Against Arbitrary Rejection

To protect the rights of business entities and ensure administrative transparency, Resolution No. 57 strictly prohibits any application rejection that is arbitrary, subjective, or lacking a clear legal basis (Abduazizov, 2025).

Under this legal framework, a certification application may only be rejected on three specific grounds: non-compliance of the application form with the prescribed standardized format; submission of incomplete or non-conforming supporting documents; and the detection of false, deliberately misleading, or falsified information by the applicant.

If an application is rejected, the certification body must notify the applicant in writing of the detailed reasons for rejection without delay. The applicant is granted the legal right to correct the identified deficiencies and resubmit the application without prejudice. In addition, an applicant who disputes a rejection decision is entitled to lodge a formal appeal with the O'ZTTSA Appeals Commission.

On-Site Assessment Protocol

Legal Basis and Site Audit Contractual Agreement

Under the provisions of Cabinet of Ministers Resolution No. 57 (2025), the physical assessment phase at production or service premises is governed by strict legal norms to ensure that every product and service transparently complies with Halal standards. This on-site assessment is carried out on the basis of a formal contractual agreement executed between the applicant and the accredited certification body (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025).

Under the terms of this agreement, the applicant is required to pay an assessment service fee. The regulation stipulates, on a statutory basis, that this audit fee is non-refundable, regardless of whether the final assessment outcome is a pass or a rejection (Abduazizov, 2025). This legal provision is designed to guarantee the independence, neutrality, and integrity of the certification body against any financial pressure or influence from the applicant.

Assessment Programme and Branch Audit Coverage

On-site audit procedures are conducted according to a special Evaluation Programme formally drawn up and approved by the head of the relevant certification body. This programme sets out the Shariah and technical review parameters at the production location. Where an applicant operates multiple business branches or factory facilities, Resolution No. 57 stipulates that physical on-site audit inspections must be carried out comprehensively at all relevant branch locations (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025). Random-sampling-based auditing of branches is not permitted, to ensure that no branch escapes oversight against the national Halal standard.

Preparation of the Audit Report and the Applicant's Right of Objection

The timeline for post-audit documentation is efficiently regulated to prevent delayed decisions: a formal audit report must be prepared within one (1) working day after the on-site assessment is completed (Abduazizov, 2025). The report is prepared in two official copies — one retained by the certification body and one issued to the applicant and both copies must be signed by an official representative of the certification body and the applicant. Should the applicant disagree with the audit findings or any non-compliance identified by the auditor, the legal framework grants the applicant the right to formally record any comments, objections, or dissenting views within the report prior to signing (Abduazizov, 2025).

Sampling Protocol and Accredited Laboratory Testing

During the on-site audit process, should any doubt or uncertainty arise regarding the composition of raw materials, additives, or product ingredients, a laboratory sampling protocol must be activated (Abduazizov, 2025): the collection of product or raw-material samples at the premises must be carried out physically in the presence of the applicant; samples collected are tested at laboratories accredited under technical regulations and Shariah requirements to detect haram substances (such as tests for porcine DNA or alcohol content); and test results are documented in an official report that must be completed within one (1) working day and jointly signed by the certification authority and the applicant (Abduazizov, 2025).

Issuance, Periodic Monitoring, and Certificate Revocation (Lifecycle of the Halal Certificate)

Issuance Decision, Usage Agreement, and Certificate Validity Period

Under the provisions of Cabinet of Ministers Resolution No. 57 (2025), once the on-site assessment and laboratory testing (where applicable) are completed, the accredited certification body is required to compile

and evaluate the full documentation within five (5) working days to issue an official decision on whether to approve or reject the issuance of the Certificate of Conformity (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025).

Where the application is approved: a formal agreement is executed between the certification body and the applicant, detailing the rights, obligations, and terms of use of the official "Halal" mark and logo; the certificate is registered in the official electronic database and issued to the applicant within three (3) working days; the certificate is granted for a validity period of three (3) years (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025); and the certificate is issued specifically to the applicant entity and is non-transferable to any other individual or legal entity.

Periodic and Unscheduled Assessments

To ensure that Shariah compliance and technical standards are maintained throughout the certificate's three-year validity period, Resolution No. 57 establishes a strict periodic oversight mechanism set out under Appendix 4 (Cabinet of Ministers of the Republic of Uzbekistan, 2025): the first periodic monitoring audit must be conducted within twelve (12) months of the certificate's registration date (Abduazizov, 2025); following the first assessment, subsequent monitoring audits are conducted annually; an unscheduled audit must be conducted within the first six (6) months after certificate registration to verify the initial consistency of operations (Abduazizov, 2025); and should any consumer complaint or dispute arise regarding the halal status of a certified product or service, the certification body is required to conduct an immediate unscheduled audit at the premises (Abduazizov, 2025).

Conditions for Suspension and Revocation

The legal framework of Resolution No. 57 grants the certification body statutory authority to confirm, suspend, or formally revoke a halal conformity certificate (Abduazizov, 2025). Suspension may occur under three specific circumstances: a voluntary request by the certificate holder itself (for a maximum period of 30 days); the detection of technical non-compliance during a periodic assessment, in which case the certificate holder is given 30 days to undertake corrective action; and the occurrence of unnotified changes in the production process, raw-material supplier selection, or service workflow.

Permanent revocation of the certificate will be enforced should the certificate holder fail to correct identified non-compliance within ninety (90) days, or should gross violations of Shariah standards or fraudulent certification be detected. All suspension or revocation decisions take effect immediately from the date the decision is made and must be communicated to the certificate holder within three (3) working days. Once a suspension or revocation takes effect, the holder must immediately cease using the "Halal" mark and label on their products and promotional materials; any continued use is subject to legal liability under Uzbek law.

The Role of the Appeals Commission and Legal Liability

To ensure fairness and provide legal remedy protection to business entities, Resolution No. 57 establishes an Appeals Commission under the Uzbek Agency for Technical Regulation (O'ZTTSA / UZSTANDARD) (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025). An applicant or certificate holder who is dissatisfied with, or disputes, a decision to reject, suspend, or revoke a certificate by the certification body is entitled to lodge a formal appeal with this Commission for a fair review. The secondary commentary examined does not clarify whether the Appeals Commission's own decisions may be further challenged through Uzbekistan's general administrative courts a further question of judicial remedy that is likewise identified as a limitation of this study (see Chapter 8.4).

Regional Comparative Analysis: Uzbekistan, Indonesia, And Malaysia

Rationale for Comparison

These three countries represent three distinct approaches to the same underlying policy problem how a Muslim-majority nation should regulate the use of the term "Halal" in trade. Indonesia represents the comprehensive-mandatory pole; Uzbekistan represents the voluntary, application-driven pole; while Malaysia

represents a hybrid model JAKIM certification applications are procedurally voluntary, but the use of the term "Halal" itself is strictly regulated through general trade-description law. This comparison is not merely academic; it holds direct practical relevance to Uzbek policymakers currently building a halal ecosystem from the ground up, and to Malaysian and Indonesian investors who must understand the differing regulatory risks across these three markets.

Indonesia: A Phased Mandatory Model

Indonesia adopts an approach that is fundamentally opposed to Uzbekistan's, through the Halal Product Guarantee Law (UU JPH), administered by the Halal Product Assurance Organizing Agency (BPJPH). Unlike the voluntary nature of Resolution No. 57, the mandatory halal certification obligation for three product categories — food and beverages, raw materials/additives/processing aids, and slaughter products and services came into full effect for medium and large businesses starting 18 October 2024, following the expiry of the phasing period granted since UU JPH was first enacted (BPJPH, 2024). Medium and large businesses that fail to comply with this obligation are subject to graduated administrative action beginning with a written warning and potentially leading to the withdrawal of products from market circulation (BPJPH, 2024). To protect micro and small enterprises (UMKM) from the burden of immediate compliance costs, the Indonesian government granted this group of businesses an additional extension until 17 October 2026 to obtain certification (BPJPH, 2024). Imported products are likewise subject to the same obligation, with the final outcome dependent on mutual recognition agreements expected to be finalized before 17 October 2026.

Indonesia's model offers more comprehensive consumer certainty there is no room for a "default halal assumption" for the listed product categories — but at the cost of a heavier compliance burden on industry, particularly SMEs, requiring a multi-year transition period and a large-scale bureaucratic infrastructure (BPJPH) to accommodate a far larger volume of applications than a voluntary regime.

Malaysia: A Hybrid Model Through Trade Description Law

Malaysia offers a third, distinct model. Application for a JAKIM halal certificate itself, like Uzbekistan, is procedurally voluntary — there is no absolute obligation for every food trader to apply for JAKIM certification. However, the moment the term "Halal" is used in any form of trade, it becomes immediately subject to strict regulation under the Trade Descriptions Act 2011 (Act 730) and its subsidiary legislation, the Trade Descriptions (Definition of Halal) Order 2011, which provides a legally binding definition of what may be regarded as "Halal" (One Asia Lawyers, 2024). Any false or misleading trade description including a "Halal" claim without certification or lawful basis constitutes a general offence under Act 730, and the Ministry of Domestic Trade and Cost of Living (KPDN), together with JAKIM, is granted enforcement powers including premises inspection and seizure of non-compliant products (One Asia Lawyers, 2024).

Malaysia's model is instructive when compared with the gap identified in Chapter 3.5: by establishing a statutory definition of "Halal" and making a false claim a general offence under trade-description law regardless of whether the trader ever applied for a JAKIM certificate Malaysia closes the enforcement gap present in Uzbekistan's regime, where legal liability applies only to existing certificate holders.

Comparative Summary Table

Aspect	Uzbekistan (Resolution No. 57)	Indonesia (UU JPH)	Malaysia (Act 730 + JAKIM)
Nature of certification	Fully voluntary (applicant-driven)	Phased mandatory for specified categories since Oct 2024; UMKM extended to Oct 2026 (BPJPH, 2024)	JAKIM certificate application procedurally voluntary
Regulation of "Halal" claims	Unclear / gap identified (Section 3.5)	Offence under UU JPH for mandatory categories (BPJPH, 2024)	General offence under Act 730 & the Definition

Aspect	Uzbekistan (Resolution No. 57)	Indonesia (UU JPH)	Malaysia (Act 730 + JAKIM)
without certification			of Halal Order 2011 (One Asia Lawyers, 2024)
Implementing body	O'ZTTSA (technical) + Committee on Religious Affairs (Shariah)	BPJPH (under the Ministry of Religious Affairs)	JAKIM (certification) + KPDN (trade enforcement)
Certificate validity period	3 years	Varies by product category	Subject to periodic JAKIM review
Non-compliance penalty	Suspension/revocation of certificate (certificate holders only)	Written warning → product withdrawal (mandatory categories)	Fine and/or imprisonment under Act 730's general offence; product seizure

Cross-Border Policy Lessons

This comparison reveals that the voluntary nature of Resolution No. 57 while pragmatic for Uzbekistan's unique socio-cultural context (see Section 3.2) leaves an enforcement gap that both neighbouring countries have explicitly addressed through different routes: Indonesia through a direct mandatory obligation, and Malaysia through a general statutory definition under trade-description law that applies regardless of certification status. For Uzbek policymakers, one concrete recommendation arising from this comparative analysis is to consider a modest amendment to the existing framework not altering the voluntary nature of certification itself, but establishing a separate provision (whether under Resolution No. 57 or the general Consumer Protection Law) that makes a false "Halal" claim by an uncertified entity an offence preserving the flexibility of the voluntary model while closing the consumer-protection gap, following Malaysia's approach.

CONCLUSION

Summary of Findings and Legal Impact

The enforcement of Cabinet of Ministers of the Republic of Uzbekistan Resolution No. 57 (2025), dated 1 February 2025, marks a significant legal milestone in the modernization of Uzbekistan's halal ecosystem (Abduazizov, 2025; Cabinet of Ministers of the Republic of Uzbekistan, 2025). Through the establishment of structured procedures, the adoption of the OIC/SMIIC 1 standard, and the implementation of a digital integrated information system, Resolution No. 57 successfully closes a regulatory gap that had previously exposed the local market to uncertainty and halal fraud (Abduazizov, 2025; Ismanov & Yormatov, 2024).

This legal analysis shows that the voluntary nature of certification is a pragmatic approach that respects local traditional practice (halal by default) without imposing mandatory legal burdens on local small enterprises. At the same time, strict safeguards over applications, on-site audits, laboratory testing, and periodic monitoring ensure that any entity choosing to display the official "Halal" mark is held accountable under binding legal terms (Abduazizov, 2025). However, as argued in Sections 3.5 and 7, this pragmatic advantage also entails an enforcement gap absent from Indonesia's mandatory regime or Malaysia's general regulatory regime a finding that only becomes clear through a regional comparative lens.

Policy Implications for Industry Players and International Investors

Cross-Border Investment Opportunities: Recognition of SMIIC standards under Resolution No. 57 facilitates the entry of international investors and companies (including from Malaysia) to establish Shariah-compliant

production facilities, hospitality services, and agribusiness joint ventures in Uzbekistan (BERNAMA, 2026a; Mustapahayuddin Abdul Khalim, 2026).

Empowerment of Uzbek SME Exports: Holding a three-year halal conformity certificate confers a competitive advantage on local manufacturers seeking to penetrate GCC and Southeast Asian export markets through smoother customs clearance (Ismanov & Yormatov, 2024).

Muslim Traveller Confidence: Enforcement of the official "Halal" label starting 1 May 2025 provides certainty and peace of mind to international travellers visiting Silk Road heritage destinations (Kun.uz, 2025; Mustapahayuddin Abdul Khalim, 2026).

Regulatory Caution for Investors: Investors and exporting companies from mandatory or hybrid-regime countries (such as Indonesia and Malaysia) should understand that the absence of an Uzbek halal certificate on a local competitor's product does not necessarily mean that product is non-Shariah-compliant (see the concept of halal by default, Section 3.2) an important market nuance for competitiveness analysis and market-entry strategy.

Contribution of Regional Comparison

This study's principal contribution to the existing literature is situating Resolution No. 57 within the context of three distinct regional halal regulatory models mandatory (Indonesia), voluntary (Uzbekistan), and hybrid (Malaysia) as summarized in the Table in Section 7.4. This comparative analytical framework may serve as a basis for future research examining the halal regimes of other Central Asian countries (such as Kazakhstan and Kyrgyzstan) that are likewise developing formal halal certification frameworks.

Limitations of the Study and Recommendations for Future Research

This study is subject to several methodological limitations that must be transparently stated. First, as noted in Section 2.3, this analysis relies on translated text and secondary commentary on Resolution No. 57, rather than pinpoint citations to article/clause numbers from the primary Uzbek/Russian text; this limits the precision of legal references for litigation or formal legal advisory purposes. Second, the enforcement gap identified in Section 3.5 concerning "Halal" claims without certification remains an open question requiring verification through direct reference to Uzbekistan's general Consumer Protection Law or interviews with local legal experts beyond the scope of the documents analysed in this study. Third, the question of whether O'ZTTSA Appeals Commission decisions are subject to further judicial review (see Section 6.4) cannot be answered from the secondary sources examined.

Future research is recommended in the following order: (a) conducting a full primary-text analysis of Resolution No. 57 together with a certified translation to enable precise pinpoint citation; (b) conducting empirical research through interviews with O'ZTTSA auditors, local corporate lawyers, and SME entrepreneurs to verify the enforcement gap identified in Section 3.5; (c) extending the comparative framework of Chapter 7 to the halal regimes of Kazakhstan and other Central Asian countries; and (d) empirically examining the effect of voluntary certification on certificate uptake rates among Uzbek SMEs relative to Indonesia's mandatory compliance rate, in order to quantitatively test the "pragmatic" argument advanced in this study.

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