Halal International Journal
Halalin Journal Vol. 2 No. 2 (2025) 46-66
Available online at
https://halalin.walisongo.ac.id/index.php/halalin

Employee Competency and Certification in the Halal Industry: A New Legal Obligation for Employers under Indonesia's Employment Law and Halal Product Assurance System

Tri Nurhayati[1*], Anas Sa'bani [2]
[1] UIN Walisongo, Indonesia.
[2] Universitas Dian Nuswantoro, Indonesia.

* Corresponding author's e-mail: trinurhayatifsh@walisongo.ac.id

ABSTRACT

The implementation of Indonesia's Halal Product Assurance System (HPAS) has expanded halal certification beyond product compliance to include workforce competency and organizational governance. However, although the Halal Product Assurance Law requires business actors to appoint a Halal Supervisor, it does not explicitly regulate employers' obligation to provide halal competency training. This study examines the relationship between employers' training obligations under Indonesian employment law and the implementation of the Halal Product Assurance System. Using a normative juridical method with statutory, conceptual, and comparative approaches, the study analyses Law Number 13 of 2003 concerning Employment as amended by Law Number 6 of 2023, Law Number 33 of 2014 concerning Halal Product Assurance, Government Regulation Number 42 of 2024, and relevant regulations on halal supervision and professional certification. The findings reveal that, although halal legislation does not expressly mandate halal training for all employees, a systematic and teleological interpretation of employment and halal laws establishes an implied legal obligation for employers to ensure that workers engaged in halal-critical activities possess adequate competencies. Such competencies should be developed through structured training and professional certification, particularly for Halal Supervisors and Halal Slaughterers. This study further proposes an integrated collaborative model involving Vocational Training Centers (LPK), Halal Inspection Bodies (LPH), Local Manpower Offices (Disnaker), the National Professional Certification Board (BNSP), and the Halal Product Assurance Agency (BPJPH) to strengthen Indonesia's halal workforce development system. The proposed model contributes to the harmonization of employment law and halal governance while supporting sustainable development and global competitiveness of Indonesia's halal industry.

Keywords: Halal Product Assurance System; Employee Competency; Halal Supervisor; Employment Law; Professional Certification.

Introduction

Indonesia has emerged as one of the most strategic actors in the global halal industry due to its large Muslim population and increasing demand for halal-certified products. The development of the halal ecosystem is no longer limited to the certification of products but has expanded into a comprehensive governance system encompassing supply chains, production processes, management systems, and human resources. This transformation was strengthened by the enactment of Law Number 33 of 2014 concerning Halal Product Assurance (Jaminan Produk Halal/JPH), which established halal certification as a mandatory legal regime rather than a voluntary business initiative. The implementation of mandatory halal certification has created new legal consequences for business actors, particularly regarding their responsibility to ensure that all stages of production comply with halal requirements (Tieman, 2011).

The regulatory framework governing halal assurance emphasizes that halal compliance is not merely determined by the halal status of raw materials but also by the integrity of production processes and organizational governance. In this regard, Government Regulation Number 39 of 2021 concerning the Implementation of the Halal Product Assurance Sector (which has subsequently been refined through PP No. 42 of 2024) requires business actors to implement the Halal Product Process (Proses Produk Halal) and appoint a Halal Supervisor (Penyelia Halal) responsible for ensuring the consistency of halal compliance within the company. The Halal Supervisor serves as an internal control mechanism, overseeing materials, production processes, documentation, and the implementation of the Halal Assurance System.

The increasing importance of Halal Supervisors demonstrates that human resources have become a fundamental component of halal assurance governance. According to the Halal Product Assurance Agency (BPJPH), Halal Supervisors are required to possess adequate knowledge, competence, and understanding of Islamic law and halal production processes because they function as internal halal auditors within business entities. BPJPH has repeatedly emphasized the need for systematic training and competency development to ensure that Halal Supervisors are capable of maintaining the integrity of halal-certified products and production systems.

Despite the growing recognition of competency requirements in halal governance, Indonesian halal legislation does not explicitly regulate whether employers are legally obligated to provide halal-related training for their employees. Existing regulations primarily focus on the obligation to appoint a Halal Supervisor and implement a Halal Assurance System. This situation raises an important legal question: can the obligation to appoint competent halal personnel be interpreted as an obligation to provide education, training, and competency certification for workers involved in critical halal processes? The answer to this question becomes increasingly significant as the halal industry expands into sectors requiring specialized technical competencies, such as halal slaughterhouses, food processing industries, pharmaceuticals, cosmetics, logistics, and hospitality services (Jan Mei Soon, Mahmood Chandia, 2017). From the perspective of employment law, workforce competency development is not a new concept. Law Number 13 of 2003 concerning Employment, as amended by Law Number 6 of 2023, places substantial emphasis on vocational training and competency development as instruments for improving productivity and worker welfare. Article 9 of the Employment Law stipulates that job training shall be organized and directed toward equipping, enhancing, and developing work competencies in order to improve productivity and welfare (Organisation for Economic Co-operation and Development (OECD), 2021). This provision reflects the state's commitment to competency-based workforce development and establishes a legal foundation for employer participation in employee training programs. Consequently, the emergence of halal competency requirements raises the possibility that halal training may no longer constitute a voluntary corporate initiative but rather a legal necessity derived from the intersection of employment law and halal regulatory obligations.

Previous studies on halal governance have addressed several important dimensions of the halal certification regime. The existing literature has predominantly examined halal certification from the perspectives of consumer protection, halal supply chain management, halal assurance systems, institutional governance, and organizational compliance. Other studies have specifically discussed the role and competency of Halal Supervisors in maintaining halal integrity and implementing halal assurance procedures, while research on halal workforce development has highlighted the importance of employee knowledge, training, and competency in supporting organizational compliance. In parallel, employment law scholarship has primarily examined vocational training, workforce competency development, productivity, industrial relations, and employer responsibilities in developing workers' occupational skills. These studies have established the importance of both halal governance and workforce competency, but they have generally treated these two regulatory domains as separate areas of inquiry.

What remains insufficiently explored is the legal relationship between employers' general obligations to develop workforce competencies under employment law and the specific competency requirements generated by the Halal Product Assurance System. In particular, previous scholarship has not adequately examined whether the statutory obligation to organize

job training can provide a legal basis for employers to develop halal-related competencies when halal regulations require business actors to maintain competent personnel, including Halal Supervisors and other workers involved in halal-critical activities. The unresolved issue is therefore not merely whether halal training is beneficial or necessary from a managerial perspective, but whether such training can be legally constructed as part of employers' obligations through a systematic interpretation of employment and halal product assurance legislation. This study fills this gap by undertaking a normative legal analysis of the relationship between Article 9 of the Employment Law and the competency requirements established under the Halal Product Assurance legal framework. Through systematic and teleological legal interpretation, the study examines how general workforce training obligations intersect with sector-specific halal competency requirements and whether this intersection generates an implied legal obligation for employers to facilitate halal education, training, and competency certification for employees engaged in halal-critical activities. In doing so, the study moves beyond the existing fragmented discussion of halal certification and workforce development and reconstructs halal competency as a legally relevant dimension of occupational competency within Indonesia's employment and halal governance framework.

This gap becomes increasingly important considering that the success of halal certification depends not only on regulatory compliance and documentation but also on the competency of employees responsible for implementing halal requirements in daily business operations. Without adequately trained personnel, the effectiveness of the Halal Assurance System may be compromised despite the existence of formal certification. Consequently, the obligation to appoint a Halal Supervisor may logically imply a broader obligation to ensure that workers possess sufficient halal-related competencies through training and professional certification programs.

This article argues that the implementation of the Halal Product Assurance System has generated a new dimension of employer responsibility in Indonesia. Through a systematic interpretation of employment law and halal legislation, the obligation to maintain halal compliance can be understood as requiring employers to facilitate competency development for employees engaged in halal-critical activities. Accordingly, this study seeks to analyze the legal relationship between workforce training obligations and halal governance requirements, examine the normative implications of the obligation to appoint Halal Supervisors, and formulate an institutional collaboration model involving Vocational Training Institutions (LPK), Halal Inspection Bodies (LPH), Local Manpower Offices (Disnaker), BPJPH, and the National Professional Certification Board (BNSP) in developing a competent halal workforce. He findings of this study are expected to contribute to the development of Indonesian halal governance by providing a legal framework that integrates employment law, competency certification, and halal assurance systems. Furthermore, the study offers a policy-oriented model for strengthening the national halal workforce ecosystem through collaborative competency development and professional certification mechanisms.

Methods

This study employs a normative juridical research method (Peter Mahmud Marzuki, 2021) focusing on the examination of legal norms governing workforce competency development and halal assurance obligations. Normative legal research is appropriate because the study seeks to analyze the relationship between legal provisions contained in employment law and halal regulatory frameworks, as well as to construct legal arguments regarding employers' responsibilities in developing halal-related competencies among employees. The research utilizes several approaches. First, the statutory approach is applied to examine legal instruments governing employment training, competency certification, and halal assurance systems. The primary legal materials include the 1945 Constitution of the Republic of Indonesia, Law Number 13 of 2003 concerning Employment as amended by Law Number 6 of 2023, Law Number 33 of 2014 concerning Halal Product Assurance, Government Regulation Number 39 of 2021

concerning the Implementation of the Halal Product Assurance Sector, and relevant regulations concerning Halal Supervisors, professional certification, and competency standards.

Second, a conceptual approach is employed to examine theoretical concepts related to workforce competency, professional certification, human capital development, halal governance, and regulatory compliance. This approach facilitates the interpretation of competency development as an integral component of legal compliance within the halal industry. Third, a comparative approach is used to compare competency-based workforce development principles within employment law and competency requirements embedded in halal assurance regulations. Through this comparison, the study identifies normative intersections between the two regulatory regimes and evaluates their implications for employers (Soekanto & Mamudji, 2015).

The legal materials analyzed consist of primary, secondary, and tertiary legal sources (Peter Mahmud Marzuki, 2021). Primary legal materials include legislation and government regulations related to employment and halal assurance. Secondary legal materials comprise scholarly books, peer-reviewed journal articles, policy reports, official publications issued by BPJPH, and literature concerning competency-based training systems and halal governance. Relevant policy documents and competency development initiatives issued by BPJPH regarding Halal Supervisors and halal training programs are also examined to understand current implementation practices.

Data analysis is conducted qualitatively using legal interpretation methods, particularly systematic interpretation and teleological interpretation (Soekanto, S., & Mamudji, 2015). Systematic interpretation is employed to identify normative relationships between employment law provisions on workforce training and halal regulatory obligations. Teleological interpretation is utilized to determine the legislative objectives underlying competency requirements within the Halal Product Assurance System. Through these analytical methods, the study develops a legal construction regarding employers' obligations to facilitate halal competency development and proposes a collaborative institutional model for implementing halal workforce certification in Indonesia.

Results and Discussions

The Concept of Human Resource Competency in the Halal Industry

The rapid expansion of the global halal industry has fundamentally transformed the concept of halal compliance from a product-oriented certification regime into an integrated governance system that encompasses organizational management, operational procedures, and human resource development. Contemporary halal assurance no longer focuses exclusively on verifying the halal status of raw materials or finished products; instead, it requires the establishment of a comprehensive management system capable of ensuring continuous compliance throughout the entire production chain. Within this governance framework, human resources constitute one of the most critical determinants of an effective Halal Product Assurance System (HPAS), as the implementation of halal requirements ultimately depends on the competency of individuals responsible for planning, supervising, documenting, and controlling halal-related processes (Ab Talib, 2024).

This paradigm shift reflects the evolution of international halal governance toward a risk-based management approach. Modern halal assurance systems emphasize preventive controls rather than post-production verification. Consequently, organizational compliance is measured not only by the halal status of products but also by the capability of employees to identify halal critical points, implement standard operating procedures, prevent cross-contamination, maintain traceability, and perform continuous monitoring. Human resource competency therefore functions as a strategic instrument for maintaining the integrity, consistency, and sustainability of halal assurance throughout the production process (Abdul Rahman, Nuradibah, 2026).

From the perspective of human resource management, competency is generally understood as the integration of knowledge, technical skills, professional attitudes, and behavioural characteristics that enable individuals to perform their assigned responsibilities effectively. Spencer and Spencer define competency as the underlying characteristics of an individual that are causally related to superior performance within a particular occupation (Spencer, Lyle M., 2008). Contemporary competency theory further recognizes competency as a dynamic organizational asset that contributes directly to productivity, innovation, quality assurance, and institutional competitiveness.

Within the halal industry, however, competency extends beyond conventional technical qualifications. Halal competency incorporates regulatory knowledge, religious understanding, managerial capability, and ethical commitment necessary to implement the Halal Product Assurance System consistently. Employees engaged in procurement, warehousing, production, slaughtering, quality assurance, logistics, and internal auditing are expected not only to perform technical functions but also to understand the legal and religious implications of their operational decisions. Failure to maintain adequate competency may jeopardize the validity of halal certification, expose business actors to administrative sanctions, and undermine consumer confidence in halal-certified products)(Fernando, Y., Darun, M. R., Abideen, A. Z., Ibrahim, D. N., Tieman, M., & Mohamad, 2021).

This multidimensional character distinguishes halal competency from ordinary occupational competency. Rather than focusing solely on job performance, halal competency serves as a regulatory competency that enables business actors to comply with statutory obligations imposed by halal legislation. Accordingly, employee competency becomes an essential component of corporate compliance programs and internal governance mechanisms. The Indonesian Halal Product Assurance regime reinforces this conceptual development. Law Number 33 of 2014 concerning Halal Product Assurance, together with Government Regulation Number 42 of 2024, establishes that halal assurance must be implemented through a structured Halal Product Assurance System involving organizational commitment, documented procedures, internal monitoring, corrective actions, and competent personnel. One of the most significant institutional innovations introduced by the legislation is the mandatory appointment of a Halal Supervisor (Penyelia Halal) within business entities implementing the Halal Product Assurance System. The regulatory framework further requires that Halal Supervisors possess adequate competency demonstrated through recognized education, training, and competency certification.

The legal significance of these provisions extends beyond the appointment of a single designated officer. In practice, Halal Supervisors cannot effectively perform their statutory responsibilities without organizational support and competent operational personnel. Supervising halal compliance throughout procurement, production, storage, distribution, and documentation necessarily requires cooperation among employees occupying different functional positions. Consequently, halal competency should be understood as an organizational capability rather than merely an individual qualification.

Recent empirical studies support this interpretation. Research published in the Journal of Islamic Marketing demonstrates that organizational commitment, employee knowledge, and continuous training significantly influence the effectiveness of halal assurance implementation across manufacturing industries. Likewise, studies in the British Food Journal conclude that human capital development constitutes one of the strongest determinants of sustainable halal compliance because competent employees reduce operational risks, improve audit performance, and strengthen consumer trust (Ab Talib, 2024).

The importance of competency development has also been highlighted within Indonesia's halal ecosystem. Studies concerning the implementation of the Halal Product Assurance System among Indonesian food industries indicate that enterprises with structured employee training programs exhibit significantly higher levels of compliance than organizations relying solely on documentary fulfilment during certification audits (Fauzi, Muchammad, 2024). These findings confirm that halal assurance cannot be sustained through regulatory compliance alone; rather, it depends upon continuous competency development embedded within organizational culture.

From a governance perspective, halal competency may therefore be classified into four interrelated dimensions. First, regulatory competency refers to employees' understanding of statutory obligations governing halal assurance, certification procedures, legal responsibilities of business actors, and applicable administrative requirements. Second, technical competency encompasses operational skills required to perform halal-compliant production activities, including halal critical point analysis, prevention of cross-contamination, sanitation procedures, ingredient verification, slaughtering techniques, and traceability management. Third, managerial competency involves the capability to administer the Halal Product Assurance System through documentation, internal audits, corrective actions, risk management, and continuous improvement mechanisms. Fourth, ethical competency represents employees' professional commitment to integrity, accountability, transparency, and compliance with Islamic ethical principles underlying halal governance.

These four dimensions demonstrate that halal competency constitutes a comprehensive professional framework integrating legal compliance, technical expertise, organizational management, and ethical responsibility. Consequently, competency development should not be regarded merely as an optional human resource development strategy but rather as an essential component of corporate governance within halal industries.

This conceptualization becomes particularly relevant when examined through the lens of Indonesian employment law. Article 9 of Law Number 13 of 2003 concerning Employment, as amended by Law Number 6 of 2023, provides that job training shall be organized to equip, improve, and develop workers' competencies with the objective of enhancing productivity, discipline, attitudes, and welfare. This provision establishes a general legal obligation concerning workforce competency development through job training. However, Article 9 does not expressly identify halal competency as a specific occupational competency or explicitly require employers to provide halal-related training to all employees.

The Halal Product Assurance legal framework establishes a complementary but distinct set of obligations. Law Number 33 of 2014 concerning Halal Product Assurance requires business actors to implement the Halal Product Assurance System (SJPH), while Government Regulation Number 42 of 2024 further regulates the implementation of halal product assurance and the requirements concerning competent Halal Supervisors. These provisions establish the legal obligation of business actors to maintain halal compliance and ensure the availability of competent personnel. Nevertheless, the existing halal regulations do not expressly impose a blanket obligation upon employers to provide halal training to every employee. The express legal obligation is therefore directed primarily toward halal assurance and the availability of competent personnel, rather than toward a universal employee-training requirement.

The relationship between these two regulatory frameworks can be examined through systematic legal interpretation. Article 9 of the Employment Law establishes a general obligation to develop work competencies according to employment needs, while the Halal Product Assurance framework creates specific competency requirements for the effective implementation of halal assurance. Where employees perform functions that directly affect halal compliance, the competencies required for those functions may reasonably constitute part of their occupational competencies. Accordingly, halal competency development can be connected to the existing workforce training obligation without asserting that the legislation expressly creates a separate obligation of "halal training."

This study therefore distinguishes between an existing legal obligation and the legal interpretation proposed by the authors. The existing obligations are the employer's obligation to develop workforce competencies through job training under Article 9 of the Employment Law and the business actor's obligation to implement the Halal Product Assurance System and ensure competent halal personnel under the Halal Product Assurance framework. The authors' proposed interpretation is that, where employees are engaged in halal-critical activities, the development of halal-related competencies may constitute an appropriate legal mechanism for fulfilling these existing obligations. Thus, halal training is not presented as an expressly stipulated obligation applicable to every worker, but as a constructed implied legal obligation arising from the

systematic relationship between employment competency requirements and halal compliance requirements.

This interpretation is particularly relevant to personnel whose functions directly affect halal assurance, including Halal Supervisors and other workers involved in halal-critical processes. For such personnel, competency in halal principles, halal procedures, traceability, documentation, and prevention of contamination is functionally necessary for the implementation of the Halal Product Assurance System. Consequently, halal education, vocational training, and competency certification may be regarded as mechanisms for ensuring that workers possess the competencies required by their occupational functions and by the applicable halal regulatory framework. This interpretation strengthens the legal coherence between employment law and halal governance while avoiding the conclusion that Indonesian legislation expressly requires halal training for all employees.

Accordingly, this study argues that halal competency represents a new category of legally mandated occupational competency arising from the harmonization of employment law and halal product assurance law. In this regard, competency development through structured education, vocational training, and professional certification should no longer be perceived solely as a managerial discretion or voluntary corporate initiative. Rather, it constitutes a legal compliance mechanism enabling business actors to fulfil statutory obligations under Indonesia's Halal Product Assurance System while simultaneously strengthening the competitiveness and sustainability of the national halal industry.

Legal Interpretation of Article 9 of the Employment Law: Harmonizing Employment Law and the Halal Product Assurance Law

The mandatory implementation of the Halal Product Assurance System (HPAS) in Indonesia has introduced a new legal landscape that extends beyond product certification to encompass organizational governance and human resource management. Although Law Number 33 of 2014 concerning Halal Product Assurance (hereinafter the Halal Product Assurance Law) principally regulates the obligations of business actors to ensure the halal status of products, its implementation inevitably requires competent personnel capable of maintaining compliance throughout the production process. This development raises an important legal question regarding whether the obligation to establish a Halal Product Assurance System should also be interpreted as imposing a legal responsibility upon employers to provide competency development and training for their employees.

This issue cannot be resolved solely through a literal interpretation of the Halal Product Assurance Law because neither Law Number 33 of 2014 nor Government Regulation Number 42 of 2024 explicitly requires employers to conduct halal competency training for all workers. Instead, the answer requires a systematic interpretation by integrating the Employment Law with the Halal Product Assurance regulatory framework. Such an interpretative approach is consistent with contemporary legal theory, which recognizes that statutory provisions should not be interpreted in isolation but rather as part of an integrated legal system pursuing coherent legislative objectives (Alexy, 2010).

Article 9 of Law Number 13 of 2003 concerning Employment, as amended by Law Number 6 of 2023 concerning Job Creation, provides that job training shall be organized and directed to equip, improve, and develop work competencies in order to enhance productivity, discipline, attitudes, and work ethics according to the needs of employment. Although the provision appears to regulate vocational training in general, its normative construction establishes a mandatory legal obligation for competency development whenever a particular occupation requires specific professional qualifications.

The legislative objective underlying Article 9 demonstrates that competency development is not merely an optional managerial policy but an integral component of labour protection and workforce development. Indonesian employment law adopts a human capital approach whereby employers, employees, and the government share responsibility for improving workforce competency to meet evolving industrial demands. Consequently, whenever

new regulatory standards introduce additional competency requirements within a particular sector, employers are expected to facilitate the acquisition of those competencies through structured education and training programmes (Silva, 2022).

The enactment of the Halal Product Assurance Law significantly changes the competency requirements applicable to industries producing, processing, storing, distributing, and trading halal products. Government Regulation Number 42 of 2024 explicitly requires business actors implementing the Halal Product Assurance System to appoint a Halal Supervisor possessing adequate competency demonstrated through halal education, training, and competency certification. Furthermore, the regulation requires continuous implementation of the Halal Product Assurance System, including internal monitoring, documentation, evaluation, and corrective actions. These regulatory obligations cannot be effectively implemented unless employees responsible for halal-critical activities possess sufficient competency regarding halal principles and operational procedures.

From the perspective of statutory interpretation, the relationship between Article 9 of the Employment Law and the Halal Product Assurance Law reflects the principle of systematic legal interpretation (systematische rechtsinterpretatie). Under this interpretative method, statutory provisions are understood within the broader legal framework rather than as isolated legal norms. Accordingly, Article 9 should be interpreted together with the competency requirements established under the Halal Product Assurance regime. Such interpretation demonstrates that vocational training obligations under employment law provide the legal mechanism through which employers fulfil competency requirements imposed by halal legislation.

This interpretation is further strengthened by the principle of teleological interpretation, which seeks to identify the social objectives pursued by legislation. The primary objective of the Employment Law is to develop competent, productive, and competitive workers capable of responding to industrial transformation. Meanwhile, the principal objective of the Halal Product Assurance Law is to provide legal certainty regarding halal products while protecting Muslim consumers and enhancing the competitiveness of Indonesian industries. Both statutes therefore pursue complementary public interests through competency development. Interpreting these statutes harmoniously allows the objectives of each legal regime to be achieved simultaneously without creating normative inconsistency.

The concept of legal harmonization has become increasingly important in modern regulatory governance because contemporary industries are simultaneously regulated by multiple legal regimes. Halal industries, for instance, are subject not only to labour law but also to food safety law, consumer protection law, quality assurance standards, occupational safety regulations, and halal governance requirements. Effective regulatory compliance therefore depends upon the integration rather than fragmentation of these legal obligations (Coglianese & Kagan, 2007).

Within the Indonesian halal ecosystem, employee competency represents the intersection between employment regulation and halal governance. The Halal Product Assurance System requires employees to identify halal critical points, maintain traceability, implement documented procedures, conduct internal monitoring, and prevent cross-contamination throughout production activities. These operational responsibilities correspond directly with the competency development objectives established under Article 9 of the Employment Law. Consequently, halal competency should not be regarded merely as an additional technical qualification but as a specific category of occupational competency recognized within Indonesian labour law.

Recent international scholarship supports this interpretation. Studies published in the *Journal of Islamic Marketing* demonstrate that organizational competency and continuous employee training are among the strongest predictors of effective halal assurance implementation across manufacturing industries (Magala, 2023). Similarly, research in the *British Food Journal* concludes that workforce capability significantly influences halal governance performance because competent employees improve audit readiness, regulatory compliance, and consumer confidence while reducing operational risks associated with halal non-conformities (Ab Talib, 2024).

Comparable developments are also evident in Malaysia and Brunei Darussalam, where halal governance has gradually shifted from document-based certification toward competency-based regulatory compliance. Empirical studies indicate that organizations investing in continuous halal training exhibit substantially higher compliance levels than organizations relying solely on documentary fulfilment during certification audits (Hamdan & Hashim, 2024). These comparative experiences reinforce the argument that competency development constitutes an essential regulatory instrument rather than merely a voluntary human resource practice.

Accordingly, this study argues that Article 9 of the Employment Law should be interpreted as providing the normative legal basis for employer obligations to facilitate halal competency development whenever statutory requirements under the Halal Product Assurance Law impose competency-based responsibilities upon business actors. Although the Halal Product Assurance Law does not expressly stipulate mandatory halal training for every employee, the combined application of systematic and teleological interpretation demonstrates that effective implementation of the Halal Product Assurance System is legally impossible without competent human resources. Consequently, employers bear an implied legal obligation to provide competency development, particularly for employees engaged in halal-critical processes, including Halal Supervisors, halal slaughterers, production personnel, quality assurance officers, procurement staff, and internal auditors.

This harmonized interpretation establishes a new legal construction in Indonesian labour law whereby halal competency becomes a legally relevant dimension of occupational competency. Rather than constituting an independent regulatory obligation, halal training functions as the operational mechanism through which employers fulfil both their workforce development responsibilities under Article 9 of the Employment Law and their compliance obligations under the Halal Product Assurance Law. Such an interpretation promotes legal certainty, strengthens regulatory coherence, and supports the sustainable development of Indonesia's halal industry through competency-based governance.

The foregoing analysis demonstrates that neither the Employment Law nor the Halal Product Assurance Law independently establishes a comprehensive legal framework governing halal workforce development. However, when interpreted systematically, both statutes create complementary legal obligations that converge upon the same regulatory objective, namely ensuring that business actors possess competent human resources capable of implementing the Halal Product Assurance System effectively.

From the perspective of legal harmonization, Article 9 of the Employment Law performs a general normative function, whereas the Halal Product Assurance Law establishes sector-specific competency requirements. In other words, labour legislation provides the legal foundation for workforce competency development applicable to all sectors, while halal legislation specifies the particular competencies required within halal-related industries. Consequently, these statutes should not be viewed as separate regulatory regimes but rather as mutually reinforcing legal instruments.

This relationship is consistent with the principle of functional harmonization of legislation, whereby different legal instruments governing the same regulatory object should be interpreted coherently to eliminate normative gaps and regulatory inconsistency. In modern regulatory governance, harmonization enables multiple legal regimes to operate collectively in achieving shared public policy objectives rather than functioning independently (Cary Coglianese, 2008).

Applying this approach to Indonesia's halal ecosystem indicates that employers' obligation to provide competency development under Article 9 should extend to competencies specifically required by halal legislation. Such interpretation is supported by Government Regulation Number 42 of 2024, which requires business actors to establish an effective Halal

Product Assurance System through competent Halal Supervisors, documented procedures, internal monitoring, continuous evaluation, and corrective actions. These statutory responsibilities cannot realistically be fulfilled unless employees participating in halal-critical activities receive adequate education and vocational training.

Furthermore, Indonesian employment law recognizes competency as a dynamic concept that evolves alongside technological, industrial, and regulatory developments. The introduction of mandatory halal certification therefore creates new competency standards within the labour market. Consequently, competency development concerning halal governance should be interpreted as part of employers' statutory obligation to prepare workers for emerging occupational requirements rather than as a voluntary corporate initiative.

International labour standards similarly emphasize that vocational training should respond to industrial transformation and regulatory changes. The International Labour Organization argues that competency development constitutes a shared responsibility between governments, employers, and workers to ensure sustainable economic development and decent work. Under this approach, competency development should anticipate future industrial requirements instead of merely responding to existing labour demands (ILO, 2022). The transition toward mandatory halal certification represents precisely such a structural transformation requiring corresponding changes in workforce competency.

Another important implication concerns the legal status of halal competency itself. Traditionally, competency development has focused on technical, managerial, or occupational skills directly associated with productivity. However, the Halal Product Assurance Law introduces an additional category of competency, namely regulatory competency, which enables employees to comply with statutory obligations governing halal assurance. Regulatory competency therefore becomes inseparable from technical competency because compliance failures may result not only in operational inefficiency but also in administrative sanctions, suspension of halal certification, consumer protection issues, and reputational damage.

This finding contributes to the theoretical development of employment law by proposing that halal competency represents a legally mandated occupational competency rather than merely a professional qualification. Such competency derives simultaneously from labour law, halal legislation, consumer protection law, and corporate governance principles. Consequently, employer responsibility extends beyond improving productivity to ensuring legal compliance across business operations.

The harmonization between the Employment Law and the Halal Product Assurance Law may therefore be summarized as follows.

Table 1.
Harmonization of Legal Norms between the Employment Law and the Halal Product Assurance Law

Employment Law Framework	Halal Product Assurance Framework	Harmonized Legal Interpretation	Legal Consequences for Employers
Article 9 of Law No. 13 of 2003 (as amended by Law No. 6 of 2023): Job training shall equip, improve, and develop workforce competencies.	Law No. 33 of 2014 requires implementation of the Halal Product Assurance System.	General competency obligations under employment law extend to halal-related competencies where required by legislation.	Employers should organize competency development programmes related to halal assurance.
Articles 10–12 of the Employment Law recognize vocational training as a means of improving workforce quality and productivity.	Government Regulation No. 42 of 2024 requires competent Halal Supervisors and continuous implementation of the	Vocational training constitutes the operational mechanism for fulfilling competency obligations under halal legislation.	Employers should facilitate halal education, training, and competency upgrading for relevant personnel.

	Halal Product Assurance System.		
Employment law promotes workforce competitiveness through competency development.	Halal legislation promotes consumer protection and legal certainty through competent implementation of SJPH.	Competency simultaneously serves labour productivity and regulatory compliance objectives.	Human resource development should integrate halal competency into annual training programmes.
Employment law encourages competency certification according to occupational standards.	Halal regulations recognize education, competency training, and certification for Halal Supervisors.	Halal competency certification becomes part of occupational competency development.	Employers should support competency certification for Halal Supervisors and other halal-critical personnel.
Employers bear responsibility for workforce development.	Business actors bear responsibility for maintaining halal compliance.	Employer obligations and halal compliance obligations are functionally interconnected.	Competency development becomes an element of corporate halal governance and legal risk management.

Source: Author's elaboration based on various sources

Table 1 demonstrates that the interaction between the two legal regimes creates what may be described as a constructed implied legal obligation. Although no statutory provision expressly states that employers must provide halal competency training for every employee, the combined interpretation of employment law and halal legislation produces a coherent legal expectation that employers ensure adequate competency for workers involved in halal-critical processes. The implied nature of this obligation does not diminish its legal significance; rather, it reflects the evolutionary character of modern regulatory governance, in which statutory objectives are achieved through the harmonization of complementary legal norms.

Accordingly, competency development should be regarded not merely as an element of human resource management but as an integral component of corporate legal compliance. Employers who invest in halal competency development simultaneously fulfil workforce development responsibilities under employment law, strengthen implementation of the Halal Product Assurance System, reduce regulatory risks, and enhance corporate competitiveness within the rapidly expanding global halal economy.

Halal Supervisor as a Mandatory Competency Requirement: A New Dimension of Employer Responsibility under Indonesian Halal Governance

The Halal Supervisor occupies a distinct legal position within Indonesia's halal governance framework because the role is directly connected to the implementation and maintenance of the Halal Product Assurance System (Sistem Jaminan Produk Halal/SJPH). Unlike general employee competency requirements, which concern the ability of workers to perform their occupational duties, the competence of a Halal Supervisor is specifically directed toward ensuring that the business process remains compliant with halal requirements. The supervisor therefore functions as an internal compliance actor who monitors the implementation of halal procedures, verifies the conformity of materials and production processes, and provides the necessary assurance that the business continues to meet the requirements established under the halal product assurance regime. In this respect, the Halal Supervisor should be understood not merely as a trained employee, but as a legally recognized organizational function within the governance structure of halal-certified businesses.

The legal significance of the Halal Supervisor derives from the supervisor's responsibility to translate regulatory requirements into operational controls within the business entity. The supervisor is responsible for overseeing critical aspects of the halal assurance process, including the use of halal-certified or otherwise legally acceptable materials, the separation and control of halal production processes, the traceability of materials and products, and the implementation of corrective measures when non-conformities are identified. This function establishes an internal chain of accountability between the business actor and the halal assurance authority. Consequently, the appointment of a Halal Supervisor is not merely an administrative measure to satisfy certification requirements; it constitutes an institutional mechanism through which the business actor demonstrates its capacity to continuously maintain halal compliance after certification has been obtained.

The legal basis for this obligation originates from Law Number 33 of 2014 concerning Halal Product Assurance, which requires business actors implementing the Halal Product Assurance System to maintain the continuity of halal compliance after obtaining halal certification. This obligation is elaborated in Government Regulation Number 42 of 2024 concerning the Administration of Halal Product Assurance, which explicitly requires business entities to appoint one or more Halal Supervisors responsible for coordinating, implementing, monitoring, evaluating, and reporting the implementation of the Halal Product Assurance System.

The introduction of the Halal Supervisor reflects an important regulatory transformation. Contemporary halal governance no longer relies solely on external certification audits but adopts a continuous compliance model, whereby business actors themselves assume primary responsibility for maintaining halal integrity throughout the product lifecycle. External audits conducted by Halal Inspection Bodies therefore function as periodic verification mechanisms rather than the sole instrument of regulatory control. Such an approach is consistent with international regulatory governance, which increasingly emphasizes internal compliance systems supported by competent personnel instead of relying exclusively on government inspection (Cary Coglianese, 2008).

Within this framework, the Halal Supervisor performs multiple legal and managerial functions. Operationally, the Halal Supervisor identifies halal critical points, verifies raw materials, monitors production processes, supervises storage and distribution activities, maintains documentation, conducts internal evaluations, recommends corrective actions, and ensures the consistent implementation of the Halal Product Assurance System. Legally, the Halal Supervisor represents the internal compliance mechanism through which business actors fulfil their statutory obligations under the Halal Product Assurance Law. Consequently, the effectiveness of halal certification depends not only on documentary compliance but also on the competency of the individual entrusted with this responsibility.

This institutional design distinguishes Indonesia's Halal Product Assurance System from conventional quality management systems. Whereas quality assurance generally focuses on technical conformity with industrial standards, halal assurance simultaneously integrates religious legitimacy, legal compliance, consumer protection, food safety, and corporate governance. Accordingly, the Halal Supervisor must possess interdisciplinary competencies extending beyond technical production knowledge.

Government Regulation Number 42 of 2024 reinforces this approach by requiring that Halal Supervisors possess adequate competency obtained through halal education, structured training, and competency development. The regulation further recognizes competency certification as an important mechanism for ensuring that Halal Supervisors possess the knowledge and professional capability necessary to perform their statutory duties. This requirement demonstrates that competency is not merely a desirable qualification but an essential legal prerequisite for implementing the Halal Product Assurance System. From the perspective of employment law, this regulatory development has profound implications for employer responsibilities. As discussed in the previous section, Article 9 of Law Number 13 of 2003 concerning Employment, as amended by Law Number 6 of 2023, requires employers to organize job training aimed at improving employee competencies. Although the Employment Law does not specifically mention halal competency, the emergence of competency requirements

under the Halal Product Assurance regime necessarily expands the scope of employer obligations. Once legislation requires specific occupational competencies, employers bear responsibility for facilitating competency development through vocational education and professional training.

Accordingly, the obligation to appoint a Halal Supervisor cannot be interpreted merely as an administrative requirement to designate a particular employee. Instead, it implicitly requires employers to ensure that the appointed individual possesses sufficient competency to perform statutory responsibilities effectively. This interpretation is consistent with the principle of effective implementation (effet utile) in legal interpretation, which requires statutory provisions to be interpreted in a manner that enables legislative objectives to be achieved rather than rendered ineffective. Appointing an untrained Halal Supervisor would undermine the very objective of the Halal Product Assurance System, namely ensuring continuous halal compliance within business operations.

Recent empirical research supports this normative interpretation. Studies published in the Journal of Islamic Marketing demonstrate that organizational commitment and employee competency significantly influence the effectiveness of halal governance in manufacturing industries. Similarly, research in the British Food Journal concludes that continuous competency development is positively associated with audit performance, operational consistency, and consumer trust in halal-certified businesses (Ab Talib, 2024). These findings indicate that competency development should be regarded as a strategic compliance mechanism rather than merely a human resource development initiative.

Comparative experiences from Malaysia and Brunei Darussalam further strengthen this conclusion. Both jurisdictions have gradually shifted from document-oriented halal certification toward competency-based halal governance by emphasizing structured training and professional development for halal officers. Hamdan and Hashim argue that the sustainability of halal assurance depends primarily upon competent Halal Supervisors capable of translating regulatory requirements into operational practice. Without adequate competency, halal governance risks becoming a documentary exercise rather than an effective compliance system (Hamdan & Hashim, 2024).

The Indonesian regulatory framework follows the same trajectory. By recognizing Halal Supervisors as competent professionals responsible for internal halal governance, the law implicitly establishes a new category of legally required occupational competency. This competency combines regulatory knowledge, technical capability, managerial skills, communication competence, ethical integrity, and continuous professional development. Consequently, employers should integrate halal competency into corporate human resource policies, annual training plans, competency mapping, and career development systems.

This study therefore proposes that the Halal Supervisor should be understood not merely as a statutory position but as the cornerstone of corporate halal governance. The appointment of a Halal Supervisor signifies the transition from product-based regulation toward competency-based organizational compliance. Accordingly, employer responsibility extends beyond appointing personnel to ensuring that those personnel receive adequate education, structured training, competency assessment, and continuing professional development. Such an interpretation harmonizes the objectives of the Employment Law and the Halal Product Assurance Law while strengthening legal certainty, consumer protection, and sustainable industrial competitiveness. From this analysis emerges an important normative proposition. The obligation to appoint a Halal Supervisor should be interpreted as creating an implied employer obligation to provide competency development for employees engaged in halal-critical activities. Although Indonesian legislation does not expressly mandate halal training for every employee, the effectiveness of the Halal Product Assurance System depends upon competent human resources throughout the organization. Therefore, structured halal education, vocational training, and competency certification constitute essential legal instruments enabling employers to fulfil both employment obligations and halal regulatory compliance simultaneously. This interpretation represents the convergence of labour law, halal governance, and corporate compliance into an integrated legal framework for the sustainable development of Indonesia's halal industry.

Competency Certification for Halal Slaughter (Juru Sembelih Halal)

The certification of competency for Halal Slaughterers (Juru Sembelih Halal/Juleha) represents a specific competency requirement within Indonesia's Halal Product Assurance System (HPAS). Unlike the Halal Supervisor, who performs an internal compliance function within the business entity, the Juleha performs a technical function directly connected to the halal status of meat and poultry products. Accordingly, Juleha certification constitutes a distinct form of occupational competency that links the technical execution of slaughtering with the legal and Sharia requirements governing halal products.

Under Law Number 33 of 2014 concerning Halal Product Assurance, every stage of the halal supply chain must comply with halal standards, including slaughtering activities. This requirement is further operationalized in Government Regulation Number 42 of 2024, which mandates that slaughtering processes must be conducted by individuals who possess recognized competency in halal slaughtering techniques. The regulation explicitly emphasizes that slaughterers must understand not only the technical aspects of animal handling and slaughter but also the Sharia principles governing halal slaughter (*żabḥ*), including the invocation of the name of Allah (*tasmiyah*), the use of appropriate instruments, and the minimization of animal suffering. From a legal perspective, Juleha competency certification serves to establish that the slaughterer has fulfilled the competency requirements applicable to halal slaughtering. Its significance therefore lies in connecting individual occupational competence with the compliance obligations imposed on halal-certified business actors. Certification provides an objective mechanism for demonstrating that the person performing the slaughtering function possesses the competencies required under the applicable halal and occupational competency standards.

The competency requirements for Juleha should be distinguished from general workforce competencies because they are directly tied to the validity and conformity of the slaughtering process. The competency framework encompasses, at minimum, knowledge of the Sharia requirements governing slaughter, including the eligibility of the animal, the invocation of the name of Allah (*tasmiyah*), and the prescribed method of slaughter; technical competence in handling animals and operating the slaughtering instruments; and the ability to conduct slaughtering in accordance with applicable halal and animal-welfare requirements. These competencies demonstrate that Juleha certification is not merely evidence of general occupational skill but a mechanism for verifying competencies that are specifically relevant to halal compliance.

Empirical studies indicate that competency certification significantly enhances the reliability of halal assurance systems. Research published in the Journal of Islamic Marketing shows that certified slaughterers contribute to higher levels of consumer trust and reduced incidences of halal non-compliance in meat processing industries (Fernando, Y., Darun, M. R., Abideen, A. Z., Ibrahim, D. N., Tieman, M., & Mohamad, 2021). Furthermore, studies in the Food Control Journal highlight that structured training programs for slaughterers improve adherence to both halal requirements and animal welfare standards, thereby strengthening the overall integrity of the halal supply chain (Karijn Bonne and Wim Verbeke, 2006).

However, challenges remain in the implementation of competency certification for Juru Sembelih Halal. One of the primary issues is the limited availability of certified training institutions, particularly in rural and small-scale slaughtering operations. Additionally, there is a gap between regulatory requirements and industry readiness, as many small enterprises lack financial and institutional capacity to support certification processes. These challenges highlight the need for government intervention in the form of subsidies, training support programs, and capacity-building initiatives.

Another critical issue is the standardization of competency assessment. While SKKNI provides a national framework, variations in implementation across certification bodies may lead to inconsistencies in assessment outcomes. Ensuring uniformity in certification standards is essential to maintain the credibility of the halal assurance system and to prevent regulatory fragmentation.

Juleha competency certification therefore provides a concrete illustration of how occupational competency has become an integral component of Indonesia's halal governance. Its legal significance lies in ensuring that the person performing the slaughtering function possesses competencies specifically required to maintain the halal status of animal-derived products. Unlike general workforce training, Juleha certification establishes a formal mechanism for verifying individual competence in a function that is directly connected to halal compliance. It consequently demonstrates that the implementation of halal product assurance increasingly depends not only on certification of products or business processes but also on the verified competency of the personnel performing critical halal functions.

A Collaborative Institutional Model for Halal Workforce Competency Development: Integrating Vocational Training Centers, Halal Inspection Bodies, Local Manpower Offices, the National Professional Certification Board, and the Halal Product Assurance Agency

The implementation of Indonesia's mandatory Halal Product Assurance System (HPAS) has generated an unprecedented demand for competent halal professionals across various industrial sectors. The increasing number of enterprises required to obtain halal certification has simultaneously increased the need for qualified Halal Supervisors (Penyelia Halal) and Halal Slaughterers (Juru Sembelih Halal). Nevertheless, the current institutional framework remains fragmented. Vocational training providers, halal inspection institutions, professional certification bodies, and labour authorities continue to operate independently, resulting in overlapping responsibilities, inconsistent competency development, and unequal access to professional certification, particularly for micro, small, and medium-sized enterprises (MSMEs).

This institutional fragmentation presents a significant challenge to the sustainable implementation of the Halal Product Assurance Law. Although Government Regulation Number 42 of 2024 establishes competency requirements for Halal Supervisors, the regulation does not comprehensively regulate the institutional mechanism responsible for developing, assessing, certifying, and continuously upgrading halal workforce competencies. Consequently, a collaborative governance approach is required to integrate the mandates of multiple public institutions into a coherent national competency development system (Ansell, Chris, 2008)

Collaborative governance has become an increasingly important model in contemporary public administration because complex regulatory issues cannot be effectively addressed by a single institution acting independently. Ansell and Gash define collaborative governance as a structured decision-making process involving public agencies, private organizations, and other stakeholders working collectively to achieve common policy objectives. In the context of Indonesia's halal ecosystem, collaborative governance offers an appropriate institutional framework for strengthening workforce competency while reducing regulatory fragmentation.

This study proposes a Five-Actor Collaborative Competency Model integrating Vocational Training Centers (Lembaga Pelatihan Kerja/LPK), Halal Inspection Bodies (Lembaga Pemeriksa Halal/LPH), Local Manpower Offices (Dinas Ketenagakerjaan), the National Professional Certification Board (BNSP), and the Halal Product Assurance Agency (BPJPH). Rather than functioning independently, these institutions should operate as complementary components of a national halal workforce development ecosystem.

At the policy level, BPJPH should function as the national regulatory authority responsible for establishing competency policies, determining minimum competency standards for Halal Supervisors and Halal Slaughterers, accrediting halal training providers, coordinating institutional cooperation, and monitoring implementation. As the institution mandated by Law Number 33 of 2014, BPJPH possesses the legal authority to formulate national competency strategies supporting the implementation of the Halal Product Assurance System.

The National Professional Certification Board (BNSP) should serve as the principal authority responsible for competency certification. Through accredited Professional Certification Institutions (LSP), BNSP should ensure that competency assessments are conducted according to nationally recognized occupational standards. Certification should not merely evaluate theoretical knowledge but should comprehensively assess practical capability, regulatory

understanding, ethical conduct, communication skills, and professional judgement required for halal governance. Integrating halal competency schemes into the Indonesian National Work Competency Standards (SKKNI) would further strengthen the legal recognition of halal professions within the national labour market.

Vocational Training Centers (LPK) constitute the operational foundation of competency development. Their responsibilities should extend beyond delivering technical instruction to providing competency-based education integrating halal jurisprudence, halal governance, food safety, traceability systems, quality assurance, digital documentation, occupational safety, and communication skills. Training curricula should adopt competency-based training principles consistent with International Labour Organization (ILO) recommendations concerning lifelong learning and workforce adaptability (Silva, 2022). Furthermore, LPKs should collaborate with universities, halal research centres, and industry associations to ensure that training content reflects current industrial practices and technological developments.

The role of Halal Inspection Bodies (LPH) should also be expanded beyond audit functions. Because LPHs possess practical expertise regarding halal compliance, they should contribute to curriculum development, practical simulation, internship programmes, assessor training, and continuous competency evaluation. Their direct involvement would bridge the gap between classroom instruction and industrial practice while improving the relevance of competency assessments.

Meanwhile, Local Manpower Offices (Disnaker) should integrate halal competency development into regional workforce policies. Existing employment programmes, vocational training initiatives, apprenticeship schemes, and labour market information systems should incorporate halal competency as an emerging occupational qualification. Regional governments may also provide financial incentives, certification subsidies, and training grants for MSMEs, thereby improving equitable access to competency certification across different regions. Such intervention is particularly important because financial limitations remain one of the principal barriers preventing small enterprises from obtaining certified halal professionals.

The proposed collaborative model also requires active participation from business actors. Employers should no longer regard halal competency as merely a certification requirement but as a strategic investment in corporate governance, legal compliance, and organizational competitiveness. Annual human resource development plans should therefore include halal competency mapping, competency gap analysis, periodic refresher training, continuing professional development (CPD), and competency certification for personnel engaged in halal-critical activities. Such integration aligns employer obligations under Article 9 of the Employment Law with statutory responsibilities under the Halal Product Assurance Law.

An important feature of the proposed model is the establishment of a continuous competency cycle. Rather than limiting competency development to pre-certification training, the system should operate through five interconnected stages: (1) competency mapping based on industrial needs; (2) competency-based education and vocational training; (3) independent competency assessment by accredited Professional Certification Institutions; (4) competency certification recognized nationally by BNSP and BPJPH; and (5) continuous professional development through refresher training, periodic evaluation, and recertification. This cyclical approach reflects international best practices in professional certification and quality assurance by ensuring that competencies remain relevant amidst technological and regulatory changes.

The proposed collaborative model also generates broader socio-economic benefits. Strengthening halal workforce competency enhances legal compliance, improves consumer confidence, reduces certification risks, facilitates international market access, and supports Indonesia's aspiration to become a global halal production centre. From the perspective of labour policy, competency certification increases worker employability, career mobility, and professional recognition while contributing to national productivity. These outcomes are consistent with Sustainable Development Goal (SDG) 8 concerning decent work and economic growth and SDG 9 concerning industry, innovation, and infrastructure.

The novelty of this study lies in its proposal to reposition halal competency development as an integrated labour governance strategy rather than a sectoral halal certification issue.

Existing studies generally discuss Halal Supervisors, halal certification, or competency development independently. This article demonstrates that sustainable implementation of the Halal Product Assurance System requires institutional harmonization among employment authorities, professional certification bodies, halal regulators, inspection institutions, and vocational training providers. Consequently, halal competency should be recognized as a shared regulatory responsibility rather than the exclusive concern of BPJPH or business actors alone.

Based on this analysis, the study proposes that the Indonesian Government establish a National Halal Workforce Competency Framework through formal cooperation among BPJPH, the Ministry of Manpower, BNSP, accredited LPHs, vocational training institutions, universities, and industry associations. Such a framework would provide legal certainty concerning institutional responsibilities, standardize competency development nationally, and ensure the sustainable implementation of Indonesia's mandatory Halal Product Assurance System. Ultimately, integrating labour law and halal governance through collaborative institutional arrangements represents a strategic pathway toward strengthening both workforce quality and the global competitiveness of Indonesia's halal industry.

The findings of this study demonstrate that the implementation of Indonesia's mandatory Halal Product Assurance System (HPAS) requires a paradigm shift in public policy. Halal assurance should no longer be perceived solely as a product certification mechanism but rather as a comprehensive human resource governance system requiring competent personnel throughout the production chain. Consequently, workforce competency development must become an integral component of national halal policy.

From a regulatory perspective, this study identifies the need for stronger harmonization between employment law and halal legislation. Although Article 9 of Law Number 13 of 2003 concerning Employment (as amended by Law Number 6 of 2023) establishes employers' responsibility to develop workforce competencies, the current legal framework does not explicitly recognize halal competency as one of the mandatory occupational competencies required in halal-related industries. Likewise, while Law Number 33 of 2014 and Government Regulation Number 42 of 2024 require business actors to appoint competent Halal Supervisors, they do not comprehensively regulate the institutional mechanism through which employers should fulfil this competency obligation. Therefore, future implementing regulations should explicitly integrate workforce competency development into the Halal Product Assurance System through coordinated policies issued by the Ministry of Manpower and BPJPH.

The findings also suggest the necessity of institutionalizing halal competency within Indonesia's national vocational education and training system. Halal competency standards should be incorporated into the Indonesian National Work Competency Standards (SKKNI), enabling Halal Supervisors and Halal Slaughterers to be formally recognized as nationally certified professions. Such recognition would strengthen labour mobility, improve professional career pathways, and ensure consistency in competency assessment across regions and industrial sectors. Accordingly, BNSP should expand competency certification schemes specifically designed for halal-related occupations while encouraging the establishment of accredited Professional Certification Institutions (LSP) specializing in the halal industry.

At the implementation level, this study recommends strengthening collaboration among BPJPH, the Ministry of Manpower, BNSP, Vocational Training Centers (LPK), Halal Inspection Bodies (LPH), universities, and industry associations. The proposed collaborative governance model enables these institutions to share complementary responsibilities for competency standard development, curriculum design, vocational training, competency assessment, certification, and continuing professional development. Such collaboration is expected to reduce institutional fragmentation while improving the efficiency and effectiveness of Indonesia's halal workforce development system.

The proposed model is particularly relevant for micro, small, and medium-sized enterprises (MSMEs), which frequently encounter financial and technical constraints in fulfilling halal certification requirements. Government-funded training programmes, certification subsidies, competency scholarships, and digital learning platforms should therefore be expanded to improve MSME participation in halal workforce development. Integrating halal competency

into existing employment and entrepreneurship programmes administered by Local Manpower Offices (Disnaker) would further support equitable access to competency certification throughout Indonesia. From the perspective of industrial competitiveness, competency-based halal governance contributes not only to legal compliance but also to organizational performance. Competent Halal Supervisors and Halal Slaughterers reduce the likelihood of non-conformities during halal audits, improve internal control systems, strengthen consumer confidence, and facilitate international market access. Consequently, investment in halal workforce competency should be regarded as a strategic component of corporate governance and sustainable business development rather than merely as a regulatory cost.

Finally, this study recommends the establishment of a National Halal Workforce Competency Framework, jointly administered by BPJPH, the Ministry of Manpower, and BNSP. Such a framework should regulate competency standards, competency-based training, professional certification, continuing professional development, periodic recertification, and institutional coordination. By integrating labour governance with halal governance, Indonesia will be better positioned to strengthen the quality of its workforce while enhancing its competitiveness within the rapidly growing global halal economy.

Novelty Statement

The novelty of this study lies in its integration of three dimensions that have largely been examined separately in previous research: halal product assurance, occupational competency, and labour governance. Previous studies have predominantly addressed halal certification from the perspectives of consumer protection, supply-chain assurance, halal management systems, or the role of individual halal personnel. This study differs by examining halal workforce competency as a legal and institutional issue within the intersection of Indonesian employment law and halal product assurance law. The distinction is not merely thematic; it concerns the allocation of legal responsibility for ensuring that personnel performing halal-critical functions possess and maintain the competencies required for halal compliance.

First, the study differs from prior halal governance research by treating halal competency as a labour-law issue rather than solely as a technical requirement of halal certification. While previous research has examined halal certification, Halal Supervisors, and halal assurance practices primarily from regulatory, managerial, or supply-chain perspectives, this study examines the legal relationship between the employer's workforce-development obligation under Article 9 of the Employment Law and the competency requirements arising from the Halal Product Assurance framework. Through a systematic and teleological legal analysis, the study develops the argument that halal competency may constitute a legally relevant occupational competency for personnel performing halal-critical functions. This provides a labour-law dimension that is insufficiently developed in the existing halal governance literature.

Second, the study develops the concept of Integrated Halal Workforce Competency Governance by connecting four regulatory dimensions that are commonly treated separately: employment regulation, halal product assurance, professional competency certification, and corporate compliance. The contribution of this concept is to reposition workforce competency as an intermediate regulatory mechanism through which halal obligations are translated into organizational practice. Thus, halal certification is not treated as an isolated product or business-process obligation, but as a governance system that also depends on the verified competency of personnel responsible for halal-critical activities..

Third, the study moves beyond institution-specific approaches by proposing a Five-Actor Collaborative Competency Model that connects BPJPH, BNSP/LSP, LPK, LPH, and Disnaker within a single competency-development architecture. Existing regulatory and scholarly discussions generally assign these institutions separate functions—halal assurance, professional certification, vocational training, halal inspection, or labour administration—without specifying an integrated mechanism for coordinating those functions in halal workforce development. The proposed model contributes an institutional architecture that clarifies the complementary roles of the five actors across competency standardization, training, assessment, certification, and continuous competency development..

Fourth, the study translates the proposed legal and institutional framework into a National Halal Workforce Competency Development Roadmap**.** Unlike studies that primarily identify the importance of halal competency or describe existing certification mechanisms, this study provides a phased implementation sequence linking regulatory harmonization, competency standardization, training and capacity building, professional certification, and monitoring and evaluation. The roadmap therefore constitutes the practical policy contribution of the study by connecting the proposed legal framework with implementable institutional actions..

Taken together, the study differs from previous research in four connected respects: (1) it reconstructs halal workforce competency as a labour-law issue linked to employers' legal responsibilities; (2) it develops an integrated governance concept connecting employment law, halal product assurance, professional certification, and corporate compliance; (3) it proposes a Five-Actor Collaborative Competency Model that integrates institutions whose functions have generally been examined separately; and (4) it translates the proposed framework into a phased national implementation roadmap. The novelty therefore lies not in identifying competency, certification, or institutional collaboration as isolated concerns, but in demonstrating how these elements can be integrated into a coherent legal and governance framework for the implementation of Indonesia's mandatory halal assurance regime.

Conclusion

This study finds that Indonesia's mandatory Halal Product Assurance System has expanded the legal dimension of workforce competency in halal industries. Halal compliance cannot be effectively maintained through product certification alone; it also requires competent personnel capable of implementing and monitoring halal assurance procedures. The analysis therefore establishes a legal connection between workforce competency under Article 9 of the Employment Law and the competency requirements arising from the Halal Product Assurance framework.

The study further concludes that the statutory obligation to appoint competent Halal Supervisors and to maintain continuous halal compliance supports the construction of an implied employer obligation to develop relevant competencies among personnel performing halal-critical functions. This obligation should not be understood as a general requirement to provide halal training to every employee, but as a duty to ensure that personnel entrusted with critical halal functions possess the competencies necessary to perform those functions. Halal Supervisors and Halal Slaughterers consequently represent distinct occupational competency categories through which halal requirements are translated into operational practice.

At the institutional level, the study proposes an integrated competency governance framework that connects halal regulation, employment governance, professional certification, vocational training, and institutional coordination. The proposed Five-Actor Collaborative Competency Model provides a mechanism for connecting policy coordination, competency development, assessment, certification, and continuous competency development. This framework constitutes the principal institutional contribution of the study by moving halal workforce development from fragmented institutional functions toward a coordinated governance arrangement

Theoretically, the study contributes by positioning halal workforce competency at the intersection of labour law and sector-specific halal regulation. It demonstrates how statutory provisions concerning workforce development may be interpreted in conjunction with halal assurance requirements to construct an employer responsibility for maintaining competency in halal-critical functions. This contribution extends labour-law analysis beyond general workforce development toward competency requirements arising from sector-specific regulatory regimes.

The principal policy implication is the need for greater institutional coordination between BPJPH, employment authorities, and professional certification institutions in developing a coherent national halal workforce competency framework. Such coordination should prioritize clear competency standards, reliable certification mechanisms, and accessible competency

development, particularly for halal-critical occupations and MSMEs. The proposed framework provides a basis for future regulatory and institutional reforms without treating halal competency as a substitute for the existing halal certification regime.

Despite these contributions, this study is limited by its normative legal approach, which primarily relies on statutory interpretation and doctrinal legal analysis. Future research should therefore adopt empirical methodologies to evaluate the implementation of halal competency development within industries, assess employer compliance with competency obligations, measure the effectiveness of professional certification programmes, and examine the practical impact of collaborative governance involving BPJPH, BNSP, LPK, LPH, and regional labour authorities. Comparative studies involving Malaysia, Brunei Darussalam, and other jurisdictions with established halal governance systems would further enrich the development of competency-based halal workforce regulation.

Conflicts of Interest

None.

References

Ab Talib, M. S. (2024). "Sustainability, Technology, and Strategic Corporate Branding for Halal Logistics." *Routledge*, 70–90.

Abdul Rahman, Nuradibah, and W. R. W. I. (2026). "Halal supply chain disruptions in Malaysia: a gap analysis through systematic literature review." *Journal of Islamic Accounting and Business Research*, 1–26.

Alexy, R. (2010). *A theory of constitutional rights*. Oxford university press.

Ansell, Chris, and A. G. (2008). "Collaborative governance in theory and practice." *Journal of Public Administration Research and Theory Advance*, *18*(4), 543–571.

Cary Coglianese, R. A. K. (2008). REGULATION AND REGULATORY PROCESSES. *SSRN*, *8*(43), 3–35.

Fauzi, Muchammad, and D. R. (2024). "Assessing the Effectiveness of the Halal Assurance System 23000." *Journal of Digital Marketing and Halal Industry*, *6*(2), 261–279.

Fernando, Y., Darun, M. R., Abideen, A. Z., Ibrahim, D. N., Tieman, M., & Mohamad, F. (2021). Adoption of blockchain technology to improve integrity of halal supply chain management. In Encyclopedia of organizational knowledge, administration, and technology. *IGI Global Scientific Publishing*, 2488–2496.

Hamdan, F., & Hashim, N. (2024). Competency and recognition of the halal supervisor in Brunei Darussalam. *IIUM Journals*, *4*(2), 17–21.

Jan Mei Soon, Mahmood Chandia, J. M. R. (2017). Halal integrity in the food supply chain. *British Food Journal*, *(1)*(119), 39–51.

Karijn Bonne and Wim Verbeke. (2006). Muslim consumer's motivations towards meat consumption in Belgium : qualitative exploratory insights from means-end chain analysis. *Anthropology of Food*, *5*.

Magala, A. S. (2023). Akomodasi Hukum Yang Hidup Dalam Kuhp Baru Indonesia Menurut Perspektif Hukum Progresif. *SPEKTRUM HUKUM*, *20*(2). https://doi.org/10.56444/sh.v20i2.4345

Organisation for Economic Co-operation and Development (OECD). (2021). *Skills Outlook 2021;Learning For Life*. OECD Publishing.

Peter Mahmud Marzuki. (2021). *Penelitian Hukum* (Edisi Revi). Kencana.

Silva, V. (2022). "The ILO and the future of work: The politics of global labour policy." *Global Social Policy*, *22*(2), 341–358.

Soekanto, S., & Mamudji, S. (2015). *Penelitian Hukum Normatif: Suatu Tinjauan Singkat*. RajaGrafindo Persada.

Soekanto, S., & Mamudji, S. (2015). *Metode Penelitian dan Penulisan Hukum*. Badan Penerbit Fakultas Hukum Universitas Indonesia, Jakarta.

Spencer, Lyle M., and P. S. M. S. (2008). *Competence at Work models for superior performance*. John Wiley & Sons.

Tieman, M. (2011). No TitleThe application of Halal in supply chain management: In-depth interviews. *Journal of Islamic Marketing*, *2*(2), 186–195.

Republic of Indonesia. (1945). The 1945 Constitution of the Republic of Indonesia.

Republic of Indonesia. (2003). Law Number 13 of 2003 concerning Manpower. State Gazette of the Republic of Indonesia Year 2003 Number 39, Supplement to the State Gazette of the Republic of Indonesia Number 4279.

Republic of Indonesia. (2006). Government Regulation Number 31 of 2006 concerning the National Job Training System. State Gazette of the Republic of Indonesia Year 2006 Number 67, Supplement to the State Gazette of the Republic of Indonesia Number 4637.

Republic of Indonesia. (2014). Law Number 33 of 2014 concerning Halal Product Assurance. State Gazette of the Republic of Indonesia Year 2014 Number 295, Supplement to the State Gazette of the Republic of Indonesia Number 5604.

Republic of Indonesia. (2021). Government Regulation Number 39 of 2021 concerning the Implementation of Halal Product Assurance. State Gazette of the Republic of Indonesia Year 2021 Number 49, Supplement to the State Gazette of the Republic of Indonesia Number 6651.

Republic of Indonesia. (2023). Law Number 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law. State Gazette of the Republic of Indonesia Year 2023 Number 41, Supplement to the State Gazette of the Republic of Indonesia Number 6856.

Republic of Indonesia. (2024). Government Regulation Number 42 of 2024 concerning the Implementation of Halal Product Assurance. State Gazette of the Republic of Indonesia Year 2024 Number 186, Supplement to the State Gazette of the Republic of Indonesia Number 8280.