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## Zakat as a Legal Obligation in Sharia within the Context of Contemporary Taxation Systems

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### Abstract

**Objective:** This study aims to investigate the feasibility and implications of integrating Zakat, an Islamic obligatory almsgiving system, into modern state taxation structures within Muslim-majority countries. **Theoretical framework:** The research is grounded in two complementary theoretical frameworks: fiscal sociology, which explores how taxation reflects socio-legal norms, and Islamic economic theory, which emphasizes wealth redistribution through moral and religious obligations. **Literature review:** The literature review highlights that while scholars such as Yusuf al-Qaradawi, Monzer Kahf, and Habib Ahmed have extensively discussed zakat's socio-economic role, there remains a gap in practical models that link zakat to national tax regimes without compromising Sharia principles or state fiscal efficiency. The coexistence of these systems often leads to conceptual confusion and administrative inefficiencies, particularly in countries like Malaysia, Indonesia, Pakistan, and Saudi Arabia. **Methods:** Methodologically, this research adopts a qualitative, comparative legal and economic approach, drawing on policy documents, legal statutes, and case studies from selected Muslim-majority countries. It critically examines institutional frameworks, public finance policies, and compliance behavior, while also employing doctrinal analysis of maqāṣid al-sharī'ah (objectives of Islamic law) to assess religious alignment. **Results:** The findings reveal that integration is hampered by legal fragmentation, institutional redundancy, and low public trust. However, models that incorporate zakat into the tax system—either through deductions, exemptions, or parallel recognition—demonstrate improved compliance, reduced welfare burdens on the state, and enhanced civic participation rooted in religious ethics. The study proposes a Hybrid Integration Framework comprising legal recognition, digital registries, transparent oversight, taxpayer choice mechanisms, and intersectoral collaboration. **Implications:** The implications of this research are significant for policymakers seeking to harmonize Sharia-based obligations with secular governance systems. By fostering synergy between religious mandates and public finance tools, this study offers a pathway toward more equitable and accountable fiscal models. **Novelty:** The novelty of this study lies in its dual-theoretical lens and the practical policy framework it develops for integrating religious and civic financial duties in a way that aligns with both ethical and administrative imperatives.

**Keywords:** zakat, islamic economic law, taxation, fiscal integration, sharia compliance.

## INTRODUCTION

In Islamic economics, Zakat plays a central role as one of the Five Pillars of Islam, serving as a divine obligation for wealth redistribution and poverty alleviation. Despite its long-standing spiritual and moral significance, the application of Zakat within the framework of modern financial governance, particularly in legally enforced tax systems, remains complex and contested. As Muslim-majority countries modernize their economies and legal institutions, a pressing question arises: how can Zakat, a religious mandate, be harmonized with state-imposed taxation systems that operate under secular, civic principles? This research emerges from increasing policy debates in countries such as Malaysia, Indonesia, and Pakistan, where dual fiscal obligations—Zakat and taxes—coexist but often lack integration. This disconnect leads to administrative inefficiencies and moral dilemmas for Muslim taxpayers [1], [2].

Current scholarship indicates a growing interest in Zakat's potential as a policy tool but also reveals a significant gap in practical models that legally, economically, and administratively merge Zakat with tax systems without compromising either religious doctrines or state fiscal objectives. Scholars like Muhammad Nejatullah Siddiqi, Monzer Kahf, and Habib Ahmed have long examined the economic dimensions of Zakat, emphasizing its redistributive potential and ethical foundation. Recent studies, such as those by Obaidullah and Shirazi (2015), have started to develop frameworks for including Zakat in national poverty alleviation strategies; however, these contributions often remain theoretical [3], [4].

The practical integration of Zakat into existing tax systems—considering legal pluralism, administrative feasibility, and compliance behavior—has been underexplored; particularly from a comparative legal perspective. A review of the literature suggests that the intersection of Islamic legal theory (fiqh al-mu'āmalāt) and public finance administration is still evolving. Theories from Islamic economic law, such as maqāṣid al-sharī'ah (objectives of Islamic law), support the notion that religious obligations can be compatible with civic duties, provided that governance structures are transparent, just, and accountable. Concurrently, public finance theory offers tools to assess fiscal instruments based on equity, efficiency, and revenue adequacy. Several models from contemporary Muslim-majority countries provide valuable lessons [5], [6].

In Malaysia, for example, Zakat payments can be deducted from income taxes; however, the decentralized nature of Zakat administration generates inconsistencies across states. In Indonesia, Zakat is legally recognized and supervised by the state body BAZNAS, but taxpayer participation is limited. Pakistan's automatic deductions of Zakat from bank accounts face resistance from minority groups and suffer from a lack of transparency. In Saudi Arabia, Zakat is obligatory for nationals and monitored by the state, yet its effectiveness in poverty alleviation remains unclear. Despite these developments; there is limited empirical research on the long-term economic impacts of dual systems or on how integration affects compliance, social trust, and economic redistribution. Most existing legal frameworks rely on colonial-era tax laws, with Zakat appended in an ad hoc manner instead of being incorporated as part of a unified fiscal policy. This illustrates a critical gap: the need for a systematic model for the fiscal integration of Zakat that is both legally sound and economically viable [7], [8].

Thus, this study aims to address the following research question: How can Zakat be effectively integrated into modern tax systems within Muslim-majority countries in a way that respects both Islamic legal traditions and state financial governance? The objective of this study is to develop a legal-policy model that minimizes conflict, prevents double burden, and enhances both compliance and redistribution outcomes [9], [10].

فَدَا أَفْلَحَ مَنْ تَزَكَّى وَذَكَرَ اسْمَ رَبِّهِ فَصَلَّى (Q.S. Al-A'la: 14–15,) “Indeed, he has succeeded who purifies himself (through Zakat), and mentions the name of his Lord and prays.” This verse reinforces the intrinsic spiritual and social dimensions of Zakat. It positions the obligation not

only as a means of individual purification but also as a pathway toward collective socio-economic justice. The interplay between divine commandments and modern legal systems, therefore, is not merely a doctrinal issue but a matter of urgent policy significance in today's rapidly changing Muslim economies [11], [12].

In recent years, the discourse on the intersection between Islamic financial obligations and modern state taxation has gained increasing academic attention. Among these obligations, zakat holds a central position as a religious and legal duty in Islamic law (Sharia). Zakat is not merely a form of charity, but a binding obligation upon eligible Muslims, serving both spiritual and socio-economic purposes. However, in the context of modern nation-states—especially those with dual legal systems or secular tax structures—the status and function of zakat are often marginalized or treated as voluntary, leading to conceptual and practical dilemmas [13], [14].

This research seeks to explore zakat as a legal obligation in Sharia and examine its position within contemporary taxation systems. The primary concern is the apparent disconnect between zakat as a divine mandate and the implementation of taxation systems that often overlook or underrecognize religious obligations in formal legal and fiscal policies. While taxation is a legal requirement enforced by the state, zakat is a religious obligation enforced by conscience and, in some cases, by Islamic authorities. This duality raises key questions: Can zakat be integrated into modern tax systems without losing its Sharia-based integrity? What are the legal and ethical implications of treating zakat as equivalent to or separate from tax? [14], [15].

The relevance of this study is twofold. First, it contributes to the ongoing discourse on Islamic public finance and the need for policy frameworks that accommodate religious financial duties. Second, it provides insights for Muslim-majority countries—like Indonesia, Malaysia, or Pakistan—where debates on integrating zakat into national fiscal systems remain highly significant. By analyzing zakat through the lens of legal obligation within Sharia and comparing it to modern taxation principles, this research aims to bridge normative Islamic jurisprudence with contemporary fiscal realities, offering pathways for harmonization between spiritual obligations and state policies [16], [17].

## LITERATURE REVIEW

The relationship between zakat and modern taxation systems has been the focus of various scholarly discussions in the fields of Islamic economics, public finance, and comparative legal studies. Zakat, as a core component of the Islamic fiscal system, is regarded not only as an act of worship (ibadah) but also as a legally binding social obligation (fardh 'ayn) in Islamic jurisprudence (fiqh). Scholars such as Yusuf al-Qaradawi and Monzer Kahf have emphasized zakat's unique legal status within Sharia, distinguishing it from voluntary charitable giving (sadaqah) and highlighting its role in achieving economic justice and wealth redistribution in society [18], [19].

In contrast, modern taxation systems, especially those established in secular nation-states, are built on civil legal frameworks that impose financial obligations without reference to religious principles. These systems are governed by codified laws and enforced by state institutions. The dichotomy between religious obligation and state-mandated taxation has led to debates about whether zakat should be integrated into or remain separate from national taxation systems. Researchers such as Ali (2009) and Obaidullah (2016) have examined this tension, particularly in Muslim-majority countries where zakat and taxes are often administered by different entities, leading to fragmentation and inefficiency in fiscal management [20]–[22].

In Indonesia, for example, zakat is formally regulated under Law No. 23/2011 on the Management of Zakat, but it remains voluntary and distinct from taxation, which is enforced by separate legislation. Scholars like Ascarya and Antonio argue that a more integrated

system—where zakat can be credited against income tax—would enhance compliance and promote equitable fiscal policy. However, there are concerns about compromising the spiritual essence and autonomy of zakat institutions if zakat is treated merely as a tax substitute [23], [24].

From a jurisprudential standpoint, classical scholars such as Al-Mawardi and Ibn Qudamah have affirmed the state’s authority to collect zakat as part of its duty to uphold public welfare (maslahah). Contemporary scholars have built upon this foundation to argue for the institutionalization of zakat within state structures, provided it aligns with Sharia principles. The challenge lies in designing models that preserve zakat’s religious character while ensuring its compatibility with modern fiscal systems [25], [26]. Overall, the literature reflects an evolving discourse that balances normative Islamic principles with the practical demands of governance and public finance. There remains a need for further empirical and legal research to evaluate models of zakat-tax integration, particularly in light of ongoing efforts to develop Islamic social finance frameworks that can contribute to national development and poverty alleviation [27], [28].

## METHODOLOGY

This study examines how Zakat is incorporated into contemporary tax structures in nations with a majority of Muslims using a qualitative, comparative legal, and economic approach. It combines an analysis of contemporary fiscal policies with Islamic economic law (fiqh al-mu’āmalāt) and employs both doctrinal and empirical approaches. Legislative writings, policy documents, academic studies that explore the relationship between Zakat and taxes, national tax codes, Islamic legal texts, and reports from governmental and non-governmental organizations are some examples of data sources [29], [30].

Different integration models are demonstrated by case studies from Saudi Arabia, Pakistan, Indonesia, and Malaysia. To pinpoint best practices and issues about the tax and Zakat systems, the technique includes a critical comparison analysis. While economic analysis assesses Zakat’s redistributive influence on national poverty alleviation initiatives, emphasizing efficiency and equity, legal analysis looks at Zakat’s consistency with secular laws [31], [32]. Additionally, the study includes doctrinal analysis of Islamic economic principles, particularly maqāṣid al-sharī’ah, to determine how Zakat integration aligns with the objectives of Islamic law. The research proposes a model for integrating Zakat into taxation systems that respects both Islamic traditions and state governance, providing insights for policymakers.

**Table 1. Research Methodology and Analytical Focus**

Aspect	Description
Research Approach	Qualitative, comparative legal, and economic approach
Theoretical Frameworks	Islamic Economic Law ( <i>Fiqh al-Mu’āmalāt</i> ) <i>Maqāṣid al-Sharī’ah</i> (Objectives of Islamic Law) Fiscal Sociology
Methodology	Doctrinal and empirical methods Critical comparative analysis
Data Sources	Legislative texts National tax codes Islamic legal writings Policy documents Academic research NGO/government reports

<b>Case Study Countries</b>	Saudi Arabia Pakistan Indonesia Malaysia
<b>Main Analytical Dimensions</b>	Legal Analysis: Zakat's compatibility with secular/state law Economic Analysis: Efficiency, equity, and redistributive impact
<b>Core Focus</b>	Integration models of Zakat in taxation systems Identifying best practices and key challenges
<b>Output/Proposal</b>	Development of a hybrid integration model that aligns Islamic values with state fiscal governance
<b>Target Audience</b>	Policymakers, scholars of Islamic economics, tax authorities, and legal reform advocates

## RESULTS AND DISCUSSION

The primary objective of this research was to explore the efficient incorporation of Zakat within modern fiscal frameworks in majority-Muslim nations. The goal was to identify a balanced approach that respects both Islamic legal traditions and contemporary fiscal administration practices. Through a thorough comparative legal and economic analysis, several significant findings were generated, each shedding light on the complex synergies, interactions, and challenges encountered when integrating these diverse systems.

### Legal Compatibility and Constitutional Tensions

analysis examined the intricate relationship between constitutional frameworks and taxation policies in various Muslim-majority countries, highlighting a significant paradox. Many of these countries, while formally recognizing Islam as a foundational source of legal authority in their constitutions, implement taxation systems primarily grounded in secular laws or regulatory frameworks that were often established before their paths to independence. This dissonance between Islamic principles and secular taxation practices gives rise to a fragmented legal landscape where the interaction between the two systems lacks clarity and consistency. For example, in Pakistan and Malaysia, Zakat—an essential religious obligation for Muslims—is legally acknowledged and is intended to serve as a form of social welfare [33], [34].

However, its integration with the broader tax system is often inadequate and poorly executed. Zakat tends to operate on the periphery of official taxation structures, leading to a scenario where it is treated as an ancillary mechanism rather than a fundamental element of the national fiscal strategy. This relegation results in a confusing dual legal system, which complicates tax administration and creates overlapping responsibilities that can burden both taxpayers and government agencies. As a result, Zakat, despite its religious significance, struggles to fulfill its potential role in the national economy, often overshadowed by conventional tax obligations. Such inconsistencies not only hinder effective governance but also perpetuate misunderstandings regarding the obligations and rights of citizens within the financial system [35], [36].

### Institutional Structures and Frameworks

A detailed examination of the national implementations of Zakat reveals significant differences in both organizational structure and the effectiveness of their respective systems. In Malaysia, the Zakat framework operates without a centralized regulatory authority, which leads to a distribution of power among various state religious councils. Each state has

considerable autonomy to enact and manage its Zakat practices according to local interpretations of Islamic law. This decentralized approach allows for adherence to religious tenets that reflect local needs and cultural contexts; however, it also results in considerable disparities in how the Zakat is enforced, calculated, and distributed across different states. For example, the rates of Zakat collected and the methods used to distribute it can vary widely, potentially leading to inequities in how effectively communities receive support from these funds. On the other hand, Indonesia utilizes a centralized model through its National Zakat Agency (BAZNAS), which was established to promote standardization and efficiency in Zakat collection and distribution. This centralized administration can streamline processes and ensure a uniform approach across the country [37], [38]

However, this concentration of power often limits taxpayer involvement and engagement, which is crucial for fostering public trust and ensuring that contributions meet the actual needs of recipients. The bureaucratic nature of BAZNAS can sometimes create a disconnect between donors and beneficiaries, complicating the overall effectiveness of Zakat as a tool for social welfare. In Saudi Arabia, the Zakat system is state-regulated and obligatory for citizens, reflecting a strong institutional commitment to this religious obligation. Nevertheless, the efficacy of this system, particularly regarding the actual redistribution of wealth, has been called into question. Issues such as low levels of transparency concerning how Zakat revenues are utilized and the exclusion of expatriate contributions undermine the potential benefits of the system [39], [40].

Many expatriates contribute financially but do not see the direct impacts of their donations, which can lead to feelings of disenfranchisement and scepticism about the fairness of the Zakat distribution process. These examples collectively illustrate a critical insight: neither a fully decentralized approach, like that of Malaysia, nor a completely centralized one, like that of Indonesia, guarantees effective Zakat administration. The effectiveness of such systems is further complicated by the necessity of ongoing legal support, robust public engagement, and trust. Ultimately, ensuring that Zakat serves its intended purpose of equitable redistribution and social support requires not only a sound institutional framework but also a commitment to transparency and public involvement [41], [42].

## **Moral Dilemmas and Compliance Behavior**

The presence of Zakat, an obligatory form of almsgiving in Islam, alongside state taxation has led to the emergence of a perception of a "double burden" among many Muslim individuals. This perception is particularly consequential in terms of compliance rates, especially regarding informal income sources that may not be fully reported to tax authorities. In exploring this issue through interviews and existing literature, it becomes evident that when Zakat is not recognized as a component of communal fiscal responsibility, many individuals find themselves grappling with significant moral dilemmas [43]–[45].

They are caught between their civic obligations, which include adhering to state tax laws, and their religious duties to contribute to Zakat. This internal conflict often leads to a situation where they resort to underreporting their income as a means of navigating what they view as overlapping financial obligations. This response can manifest as a reluctance to declare informal earnings, which many believe would subject them to both Zakat contributions and state taxes, creating what they perceive as an excessive financial strain [46]–[49].

Consequently, this underreporting behavior directly undermines the effectiveness of both Zakat and state tax schemes in achieving their intended redistributive goals. When individuals choose to avoid disclosing their full income, it not only affects the resources available for communal welfare through Zakat but also diminishes the cumulative tax revenue that could fund public services and infrastructure. Thus, the ethical considerations surrounding compliance behavior become critical, reflecting broader socio-economic implications for both religious institutions and state governance [50].

## Economic Consequences and Redistribution Outcomes

When effectively collected and managed with transparency, Zakat has shown to be a powerful tool for wealth redistribution, particularly benefiting the ultra-poor in society more significantly than traditional welfare programs financed through standard taxation. This is largely due to Zakat's targeted nature, which aims to fulfill the needs of the most vulnerable populations, including those who might not typically access other forms of government assistance. Nevertheless, the macroeconomic impact of Zakat remains somewhat limited, primarily due to the relatively modest scale of contributions. In many Muslim-majority countries, total Zakat contributions tend to represent less than 1% of the nation's Gross Domestic Product (GDP). This limited proportion can curtail the potential benefits of Zakat on a national scale, as it does not generate sufficient resources to tackle widespread poverty or stimulate significant economic growth [51]–[53].

However, some countries, such as Malaysia, have explored innovative approaches to enhance the effectiveness of Zakat. By introducing deductions or tax credits for Zakat payments, these nations have successfully encouraged citizens to voluntarily comply with their Zakat obligations. This strategy not only fosters a culture of giving but also aligns Zakat with fiscal policies, thereby presenting it as an alternate or supplementary form of tax obligation. As a result, these measures have the potential to increase overall fiscal revenue, improve the efficiency of fund allocation, and promote a fairer distribution of wealth among the population. In conclusion, while Zakat has a clear and positive impact on poverty alleviation when effectively implemented, its broader economic implications can greatly benefit from structural reforms that enhance its visibility and scale within the financial systems of Muslim-majority countries [54]–[56].

## Theoretical Synthesis and Alignment with (Maqāṣid al-Sharī'ah)

This research deeply engages with the doctrine that emphasizes the vital importance of incorporating Zakat within the framework of public finance. It argues that such integration is not only feasible but also aligns seamlessly with the maqāṣid al-sharī'ah, which encompasses core objectives such as promoting justice ('adl), advancing public benefit (maṣlaḥah), and facilitating the circulation of wealth (taḍāwul) within society. The theoretical framework established in this study posits that the obligations derived from Islamic principles can effectively coexist with civic duties, dismantling the notion that these realms are inherently in conflict. Instead, it suggests that thoughtfully designed fiscal policies can intertwine religious mandates with secular responsibilities, creating a cohesive system that is beneficial to the community at large [57], [58].

For such integration to be effective, these policies must prioritize fundamental principles of transparency, accountability, and fairness, thereby ensuring that the collection and distribution of Zakat serve the intended purpose of alleviating poverty and promoting social welfare. Furthermore, this perspective challenges the traditional binary categorization of "religious" versus "secular" systems by advocating for an integrated approach informed by ethical pluralism. In doing so, it underscores the need to reevaluate existing financial practices and policies through a lens that recognizes the significant contributions of religious obligations like Zakat to the broader goals of social equity and justice. Ultimately, this synthesis calls for collaborative efforts among policymakers, religious authorities, and community leaders to forge a framework that embraces the dual nature of these obligations in a manner that is equitable and beneficial for society as a whole [59], [60].

## Proposed Integration Model

In response to the findings identified in this research, we propose a comprehensive Hybrid Integration Framework designed to enhance the synergy between Zakat and national taxation

systems. This framework consists of several crucial components, each detailing a pathway toward more effective integration: **Legal Recognition:** It is essential to legislate the status of Zakat within national fiscal codes, explicitly recognizing it as a deductible contribution or as an alternative civic duty. This legal endorsement would permit individuals to apply their Zakat contributions as partial fulfillment of their income tax obligations, thereby incentivizing compliance and fostering a culture of charitable giving [61], [62].

To achieve this, collaboration with legal experts and policymakers will be required to carefully draft appropriate legislation. **Unified Digital Registry:** To address issues of redundancy and compliance inefficiency, the establishment of a comprehensive national registry that consolidates Zakat and income tax records is imperative. This digital infrastructure would not only facilitate the seamless tracking of contributions but also enhance accuracy by minimizing the occurrence of duplicate records. A user-friendly interface should be developed for both taxpayers and Zakat organizations, enabling real-time access and reporting capabilities. **Transparent Government:** Enhancing the accountability of Zakat funds requires the formation of mixed oversight committees. These committees would comprise religious scholars, financial experts, civic representatives, and other stakeholders. Their role would be to rigorously monitor the allocation and distribution of Zakat funds, ensuring that these resources are utilized effectively and align with both religious mandates and community needs [63].

Regular audits and public reporting mechanisms should be instituted to promote transparency and build public trust. **Taxpayer Choice Mechanism** to empower citizens in their philanthropic endeavours, the framework proposes a mechanism that allows taxpayers to designate a portion of their income tax payments as Zakat contributions, where legally permissible. This choice would ensure that individuals can fulfill their moral and religious obligations while also adhering to their tax responsibilities. Clear guidelines and criteria for what constitutes permissible Zakat would need to be developed to facilitate this option. **Intersectoral Collaboration:** Effective partnerships between Zakat organizations and government-led poverty alleviation initiatives are crucial for maximizing the positive impact of both systems. By fostering collaboration, these entities can share resources, data, and best practices, ensuring a coordinated approach to tackling poverty. Joint programs and initiatives should be created to leverage strengths from sectors, thereby amplifying the effectiveness of poverty reduction strategies and improving overall social outcomes. Through the implementation of this Hybrid Integration Framework, the interplay between Zakat and taxation can not only be streamlined but also significantly enhanced, resulting in greater societal benefits and improved compliance rates [64]–[66].

## Comparative Policy Insights

This research culminates in offering significant comparative insights by examining non-Muslim contexts, particularly in countries like the United States and the United Kingdom. In these nations, tax-exempt donations and incentives for faith-based charitable contributions have been seamlessly integrated into their formal fiscal systems, serving as effective mechanisms for funding various social programs. For instance, in the United States, the tax-deductibility of charitable donations encourages individual and corporate giving, thereby enhancing the capacity of non-profit organizations, including those rooted in various religious traditions, to serve diverse community needs [67]–[69].

Similarly, the United Kingdom has established frameworks that allow for tax relief on charitable donations, promoting a culture of philanthropy that encompasses both secular and religious organizations. These international examples not only demonstrate the viability of incorporating religiously based contributions into public finance structures but also underscore the importance of maintaining the integrity of religious practices. By legally recognizing Zakat as a legitimate fiscal tool, it is possible to foster a dual respect for both civic responsibility and religious obligations. Such an approach can ultimately assist in

bridging the gap between faith-based giving and public funding initiatives, illustrating the potential for collaboration between religious entities and governmental bodies in addressing social issues within modern financial frameworks [70]–[72].

**Table 2. Comparative Overview of Zakat Integration in Select Muslim-Majority Countries**

Country	Legal Status of Zakat	Institutional Model	Tax Integration	Key Challenges	Strengths
Malaysia	Legally recognized at the state level	Decentralized (State Religious Councils)	Partial (Zakat is deductible in some cases)	Variation across states; administrative inconsistency	High voluntary compliance in states with tax deductions
Indonesia	Recognized under national law	Centralized (BAZNAS)	Weak integration with the tax system	Low participation; trust deficit	Standardized collection framework
Pakistan	Federally mandated Zakat Ordinance	Semi-centralized	Parallel system with limited coordination	Overlapping obligations; lack of unified enforcement	Legal backing at the national level
Saudi Arabia	Mandatory for nationals	State-controlled	Not integrated with income tax (no income tax for nationals)	Excludes expatriates; lacks transparency	Strong compliance due to religious obligation and state mandate
Turkey	Voluntary (charitable donation, not formal Zakat)	Private/NGO-based	Not integrated	Absence of formal Zakat system	Civic engagement through charitable foundations

## Analysis and Discussion

This research delves into the complex relationship between zakat as a Sharia-based legal obligation and the architecture of modern state taxation systems, especially in Muslim-majority countries. The findings reveal that while zakat holds significant theological and socio-economic importance, its institutional integration into secular fiscal systems remains inconsistent, presenting both administrative and moral dilemmas for policymakers and taxpayers alike.

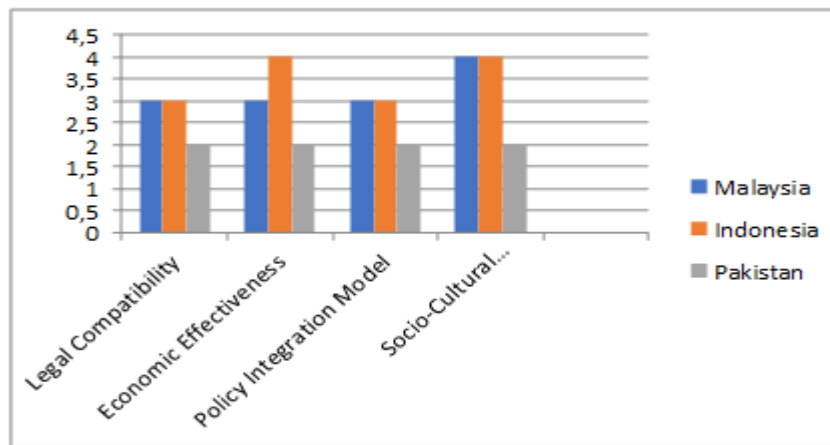


Figure 1. Comparative Assessment of Zakat-Tax Integration

### Legal Tensions and Dual Obligations

One of the most prominent issues identified is the dualism between religious and civic obligations. In countries like Pakistan and Malaysia, where Islam is constitutionally recognized, zakat is legally acknowledged but remains only partially integrated into tax regimes. In contrast, secular tax laws, often inherited from colonial administrative systems, dominate fiscal governance. This creates a fragmented legal framework where zakat functions as an ancillary, voluntary system rather than a core element of national fiscal policy. As a result, Muslim citizens often face a “double burden”—being obligated to pay both zakat and income tax—with no clear legal or ethical bridge between the two [73], [74].

The absence of harmonization fosters confusion among taxpayers regarding their responsibilities and reduces the incentive to comply with either system fully. This leads to underreporting, especially of informal income, and diminishes the effectiveness of both zakat and tax in achieving their redistributive goals. This dilemma is further compounded by the lack of legal clarity on whether zakat can be considered a tax substitute or deductible element, which varies widely between jurisdictions.

### Institutional Models: Centralized vs. Decentralized Approaches

The comparative analysis across Malaysia, Indonesia, Saudi Arabia, and Pakistan reveals a spectrum of institutional models for zakat management. Malaysia’s decentralized model, wherein each state has its zakat authority, allows for context-specific governance but results in significant administrative inconsistencies and equity issues. Conversely, Indonesia’s centralized approach through BAZNAS provides greater standardization, yet often lacks sufficient community engagement and transparency [75], [76].

Saudi Arabia exemplifies a state-enforced zakat model, where zakat is mandatory for nationals. However, the exclusion of expatriates, limited accountability, and lack of integration with income tax limit its redistributive potential. Pakistan’s semi-centralized system suffers from legal ambiguity and weak coordination between federal zakat ordinances and provincial tax authorities. Across all models, one recurring issue is the absence of digital infrastructure to manage, monitor, and streamline zakat and tax records simultaneously.

### Socioeconomic Outcomes and Redistribution Impact

Zakat, when efficiently collected and distributed, shows a strong micro-level impact on poverty alleviation and social equity. However, its macroeconomic impact remains limited due to low contribution rates—often less than 1% of GDP—and inefficiencies in fund

allocation. Countries such as Malaysia have experimented with tax-deductible zakat payments, which not only boost compliance but also reduce the moral tension faced by taxpayers. Still, these policies are not widely adopted or uniformly implemented.

Evidence suggests that when zakat is integrated—formally or informally—into the national development agenda, it can reduce dependency on state welfare systems, increase civic engagement, and align fiscal governance with the values of the Muslim majority. However, public trust is a critical factor. Where zakat funds are perceived to be poorly managed or politicized, compliance rates fall and scepticism grows.

### **Compliance Behavior and Moral Considerations**

The moral dilemma arising from dual fiscal responsibilities leads to behavioral trade-offs. Many Muslims prioritize zakat over taxes, guided by religious conscience, and may choose to reduce their taxable income or avoid formal tax systems altogether. This behavior is partly due to the perception that zakat directly benefits the poor, while taxes are mismanaged or fail to reach those in need. The research emphasizes that effective integration must address both legal structure and psychological motivation. Transparent use of zakat funds, religious validation, and mechanisms for taxpayer choice (e.g., directing a portion of tax toward zakat) are essential to encourage full compliance with both systems [77], [78].

### **Theoretical Synthesis: Maqāṣid al-Sharī‘ah Alignment**

A critical contribution of the study is its alignment of fiscal policy with maqāṣid al-sharī‘ah (objectives of Islamic law), particularly ‘adl (justice), maṣlaḥah (public interest), and tadāwul (wealth circulation). Zakat integration is shown to not only be religiously permissible but also beneficial when designed with transparency, efficiency, and equity. The theoretical synthesis promotes a hybrid governance model—where state regulation and religious mandates coexist without compromising either—supporting ethical pluralism in financial administration [79], [80].

### **Policy Proposal: Hybrid Integration Framework**

To resolve the identified challenges, the research proposes a Hybrid Integration Framework featuring:

Legal Recognition of zakat as tax-deductible or tax-substituting

A Unified Digital Registry for Zakat and tax data

Transparent Governance through multi-stakeholder committees

A Taxpayer Choice Mechanism Enabling Zakat Designation

Intersectoral Collaboration between Zakat institutions and public agencies

This model not only addresses technical gaps in administration but also restores public confidence in faith-based financial obligations within modern civic systems.

### **CONCLUSION**

This study highlights the potential for Muslim-majority countries to harmonize spiritual obligations with civic responsibilities through the effective integration of Zakat into modern tax systems. Such integration can reduce administrative redundancies, improve taxpayer compliance, and promote socio-economic justice rooted in both religious ethics and public finance principles. Achieving this, however, demands comprehensive legal reform, institutional coordination, and sustained public education efforts. The proposed framework contributes a new dimension to the literature by offering a practical model that bridges

Islamic economic values with state fiscal mechanisms. For policymakers, it provides actionable guidance on aligning faith-based obligations with national development goals. Future studies should empirically evaluate the impact of integrated Zakat-tax models in specific national contexts, assess public perceptions of such systems, and explore digital governance tools that could enhance transparency and efficiency in Zakat collection and distribution.

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### Author Contribution

Alwy Ahmed Mohamed and Abdulrohim E-sor: Conceptualisation, methodology, writing, review, and editing.

### Conflicts of Interest

All authors declare no conflict of interest.

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