

RESPONSE OF THE HAJJ ORGANIZERS ASSOCIATION REGARDING THE DECREE OF LAW NUMBER 14 OF 2025

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Abstract

This study analyzes the responses, perceptions, and adaptation strategies of Hajj and Umrah organizer associations toward Law No. 14 of 2025, particularly regarding independent Umrah, digitalization, and changing relations with the government. A qualitative phenomenological approach was employed with purposively selected informants from AMPHURI and HIMPURH. Data were collected through semi-structured interviews, participant observation, and regulatory and official-document analysis, then analyzed using the Miles and Huberman model with triangulation and member checking. The findings reveal four major themes: uncertainty surrounding derivative regulations, a paradigm shift toward independent Umrah, unequal technological and resource readiness, and stronger partnership and collaborative communication with regulators. Associations responded not only defensively but also through training, legal assistance, internal restructuring, and service innovation. The study concludes that successful transformation of Hajj and Umrah governance depends on regulatory clarity, digital readiness, pilgrim protection, and the strengthening of a co-regulation model that positions associations as active policy partners.

Keywords: Hajj and Umrah; Organizer Associations; Co-Regulation; Independent Umrah; Collaborative Governance

Abstrak

Penelitian ini bertujuan menganalisis respons, persepsi, dan strategi adaptasi asosiasi penyelenggara haji dan umrah terhadap Undang-Undang Nomor 14 Tahun 2025, khususnya terkait umrah mandiri, digitalisasi, dan perubahan relasi dengan pemerintah. Penelitian menggunakan pendekatan kualitatif fenomenologis dengan informan dari AMPHURI dan HIMPURH yang dipilih secara purposif. Data dikumpulkan melalui wawancara semi-terstruktur, observasi partisipatif, serta dokumentasi regulasi dan laporan resmi, kemudian dianalisis menggunakan model Miles dan Huberman dengan triangulasi dan member checking. Hasil penelitian menunjukkan empat tema utama, yaitu ketidakjelasan regulasi turunan, pergeseran paradigma menuju umrah mandiri, ketimpangan kesiapan teknologi dan sumber daya, serta penguatan kemitraan dan komunikasi kolaboratif dengan regulator. Asosiasi tidak hanya merespons regulasi secara defensif, tetapi juga mengembangkan pelatihan, pendampingan hukum, restrukturisasi internal, dan inovasi layanan. Temuan menegaskan bahwa keberhasilan transformasi tata kelola haji dan umrah bergantung pada kejelasan regulasi, kesiapan digital, perlindungan jemaah, serta penguatan model co-regulation yang menempatkan asosiasi sebagai mitra kebijakan yang aktif dalam proses perumusan dan implementasi kebijakan.

Keywords: Haji dan Umrah; Asosiasi Penyelenggara; Co-Regulation; Umrah Mandiri; Tata Kelola Kolaboratif



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INTRODUCTION

Organizing the Hajj and Umrah pilgrimages is a complex religious and economic activity, reflecting the interplay between the spiritual, social, and managerial dimensions of the Muslim community. Globally, the implementation of the Hajj and Umrah is governed by strict regulations and continues to transform along with technological developments and the policies of the countries of origin and destination. Countries like Indonesia face significant challenges in managing the flow of pilgrims, managing travel services, and maintaining transparency and accountability of the agencies that organize the sacred pilgrimages.¹ This phenomenon becomes even more relevant when in 2025 Law Number 14 of 2025 concerning the Implementation of Hajj and Umrah was passed, which brought fundamental changes to the governance and role of organizing institutions in Indonesia.

Nationally, Law No. 14/2025 partially replaced the Ministry of Religious Affairs with the Ministry of Hajj and Umrah, and introduced the legalization of independent Umrah, a mechanism through which pilgrims can arrange their travel without going through Umrah Travel Organizers (PPIU). This provision has drawn mixed responses, particularly from organizer associations such as AMPHURI, HIMPUH, and Kesthuri, which believe the policy poses potential risks to pilgrims and threatens the sustainability of the Hajj and Umrah business.² Empirical findings from association interviews indicate concerns about weak legal protection, potential fraud, and declining service standards in independent worship systems.

In the context of the Muslim economy, Hajj and Umrah travel agencies function not only as service providers but also as part of the Muslim social and spiritual ecosystem, fostering economic empowerment, particularly in the religious MSME and transportation sectors. New regulations permitting self-organized pilgrimages challenge this economic structure, as liberalization policies are deemed inadequate to meet the readiness of Indonesia's socio-religious infrastructure.³ This socio-cultural perspective is important because it shows that state policy in a religious context is not only administrative in nature, but is also closely related to the identity and socio-religious practices of the community.

Several previous studies have shown that religious regulations in Indonesia are often top-down and do not fully take into account the capacity of local organizations to adapt to legal

¹ Z. Amri et al., *Profesionalisme Dalam Pelayanan Ibadah Suci: Praktik, Tantangan, Dan Inovasi Biro Haji & Umrah* (Jakarta, 2025).

² H. B. Suharto et al., "Regulasi Dan Kebijakan Hukum Penyelenggaraan Haji Di Indonesia," *Prosiding IAIN Jember Dan IAIN Madura*, 2020.

³ L. Santoso and A. Rachman, "Digitalising Halal Certification: The Dynamic of Regulations and Policies Concerning Halal Certification in Indonesia," *ResearchGate*, 2023.

changes.⁴ This is also evident in the implementation of Law 14/2025, which, according to the association, still involves minimal participation from field administrators. A public administration law perspective shows that policies implemented too hastily without the participation of social actors can trigger resistance and conflicts of interest, as occurred in the independent Umrah controversy. Thus, the dynamics of the association's response reflect a form of social adaptation to the transformation of religious policy.

Beyond policy factors, digital transformation also plays a significant role in accelerating changes in Hajj and Umrah governance. Studies on the digitalization of religious systems in Indonesia emphasize the importance of integrated pilgrim data, transparent ticketing systems, and electronic Hajj fund management.⁵ However, the implementation of digital systems in the religious sector has also created inequalities, as not all providers have adequate technological adaptability. This situation has created a digital divide between large and small agencies, strengthening the association's argument that the government needs to address the readiness of human resources and religious infrastructure.

Academic studies of Hajj organizer associations also show that these organizations play an advocacy role in protecting the rights of pilgrims while maintaining the sustainability of the religious industry. However, there is limited research that qualitatively explores the experiences and meanings behind associations' responses to legal changes. Most studies focus on normative, legal, and economic aspects, neglecting the perceptions and social adaptation strategies of actors in the field.⁶ This is where there is a literature gap that needs to be bridged by a qualitative approach that places human experience and social values as the focus of analysis.

In a theoretical context, this study uses a symbolic interactionist perspective to understand how organizing associations interpret regulatory changes and construct new meanings in their relations with the government. This perspective is relevant to describing the symbolic negotiations between state authorities and socio-religious actors, where public policy is not merely an administrative instrument but also an arena of meaning and power. Furthermore, a phenomenological approach is used to explore the subjective experiences of association members in responding to the provisions of Law 14/2025.

⁴ S. Mahfudz, "Reforming Economic and Financial Fatwa Governance with Special Reference to the Islamic Banking Industry in Indonesia" (Western Sydney University, 2023).

⁵ R. P. Astuti et al., "Partisipasi Bank Indonesia Dalam Pengaturan Digitalisasi Sistem Pembayaran Indonesia," *Jurnal Ekonomi Dan Kebijakan Bisnis* 4, no. 1 (2024): 196–206, <https://doi.org/10.26740/jekobi.v4n1.p196-206>.

⁶ A. Alhifni et al., "The Awqaf-Driven Venture Capital: A Policy Innovation in Financing for the Pesantren Entrepreneurial Ecosystem," *Jurnal Ilmiah Gema Perencana* 4, no. 2 (2025): 122–38, <https://doi.org/10.61860/jigp.v4i2.322>.

Based on this background, this study aims to analyze the responses, perceptions, and adaptation strategies of Hajj organizer associations to the provisions of Law Number 14 of 2025, with a focus on social meaning and the interaction process between actors. Theoretically, this research contributes to the development of public policy studies based on religious values and participatory processes. Practically, the results are expected to provide policy recommendations for the government in formulating more inclusive regulations and encouraging collaboration between the state and Hajj organizer associations for the sustainability of safe, fair, and socially just pilgrimage services.

LITERATURE REVIEW

Theoretical studies on the responses of religious organizations to public policy emphasize the importance of understanding the relationship between legal structures, bureaucracy, and social actors in a religious context. In the Indonesian context, the implementation of the Hajj and Umrah is a manifestation of the complex interactions between the state, civil society, and the private sector. According to Majid, Azhaar, & Nurdiana, the management of the Hajj pilgrimage in Indonesia has evolved from a mere ritual activity to an instrument of strategic economic and political diplomacy.⁷ This change shows that religious policy not only has a theological dimension, but also has an impact on the economy, society, and governance.

In public policy implementation theory, Edwards III (1980) emphasized four key factors for successful implementation: communication, resources, implementer disposition, and bureaucratic structure. In the context of Law No. 14 of 2025, this framework can be used to understand how Hajj organizer associations interpret and respond to new policies. Kamal, Nawawi, & Syamsu applied this theory to the context of the Integrated Hajj Information System (SISKOHAT) and found that organizational resistance often arises from ineffective policy communication between the government and field actors.⁸ This strengthens the relevance of implementation theory in explaining the phenomenon of the association's response to the Hajj policy.

Furthermore, a governance theory approach also serves as an important framework for understanding the dynamics of the relationship between the state and associations. In the context of modernizing Hajj management, Januratmo & Vic stated that digital-based Hajj governance requires

⁷ M. Majid et al., "From Ritual to Revenue: Reframing Indonesia Pilgrimage Management as Strategic Economic Diplomacy," *Jurnal Teunuleh* 6, no. 3 (2025): 114–28, <https://doi.org/10.51612/teunuleh.v6i3.217>.

⁸ A. M. Kamal et al., "Public Service Innovation in Religious Context: E-Government Implementation Analysis of Indonesia's Integrated Hajj Information System," *TPM Journal*, 2025.

cross-institutional collaboration and legal alignment to protect pilgrims.⁹ This theory highlights the shift from a bureaucratic model to collaborative governance, where the Hajj and Umrah organizers association has a strategic position as a state partner in providing religious public services.

Symbolic interactionism theory provides a sociological foundation for understanding the Hajj organizing association's response to Law 14/2025. This perspective focuses on how social actors interpret symbols and policies within the context of social interactions. Khakim uses social construction theory to explore how Hajj policy issues are perceived by the public and the media.¹⁰ In the context of this research, the organizing association can be seen as an interpretive agent that constructs meaning for regulatory changes based on their collective experiences.

In addition to the social perspective, the theory of *maslahah* in contemporary Islamic jurisprudence is also relevant to explaining how associations consider the welfare of pilgrims in responding to new policies. Aripin, using a comparative Islamic jurisprudence approach, demonstrates that Hajj fund investments and pilgrimage management policies need to be based on principles of social justice and public welfare.¹¹ Thus, the association's response is not only pragmatic but also rooted in normative principles of Islamic law.

From the perspective of religious public policy, Munandar & Fahrurrozi emphasized that the Ministry of Religion plays a strategic role in managing the Hajj pilgrimage in the era of digitalization and new regulations.¹² However, association involvement in the policy-making process remains minimal, resulting in frequent resistance to implementation on the ground. This is where an empirical gap emerges between policy design and social acceptance, which is relevant for qualitative research in the context of Law 14/2025.

Previous research by Aljawi & Santiago also highlighted the importance of international collaboration between Indonesia and Saudi Arabia in utilizing artificial intelligence for Hajj management.¹³ However, they found that legal harmonization and pilgrim data protection remain significant challenges. This aligns with the findings of Lesmana & Afiff, who emphasized the importance of corporate citizenship in the governance of Hajj funding institutions to ensure

⁹ S. Januratmo and B. J. Vic, "Modern Governance of Hajj and Umrah: Digital Innovation and Legal Protection for Pilgrims," *Global Journal of Law and Social Sciences* 3, no. 3 (2025): 102–16, <https://doi.org/10.38035/gjlss.v3i3.583>.

¹⁰ A. Khakim, "The 2024 Hajj Special Committee: Analyzing the Complexities of Social and Media Realities Through the Lens of Social Construction Theory," *Indonesian Public and Religious Communication Policy Journal* 2, no. 1 (2025): 15–29, <https://doi.org/10.61511/ipercomp.v2i1.2025.1645>.

¹¹ J. Aripin, "Hajj Fund Investment: A Comparative Contemporary Fiqh Study on *Maslahah* and Public Policy Perspectives in Indonesia," *Millah Review Journal*, 2025.

¹² S. A. Munandar and M. Fahrurrozi, "The Strategic Role of the Ministry of Religion in Managing Hajj in the Era of Minister Nasaruddin Umar," *Multazam Journal* 5, no. 1 (2025).

¹³ M. F. Aljawi and F. Santiago, "And International Law in the Utilization of AI for the Organization of Hajj: A Collaborative Study between the Governments of Indonesia and Saudi Arabia," *Journal of Global Studies in Policy* 3, no. 2 (2025).

institutional transparency and accountability.¹⁴ Both show that aspects of modern governance have not been fully internalized by the organizing association at the operational level.

Based on various theories and previous research findings, it can be concluded that the response of the Hajj organizer association to Law 14/2025 is a multidimensional phenomenon encompassing legal, social, and organizational dimensions. Policy implementation theory, symbolic interactionism, and governance serve as complementary conceptual foundations in this study. The conceptual framework used will emphasize the relationship between religious public policy and the social response of the organizer association, with a focus on the process of interpretation, adaptation, and negotiation of meaning within the context of changing Hajj regulations in Indonesia.

RESEARCH METHODS

This study uses a qualitative approach with a phenomenological method, because the main objective of this study is to deeply understand the subjective experiences and meanings constructed by the Hajj organizers association in responding to the provisions of Law Number 14 of 2025. The phenomenological approach was chosen because it focuses on exploring the awareness and perceptions of individuals and groups towards a social phenomenon, as explained by Saputra et al. in their study on the implementation of religious policies in the public service sector.¹⁵ This research was conducted in Jakarta, the center of national Hajj association activities. Subjects included representatives from two major associations, AMPHURI and HIMPUH. Informants were selected using purposive sampling, based on the criteria of at least five years of experience in Hajj management and direct involvement in policy discussions regarding Law No. 14/2025. Data collection techniques included semi-structured interviews, participant observation in association forums, and regulatory documentation and official government reports to ensure the depth and integrity of the information.¹⁶ Data validity is maintained through triangulation of sources and methods, as well as member checking with informants to ensure appropriateness of meaning.¹⁷ Data analysis was carried out using the Miles & Huberman model which includes data

¹⁴ E. S. Lesmana and A. Z. Afiff, "A Multi-Criteria Decision-Making Framework for Evaluating Government Institutional Performance: The Role of Corporate Citizenship in Hajj Fund Ecosystems," *Decision Making and Management Economics Journal* 8, no. 1 (2025): 486–503, <https://doi.org/10.31181/dmame8120251486>.

¹⁵ H. Saputra et al., "A Phenomenological Analysis of Top-Down Policy Implementation in the Religious Service Sector in Bondowoso, Indonesia," *Journal of Humanities and Social Sciences Studies* 7, no. 5 (2025): 88–104, <https://doi.org/10.32996/jhss.2025.7.5.7>.

¹⁶ Y. Yuliharti, "Spiritual Experience in Modern Religious Movements: A Phenomenological Subjective Exploration of New Community Members in Indonesia," *Religions* 13, no. 8 (2025): 690–703, <https://doi.org/10.3390/rel13080690>.

¹⁷ I. Siregar, "Assessing Religious Obligations: A Phenomenological Approach to Value and Legal Perspectives," *Politica Journal of Islamic Government Studies* 4, no. 1 (2024): 54–67, <https://doi.org/10.33258/polit.v4i1.1016>.

reduction, data presentation, and drawing conclusions interactively.¹⁸ The analysis process began with open coding of interview transcripts, followed by grouping themes and categorizing meanings that emerged repeatedly from the informants' narratives.¹⁹ This approach allows researchers to uncover social dynamics and institutional perceptions that cannot be measured quantitatively, and provides a contextual understanding of the relationship between state policies and the responses of Hajj organizer associations in Indonesia.

RESULTS AND DISCUSSION

Research result

Based on in-depth interviews and documentation from three major Hajj and Umrah organizer associations in Indonesia, AMPHURI and HIMPURH, it was revealed that Law Number 14 of 2025 has had a significant impact on institutional dynamics, partnership patterns with the government, and business actors' adaptation strategies. Key findings indicate that associations position themselves not only as regulated parties but also as strategic partners of the government in the policy co-creation process. For example, Dedi Pardiansyah from HIMPURH emphasized that associations "provide input to regulators so that regulations are in line with the reality on the ground" and play a role in co-creating regulations in the preparation of derivative regulations. A similar stance was expressed by Prof. Ulul Albab from AMPHURI, who emphasized the association's role as a forum for advocacy and coaching members to adapt to the new, stricter regulations, particularly regarding the digitalization of reporting and structured oversight.

The first theme that emerged from the thematic analysis was "regulatory transition and the lack of clarity in the derived regulations." Nearly all informants expressed confusion regarding the non-issuance of the Ministerial Regulation, which serves as the operational guidelines for Law No. 14/2025. This creates legal uncertainty and technical challenges in the field. In a Himpurh meeting, for example, business actors stated that "business actors are confused about whether to refer to the old regulations or wait for the new regulations from the Ministry of Hajj." This situation creates a policy duality, with associations trying to comply with the new law while still following the old guidelines that have not been revoked.

The second theme is "a paradigm shift towards independent Umrah." The policy of legalizing independent Umrah, stipulated in a new article of Law No. 14/2025, has been the source of the most intense controversy. Interviews with several sources revealed differing views between

¹⁸ U. H. Islamiyah, "A Phenomenological Study of Human Resource Management in Islamic Educational Institutions: Insights from Educators and Administrators," *Journal of Islamic Education Research* 6, no. 2 (2025): 41–58, <https://doi.org/10.1177/1470595816680849>.

¹⁹ M. M. M. Munir, "Experiencing the Ethical Dilemmas of Faith: A Phenomenological Exploration of Religious Philosophy Among Indonesian Scholars," *Heliyon* 11, no. 4 (2025): e07144, <https://doi.org/10.1016/j.heliyon.2021.e07144>.

the government and associations. The Deputy Minister of Hajj emphasized that independent Umrah can only be performed individually, while associations considered that "the definition of independent Umrah remains vague and has the potential to confuse the public." On the other hand, some associations see new business opportunities by tailoring services for pilgrims who still require assistance even when traveling independently.

The third theme is "inequality in technological and resource readiness." Associations such as AMPHURI and HIMPUH acknowledge that not all members are ready for the digitalization of administration and new reporting systems. Prof. Ulul Albab explained that "administrative burdens are increasing, and not all members are equally prepared for technology adaptation." This highlights the need for training, technical assistance, and support from regulators to ensure small businesses are not left behind.

The fourth theme was "partnerships and collaborative communication with regulators." Despite various challenges, all associations expressed a positive and constructive attitude toward this new policy. They assessed that relations with the government remained good and even improved, as AMPHURI noted that "associations position themselves as strategic partners of the government, not merely objects of regulation." Adaptation strategies implemented included internal training, the formation of a legal assistance team, and the development of policy recommendations based on field experience.

In addition to the four main themes identified, the research also indicates a strengthening of the associations' internal institutional functions in response to the increasing complexity of regulations following the enactment of Law No. 14/2025. Several associations, particularly AMPHURI and HIMPUH, have begun restructuring their organizations by establishing special divisions to handle regulatory compliance and digital transformation. This step is seen as an adaptive strategy to maintain the associations' credibility in the eyes of the government while simultaneously enhancing the competitiveness of their members. These findings demonstrate that regulations not only impact the macro-level of policy but also drive structural changes at the meso-level of organizations, a previously understudied area of Hajj and Umrah policy in Indonesia.

Furthermore, the implementation of digitalization mandated by Law No. 14/2025 also has consequences for the power relations between large and small agencies. Agencies with adequate capital and technological resources tend to be quicker to adapt to online reporting systems and pilgrim data integration, while small agencies face the risk of being excluded from the market. This situation reinforces the association's concerns regarding the potential for unhealthy market consolidation. In several internal HIMPUH forums, this issue emerged as a key agenda, encouraging the association to act as a balancing institution to ensure that digitalization policies do not lead to the marginalization of small-scale businesses. Thus, the association functions not

only as a policy mediator but also as a protective actor for the sustainability of the Hajj and Umrah industry ecosystem.

From a public governance perspective, these findings demonstrate that collaborative governance practices that have developed since Law No. 14/2025 are still in a transitional stage. Although consultation mechanisms have been opened, the strategic decision-making process remains dominated by the state. This suggests that co-regulation remains partial, not fully reflecting an equal distribution of authority. Nevertheless, the involvement of associations in the development of derivative regulations is a progressive step that strengthens policy legitimacy, as emphasized in the public-private partnership framework.²⁰ In this context, the association functions as a policy broker that bridges the interests of the state, the market, and the congregation as service users.

Conceptually, the findings of this study also enrich the discourse on the liberalization of religious services. The independent Umrah policy, previously perceived as a threat to conventional business models, has actually encouraged associations to develop innovative services based on non-material added value, such as digital manasik (ritual guidance) assistance, online sharia consultation services, and strengthening congregational worship literacy. This phenomenon demonstrates that liberalization does not always lead to excessive commercialization but can be directed towards improving service quality if accompanied by a strong oversight mechanism and association role.²¹

Thus, the results of this study not only confirm the association's position as a crucial actor in the implementation of Law No. 14/2025, but also demonstrate that the successful modernization of Hajj and Umrah governance depends heavily on the balance between state regulation, market innovation, and pilgrim protection. These findings provide a theoretical contribution to the development of a co-regulation model in the religious sector and offer practical implications for policymakers in designing adaptive, inclusive, and sustainable regulations amidst the global dynamics of the Hajj and Umrah industry.

Discussion

These findings demonstrate that the Hajj organizers' response to Law No. 14/2025 was not merely reactive, but transformational, reaffirming the association's role in collaborative governance. These findings align with the concept of public-private partnership in religious governance as proposed by Kamal et al., which states that strategic partnerships between

²⁰ Kamal et al., "Public Service Innovation in Religious Context: E-Government Implementation Analysis of Indonesia's Integrated Hajj Information System."

²¹ Aripin, "Hajj Fund Investment: A Comparative Contemporary Fiqh Study on Maslahah and Public Policy Perspectives in Indonesia."

regulators and industry players are key to the effectiveness of faith-based public policies.²² However, the context of this research broadens this view by emphasizing the aspect of co-creation regulation, namely the active involvement of associations in the formation of regulations, not just their implementation.

In addition, these results support the findings of Aripin, which state that Hajj management policies in Indonesia often face a dilemma between protecting pilgrims and liberalizing the industry.²³ In the context of independent Umrah, the association demanded clear legal boundaries to prevent this policy from creating moral hazard or misuse by unprofessional parties. However, unlike previous research, this study found that the association saw opportunities for innovation and service diversification in the new policy, not just threats.

From a theoretical perspective, this phenomenon confirms the theory of the social construction of public policy proposed by Schneider & Ingram, which states that the perceptions and interpretations of policy actors play a significant role in shaping policy effectiveness. In this case, associations construct positive narratives to negotiate new roles within religious regulations. From a practical perspective, this research contributes to the development of a participatory policy communication model between the government and Hajj organizing associations.

Thus, the results of this study indicate that Law No. 14/2025 represents a transition point towards a more structured and collaborative governance of the Hajj and Umrah pilgrimages. However, the policy's success depends heavily on the clarity of its implementing regulations, readiness for digitalization, and the intensity of communication between regulators and associations. This research also opens the door to further research on how the co-regulation model can improve the effectiveness of religious public policy implementation in Indonesia.

CONCLUSION

This study demonstrates that the response of Hajj and Umrah organizer associations to Law No. 14 of 2025 is not merely reactive but reflects an ongoing process of institutional interpretation, negotiation, and adaptation. AMPHURI and HIMPUH position themselves not only as organizations affected by regulatory change but also as actors seeking meaningful involvement in the formulation and implementation of emerging governance arrangements. Their responses indicate that regulatory transformation in religious public services is interpreted through the practical experiences, institutional interests, and responsibilities of actors operating directly within the Hajj and Umrah service ecosystem.

²² Kamal et al., "Public Service Innovation in Religious Context: E-Government Implementation Analysis of Indonesia's Integrated Hajj Information System."

²³ Aripin, "Hajj Fund Investment: A Comparative Contemporary Fiqh Study on Maslahah and Public Policy Perspectives in Indonesia."

The findings identify regulatory uncertainty as one of the most significant challenges during the transition period. The absence or perceived lack of clarity of derivative operational regulations creates difficulties for business actors attempting to reconcile new legal provisions with existing technical guidelines. This condition demonstrates that the effectiveness of policy implementation depends not only on the enactment of legislation but also on timely communication, operational clarity, and the availability of implementation mechanisms that can be understood consistently by government institutions, associations, and service providers.

The legalization and development of independent Umrah also produce a shift in the relationship between pilgrims and conventional service providers. Associations perceive this policy simultaneously as a challenge to established business models and as an opportunity for service innovation. Rather than relying exclusively on conventional travel packages, associations and their members may develop forms of added-value assistance such as digital ritual guidance, online consultation, and other supporting services. The findings therefore show that regulatory liberalization can stimulate institutional adaptation when accompanied by adequate safeguards, public literacy, and clear accountability mechanisms.

Digitalization constitutes another critical dimension of this transition. Differences in technological capacity, financial resources, and human resource readiness create unequal adaptation among large and small service providers. Associations consequently assume an important intermediary role by providing training, legal assistance, regulatory interpretation, and institutional support to their members. This function places associations between the state and market actors, enabling them to mediate policy implementation while also representing concerns regarding the possible exclusion of smaller providers from an increasingly digitalized service environment.

Overall, the study concludes that the modernization of Hajj and Umrah governance requires a balance among state regulation, market adaptability, association participation, and pilgrim protection. The emerging relationship can be understood as a developing form of *co-regulation* in which associations contribute field-based knowledge and implementation experience while the state retains formal regulatory authority. However, the study remains limited to a small number of associations and a transitional regulatory period. Future research should compare a broader range of associations, examine the experiences of pilgrims and smaller agencies, and investigate longitudinally how collaborative governance develops after implementing regulations become more established.

Research Novelty

The novelty of this study lies in examining regulatory change in Hajj and Umrah governance from the lived institutional perspective of organizer associations rather than primarily

through normative legal or economic analysis. By using a phenomenological approach, the study focuses on how associations interpret regulatory uncertainty, independent Umrah, digitalization, and changing relations with the state. This perspective reveals that policy implementation is not simply a process of formal compliance but also a process of meaning construction, institutional negotiation, and organizational adaptation.

A further contribution is the identification of organizer associations as policy brokers and emerging co-regulatory actors. The findings show that associations do more than represent business interests or respond to government decisions; they provide policy input, interpret regulations for members, establish legal and compliance support, facilitate digital adaptation, and communicate field-level realities to regulators. This expands the conventional understanding of Hajj associations from regulated stakeholders toward intermediary institutions connecting government, service providers, and pilgrims.

The study also contributes by linking regulatory liberalization with organizational innovation and unequal digital readiness. Independent Umrah is shown not only as a potential disruption to conventional business models but also as a stimulus for new service forms, while digitalization simultaneously creates opportunities and risks of exclusion for smaller providers. By bringing these dimensions together, the study offers a multidimensional framework in which regulatory transition, technological adaptation, market restructuring, and collaborative governance interact within the religious public-service sector.

Research Implications

Theoretically, the findings imply that the implementation of religious public policy should be analyzed as a relational process involving interpretation, negotiation, and adaptation among state and non-state actors. Policy effectiveness is influenced not only by legal structure but also by communication quality, resource readiness, actor disposition, institutional trust, and opportunities for meaningful participation. The findings therefore support the use of collaborative governance and symbolic interaction perspectives for explaining how religious-sector regulations acquire practical meaning during implementation.

From a policy and governance perspective, the findings suggest the importance of clear derivative regulations, structured consultation mechanisms, and continuous communication between regulators and organizer associations. Association participation can provide operational information that may help policymakers identify implementation difficulties, technological disparities, and pilgrim-protection concerns. A more institutionalized consultation mechanism may therefore strengthen policy legitimacy and implementation consistency without eliminating the state's formal regulatory authority.

Practically, organizer associations need to strengthen their internal capacity as regulatory and technological intermediaries. Training in digital reporting systems, compliance assistance, legal interpretation, and service innovation can help members adapt more evenly to regulatory change. Particular attention should be given to smaller providers that may face resource limitations during digital transformation. At the same time, service innovation associated with independent Umrah should remain oriented toward transparency, accountability, and pilgrim protection so that adaptation does not reduce service standards or widen inequalities within the Hajj and Umrah ecosystem.

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