



# Barriers to halal cosmetic certification: Insights from local cosmetic producers in Brunei

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## Article Info

### Article History

Received : 2025-09-04

Revised : 2025-10-15

Accepted : 2025-10-21

Published : 2025-10-22

### Keywords:

Barriers, Halal Cosmetics, Halal Certification Process, Local Cosmetic Producers, Brunei

### DOI:

<https://doi.org/10.20885/IJHI.vol1.iss2.art6>

### JEL Classification:

D22, L66, M21, M31

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### Paper type:

Research Paper



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## Abstract

**Purpose** – This study investigates the experiences and challenges encountered by local cosmetic producers in Brunei in obtaining halal certification for their products.

**Methodology** – A qualitative research design was employed in this study, with data collected through semi-structured interviews involving eight local cosmetic producers in Brunei, all of whom were considered MSMEs.

**Findings** – The study identifies the bottlenecks to obtaining halal certification revolving around inexpedient requirements during application, tedious approval process, costly application fee, and compressed-operating counter hours. However, the findings revealed that the challenges were not directly linked to the halal certification process itself, but rather to securing the prerequisite Cosmetic Product Notification (CPN), which is required before a halal application for cosmetics can be submitted.

**Implications** – This study extends the understanding of the current challenges faced by local cosmetic producers, which may lead to their growth and readiness in the cosmetic industry. The results also suggest that authorities should streamline CPN requirements to enhance the growth of the halal cosmetics industry, particularly in Brunei. Further research should examine these challenges from the government's perspective as policymakers to provide a more balanced understanding of the certification process and examine best solutions and practices from other countries with more streamlined halal certification systems.

**Originality** – This study offers a novel contribution by examining the halal certification process for cosmetic products in Brunei from the perspective of local MSME producers, an area that has received limited scholarly attention.

### Cite this article:

Halim, A.S.A & Aghwan, Z.A. (2025). Barriers to halal cosmetic certification: Insights from local cosmetic producers in Brunei. *International Journal of Halal Industry*, 1(2), 204-220. <https://doi.org/10.20885/IJHI.vol1.iss2.art6>

## Introduction

The concept of halal, rooted in Islamic ethical principles that emphasize purity, safety, sustainability, and social responsibility (Sugibayashi, 2019), has been proven to conquer not only within the food industry, but now has encompassed pharmaceuticals, cosmetics, fashion, and the tourism industry. It has now evolved into a multi-billion-dollar ecosystem, valued at approximately USD 47.76 billion in 2024 and is expected to reach USD 115.03 billion by 2032, with a compound annual growth rate (CAGR) of 11.67% (Fortune Business Insights, 2025). However, while the worldwide halal market continues to flourish, its development at the local level varies significantly across regions. In countries like Brunei, where the Halal concept is deeply woven into both national identity and governance, the translation of this global Halal growth into the non-food sector in

Brunei, particularly cosmetics, has been comparatively limited. This can be reflected in Brunei's relatively minute market size, where most halal products, including food, are imported from abroad, compounded by its heavy dependency on the oil and gas sector, which is the main driver of its economy (Sulaiman et al., 2025).

To frame this research, it is essential to situate the study within an appropriate theoretical context. According to a study, (Minabari & Arsyad, 2024) has identified four strategic approaches that are instrumental in driving the accelerated growth of Indonesia's core Halal industry, namely increasing productivity, strengthening finance and infrastructure, strengthening policies and regulations and the Halal brand and awareness. These strategies provide a valuable framework for understanding how national halal industries can be effectively developed and sustained. In the context of Brunei, the progress of halal cosmetics among local cosmetic products appears to be constrained by challenges closely related to productivity. Difficulties encountered at the initial stage of the halal application process often lead to delays in subsequent steps, further demotivating local cosmetic producers to pursue halal certification for their products. Therefore, drawing upon this framework, this study focuses on the productivity dimensions that particularly occur in Brunei. While this strategy highlights productivity as one of the drivers of halal industry growth, this study reveals that productivity-related problems form a major barrier to Brunei's halal certification process for cosmetics, especially during the application phase.

According to an initial survey conducted in 2024 with the Halal Food Control Division (HFCD), a Brunei government entity is responsible for accepting halal application for food and non-food products, and only three local cosmetic companies have successfully obtained Brunei Halal certification for cosmetic products since 2017. Despite the stimulating potential of local cosmetic producers and Brunei standard PBD 26:2010, interest in halal certification for local cosmetics is not sufficient. This suggests a relatively limited adoption of halal certification for locally produced cosmetics. Interestingly, based on the author's observations in retail stores, a growing number of local cosmetic brands have begun to sell their products on shelves, inferring increased market participation despite their lack of halal certification. These cosmetic products are increasingly visible on the shelves of well-known local retail stores such as the Hua Ho Department Store, Supa Save, and SKH Supermarket. Other than these big stores, many local cosmetic producers also market their products through smaller retail spaces, such as 'cube shops,' a shop offering affordable rental fee allowing vendors to display and sell their products on rental display units, making them a practical option for MSMEs.

It is also worth noting that unlike food products, halal application to non-food products, including cosmetics in Brunei, is not a mandatory requirement (Halim et al., 2025). Therefore, the objective of this study is to explore the experiences of local cosmetic producers regarding the challenges encountered during the process of obtaining halal certification for their products, particularly during the application phase of the halal certification process. By exploring these challenges, this study aims to reveal the underlying factors hindering the effective participation of local cosmetic producers in halal-certified products.

Extensive research has explored consumers as subjects concerning the purchase intentions, attitudes, and needs of halal cosmetics (Khan et al., 2020; Widyanto, 2022; Halim & Aghwan, 2023; Sudarsono et al., 2024; Rahim, 2025), but far less attention has been given to producers' perspectives, particularly the local ones in Brunei. Therefore, understanding their challenges in attaining halal certification for local cosmetic products should represent an underexplored yet important dimension that could provide new insights into the nation's halal landscape.

This study provides an important opportunity to advance the understanding of the current state and ongoing development concerning the viability of halal certification for local cosmetics. The insights gained here are also expected to inform efforts to enhance administrative efficiency and efficacy and strengthen the industry communication between MSMEs and the government support mechanism. Ultimately, this study offers grounded insights that may help identify practical entry points to support the participation of local cosmetic producers in Brunei's halal-certified cosmetics sector.

## Literature Review

### An overview of governance and industry structure of halal cosmetics in Brunei Darussalam

Halal cosmetics generally denote cosmetic products which do not involve derivation from pig, carrion, blood, human body parts, predatory animals, reptiles and insects as one of the ingredients (Yusuf & Yajid, 2017). Within the realm of the halal industry, halal products refer to any services or goods that have obtained official recognition from a governing body in accordance with the Shariah law. These products are distinguished by the presence of the halal logo issued by accredited certification agencies (Marković & Stošić-Mihajlović, 2022). Therefore, the term halal should not be confined only to ingredients, but also involves the manufacturing, storage, packaging, and delivery processes (Bujang & Bakar, 2023). Halal products should also be of good quality and prioritize safe consumption (Ali & Suleiman, 2018). Ensuring such standards is not merely religious compliance but also contributes to public health and the overall social conditions of the population (Osman, 2022). This dual significance aligns with Al-Serhan's (Al Serhan, 2010) perspective, which emphasizes that halal is also a religious requirement for Muslim consumers as it plays a cardinal role in reassuring permissible and lawful consumption for them.

With the substantial increase in the global Muslim population, this vast market could present significant opportunities for halal product producers to create and prompt a global demand for products adhering to Islamic values (Aripov et al., 2024). Moreover, non-Muslims are also seen to show interest in consuming Halal products (Trimulato et al., 2022), especially those who value the aspect of cleanliness and safety and exclude animal-derived ingredients. Consequently, local cosmetic producers should be driven to market their products with Halal certification in support of the government's efforts to diversify the national economy and advance the goals of Brunei Vision 2035 (Ab Talib, 2021). Its third goal is to establish a dynamic and sustainable economy with high and stable growth, specifically within the halal sector (Prime Minister's Office, 2023).

In Brunei, all matters related to halal certification and labeling fall under the oversight of the Brunei Islamic Religious Council (MUIB), the primary governmental authority responsible for halal affairs. However, the operational management of halal permits and certifications is conducted by the Halal Food Control Division (HFCD). Both entities operate under the Ministry of Religious Affairs and are tasked with enforcing key legislative instruments governing the halal sector, including the Halal Meat Act (Cap. 183), and Halal Certificate and Halal Label Order, 2005.

The *Guidelines for the Manufacture and Handling of Halal Cosmetic Products* (PBD26:2016) and the *Guidelines for the Manufacture and Handling of Medicines, Traditional Medicines and Health Supplements* (GD24:2010) also fall under the jurisdiction of the Halal Food Control Division (BKMH). Concurrently, the Ministry of Health (MOH), through the Department of Pharmaceutical Services (DPS), regulates the safety and use of cosmetic and pharmaceutical products in Brunei. As a procedural requirement, all cosmetic products must first secure Cosmetic Product Notification (CPN) approval from the DPS before they can be considered eligible for halal certification. This is stipulated in the Halal Application Checklist, which requires the inclusion of CPN documentation in all applications for halal-certified cosmetics. Originally, *Halal Certificate and Halal Label Order* applied exclusively to food products. However, the 2017 amendment expanded its scope to encompass non-food items, such as cosmetics and personal care products, as well as associated services, including transportation, storage, and packaging. While this expansion permits producers of non-food goods to apply for halal certification, the process remains voluntary and has not yet been mandated by law (Ahmadi, 2017).

### Challenges in the halal certification process: insights from regional studies and the cosmetic sector

A critical review of the literature on two studies by Prabowo et al. (2015) and Muhammad (2019) claims that one common issue that was found to hinder the industry players in obtaining Halal certificates for their product is the amount of obscurity of the procedure of acquiring Halal certification (Prabowo et al., 2015). The information itself was found to be unclear; even with accurate information in hand, numerous requirements must be met, often resulting in a prolonged

and delayed timeline, particularly in the preparation of the Halal Assurance System (HAS). Prabowo highlighted the emergence of this issue because of a lack of professional guidance. Another study has also pointed out that the Halal application procedure takes too long to complete on account of strict standards of procedure, delayed meetings, inflexible decisions between departments, and expensive costs (Muhammad, 2019). It seems that the pattern of difficulties and complicated, expensive, and ambiguous procedural requirements is quite common in halal logo applications, not to mention the absence of extensive assistance by certification bodies. Both studies (Prabowo et al., 2015) and Muhammad (2019) also agreed on the importance of third-party involvement, for example, a consultant that could help to facilitate and speed up the flow of the related halal certification process. However, the idea of having a third party to assist businesses in attaining halal certification has not been widely practiced in Brunei, possibly because of the centralized system in which applications are submitted directly to the responsible government agency, MUIB. While centralization assures consistency and greater regulatory oversight, it may also slow down the process and limit external support, which could otherwise enhance efficiency and communication among applicants and the government. This is particularly evident among small businesses, which often struggle to fully comprehend the procedural requirements and technical terminology involved in the halal certification process.

On top of that, another study was conducted to identify challenges encountered by Original Equipment Manufacturers (OEMs) in acquiring Halal certifications for cosmetics that they produce. OEMs operate as manufacturing entities that produce items based on the desires and specifications of their clients, who are often referred to as founders. These manufacturers are likewise not exempted from facing various challenges in securing halal certification, spanning lengthy approval periods, application backlogs, and limited staffing authorities (Mazril Suzaimi et al., 2023). The study further revealed that the Muslim-owned OEM investigated faced intense competition with non-Muslims OEM, who were also actively seeking Halal approval for their cosmetic goods in response to high consumer demand, given that majority of their clientele are among Malay Muslims. This scenario clearly reflects a shifting market dynamic in which Halal has evolved from religious compliance to becoming a strategic business tool to attract halal-conscious consumers.

Additionally, the author also discovered cases in Malaysia and Indonesia, where a noticeable shortage of qualified personnel in this field has resulted in delays in the halal certification process. This has affected applicants from the aspect of incurred costs and their interest in proceeding with the Halal application. Nevertheless, local MSMEs should perceive halal certification in cosmetics not only as a regulatory requirement, but also as a strategic tool to enhance the quality, credibility, and value of their cosmetic products (Fianto et al., 2025). Previous research on MSMEs has shown that the expectation of achieving higher revenue through the adoption of halal practices serves as a key motivator for these enterprises to pursue halal certification, in addition to religiosity, government support, and consumer demand (Silalahi et al., 2022). This indicates how financial incentives can play a pivotal role in influencing business decisions, where economic gains are often the main concern for businesses.

Similar to the experiences of Malaysia and Indonesia, the issue of manpower inadequacy is one of the complications encountered by the internal officers of the Brunei Islamic Religious Council (MUIB) in the process of releasing their halal certification to applicants (Sulaiman & Hashim, 2021). The long wait for Halal certification approval due to frequent delays in Halal Panel meetings was also mentioned as one of their department's operational inefficiencies.

In addition, the article has also discovered that the delay in obtaining Halal certification in Brunei occasionally comes from the applicant's incompetency in providing the complete application form and other required documents. This affects the flow of the following procedure. Despite the laid-out checklist provided by MUIB to assist in completing documents, the incompetency problem is still visible. Additionally, late payment by applicants also slows down the application procedure (Sulaiman & Hashim, 2021). The unadvanced use of technology in applications such as submission and filing systems could also be the reason for the ineffectiveness that occurred during the process of halal certificate application, as MUIB still requires to receive the form in the state of hard copy. While this study has contributed valuable insights into the



broader Halal certification value chain in Brunei, its scope remains general and lacks specific engagement with sectoral specifications. In contrast, this research provides a more focused and in-depth examination of the procedural complexities surrounding halal certification for cosmetic products. By concentrating on this niche, an increasingly relevant segment, this study addresses a critical gap in the literature that highlights the operational inefficiencies, regulatory ambiguities, and institutional bottlenecks that affect the cosmetic sector. Given the fact that the majority of local cosmetic companies are categorized as MSME, the relevance of obstacles faced by them might be potentially different from that of large-scale international cosmetic companies. This sharper focus on minute-scale companies in Brunei should allow for a more targeted analysis of stakeholder interactions, institutional roles, and systemic barriers, which are often overlooked in generalized studies of the Halal value chain.

These sector-specific challenges are further contextualized by regional insights, such as industry players in East Kalimantan, Indonesia, asserting that the lack of government support and effort might have affected consumers' interest in acknowledging the importance of halal logos on products. Consequently, low demand for halal logos from consumers propels business players to conclude that halal certificates will serve no purpose for their company except for the financial burden it imposes (Prabowo et al., 2015). Research has revealed that certain concepts in Islam are not universally understood even among relatively highly educated people (Aris et al., 2012). This could also mean that even in an Islamic country populated mainly by Muslims, the value of halal certification might also be cloudy for both industry players and consumers. Similarly, the voluntary nature of halal certification for cosmetic products in Brunei may contribute to a comparable mindset among local producers. Without regulatory compulsion or clear market demand, producers may perceive halal certification as an optional and nonessential investment, particularly when weighed against the financial and procedural burdens involved. However, Muslim consumers demonstrate self-restraint in their consumption by adhering to Islamic guidelines and placing trust in halal certification, indicating the growing awareness of their obligation towards religion (Ashraf, 2019).

Prabowo classified factors hindering halal certification into internal and external factors. Internal factors refer to issues that emerge from the organization itself, either from the administrative department or workers. The items affecting the delay of halal certification are a) lack of knowledge and awareness among industry players, b) management constraints, c) financial constraints, and d) type of products. External factors refer to those that emerge from outside the company or organization. The factors are as follows: a) lack of dissemination of information and socialization, b) lack of government role, c) low consumer awareness and demand, d) certification procedure, e) limited supply of raw materials that meet requirements, f) social and cultural constraints, and g) constraints from certifying bodies (Prabowo et al., 2015).

Muhammad et al. (2019) investigated a triangulation analysis between three main stakeholders in Malaysia: halal auditors, halal executives, and halal certification panels. This study has identified six Malaysia's primary challenges in halal certification processes: a) lack of manpower, b) halal auditors' lack of skills and knowledge, c) Problems with MyeHALAL system, d) issues in reviewing halal certification applications, e) lack of proper guidelines in Malaysian halal certification, and (f) competition from the foreign certification body.

A recent study examining the challenges faced by food stall owners in obtaining halal certification identified several key impediments, including difficulties in listing ingredients, negative attitudes and perceptions toward the halal application process, limited awareness of its business benefits, and associated certification fees (Idris et al., 2025). This indicates that such barriers are generally present across different types of businesses, but they are more pronounced in the food sector of Brunei, where obtaining halal certification is mandatory, while for cosmetics, it remains voluntary.

## Research Methods

This study adopts a qualitative research approach to gain an in-depth understanding of the challenges encountered by local cosmetic producers in obtaining halal certification for their products, particularly during the application phase of the halal certification process. The selection

of informants for interviews with local cosmetic producers was based on purposive sampling. Robinson highlighted that “*purposive sampling is intentional selection of informants based on their ability to elucidate a specific theme, concept, or phenomenon* (Robinson, 2014).” Therefore, this specific type of sampling should enable the objective to be achieved rationally and appropriately, as it involves samples with specific knowledge and experience of the subject matter.

Data were collected through semi-structured interviews with local cosmetic business owners. Respondents who were included as interview participants in this study consisted of eight local cosmetic producers who had established their cosmetic companies in Brunei as the Micro, Small & Medium Enterprises (MSMEs). The background profiles of the eight local cosmetic producers are shown in Table 2. As per the ASEAN main portal, Micro, Small, and Medium Enterprises (MSMEs) are organizations or companies with fewer than 100 employees, annual revenues not exceeding \$ B\$5 million, and assets falling below B\$3 million (ASEAN Main Portal 2024). Therefore, according to the definitions (refer Table 1), the existing local cosmetic producers in Brunei are classified as MSMEs.

**Table 1.** Definition of MSME in Brunei as per ASEAN main portal

Country	Micro		Small		Medium	
	Number of Employees	Other Criteria	Number of Employees	Other Criteria	Number of Employees	Other Criteria
Brunei	1-9	Annual Revenue: Less than B\$100,000  Assets: Less than B\$60,000	10-29	Annual Revenue: Less than B\$100,000 to less than B\$1 million  Assets: Less than B\$60,000 to less than B\$600,000	30-99	Annual Revenue: B\$1 million to less than B\$5 million  Assets: B\$60,000 to less than B\$3 million

Source: ASEAN main portal

**Table 2.** Profile background of local cosmetic producers

Profile background of local cosmetic producers				
Informants' codes	Gender	Age	Duration involved in cosmetic business	Main products
D	One Female	25	5 years	Lip Products
G	One Female	36	5 years	Full range of Makeup and Personal Care Products
R	One Female	28	2 years	Perfume
M	One Female	45	3 years	Soaps
S	One Female	31	2 years	Eye Makeup Products
F	One Female	36	16 years	Traditional Herbs, Lotions, Feminine Spray
Y	One Female	37	20 years	Soaps and Beauty Creams
W	Two Males	25 & 27	3 years	Perfume

Source: Author's interview conducted in 2022-2023

Most of the eight respondents who are currently in cosmetic businesses are performing their business through social media platforms such as Facebook and Instagram. Only a few of them run their businesses with physical stores. In other words, these local cosmetic producers or entrepreneurs are not cosmetic distributors for external companies; rather, they are individuals who own and operate their own brands. The participants were initially contacted via phone to request their participation. After obtaining consent, the interviews were scheduled at convenient times. All interviews were audio-recorded with the participants' permission to be transcribed verbatim for

analysis. The interviews were performed in a one-one setting, as this approach was deemed more practical and effective for this study than employing the focus group discussion method. The rationale behind this was to eliminate the possibility of influencing their answers from one informant to another, which would affect the overall shape of the responses and findings.

The questions used during the interviews were based on past research studies available in literature reviews and were designed based on the research objectives of this study. A pilot study was conducted initially to determine if the interview questions generated discussion and relevant information and to verify that the questions did not exhibit a leading nature. To confirm the reliability of the data, the questions were tested on three interviewees, and their understanding towards the questions was measured by their ability to answer the question reasonably. Questions that might have appeared ambiguous to the informant were rephrased and adjusted prior to the interviews. The questions were then submitted to professionals for assessment and feedback.

Content validity was performed to ensure that the interview questions accurately represented the constructs being measured. The study utilized the Content Validity Index (CVI) to evaluate each question and item in both the interview questions and questionnaires for its relevance and clarity, based on expert judgments. The questions were validated by two professional experts specializing in the halal industry. The results of the S-CVI/Ave and S-CVI/UA (refer [Table 3](#)) for the entire scale were [1], surpassing the minimum acceptable value of [0.80] for two experiments, which is in accordance with ([Davis, 1992](#)).

**Table 3.** CVI score analysis of interview instruments

Item	Expert 1	Expert 2	Experts in Agreement	I-CVI	UA
Informants' Background	4	4	2	1	1
B1	4	4	2	1	1
B2	4	4	2	1	1
B3	4	4	2	1	1
B4	4	4	2	1	1
B5	4	4	2	1	1
			S-CVI/Ave	1	
			S-CVI/UA		1

Source: Processed by the authors

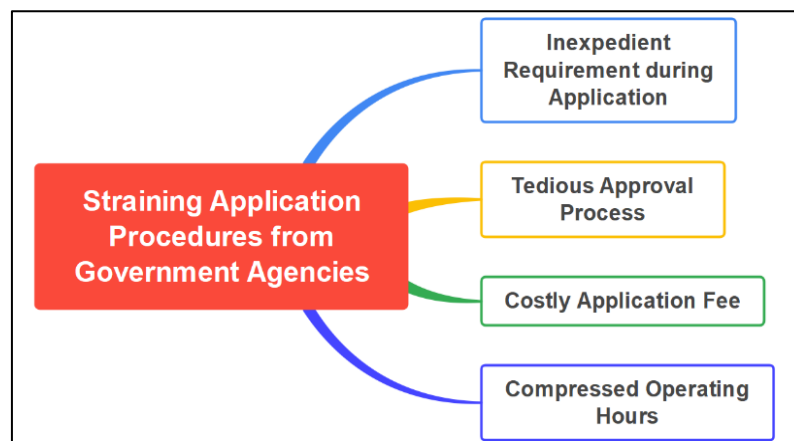
In addition, questions for the interviews were prepared and given to the informants at least two weeks prior to the interview. However, unforeseen questions developed during the interviews. This indicates that the questions provided were semi-structured, as they promoted a narrative mode of expression ([Hiles, 2017](#)). This enabled informants to provide answers using their own words and interpretations ([Willig, 2006](#)). As opposed to prodding informants with predetermined responses, the inquiries were carefully crafted to elicit their thoughts and perspectives on the subject. The study also utilized thematic analysis following the six-phase framework outlined by [Braun \(2006\)](#) to systematically identify, analyze, and interpret patterns across the interview data, providing in-depth insights into the challenges encountered by local cosmetic producers during the process of obtaining halal certification for their products.

This methodological approach ensured that the collected data were both relevant and robust, laying a strong foundation for the subsequent analysis of the challenges faced in obtaining halal certification.

## Results and Discussion

This study discovered that the challenges experienced by local cosmetic producers in obtaining halal certification are primarily caused by the cosmetic product notification (CPN) approval granted by the Department of Pharmaceutical Services, MOH (DPS). This requirement serves as a critical regulatory step and prerequisite that directly impacts a producer's ability to proceed with the halal certification process.

In the context of Brunei's cosmetic manufacturing sector, obtaining halal certification appears to present fewer challenges than securing Cosmetic Product Notification (CPN) approval, which is prioritized due to its mandatory status for product sales. The voluntary nature of halal certification for cosmetic products may further influence producers' motivations to pursue it. Based on interviews with eight informants, four key challenges that contributed to difficulties during the CPN and Halal application process were identified: (a) inexpedient requirements during application, (b) tedious approval procedure, (c) costly application fees, and (d) compressed operating hours (see Figure 1).



**Figure 1.** Challenges encountered during application procedure of CPN and halal certificate for cosmetic products in Brunei

Source: Author own

### Inexpedient requirement during application

In the dynamic world of cosmetics, complying with government regulations is crucial for ensuring consumer safety and satisfaction. However, the path to obtaining government notifications for cosmetics is far from straightforward and marked by intricate challenges. The procedures mandated by government agencies in acquiring approval to obtain authorization for the sale of cosmetics were found to be impractical by some local cosmetic producers, making it difficult to complete the application.

Participant D recounted the complexity of securing two halal supervisors at the original equipment manufacturer (OEM), the facility responsible for the production of their cosmetics. The producer initially thought that she could appoint herself as a halal supervisor; however, this position required a qualified individual to run the task.

Informant D: *"HFCD requires two Halal supervisors from the OEM factory in order to proceed certifying my products with Brunei Halal logo and that is quite difficult to fulfill because I need to find them myself. I did not know that the Halal supervisors need to be someone qualified because I thought I could be the Halal supervisor."*

In addition, informant D observed that the Ministry of Religious Affairs' (MORA) website provided ambiguous guidance regarding the process of obtaining halal certificates, specifically with regard to cosmetics. She was not able to locate the webpage, particularly for the halal cosmetics application; therefore, informant D initiated to send a direct contact via email in an attempt to obtain further information. As a means of streamlining the halal cosmetic application process, the interviewee recommended HFCD to create a webpage under the MORA website dedicated to this purpose with guidelines and a checklist of submission. According to Participant D:

*"My experience with their website was confusing as there were too many buttons to click troubling me to find which is which. In the end, I just emailed MORA and ask for more details and thankfully they replied me by attaching all the requirements needed to get Halal certification for my cosmetic products. If only there is one webpage specifically for cosmetic application so I know what to apply, what to do next and etc."*

Participant G emphasized the difficulty they had in interacting with the MOH to acquire CPN due to discrepancies they discovered in the paperwork required for submission:



*“Issue that we usually struggle with is dealing with MOH in obtaining their approval for our products. Our products have obtained their approval anyways. However, the documentation required by MOH seemed to be inconsistent. For example, last time there was a delay in receiving our products due to a simple mistake written in the form/ document.”*

The Department of Pharmaceutical Services (DPS) ambiguous directive for modification, which resulted in superfluous alterations to the application form, was an additional challenging experience recounted by informant S. This has led to an increase in costs due to shipping fees, delays, and modification of ingredients to be made by the company's OEM. The interviewee claimed that the officers would usually ask for some amendments to the submitted list of ingredients, so it adheres to the Guidelines for Notification of Cosmetic Products in Brunei. However, subsequent to the completion of the specified modification, along with the cost borne for the change, and application was re-submitted to the department, a further amendment to the ingredients was identified, resulting in redundant processes. The cause of what seemingly can be considered back-and-forth processes may have occurred due to the unclear and vague instruction of amendments from the said department. The interviewee further mentioned that any subsequent submission following the modification must be treated as a new application instead of being marked as a follow-up.

Informant S: *“When I send the list of ingredients for approval by the pharmaceutical department, they will usually instruct to modify some ingredients so that it follows Brunei's regulation. However, after the instructed alterations were settled with the factory which cost us an extra charge and applications were resent to the department, another new instruction for other modification were pointed out. Apparently, they missed out some other ingredients. Basically, their instructions were not clear enough. These back-to-back processes resulted to the increase of cost due to shipping and delays. Resending application needs to be submitted by hand also and the application needs to be submitted as a new application.”*

A similar incident was also reported by another source identified as informant F, who struggled to obtain the approval of CPN for her traditional products as repetitive alterations to the ingredients needed to be performed. These traditional products are mainly manufactured without involving any production in any OEM factory; in other words, she handproduces these products. She concurred that approval is considerably simpler for cosmetics produced in a factory, given that the manufacturer can provide ingredient information, including scientific names, in accordance with the DPS specifications. However, she believes that manufacturing cosmetics in a factory, particularly for traditional products, could potentially diminish their inherent value. As a result, she preferred to produce these types of products manually.

Informant F: *Pharmaceutical department sometimes are not helpful as sometimes their instructions were unclear so I would rather hire a third party to handle product documentations. One of my products is still under review in obtaining product notification and it has been going on for 4 years now, the issue is actually on the labelling of the products. MOH used to ask me to cover the labelling for some of my products. I argued to them that I have been trying to settle with MOH about this but they were not being helpful. So, I really hope they could give clearer instructions on this”*

*“I also struggle with getting the product notification for my traditional products as plenty of alterations need to be made repeatedly. It is way easier to get it manufactured in the factory as they can provide along with all the scientific names. However, for me, if my products are manufactured in the factory, somehow, I feel like it will lose its traditional value.”*

Informant F expressed in the excerpt below that the time-consuming and cumbersome procedures that often arise during the application to obtain CPN from the Pharmaceutical Services department hampered the subsequent endeavor of acquiring Halal logo for their cosmetic products:

*“If the MOH approval is already this difficult, how could we move to Halal logo?”*

The prolonged process may potentially lead customers to have a preference towards cosmetics without halal certification owing to the wider availability and easier access to the said goods (Othman et al., 2025). In all likelihood, the fast-evolving market for conventional cosmetics may continue to capture more consumers' attention, as the limited supply of halal-certified cosmetic options may discourage them from seeking them out.

Speaking about the inconsistent requirements from the MOH in obtaining the approval of CPN, which again stems from the back-and-forth process, informant Y also brought up a similar

experience. She also claimed to have received unclear directives to revise the submitted form specifically on the listed ingredients. The informant encountered difficulty in comprehending the directives of the governing body because of the lack of clarity regarding permissible and impermissible practices in cosmetic production. When clarification on the required modification was requested by the informant, the department declined to disclose the informant with an answer on the grounds of confidentiality concerns.

Participant Y: *"Unclear instructions on amendment. No clear justification on what to amend. Unclear on what is allowed and what is not allowed in the cosmetic production. When we asked for clarification, MOH mentioned that the information needed cannot be disclosed. We didn't even know what to be amended. When we asked them to specify the issue, they would answer 'that one you have to ask someone else'"*

Another issue raised by interviewee Y was the request to furnish DPS with precise information on traceability, origin of cosmetic ingredients, and the ingredients' scientific names for the cosmetic products they put for CPN approval. Obtaining this scientific information is challenging for the applicant, who lacks a scientific background, because she manually produces some of their cosmetic products without participating in manufacturing facility production, which commonly provides documentation containing comprehensive details of cosmetic products manufactured in their manufacturing facilities or factories.

Informant Y: *"MOH requests on specific traceability and origin of some ingredients such as Manjakani or sunflower which is difficult to attain. For non-science people, this is irrelevant to request us to provide. Lab test is not available therefore slowing down subsequent processes."*

In essence, the ambiguous directive issued by the governing body, the Department of Pharmaceutical Services, regarding the modification of ingredients, primarily contributes to the inefficiency of the registration process for cosmetic products intended for sale. This directive requires the resubmission of CPN applications and documentation, which inevitably results in further back-and-forth processes. Laboratory tests mandated by the DPS are not accessible in Brunei, thereby compelling domestic cosmetic manufacturers to outsource production to original equipment manufacturers (OEMs) located overseas, which are able to furnish the department with the necessary documentation. This has imposed difficulty in attaining CPN approval for local cosmetic producers who hand-produced their cosmetic products, such as soap, as CPN requires precise details, including the ingredients' traceability and its origin, along with the scientific names. As a result of the redundant submission process, expenses have increased owing to the modification of ingredients to be made by the OEM, shipping fees, and delay of product arrival. Additionally, MORA's website was determined to be strenuous, as there is an absence of dedicated webpages to apply halal certification for cosmetics. All information was procured through direct communication via email with the HFCD. Furthermore, it was also disclosed that two qualified halal supervisors from the cosmetics manufacturing facility are required to attain a halal logo for cosmetic products. The informant recognized that it is challenging to meet this requirement.

### **Tedious approval process**

The informants also described the tedious and protracted application process they endured in an attempt to acquire approval from authorities. Informants D, G, and R felt that the mandatory hardcopy submission to the DPS for the CPN application is a hassling experience. They would appreciate the option to complete the submission online.

Informant D: *"I really hope there is an easier access to the application, maybe through website so we can just do online application."*

Informant G: *"I hope all these permissions and approvals could be made streamline, that would be easier for us. Make it online, no need to do everything manually. Sometimes when we went down to their office, the officers handling the approval matter were not there thereby slowing everything down."*

Informant R: *"The government agencies should also do online alternatives for this kind of application."*

Informant F expressed her frustration with the requirement to attach a compact disk (CD) to store all documentation related to the CPN application. According to her, this specific procedure is considerably outdated and inconvenient, given the fact that the CD needs to be handed for each application, irrespective of whether or not this is the initial submission.

Informant F: *"They even ask for CD to complete the application which is quite outdated"*

In addition, informants G and Y concurred that obtaining the Halal certificate from MUIB and CPN approval from the MOH requires an excessive number of prerequisites, resulting in a prolonged process to receive the certification of approval.

Informant G: *"Too many processes, even in the food industry. Of course, we do not mind to get our products certified Halal, but putting the application up online would be much better and easier. Especially when we are importing the same products every time. A friend of mine who is working in the F&B industry did mention that their experience in getting Halal certification for their food products was difficult and demanding in comparison to the process of acquiring MOH approval. This is because Halal certification requires several more procedures in scrutinizing e.g., checking the kitchen, premises and etc. While the MOH approval only requires documents on the ingredients."*

Informant Y: *It is Hard to obtain MOH, DPS approval for product notification. It is not that easy as they keep making us to do back and forth process. It took too long to get them to approve. Sometimes 3 months, 6 months up until one year."*

These findings align with recent research that similarly identifies the challenges faced by micro-enterprises operating in the food industry due to the lack of online payment options (Kifli, 2022). One participant voiced their dissatisfaction with the necessity to visit multiple locations to submit their applications, collect approval letters when they become available, and then proceed to the upper levels of the buildings to make payments. The respondent expressed concern that senior citizens would find the cash physical payment system inconvenient. As a result, she suggested that applicants be offered the option to pay online.

In summary, the tedious approval process has impacted informants, who are local cosmetic producers. Specifically, they noted that CPN approval and halal certificate processes would frequently require a lengthy amount of time to be finalized. The prerequisite to providing each application with a compact disk (CD) is deemed inconvenient by the sources. Furthermore, they held the view that in this digital age, it is particularly relevant to permit digital submissions of applications, as opposed to limiting them exclusively for physical submissions.

### **Costly application fee**

Based on the collected responses, it can be inferred that the informants considered the application fee to be comparatively steep, considering their status as MSMEs' business participants.

According to informant G, CPN applied through the Department of Pharmaceutical Services must be renewed annually even when the ingredients of the cosmetic product remain unchanged. The renewal of CPN is considerably expensive considering the extensive color palette commonly found in cosmetics. For each shade of color, a separate CPN certificate is necessary, and an associated fee is incurred for each one. The source explained:

*"The approval itself must be renewed annually even when the product's ingredients stay the same. Different color of lipsticks will have different approval letter from MOH. Approval letter will be charged per product. if I am not mistaken \$50. So around \$1k only for MOH approval that needs to be renewed every year. This process is quite inconvenient for us producers as the ingredients are not altered but renewal of MOH approval has to be applied every year."*

A comparable situation also occurred for informant R, whose main product is perfume, where one scent is acquired to obtain one CPN certificate. In other words, 10 different scents are required to apply 10 CPN certificates individually for each scent. The cost of this procedure is unquestionably weighted for local cosmetic producers, given that they are mostly comprised of MSME business participants. She proposed that the certificate should be issued by product category instead of scent or shade.

Informant G: *"It would also be less burdening for us business players if the CPN approval or Halal certificate could be issued per types of products. Like instead of 1 scent for 1 Halal application, it would be more convenient if one CPN or Halal application could be made for the same kind of products."*

In general, according to the interviewees, the costly application fee lies in the mandatory annual renewal fee of CPN, irrespective of the absence of any ingredient changes in the cosmetic products. The high cost of the fees has been further exacerbated by the requirement to issue CPN

approval and halal certificates for each product of different shade of colors for makeups or different scents, particularly in the perfume context. Consequently, the informants suggested that the application of CPN and Halal certificates could be issued by product category.

Figure 2 shows the reference for notification fees stated in the Guidelines for Notification of Cosmetic Products in Brunei Darussalam, 3<sup>rd</sup> Edition, 2015.

NOTIFICATION FEES			
35. A notification fee is payable for each cosmetic product <b>upon submission</b> of the notification form.			
The fees are shown in the following table:			
Fees for Notification of Cosmetic Products			
(1)	(a)	New Product Notification	\$10/ year
	(b)	Product variant	\$10/ year
	(c)	Palette(s) in a range of one product type	\$10 each (first 5 colours)/ year \$5 each (subsequent colour)/ year
(2)	Renewal of Cosmetic Product Notification*		\$10/ year
(3)	Application to amend Cosmetic Product Notification		No charge

\*Renewal of Cosmetic Product Notification – Annual renewal fee to maintain the notification of each cosmetic product.

**Figure 2.** Notification fees for cosmetic products in Brunei

Source: Guidelines for notification of cosmetic products in Brunei Darussalam, 3<sup>rd</sup> Edition, 2015.

### Compressed operating hours

In a changing world of services, the efficiency of government counters plays a crucial role in ensuring effective service delivery. One area that deserves attention is the operating hours of these counters, which can negatively impact the smooth submission of applications. As governments strive for optimization and cost effectiveness, they may unintentionally overlook the consequences of operating hours on accessibility and timely processing across sectors.

The reduced availability of government counters presents a challenge for citizens and seems to hamper the effectiveness of public service agencies. This exploration examines how limited operating hours can affect the application submission process, creating barriers for individuals and businesses seeking assistance and approval from the government.

As stated in the first challenge, Inexpedient Requirement during Application, where the back-and-forth process during the application procedure was repetitively mentioned by the informants, the short operating hours for the submission of applications appear to be the cause of this issue.

According to informant S, operating hours for the CPN form submission are restricted to only three days a week up until 3pm. Due to this constraint, she had to revisit the department several times, and as a working individual, the informant had to apply for multiple leaves of absence from her job to allow the completion of the CPN application. She also conveyed her discontent with the frequent unavailability of the department's call center. The source shared her experiences as follows:

*"The counter for product notification's application is only opened for three days in a week, Monday, Tuesday, and Wednesday with limited duration of operating hours so sometimes we need to come back for multiple times which takes longer time to complete. I had to take multiple leaves just to complete the application. Call center is unreachable most of the time."*

This compressed schedule forces applicants to navigate the process in bits and pieces, significantly extending the overall completion time and adding unnecessary complexity to an already-bureaucratic process. Clearly, such restricted counter-hours do not serve the public's best



interests when it comes to the efficient and timely completion of important applications. Informant Y added:

*“Short operating hours at PD for application submission. I think the counters will only be open around 8-11am. Tuesday & Thursday. There will always be long hours of waiting with other applicants due to this short hour”*

By far, the sources only shared their counter experiences at the Department of Pharmaceutical Services (DPS), and none mentioned anything about the occurrence of Halal Division Food Control (HFCD) in relation to the application for halal certificates. This is due to the fact that none of these informants have actually submitted the Halal certification paperwork for cosmetic products directly to the office of HFCD. Only one of them had put forth an inquiry on halal logo applications to the department, and the inquiry was made via email contact only.

## Discussion

This research directly addresses the overarching question posed in the introduction, "What are the specific challenges faced by local cosmetic producers in obtaining halal certification, and what are their experiences and views regarding these obstacles during the application phase?". The findings reveal that key challenges include bureaucratic inefficiencies, financial limitations, and perceived lack of clear guidance. Notably, the most significant bottlenecks were associated not directly with the halal certification itself but with securing the prerequisite Cosmetic Product Notification (CPN), which must be obtained prior to submitting a halal application for cosmetics. This can be observed through the checklist of Halal permit applications for cosmetics in Figure 3, where the submission of the CPN acknowledgement letter is mandated.

**BAHAGIAN KAWALAN MAKANAN HALAL, JABATAN HAL EHWAL SYARIAH, KEMENTERIAN HAL EHWAL UGAMA  
NEGARA BRUNEI DARUSSALAM**

**SENARAI SEMAK PERMOHONAN PERMIT HALAL**

**C: Dokumen-Dokumen yang wajib bagi permohonan produk-produk seperti di bawah :**  
C : Required Documents for applications of products as below :

<input type="checkbox"/>	<b>Surat Pengakuan Notifikasi Produk (Bagi produk ubat tradisional dan tambahan kesihatan)</b> <i>Product Notification Acknowledgement Letter (Specifically for Traditional Medicine and Health Supplement products)</i>
<input type="checkbox"/>	<b>Amalan Pengilangan yang baik (Bagi produk perubatan, produk ubat tradisional dan tambahankesihatan)</b> <i>Good Manufacturing Practices (For medicine, Traditional Medicine and Health Supplement)</i>
<input type="checkbox"/>	<b>Surat Pengakuan Notifikasi Produk Kosmetik (Bagi produk kosmetik)</b> <i>Cosmetic Product Notification Acknowledgement Letter (For cosmetic products)</i>

**Figure 3.** Checklist for halal permit application

Source: Ministry of Religious Affair, n.d.

Interestingly, while neighboring countries have also faced similar challenges in obtaining halal certification for cosmetics, Brunei's situation appears to be at a more foundational level, with the primary obstacles arising specifically from procedures with the Department of Pharmaceutical Services (DPS) rather than from the Halal application criteria itself. This indicates that Brunei faced a unique preliminary challenge situated within the pre-halal certification phase. On the other hand, countries such as the European Union face complex regulatory issues for cosmetic products, particularly due to inconsistent interpretations of safety standards (European Union, 2009). Although mandatory, the Cosmetic Product Safety Report (CPSR) varies significantly because safety assessors have different qualifications and experiences. The ban on animal testing further complicates matters, requiring the development of alternative safety validation methods that are not uniformly standardized across member states.

In Japan, the pre-market approval process is equally stringent, involving the acquisition of two separate licenses: the cosmetics manufacturing license and the cosmetic marketing license (Trial Experts Credevo, 2022). These licenses require strict compliance with Good Quality Practice (GQP) and Good Vigilance Practice (GVP) in addition to procedural complexity. The need to

coordinate with multiple prefectural authorities increases the administrative workload and prolongs the registration timeline, making it difficult for applicants to complete the submission process.

Brazil, particularly in the state of Sao Paulo, presents challenges, primarily for micro and small cosmetic enterprises. These include bureaucratic export procedures, unstable exchange rates, delayed payments, tariff barriers, and high logistical costs (Farina 2018). Additionally, limited government incentives and the difficulty of securing capital or adjusting products to meet consumer demand further hinder international expansion.

The challenges encountered by the aforementioned countries largely revolved around stringent safety requirements for producing cosmetics that are objectively similar to the CPN in Brunei, although Brunei's CPN remains less advanced in scope. Some of the requirements, such as GVP and the cosmetics marketing license, have not yet been introduced in Brunei, inferring a significant contrast with developed countries. The issues observed in Sao Paulo pertaining to bureaucratic export procedures, unstable exchange rates, tariff barriers, etc. are also experienced in Brunei (Halim, 2025). However, these challenges are not discussed in this paper because they fall outside the scope of this research. Instead, this study highlights the halal application procedure and the process of submitting relevant documentation to obtain halal certificates for cosmetic products.

The foundational level of challenges faced by cosmetic producers in Brunei may reflect Brunei's lack of a structured mechanism to enhance product credibility and its global market readiness. The study's outcomes suggests that Brunei cosmetic industry is still in its developmental phase owing to the fact that most local cosmetic producers are among MSMEs. Therefore, it can be inferred that Brunei's emphasis on the cosmetic industry is oriented toward nurturing local growth rather than navigating international compliance standards.

Building on this observation, this study's outcomes contribute to the existing body of knowledge by providing an in-depth understanding of the practical impediments to halal certification within the cosmetic industry, particularly from the perspective of local producers in Brunei. For instance, the observation that producers frequently cited extensive documentation requirements and protracted waiting periods as major challenges provides empirical support for the notion that administrative burden significantly affects small and medium-sized enterprises (SMEs) seeking regulatory approvals, as previously discussed by Muhammad (2019), Mazril Suzaimi et al. (2023), and Prabowo et al. (2015).

## Conclusion

This study aimed to investigate the experiences and challenges faced by local cosmetic producers in Brunei in obtaining halal certification for their products. The findings indicate that the primary obstacle does not lie in the halal certification process itself, but rather in securing mandatory Cosmetic Product Notification (CPN) from the Department of Pharmaceutical Services. Although Halal certification remains voluntary, the requirement for CPN approval creates a significant procedural bottleneck that affects SMEs' ability to proceed with halal applications efficiently. Based on interviews with eight informants, four key challenges were identified: unclear application requirements, lengthy approval procedures, high costs, and limited counter-operating hours. The important implications of this study are significant for policymakers to streamline CPN procedures and provide clearer guidance to support halal adoption after obtaining approval from the CPN. However, the limitation of this study lies in the relatively small number of MSMEs involved, which limits the generalizability of the findings. Furthermore, the study concentrated primarily on the application phase without examining the challenges that may occur post-certification. Future research could examine best practices from countries with more streamlined halal certification systems, and explore the challenges encountered by local cosmetic producers beyond the application phase to further support local industry development.

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