
RESEARCH ARTICLE

Interfaith Marriage in Indonesia: The Controversy between MUI Fatwa and Surabaya District Court Decision

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ABSTRACT

This article is motivated by the issue of the Surabaya District Court's decision to legalize interfaith marriage. This issue has garnered a lot of opinions and criticism because it is considered to be not in line with the MUI fatwa that has been established. Therefore, the focus of this study is firstly on the legal basis of the MUI in establishing interfaith marriage, secondly on the considerations of the Surabaya District Court judge in deciding on interfaith marriage, and lastly on the legality of interfaith marriage in law and human rights. Using a sociological and normative approach, it can be concluded that the Surabaya District Court decision was rejected by various groups, especially the MUI, which was deemed to be no longer in line with the fatwa that had been established since long ago. Regarding this issue, the MUI will hold a meeting with the legal commission to discuss this issue. Nevertheless, the Surabaya District Court remains on the decision they issued because they have a basis for the decision. This study obtained data sources from secondary data by processing data from primary legal materials and secondary legal materials in the form of laws, civil procedure law books, and opinions of legal experts and theses. The results of this study are that interfaith marriage is recognized by state law if it is recorded in civil registration, as stipulated in Article 37 of the Population Administration Law, but it is not valid according to religion.

KEYWORDS

Interfaith marriage, MUI fatwa, legality, courts, human rights

ARTICLE INFORMATION

ACCEPTED: 02 May 2023

PUBLISHED: 08 May 2023

DOI: 10.32996/ijlps.2023.5.3.1

1. Introduction

Marriage is a bond between a husband and wife with the aim of creating a happy and prosperous family in accordance with the demands of the Almighty God. The form of marriage is not always the same, depending on the place, culture, and origin. (Clamar, 1991) Marriage based on religion aims to create a peaceful and prosperous relationship, usually referred to as *sakinah mawaddah* and *warahmah* in Islam, and another goal is to marry those who have the same religion. Marriage is regulated in the Marriage Law, but interfaith marriage is not regulated in the law. (Halim & Ardhani, 2016; Van Niekerk & Verkuyten, 2018)

Interfaith marriage is a marriage that raises many different legal interpretations between one group and another. Some allow it, while others strictly forbid it. There is actually a study of different interpretations aimed at handling cases like this, which is the Indonesian Ulama Council (MUI), which issues fatwas classified into four areas: belief, social, cultural, and food and drugs. The fatwas issued by MUI are also general in nature because this institution accommodates all Islamic groups in Indonesia, such as NU, Muhammadiyah, and others. (Hedi et al., 2017) In determining fatwas regarding existing problems, MUI must consider legal sources such as the Quran, hadith, *ijma*, and *qiyas*. Regarding interfaith marriage, MUI has clearly explained that interfaith marriage is forbidden and prohibited for various reasons and has a significant impact on the social life that will be lived, such as issues of rights and obligations, inheritance, and child custody. (Ilham, 2020; Jalil, 2018)

Based on the current reality, it is suspected that there are many interfaith marriages happening, which invite a lot of debate among the people and often cause unrest in the community. So far, various interpretations have emerged, some prohibiting it and some justifying it with several considerations of freedom and public interest. In response to this issue, MUI deems it necessary to establish a fatwa on marriage to serve as a guideline. (Yunus & Aini, 2020)

According to the fatwa issued by the Indonesian Ulema Council (MUI) with the number 4/MUNAS VII/MUI/8/2005 on Interfaith Marriage, the establishment of the fatwa, which was approved by Commission C on Fatwa, resulted in two main points. Firstly, interfaith marriage is considered haram (forbidden) and invalid, and secondly, marriage between Muslim men and women from the People of the Book (Ahlul Kitab), according to qaul mu'tamad, is forbidden and invalid as well. (Elmali-Karakaya, 2022) The fatwa issued by MUI is based on religious texts, including the Quran, Hadith, and fiqh principles, and MUI must also consider the opinions of scholars and experts in Islamic jurisprudence by examining the evidence on the issue.

2. Literature Review

In QS al-Baqarah/2:221, Allah SWT commands not to marry idolatrous women before they believe. Allah SWT emphasizes that a female slave who believes is better than an idolatrous woman, even if she appears attractive. Similarly, for men, Allah SWT forbids marrying a female believer to an idolatrous man before he believes. This is because idolaters will lead to hell, while Allah SWT invites to paradise with forgiveness and His permission. Therefore, Allah SWT explains His verses to humans so that they can learn from them. (Bernheimer & Rippin, 2018)

From this verse, it is already very clear and relevant to be used as the legal basis for the fatwa issued by MUI. Regarding the hadith of the Prophet, he explained that a woman can be married for four reasons: (1) because of her wealth, (2) because of her lineage, (3) because of her beauty, and (4) because of her religion. Therefore, hold firmly to a woman who embraces Islam; if not, your hand will be destroyed (Hadith narrated by Abu Hurairah). As for the explanation of the Fiqh principle, preventing harm takes precedence over bringing benefits. (Arkoun, 2003)

From this hadith and the explanation of fiqh principles, it is clear that interfaith marriage is strongly discouraged in Islam as it is considered to bring harm. That is why the fiqh principle emphasizes preventing harm over seeking benefit. All agreements refer to and consider the impact that will arise from interfaith marriage. In addition to being based on the Quran and Hadith, the MUI fatwa is also based on the National MUI VII consultation, held on 19-22 Jumadil Akhir 1426 H or 26-29 July 2005. The consultation was based on four considerations. *First*, there is a suspected high number of interfaith marriages. *Second*, interfaith marriage not only invites debates among fellow Muslims but also often creates unrest in society. *Third*, there is a growing idea that justifies interfaith marriage in society under the pretext of human rights and benefits. *Fourth*, in realizing and maintaining the tranquility of family life, MUI deems it necessary to establish a fatwa on interfaith marriage to serve as a guideline. (Muntaqa, 2020)

Therefore, MUI's prohibition of interfaith marriage is an effort and a guideline for society to avoid actions that trigger the emergence of damage in the order of life. Various damages resulting from interfaith marriage, as mentioned above, can be used as a benchmark for all components of society to avoid actions that will cause harm both individually and globally.

Interfaith marriage has been a topic of debate and controversy in Indonesia, particularly in terms of its legality. The fatwa (religious edict) issued by the Majelis Ulama Indonesia (MUI) and the decision of Surabaya District Court have been at the forefront of this debate. The MUI fatwa regarding interfaith marriage is based on Islamic law and prohibits Muslims from marrying non-Muslims, with the exception of a few specific cases. (Amri, 2020; Arifin, 2019) The fatwa has been criticized for its strict interpretation of Islamic law and for not taking into account the diversity of beliefs and practices among Muslims.

On the other hand, the decision of Surabaya District Court allows interfaith marriage as long as it is registered with the civil authorities. The court's decision is based on Indonesia's civil law and its commitment to pluralism and religious freedom. However, the decision has also been criticized for going against Islamic law and for potentially causing confusion and conflict among Muslims. (Nasir, 2022)

Several studies have examined the legal and social implications of interfaith marriage in Indonesia. One study found that while interfaith marriage is legal according to civil law, it remains controversial and can lead to social and familial tensions. Another study found that the MUI fatwa has created confusion and uncertainty among Muslims, especially those who are in interfaith relationships or considering interfaith marriage.

The debate over the legality of interfaith marriage in Indonesia highlights the complex relationship between religious and civil law, as well as the challenges of balancing religious traditions with modern concepts of human rights and individual freedoms. Further research is needed to better understand the legal, social, and cultural factors that shape attitudes towards interfaith marriage in Indonesia.

3. Methodology

This research utilizes a combination of literature study and law study to analyze the legality of an interfaith marriage between the fatwa of the Majelis Ulama Indonesia (MUI) and the decision of the Surabaya District Court. The literature study is conducted to gather relevant sources, such as academic articles, books, and other literature related to the topic. This method is used to provide an understanding of the background, concepts, and theories related to the legality of interfaith marriage in Indonesia.

Meanwhile, the law study is conducted to analyze the legal aspect of the issue, specifically the fatwa of MUI and the decision of Surabaya District Court. This method is used to examine the legal framework and the interpretation of the law related to interfaith marriage.

The research will use a qualitative approach, which aims to explore the meanings and interpretations of the legal framework and the fatwa of MUI related to interfaith marriage. The data collection method for the literature study will be conducted through online databases, academic articles, and books, while for the law study, data collection will involve reviewing legal documents related to the issue, including the fatwa of MUI and the decision of Surabaya District Court.

The data collected will be analyzed using a content analysis method, which involves identifying, categorizing, and interpreting the themes and patterns in the data. This method will be used to compare and contrast the legal framework and the fatwa of MUI related to interfaith marriage with the decision of the Surabaya District Court.

4. Results and Discussion

There are many cases that occur in society regarding interfaith marriage, as found in several District Courts (PN) related to applications for interfaith marriage. An example is the Surabaya District Court which granted an application for interfaith marriage with case number 916/Pdt.P/2022/PN Sby on April 26, 2022, between Rizal Adikara and Eka Debora Sidauruk. (Cahaya, 2018). The Surabaya court decision was based on Articles 35 and 36 of the Republic of Indonesia Law Number 23 of 2006 concerning Population Administration which states that marriage registration, as referred to in Article 34, also applies to: (a) marriages established by the court; and (b) foreign nationals' marriages carried out in Indonesia at the request of the relevant foreign nationals. Then Article 36 explains that if the marriage cannot be proven by a Marriage Act, marriage registration is carried out after a court decision is made. This fact reveals a legal loophole that is exploited, causing several norms too often not function. (Islamiyati, 2017)

The reason for the judge's consideration of the decision was the disclosure of juridical facts in the trial that the applicant had agreed and based on their own will without coercion from others and had obtained the approval and blessing of their parents and agreed to form a happy, eternal, and God-based household. Interfaith marriage is not listed in the Marriage Law, but the applicant has the right to form a family, have offspring, and settle in their beliefs in accordance with Law No. 39 of 1999 concerning Human Rights Article 10 Paragraph 1, which states that every person has the right to form a family and continue their offspring through a legitimate and free will marriage. However, looking at Article 2 of the Marriage Law, a valid marriage must be based on the same religion, so there is no way for those who want to carry out interfaith marriages. (Jatmiko et al., 2022; Suhasti et al., 2018) Therefore, with the presence of 2 witnesses and in the presence of the registration officer (Dispendukcapil), interfaith marriage can be carried out, and these three things become the basis for the Surabaya PN Court Decision regarding interfaith marriage.

The controversy surrounding the validity of interfaith marriage in Indonesian law can be seen in several regulations related to such marriages. First, the Mixed Marriage Regulation (GHR) No. 158 of 1898 Articles 1, 6, and 7 explicitly regulate interfaith marriage, even stating that religious differences cannot be used as a reason to prevent the marriage. In Law No. 1 of 1974, the basis for marriage is Article 2 paragraph 1, Article 8 letter f, and Article 57, which have resulted in different opinions and understanding regarding interfaith marriage in Indonesia. Explanations regarding these three articles can be found in the Compilation of Islamic Law, Article 40 letter c and Article 44, which explicitly prohibit marriage between Muslim men and non-Muslim women. Article 40 letter c of the Compilation of Islamic Law states the following; Marriage between a man and a woman is prohibited under certain circumstances:

- a) The woman is still bound in marriage to another man.
- b) A woman who is still in her waiting period (iddah) with another man.
- c) A woman who is not of the Islamic faith. (Jatmiko et al., 2022; Wahyuni et al., 2022)

In article 40 c, it is explicitly stated that marriage between Muslim men and non-Muslim women (whether Ahl al-Kitab or not) is prohibited. Therefore, this article explains that non-Muslim women, regardless of their religion, cannot be married to Muslim men.

Meanwhile, in article 44, it is stated that a Muslim woman is prohibited from marrying a non-Muslim man. This article explicitly prohibits marriage between Muslim women and non-Muslim men, whether they are categorized as Ahl al-Kitab or not.

Finally, in article 60 of the Compilation of Islamic Law, it is mentioned that the prevention of marriage aims to avoid marriages that are prohibited by Islamic law and legislation. The prevention of marriage can be done if the prospective husband or wife does not

meet the requirements for marriage according to Islamic law and legislation. (Ibad, 2019) This article explicitly reinforces the prohibition of interfaith marriage.

The Supreme Court has decided that there is a legal void in the regulation of interfaith marriages that cannot be justified. If allowed, interfaith marriages will have negative impacts on social norms and laws in society and religion. Therefore, based on Supreme Court Decision No. 1400/K/Pdt/1986, the Civil Registry Office is allowed to conduct interfaith marriages. (Indonesia, 2022) The Supreme Court provides a legal solution for interfaith marriages by stating that interfaith marriages can be accepted in the Civil Registry Office as the only authorized institution to carry out requests where the two prospective spouses are not Muslims. This decision is a legal solution to fill the legal void because it is not explicitly stated in the Marriage Law. Therefore, Supreme Court Decision No. 1400/K/Pdt/1986 can be used as jurisprudence, so it can be applied in resolving interfaith marriage cases as one of the legal sources that apply in Indonesia. (Islam, 2014)

The essence of the Jurisprudence of Supreme Court Decision Number 1400/K/Pdt/1986 is as follows: even though the Petitioner is a Muslim and according to Article 63 paragraph 1 letter a of Law Number 1 of 1974, court intervention when necessary is the authority of the Religious Court, but because the rejection of the marriage is based on religious differences, the basis for rejection does not prohibit marriage as regulated in Article 8 of Law Number 1 of 1974. (Jaenudin, 2020; Maslul, 2014) In addition, because the aquo case is not included in the cases referred to in Article 60, paragraph 3 of Law Number 1 of 1974, the authority to handle such cases should be in the District Court and not in the Religious Court. (Yunus & Aini, 2020)

Law Number 1 of 1974 does not regulate the prohibition of marriage due to religious differences, and this is in line with Article 27 of the 1945 Constitution, which states that all citizens have equal standing in the law, including the same right to marry with fellow citizens even though they have different religions. This principle is also in line with Article 29 of the 1945 Constitution, which guarantees freedom for every citizen to embrace their own religion.

Nevertheless, because interfaith marriage is not regulated in Law Number 1 of 1974 and also not regulated in colonial product laws, and because there is a legal vacuum in facing the aquo case, the Supreme Court of Indonesia believes that the legal vacuum cannot be left because Indonesian society is pluralistic/heterogeneous and there are interfaith marriages in the reality of life in Indonesia. (Suma & SH, 2015) Allowing this legal vacuum will have negative impacts on social and religious norms and laws. Therefore, the Supreme Court of Indonesia believes that there must be a legal solution for interfaith marriage that is in accordance with social needs and applicable norms.

Based on jurisprudence, interfaith marriage can be carried out by registering the marriage at the Civil Registry Office. (Hutapea, 2011; Leeman, 2009) However, the Civil Registry Office may still refuse to register the marriage based on Article 21 of the Marriage Law, which prohibits interfaith marriage. If this happens, the Civil Registry Office will issue a written rejection letter which can then be taken to court to decide whether the rejection is appropriate or not. (Hutapea, 2011)

Regarding interfaith marriage, Musdah Mulia was the first woman to be appointed by LIPI as a Research Professor in the field of Religious Lectures at the Ministry of Religious Affairs in 1999. In her inauguration speech, she discussed the portrayal of women in religious lectures as a reconstruction of Islamic thought towards an egalitarian and democratic society. (Mulia, 2004, 2008)

In the matter of interfaith thoughts, Musdah Mulia stated as follows: "In conclusion, all opinions related to the issue of marriage between Muslims and non-Muslims or interfaith marriage are only a matter of *ijtihad*. There is no evidence in the form of Quranic texts and hadiths that explicitly and definitively prohibit or allow it. According to the *fiqh* rule, the absence of evidence itself is proof. That is, if, in a matter, there is no clear text that prohibits or commands, then it is returned to the original rule. One of the *fiqh* rules states that in matters of *muamalah*, such as marriage, the original rule is *mubah* or permissible.

Musdah Mulia's statement indicates that, in her view, Muslim and non-Muslim marriages are allowed. However, the context offered by Musdah Mulia does not consider the possible negative impacts that may arise from interfaith marriage, such as the inability to record marriages at the Office of Religious Affairs (KUA), the uncertainty of the child's education as to whether it follows the father's or mother's religion, and also the inheritance rights of children in the future. (Nelsen, 1990)

In the context of interfaith marriage in Indonesia, there are differing views between the Fatwa of the Indonesian Council of Ulama (MUI) and the laws of the country. MUI declares that in deciding whether interfaith marriage is allowed or not, religious texts such as the Quran, Hadith, and Islamic legal maxims must be considered. (Tobroni, 2015) MUI also examines the opinions of scholars and experts in Islamic jurisprudence and relevant texts related to interfaith marriage. (Yunus & Aini, 2020) However, even though interfaith marriage is recognized by the state and recorded in civil records in accordance with Article 37 of the Administration of Population Law, it remains invalid according to Islamic law. (Nasir, 2020)

The opinion of Musdah Mulia shows that, in her view, Muslim-non-Muslim marriages are allowed because there is no clear prohibition or permission in religious texts. However, Musdah Mulia's context does not take into account the possible negative impacts of interfaith marriage, such as the inability to record the marriage in the Office of Religious Affairs, ambiguity in the

religious education of children, and also the inheritance rights of children in the future. Therefore, controversies surrounding interfaith marriage in Indonesia continue to be a topic of discussion and debate among the public and experts.

5. Conclusion

In Indonesia, the issue of interfaith marriage has become an ongoing topic of debate between the fatwa (Islamic legal ruling) of the Indonesian Ulema Council (MUI) and state law. The MUI's fatwa on interfaith marriage is based on religious texts such as the Quran, hadith, and fiqh principles. The MUI also considers the opinions of imams and fiqh experts and relevant religious texts before deciding whether such marriages are allowed or not. On the other hand, state law recognizes interfaith marriage if it is registered in the civil registry, in accordance with Article 37 of the Law on Population Administration. However, despite legal recognition, interfaith marriage is still considered invalid under Islamic law. Some argue that Muslim-non-Muslim marriages are permissible because there is no clear prohibition or permission found in the texts. However, this viewpoint does not take into account the potential negative consequences of interfaith marriage, such as difficulties in registering marriages with the Religious Affairs Office, ambiguity in religious education for children, and inheritance rights for children in the future. As a result, the controversy surrounding interfaith marriage in Indonesia remains an ongoing topic of discussion and debate among society and experts

Funding: This research received no external funding.

Conflicts of Interest: The authors declare no conflict of interest.

Publisher's Note: All claims expressed in this article are solely those of the authors and do not necessarily represent those of their affiliated organizations, or those of the publisher, the editors and the reviewers.

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