



Overview of *Zakat* practices around the world

Maya Hammad, International Policy Centre for Inclusive Growth (IPC-IG)



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Overview of Zakat practices around the world

By Maya Hammad

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**OVERVIEW OF ZAKAT
PRACTICES AROUND THE WORLD**

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1. INTRODUCTION

Zakat, an obligatory donation, is the third of the five main pillars of Islam and originates from the Arabic word meaning ‘to purify’, as it is a mechanism to purify the wealth of the rich and redistribute it to achieve social justice (Saidurrahman 2013; Kailani and Slama 2020). *Zakat* is only paid out once a person’s wealth reaches the *Nisab*—the minimum amount that one needs to have before being obliged to pay *Zakat*—which is the equivalent of 85 g of gold over the course of a year and after the deduction of all personal expenses (Machado, Bilo, and Helmy 2018). Wealth that is liable for *Zakat* includes gold and silver, agricultural products and livestock, business assets, bank accounts, financial assets and rentable buildings (Hassan 2010). *Zakat* is set at 2.5 per cent of all productive wealth and is meant to be distributed to eight categories (*Asnaf*) of people listed in the *Quran* as having the right to receive it: the poor, the needy, new converts to Islam, slaves and captives, the debt ridden, stranded travellers, *Zakat* administrators and ‘for the sake of God’ (*Quran* 9:60).

The implementation of *Zakat* and its use in social protection differ extensively from one country context to the next. For this purpose, the International Policy Centre for Inclusive Growth (IPC-IG) has collaborated with the United Nations Children’s Fund (UNICEF) Afghanistan Country Office to produce this paper, which aims to **represent the different modalities of how *Zakat* collection and distribution systems operate in the world**. It is a beneficial guiding document for governments in Muslim or Muslim-majority countries considering the implementation of *Zakat* through State-led mechanisms.

The paper is divided into three main sections. First, it presents an overview of *Zakat* in Afghanistan. Second, the paper provides an overview of *Zakat* practices around the world, highlighting: (i) the management and institutional arrangements of *Zakat* systems—i.e. whether they are State- or charity-led, centralised or decentralised; (ii) the financing of *Zakat* systems—i.e. whether they are compulsory, and whether there are any tax incentives for payers; (iii) eligibility criteria and interpretation of the *Asnaf* categories; (iv) the *Zakat* benefits provided; and (v) the transparency, accountability and perceptions of *Zakat* systems. Finally, it concludes with some recommendations regarding *Zakat* practices concerning management and institutional arrangements, financing, eligibility criteria, benefits, as well as transparency, accountability and perceptions. The recommendations were developed considering the Afghan context **prior to** the new government of September 2021.

The methodology followed in this paper is a desk-based review of literature on the history of *Zakat* in Afghanistan and the international experiences in the management and oversight of *Zakat* collection and distribution processes.

2. OVERVIEW OF ZAKAT IN AFGHANISTAN

Zakat in Afghanistan: Past country analysis

Zakat collection and distribution systems have existed in Afghanistan for centuries. Katib (2012) mentions proclamations in the late 1800s and early 1900s for the collection of *Zakat* on sheep, lambs, goats, camel skins and cash from tribes in certain areas, and documents conflicts between *Zakat* collectors and those meant to pay *Zakat*. More recently, *Zakat* collection was conducted by the Taliban (Afghanistan Analysts Network 2020), but procedures differed from one province to the next, and there is no historical record of systematic collection anywhere in the country (Afghanistan Analysts Network 2021).

Zakat in Afghanistan: Present-day country analysis

Presently, *Zakat* is a private practice in Afghanistan, with Afghans independently paying their *Zakat* at their own discretion and usually to people within their villages or to relatives. The previous government's Ulema Council, the entity responsible for the interpretation of Islamic jurisprudence, did not issue any *fatwas*¹ in relation to *Zakat*. Nonetheless, it is listed in the **Social Protection Law (2011)** as one of the resources for social protection expenditure. Despite the lack of any clear direction for State-led *Zakat* collection, some government institutions such as the Ministry of Labor and social Affairs of the former government have expressed a preference for the institutionalisation of a *Zakat* Fund.² The different forms of *Zakat* collection will thus be explored in the next section.

3. OVERVIEW OF ZAKAT PRACTICES AROUND THE WORLD

This section seeks to demonstrate the various modalities of *Zakat* collection and distribution around the world by focusing on five main topics: **(i) management and institutional arrangements; (ii) financing; (iii) eligibility criteria; (iv) types of benefits; and (v) transparency, accountability and perceptions** (see Table 1). The section provides an overview of each topic through several examples from Muslim countries around the world (see Annex 1 for a summary of *Zakat* collection processes across a sample of countries), highlighting those from **fragile and conflict-affected** countries in blue below (based on World Bank (2021a)).

Table 1. Summary of topics and sub-topics addressed in the paper

Topic	Sub-topics
Management and institutional arrangements	State-led vs. charity-led
	Centralised vs. decentralised
	Integration with <i>fatwa</i> -making body
	Linkage to social protection systems
Financing	Voluntary vs. compulsory
	Types of <i>Zakatable</i> wealth
	Incentives to pay <i>Zakat</i>
Eligibility criteria	<i>Zakat</i> beneficiary category interpretations
	Additional eligibility criteria
	Role of local committees
Types of benefits	Social assistance vs. microfinancing
Transparency, accountability and perceptions	Monitoring and evaluation and grievance redress mechanisms
	Transparency for payers
	Perceptions of <i>Zakat</i> among both recipients and payers

3.1 Management and institutional arrangements

This subsection provides an overview of the management and institutional arrangements of *Zakat* collection by studying four aspects of the topic:

1. Religious pronouncements based on the rules of interpretation outlined in Islamic jurisprudence for the purpose of deriving laws from *Sharia* to address the needs of people in different locations and at different time periods [Alsayyed 2009, 2–3].

2. Communication with the Ministry of Labor and Social Affairs.

- **State-led vs charity-led Zakat Funds/collection processes**
- **Centralised vs decentralised modus operandi**
- **Integration with fatwa-making body**
- **Linkage to social protection systems.**

A summary of the main takeaways from this section is provided below.

State-led vs. charity-led Zakat Funds/collection processes

- Most countries either have voluntary State-led Zakat Funds or charity-led *Zakat* collection processes, with some conflict-affected countries such as **Yemen** and **Somalia** experiencing a militant takeover of *Zakat* collection processes.
- Most State-led *Zakat* collection is administered by Zakat Funds connected to the Ministry of Religious Affairs, with two countries (**Saudi Arabia** and **Kuwait**) involving the Ministry of Finance.

Centralised vs. decentralised modus operandi

- Most State-led *Zakat* collection and distribution processes operate through a hybrid model where the central Zakat Fund and local committees work together either through the redistribution of *Zakat* collected (as in **Sudan**) or through the implementation of unified eligibility criteria (as in Libya).

Integration with Fatwa-making body

- In the majority of countries, State-led Zakat Funds are separate from Fatwa-making bodies, but both usually fall under the Ministry of Religious Affairs (as in **Oman**).

Linkage to social protection systems

- Countries with strong State-led Zakat Funds have sought to increase linkage to social protection systems by setting coordination mechanisms (**Oman**), developing complementary eligibility criteria (**Jordan**) or including *Zakat* in social protection strategies and planning (**Sudan**).
- A few countries have embedded *Zakat* in the social protection system by using it to finance part or all of the social protection budget, as in **Saudi Arabia**, **Kuwait** and previously **Yemen**.

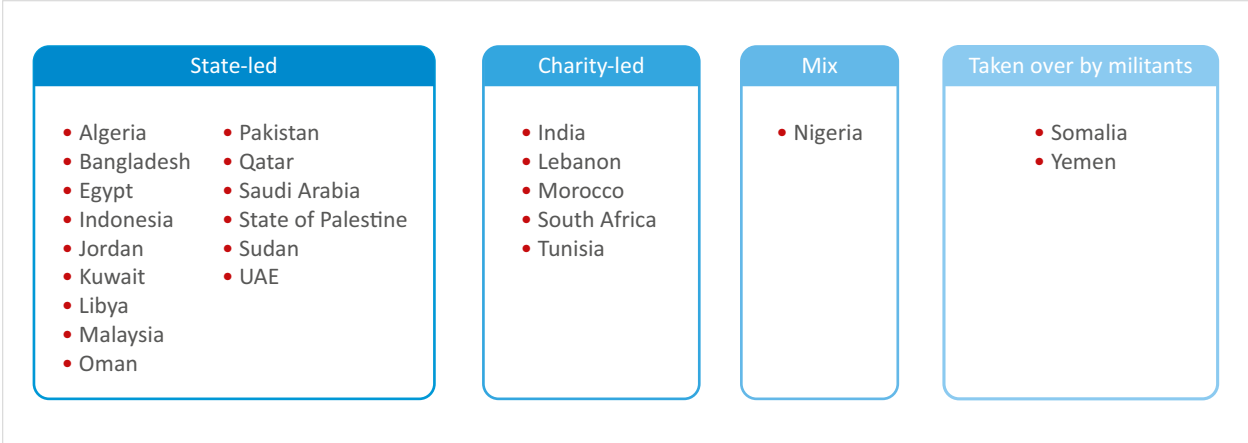
State-led vs charity-led Zakat Funds/collection processes

Zakat collection systems can either be **State-led**, **charity-led**, **a mix of the two** in some federal states or **taken over by militants** in conflict-affected countries. Figure 1 lists the country examples under each typology.

State-led *Zakat* collection is usually conducted by a Zakat Fund that is most often administratively connected to the Ministry of Religious Affairs, as is the case in **Jordan** and **Pakistan**, with exceptions that will be addressed later. **Jordan's** Zakat Fund is under the country's Ministry of Awqaf and Religious Affairs. Similarly in **Pakistan**, *Zakat* collection is overseen by Zakat and Ushr Departments, which are either separate or integrated into different departments

across Pakistan’s federal states. For example, The Government of Khyber Pakhtunkhwa has a combined Department for Zakat, Ushr, Social Welfare, Special Education and Women Empowerment, responsible for the collection and distribution of *Zakat*, among other things (Government of Khyber Pakhtunkhwa n.d.), while the Government of Punjab has a free-standing Zakat and Ushr Department. Likewise, the Zakat Board in **Bangladesh** was established by the Islamic Foundation, which is part of the Ministry of Religious Affairs (Government of Bangladesh 1982; Banglapedia n.d.). In **Oman**, the Ministry of Awqaf and Religious Affairs has recently established a Zakat Fund and made it unlawful for any other entity/charity to accept *Zakat* donations (Ministry of Awqaf and Religious Affairs 2017).

Figure 1. Modality of Zakat collection, by country



Source: Author’s own elaboration based on the literature review.

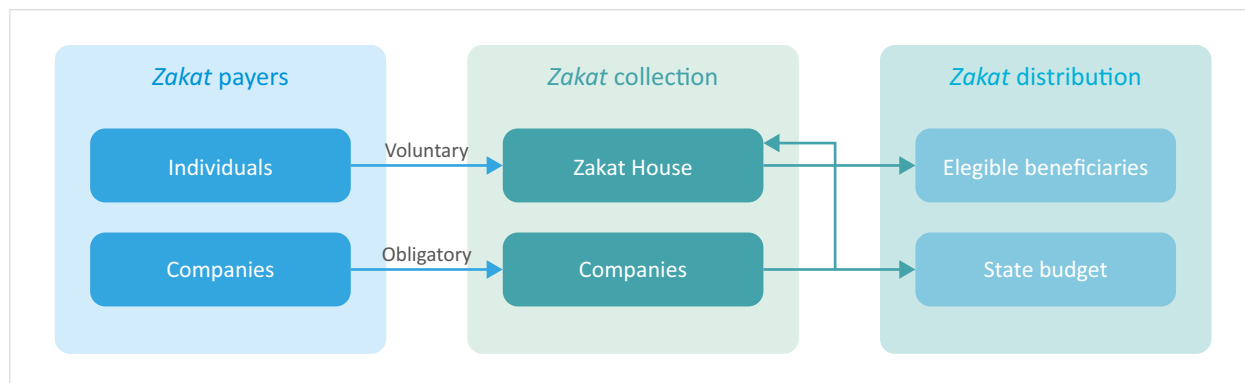
On the other hand, **Libya’s** Zakat Fund is administratively under the Council of Ministers, while **Sudan** locates the Zakat Fund under the Ministry of Social Affairs. Two Gulf countries, **Kuwait** and **Saudi Arabia**, involve the Ministry of Finance in *Zakat* collection. The responsibility for *Zakat* collection in Kuwait is shared between the Ministry of Awqaf (Islamic Funds), overseeing the Zakat House,³ which receives individuals’ voluntary *Zakat*, and the Ministry of Finance, collecting companies’ obligatory 1 per cent *Zakat* (Mahadi Ahmad et al. 2015) (see Figure 2). As for **Saudi Arabia**, State-led *Zakat* collection is the responsibility of the General Authority for Zakat and Tax (Government of Saudi Arabia 2021). The collection of *Zakat* on agricultural products or livestock is the responsibility of the emirate offices in each province under the Ministry of Interior (Bouhider 2020).

In other countries, such as Indonesia and Egypt, State-led *Zakat* collection is a new development, and the mechanism through which the two countries sought to integrate/ regulate past private/charity *Zakat* collectors differs (see Figure 3). In **Indonesia**, the National Board of Zakat (Badan Amil Zakat Nasional—BAZNAS) was established by the Zakat Management Act of 2011, which required *Zakat* collection to be led by the State and ordered private *Zakat* collectors such as mosques, associations and Islamic boarding schools to register for a Zakat Collection Permit with their local BAZNAS branch to continue collection (Saidurrahman 2013). If they do not meet certain criteria, the permit may be refused or revoked. Such private *Amil Zakat* institutions are also required to report on the collection and distribution of *Zakat* to their local BAZNAS branch (Wicaksana, Setyowati, and Gunawan Suharto 2019). Similarly, in **Egypt**, *Zakat* used to be a private matter—not collected by the State or any central agency (Atia 2011). It used to be collected and distributed through mosques and 25,000 charities/associations, but in 2014 the Egyptian Zakat and Charity House was established under the Al-Azhar Mosque to regulate and centralise *Zakat* collection. Unlike in Indonesia, where charities collecting *Zakat* had to obtain a permit and report their *Zakat* collection to the State-led fund, charities in

3. The name of the Kuwaiti Zakat Fund is the Zakat House.

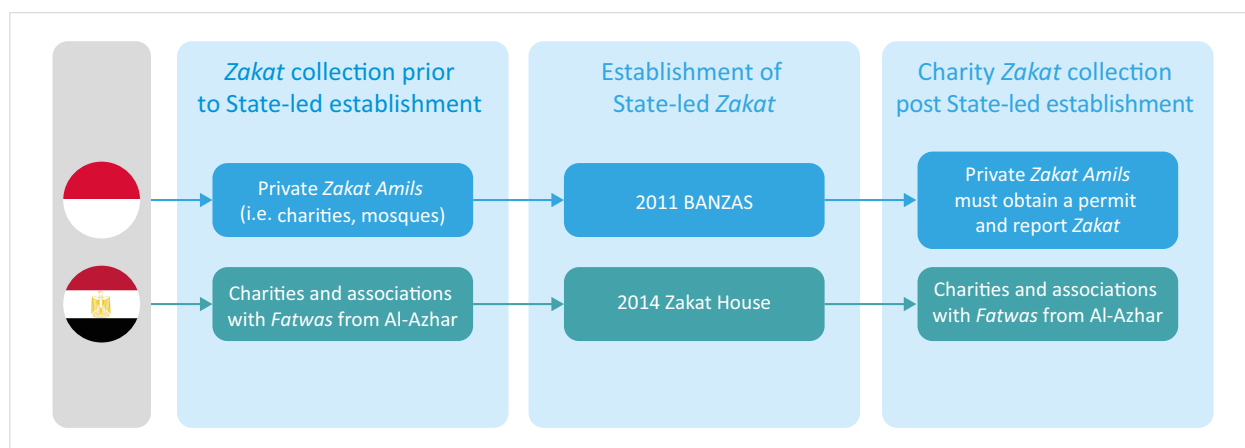
Egypt do not need to report their *Zakat* collection or obtain a licence from the Zakat House. Similar to the period prior to the establishment of the Zakat House, charities are only required to obtain a *fatwa* from Sheikhs in Al-Azhar permitting them to receive donations as *Zakat*. Consequently, with the exception of Indonesia, in most countries in which State-led and charity-led *Zakat* collection exists, charities do not have to report the *Zakat* collected to the government Zakat Fund.

Figure 2. State-led *Zakat* collection process in Kuwait



Source: Author's own elaboration.

Figure 3. Regulation of charity *Zakat* collection post State-led *Zakat* establishment in Indonesia and Egypt



Source: Author's own elaboration.

Charity-led *Zakat* collection is usually implemented by charities, and mosques as is the case in **Morocco** and **Tunisia** (Machado, Bilo, and Helmy 2018). A similar practice occurs in **India**, but the largest charity involved there is the Association of Muslim Professionals, which has established its own Zakat Fund (AMP 2021). In **South Africa**, *Zakat* collection is charity-led but occurs mainly through a charity known as the South African National Zakah Fund (SANZAF), which was established in 1974 to oversee *Zakat* collection in the country (SANZAF 2021).

Mixed *Zakat* collection occurs in countries where there are State-led *Zakat* institutions and where charities can also receive *Zakat*, as is the case in Egypt, Jordan and Indonesia. In the context of this paper, however, a mixed typology exists in countries where State-led *Zakat* systems can only collect *Zakat* from certain areas/governorates—i.e. usually in federal states. However, **Nigeria** is a more interesting example of mixed methods of *Zakat* collection, as it left the

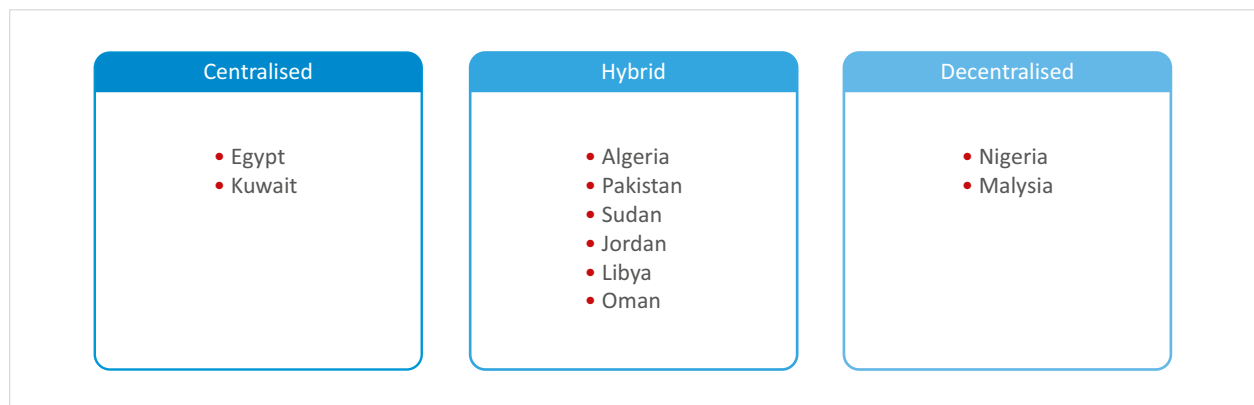
decision for the establishment of State-led *Zakat* collection to the state-level government, rather than to the national government. Only 8 out of the 12 states in Nigeria have *Zakat* legislation that organises the collection and distribution of *Zakat*, meaning that the remaining 4 rely on charity-led *Zakat* (Development, Research and Projects Centre and Nigeria Research Network 2016).

Recent incidents of *Zakat* collection systems being **taken over by militants**, as new sources of revenue, have been reported in **Yemen** and **Somalia**. *Zakat* collection in **Yemen** was previously led by the State but has since disintegrated given the Houthis' takeover of the compulsory *Zakat* collection process in the country, their publication of an amendment of the 1999 *Zakat* Law in 2019, and their resorting to violence sometimes to ensure collection (Al-Kamali 2021). In **Somalia**, Al-Shabab instated *Zakat* collection, as State-led *Zakat* collection did not exist before. Companies and communities across the country, especially communities in rural areas, and even some government officials, pay monthly and yearly *Zakat* to the militant group through its *Zakat* Fund offices (Hiraal Institute 2018; US Department of State 2019; van den Boogaard and Santoro 2021). The group's capacity to collect *Zakat*/tax has been improving in recent years (Hiraal Institute 2020). Despite the militant takeover in both countries, *Zakat* is allegedly still used for public welfare by financing cash, in-kind and livelihood programmes, albeit to varying degrees in Somalia and Yemen.⁴

Centralised vs. decentralised modus operandi

State-led *Zakat* collection processes can operate through either **centralised, decentralised or hybrid** forms. Figure 4 lists the country examples under each mode of operation.

Figure 4. Mode of operation of Zakat Funds, by country



Source: Author's own elaboration based on the literature review.

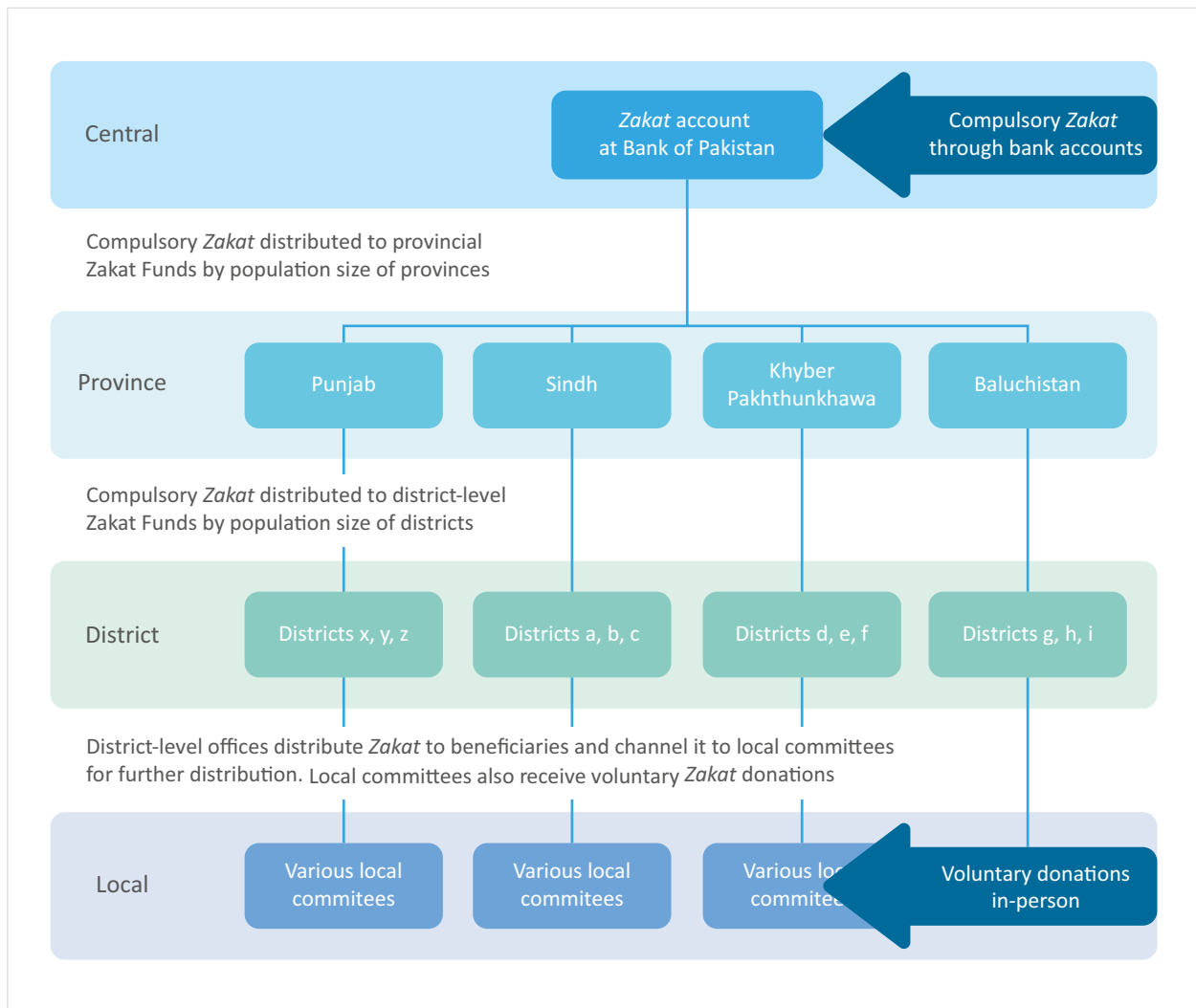
Centralised *Zakat* Funds are characterised as such because the central *Zakat* Fund/office retains all decision-making authority related to eligibility criteria and oversees *Zakat* collection and distribution processes. In **Egypt**, the government's *Zakat* House operates in a centralised manner; it is individually responsible for receiving

4. Both the Houthis and Al-Shabab claim that *Zakat* is used for the public welfare, but the extent to which this is true in practice is difficult to determine, as data on both entities are hard to attain. The Houthis have set up a very updated website for the *Zakat* Fund that they oversee (General Authority of *Zakat* 2021). See <<https://www.zakatyemen.net/>>. The website shows that the funds are spent on: (i) financial assistance for poor people; (ii) a food assistance programme; (iii) livelihood programmes such as the provision of sheep, goats etc.; (iv) financial assistance for those in debt; (v) financial assistance for injured soldiers and children of martyred soldiers; and (vi) emergency assistance for victims of airstrikes etc. (see <ibit.ly/SEX9> for the number of beneficiaries and budgets). They also have a newsletter associated with the *Zakat* Fund that has articles on the value of *Zakat*, the number of beneficiaries per district etc. (see <ibit.ly/fVRd>). Research on the Al-Shabab financial system indicates that only a small percentage of *Zakat* collected is distributed to poor people directly, while the majority is sent to "regional-level officials where they are handed over to the Finance Office". The Finance Office divides the money into logistics (food, fuel), emergencies and ministries' offices in the region where collection was made (which includes salaries of soldiers, and additional benefits for their wives and children) (Hiraal Institute 2018).

Zakat and for processing people's applications, which should be made in person at the Zakat House's office in Cairo (Al-Bashir 2016). A similar process is implemented by the Zakat House in **Kuwait**.

Hybrid Zakat Funds operate through some level of cooperation between the central Zakat Fund and local-level committees, either through the implementation of unified eligibility criteria set at the central level or through set arrangements for the redistribution of collected *Zakat* that involves the central Zakat Fund as the main redistributor. In **Pakistan**, the Central Zakat Fund oversees compulsory *Zakat* collection through automatic deductions on the first day of Ramadan from savings bank accounts that are routed to the Zakat Fund's account at the central bank. The Fund then disburses *Zakat* to provincial-level Funds based on population percentages, which then transfer the *Zakat* to district- and local-level committees responsible for delivering it straight to beneficiaries, as shown in Figure 5 (FATA Secretariat 2012; Auditor General of Pakistan 2019). Distribution of *Zakat* funding at the district level is also based on population size, which means that the poorest districts do not necessarily receive the majority share of *Zakat*, as their populations might not be the largest (Khan 2013). Each Zakat Fund at the provincial level has its own *Zakat* laws (Government of Khyber Pakhtunkhwa n.d.).

Figure 5. Mode of operation of Pakistani Zakat Funds and the entry points for the collection of compulsory and voluntary *Zakat*



Source: Author's own elaboration.

In **Sudan**, the Central Zakat Chambers interacts with *Zakat* committees at the village level by also overseeing the *Zakat* redistribution process. *Zakat* or donations are collected from across the country, administered by the central office and then redistributed to committees (Machado, Bilo, and Helmy 2018; Kjellgren et al. 2014). The Zakat Chambers' Board of Directors are responsible for allocating expenditure (Bilo, Machado, and Bacil 2020). In **Oman**, redistribution is done differently. People are free to donate their *Zakat* to local committees or to the central Zakat Fund's account. Any surplus *Zakat* remaining at local committees after all beneficiaries receive their benefits is routed back to the central Fund, which redistributes it, first, to *Zakat* committees that were unable to cover their *Zakat* dues to beneficiaries, and, second, to any eligible categories across the sultanate (Article 11) (Ministry of Awqaf and Religious Affairs 2017). Furthermore, **Jordan's** Zakat Fund also redistributes *Zakat* and implements complementary eligibility criteria. Local committees are responsible for collecting *Zakat* from people living in their jurisdiction and for distributing it to needy people in their area. Ten per cent of collected *Zakat* is re-routed to the Central Zakat Fund, which then redistributes that amount to committees in the poorest areas. As for the complementary eligibility criteria, the Zakat Fund provides monthly cash assistance to households whose income is below a certain threshold and who do not have any member that is capable of working. The Zakat Fund coordinates with the country's main cash assistance and social insurance providers, by entitling individuals receiving less than JOD50 from the National Aid Fund or JOD130 from pensions under the Social Security Corporation to a JOD10 benefit per person.⁵ In **Libya**, on the other hand, the Zakat Fund and the main social assistance provider, the Social Solidarity Fund, implement unified eligibility criteria which all *Zakat* committees across the country must follow. Nevertheless, committees have some leeway in making eligibility criteria more suited to their local context when assessing applicants.⁶

Decentralised Zakat Funds were found in both **Nigeria** and **Malaysia**, where each state has separate *Zakat* legislation and Zakat Funds operating independently of each other (Obaidullah 2017). In Malaysia, 14 state Islamic religious councils exist in the country's 13 states and the federal territory of Kuala Lumpur. Seven of those councils have established Zakat Funds under them, four of those have 'semi-corporate' *Zakat* management institutions, while three of them have fully corporate *Zakat* management institutions—i.e. following a corporate administrative style but maintaining state ownership and allowing a subsidiary company owned by the state religious council to manage *Zakat* (Nahar 2018; Abidin and Saad 2014; Sarif, Kamri, and Ali 2013). Zakat Funds across Malaysia have separate beneficiary databases, different governance structures and implementation procedures, as state religious officials have the authority to issue *fatwas* organising *Zakat* collection and distribution (Wahab and Rahman 2013; Wahid 2014).

Integration with *fatwa*-making body

Fatwa-making agencies in Muslim-majority countries are usually government bodies responsible for issuing interpretations of religious texts and thus clarifying the obligations and/or actions that are permissible for Muslims. In regard to *Zakat*, *fatwa*-making agencies typically indicate the amount of wealth after which it has to be paid (i.e. *Nisab*; see section 3.2 on financing), the types of wealth to be considered, and the categories of people who can receive it (i.e. *Asnaf*; see section 3.3 on eligibility criteria). In countries with State-led Zakat Funds, they can either be **integrated into** or **separate from *fatwa*-making bodies**. Figure 6 lists the country examples by typology.

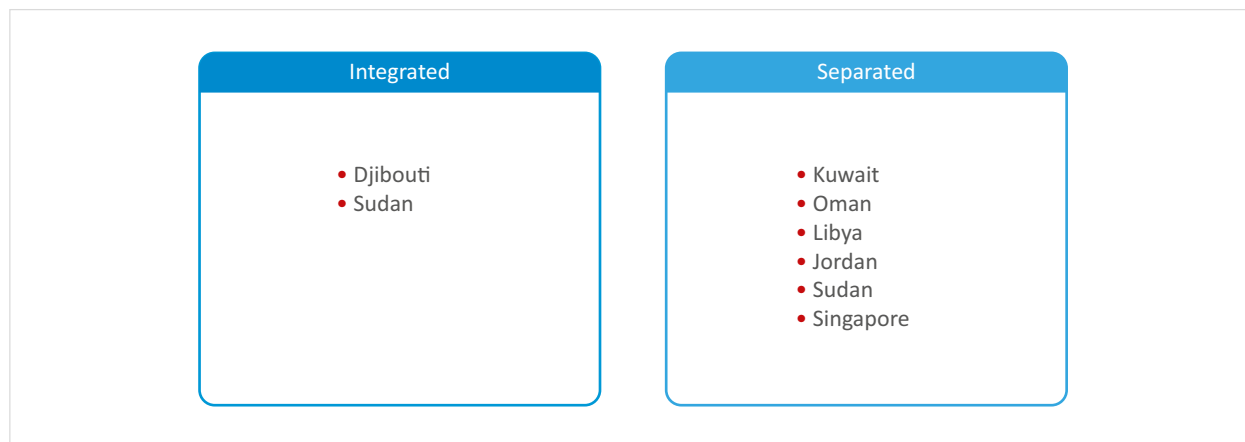
In some countries, State-led Zakat Funds are **integrated with *fatwa*-making bodies** in the same institution. **Djibouti's** Fatwa Commission was established within Diwan Al-Zakat to oversee the provision of "legal advice on matters relating to Zakat, to check and monitor the statutes and regulations governing the founding of Diwan [Al]-Zakat and ensure their compliance with standards defined by the Sharia, [and] ensure that the collection, management and distribution of Zakat resources undertaken by the foundation obeys Islamic rules and jurisprudence" (Republic of Djibouti 2004). In **Sudan**, the Zakat Chamber also has a subsidiary Fatwa Committee as per the Zakat

5. Article 6: Instructions and Conditions of Zakat and its Revisions No. 1 [2021].

6. IPC-IG interview with Libyan Zakat Fund, June 2021.

Law (2001), but the country also has a separate *fatwa*-making body known as the Association of Islamic Fiqh under the Ministry of Religious Affairs (AOIF 2016).

Figure 6. Type of integration of Zakat Funds with *fatwa*-making bodies, by country



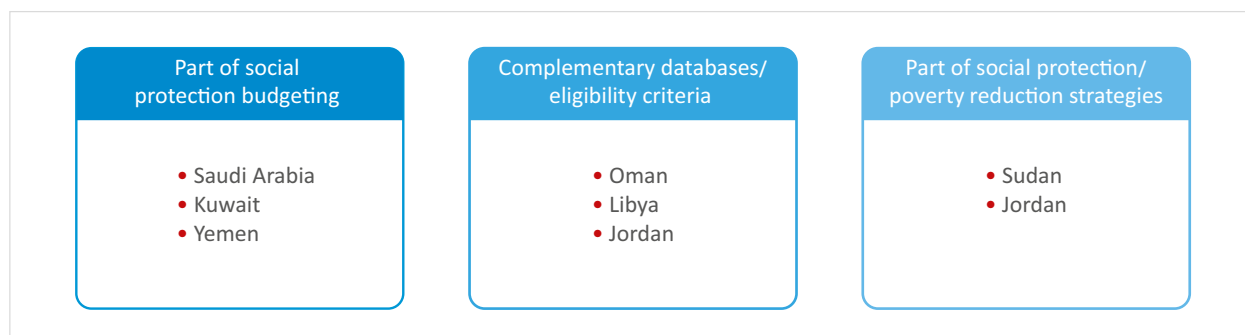
Source: Author's own elaboration based on the literature review.

In the majority of countries, State-led Zakat Funds are **separate from fatwa-making bodies**, but both usually fall under the Ministry of Religious Affairs, and often the Zakat Fund's website includes a communication form to submit questions to the *fatwa*-making body. In **Oman** and **Kuwait**, the Zakat Fund and the *fatwa*-making body are separate but under the Ministry of Awqaf and Religious Affairs (Zakah Oman 2021; Zakat House 2021). A similar structure occurs in **Singapore**, where the Zakat Fund and the Fatwa Committee fall under the government's Islamic Religious Council of Singapore. On the other hand, in **Jordan**, the Zakat Fund and the Dar Al-Iftaa are not only separate but also do not fall under the same institution. The former is part of the Ministry of Awqaf and Religious Affairs, while the latter has been an independent government entity since 2006 (Government of Jordan 2021).

Link to the social protection system

The link between *Zakat* and the social protection system is mostly limited and differs from one country to the next. Generally, the methods to create such linkages include using *Zakat* for social protection budgeting and expenditure, complementary and/or coordinated databases and/or eligibility criteria, and strategising in social protection/poverty reduction strategies. Figure 7 lists the country examples under each linkage method.

Figure 7. Linkage of *Zakat* and social protection, by country



Source: Author's own elaboration based on the literature review.

Zakat forms part of **social protection budgeting** in three countries: **Saudi Arabia**, **Yemen** and **Kuwait**. All the *Zakat* received by **Saudi Arabia's** General Authority for *Zakat* and Tax goes towards the Ministry of Human Resources and Social Development's Social Insurance Pension Services programme, which is cash assistance provided to vulnerable categories of people, including those with disabilities, widows and orphans (Government of Saudi Arabia n.d.; HRSD n.d.). *Zakat* thus forms part of the State's social protection budget in that it finances the budget line known as 'Social benefits'. In 2019, the social benefits amounted to approximately SAR2 billion, of which SAR1.2 billion (USD734,462,541 purchasing power parity—PPP) went towards the cash assistance for 903,567 beneficiary households of the Social Insurance Pension programme. **Yemen** is another country where *Zakat* forms part of social protection budgeting. Prior to the Houthi takeover of the *Zakat* collection process, the State's Chamber of *Zakat* distributed *Zakat* at the district level and provided some of it to the Social Welfare Fund, in which *Zakat* contributions were merged with other sources of financing used for social protection (Machado, Bilo, and Helmy 2018).

In **Kuwait**, *Zakat* from corporations collected by the Ministry of Finance—as opposed to the voluntary *Zakat* paid out by individuals to the Zakat House—is accrued to the National Treasury and is used for expenditure “in the public interest” (Mahadi Ahmad et al. 2015),⁷ which is interpreted as including: (i) security and justice; (ii) defence; (iii) education; (iv) health care; (v) social solidarity and social affairs; (vi) media; (vii) religious services; (viii) housing; (ix) amenities; (x) water and electricity; and (xi) agriculture and marine life.⁸ The Ministry of Finance is free to allocate the *Zakat* contribution to any of these categories within the state budget, unless the company in question specifies which one(s) it would like its *Zakat* to go towards.⁹ The KWD81 million (USD98.7 million PPP) *Zakat* collected from companies between 2007 and 2012 was divided between the Zakat House itself (71 per cent) and expenditures on public services (29 per cent) (Aamer 2013). It is important to note that the Kuwaiti Fatwa Council prefers the distribution of corporations' *Zakat* to be in the hands of the Zakat House, as it would ensure a more lawful distribution according to the religious *Asnaf*, and that Members of Parliament have suggested an amendment to Law No. 46 (2006), placing the responsibility for distribution in the hands of the Zakat House, as opposed to the Ministry of Finance (Abd-ElHafith 2021).

Zakat Funds have adopted **complementary/coordinated databases and/or eligibility criteria** in a few countries, including **Oman**, **Libya** and **Jordan**. In **Oman**, some *Zakat* committees share their databases with the Ministry of Social Development's local charity team, which is responsible for the distribution of assistance from the ministry.¹⁰ In both **Libya** and **Jordan**, paper-based sharing of beneficiary names is conducted between *Zakat* committees and the relevant cash assistance provider to avoid duplication or to calculate benefit values. In **Libya**, the *Zakat* committees share the data with the branches of the Social Solidarity Fund, the main social assistance provider, so that applicants who are existing beneficiaries of the Social Solidarity Fund receiving an amount below LYD450 (USD100)¹¹ from it can receive a top-up from the Zakat Fund.¹²

The **social protection and/or poverty reduction strategies** and similar documents in some countries have integrated *Zakat* into the overall institutions and programmes operating in the social protection system for a few countries such as **Jordan** and **Sudan**. **Jordan's** National Social Protection Strategy 2019–2025 addresses *Zakat* particularly by comparing its programmes to those of the national social assistance provider and extracting the

7. It is important to note that the Kuwaiti Fatwa Council prefers the distribution of corporations' *Zakat* to be in the hands of the Zakat House, and the draft 2019 law states as such.

8. Article 19: Executive Regulations No. 46 [2006] on Zakat and the Contribution of Companies in the State Budget. See: <ibit.ly/WSnG>.

9. Article 20: Executive Regulations No. 46 [2006] on Zakat and the Contribution of Companies in the State Budget. See: <ibit.ly/WSnG>.

10. IPC-IG interview with Oman Zakat Fund, July 2021.

11. Based on the exchange rate on 16 September 2021.

12. IPC-IG interview with Libyan Zakat Fund, June 2021.

main challenges and priorities for the role of *Zakat* as a key social assistance provider in the future. One of the strategy's targets is to improve the coordination between the Zakat Fund and the National Aid Fund by ensuring electronic linkage between the central Zakat Fund and all of its committees to provide it with access to the National Unified Registry for better beneficiary verification (Government of Jordan 2019). In **Sudan**, the Interim Poverty Reduction Strategy Paper 2012 touched on strengthening the role of *Zakat* in poverty reduction (Bilo, Machado, and Bacil 2020).

3.2 Financing

This subsection provides an overview of three financial aspects of *Zakat*:

- **Voluntary vs. compulsory *Zakat* payment mechanisms**
- **Types of wealth liable for *Zakat***
- **Incentives to pay *Zakat***

A summary of the main takeaways from this section is provided below.

Voluntary vs. compulsory *Zakat* payment mechanisms

- Most countries with State-led *Zakat* payment mechanisms have made *Zakat* voluntary, as opposed to compulsory.
- Among the few countries where *Zakat* is compulsory, only two—**Kuwait** and **Saudi Arabia**—involve the Ministry of Finance in the *Zakat* collection process.

Types of wealth liable for *Zakat*

- The type of wealth liable for *Zakat* is mostly the same across most countries, with a few exceptions extending the obligation onto companies, such as **Pakistan**, **Sudan**, **Saudi Arabia** and **Kuwait**.
- Most countries announce the Nisab (amount of wealth after which *Zakat* has to be paid) every year either through the Zakat Fund, the fatwa-making institution or the equivalent of the Ministry of Religious Affairs.

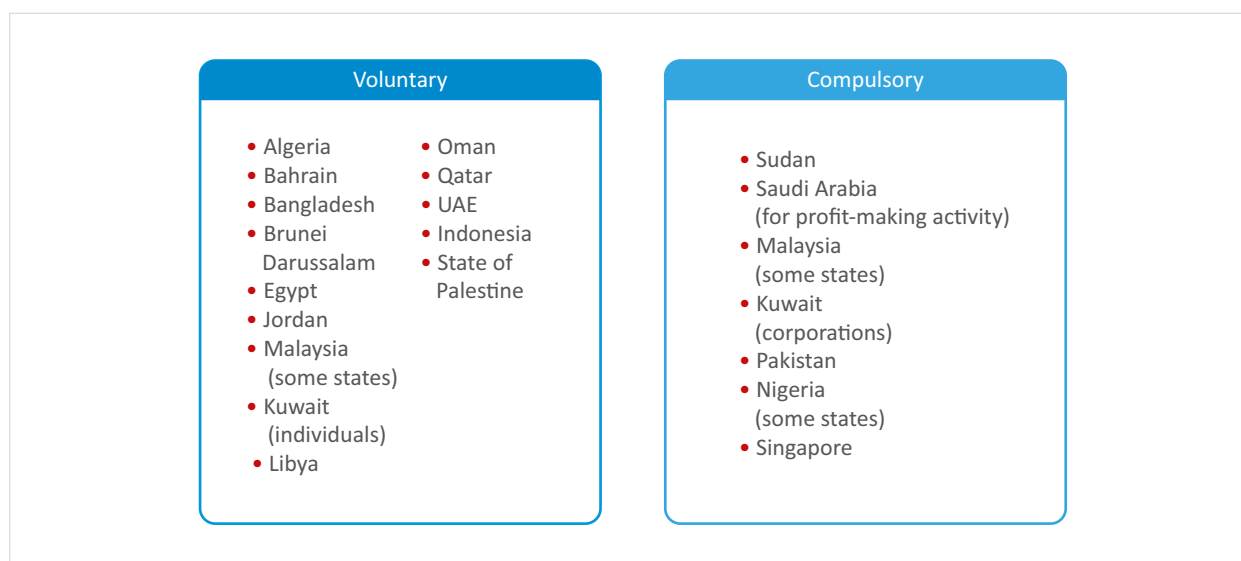
Incentives to pay *Zakat*

- Tax incentives to pay *Zakat* are provided by countries with voluntary schemes and those with compulsory ones, in the form of a deduction of *Zakat* paid from tax payable, such as in **Malaysia**, or mostly as a deduction of *Zakat* paid from taxable earnings, as in **Pakistan** and **Sudan**.

Voluntary vs. compulsory *Zakat* payment mechanisms

Payment mechanisms for State-led *Zakat* can either be **voluntary** or **compulsory** by law, akin to tax payments. Figure 8 lists the country examples under each typology.

Figure 8. State-led *Zakat* payment mechanisms, by country



Source: Author's own elaboration based on the literature review.

Most State-led *Zakat* institutions exist in countries where ***Zakat* payments are voluntary** and not compulsory by law. Examples of such arrangements are the *Zakat* Funds in both **Jordan** and **Libya**, as well as the *Zakat* House in **Kuwait** and BAZNAS in **Indonesia**. The *Zakat* regulations in **Bangladesh** specifically indicate that the *Zakat* Fund “shall consist of voluntary payment of *Zakat* by Muslims” (Government of Bangladesh 1982).

In a few countries where ***Zakat* payments are compulsory** by law, the Ministry of Finance and relevant tax-collecting institutions play a role. For example, the **Kuwaiti** Ministry of Finance is responsible for collecting compulsory *Zakat* of 1 per cent from Kuwaiti companies as per Law No. 46 (2006) (Mahadi Ahmad et al. 2015). Similarly, in **Saudi Arabia**, the responsibility for *Zakat* collection lies with the *Zakat* and Tax General Authority within the Ministry of Finance, which oversees collection from individuals engaged in profit-making activity (i.e. trading, providing services, industrial work etc.), as well as companies that are wholly owned by Saudi or Gulf Cooperation Council (GCC)¹³ nationals (Zakat and Customs Authority 2019). Recent changes to the *Zakat* regulations have extended the payment to non-Saudi/GCC companies if two of the following conditions are met: (i) the board of directors holds regular meetings in the country; (ii) executive decisions are made in Saudi Arabia; and (iii) a non-resident permanent establishment earns more than 50 per cent of its revenue in the country (Oxford Business Group 2019).

In other countries where *Zakat* is compulsory, it is collected by the relevant *Zakat* institution, as is the case in **Sudan** (Kjellgren et al. 2014), certain states in **Nigeria** (Obaidullah 2017), **Malaysia** and **Pakistan** (Hasan 2015). In **Pakistan**, for example, *Zakat* became compulsory for all Muslim citizens and corporations by the *Zakat* and Ushr Ordinance of 1980. Laws at the provincial level were then promulgated after *Zakat* was decentralised in 1997 and have reiterated this obligation. *Zakat* is deducted from bank accounts on the first day of Ramadan and routed into the Central *Zakat* Fund's account at the State Bank of Pakistan. The *Zakat* and Ushr Ordinance has been criticised, however, for providing ways to evade tax by people who think that *Zakat* is not in line with their *fiqh*¹⁴ (Auditor General of Pakistan 2019; Obaidullah 2017). In **Malaysia**, some states have strong deterrents against non-payment of *Zakat* through

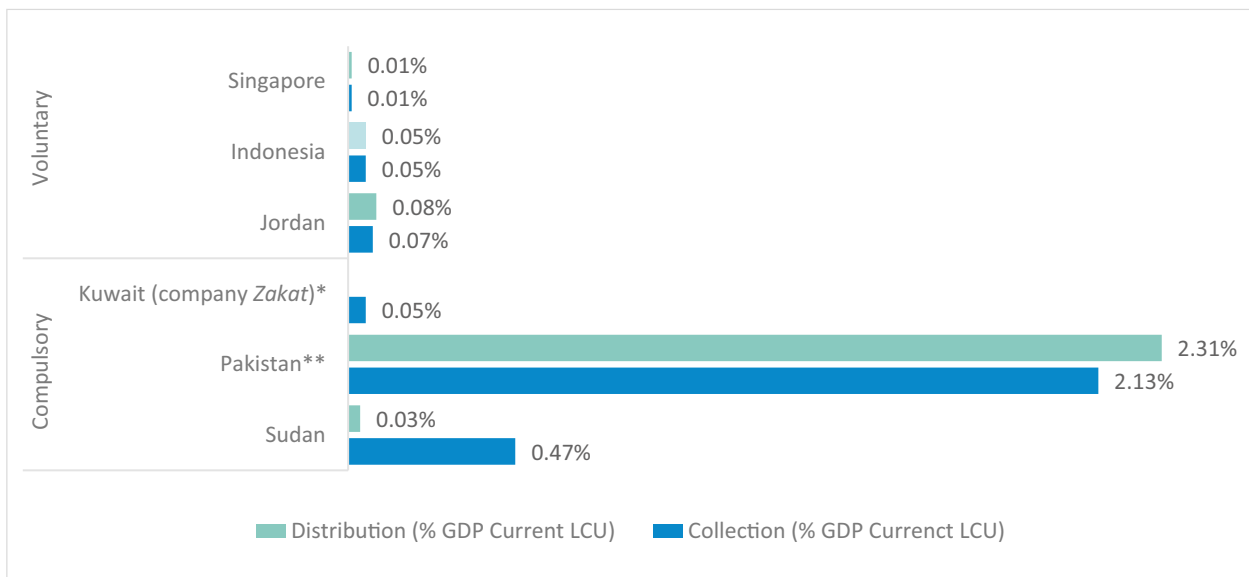
13. An economic and political union between some Arab countries located in the Gulf of Arabia, including Bahrain, Kuwait, Oman, Qatar, Saudi Arabia and the United Arab Emirates.

14. The schools of Islamic jurisprudence followed by Sunni Muslims, which could be either Hanafi, Maliki, Shafi'i or Hanbali, or those followed by Shia Muslims, which could be Twelvers, Ismailis or Zaydis.

the imposition of financial penalties and even imprisonment for non-payment (Obaidullah 2017). On the other hand, instead of imposing a penalty, **Sudanese** law enforces mechanisms for the recovery of unpaid *Zakat* directly by the *Zakat* Chamber (ibid.).

Generally, it is observed that the amount of *Zakat* collected in countries where it is compulsory is slightly higher than in countries where it is voluntary, as demonstrated in Figure 9. However, further exploration is necessary to confirm such an observation, which is not possible in the present paper given the limited access to financial information. It is also important to highlight that researchers have estimated that the current levels of *Zakat* collection through State-led *Zakat* Funds is much lower than the amount of *Zakat* potentially available and the amount collected and distributed informally across the Muslim world (Stirk 2015).

Figure 9. *Zakat* collection/distribution as a percentage of gross domestic product (GDP) in selected countries, by payment mechanism (2018)



Notes: * The *Zakat* amount indicated as collected in Kuwait is an estimate in the state budget of compulsory *Zakat* paid by companies and does not include the *Zakat* voluntarily donated to the *Zakat* House, due to the lack of information.

** The *Zakat* amount indicated as collected in Pakistan is the total compulsory *Zakat* deducted by the central bank and does not include the *Zakat* voluntarily donated at the provincial and local level, due to the lack of information.

Source: Author's own calculations from a variety of sources (MUIS 2021; BAZNAS 2020; *Zakat* Fund 2018; Ministry of Finance 2018; Auditor General of Pakistan 2019; Bilo, Machado, and Bacil 2020; World Bank 2021b).

Wealth liable for *Zakat* and *Zakat* amounts

Wealth liable for *Zakat* is almost the same across most countries and includes savings accounts, property, livestock, jewellery, stocks etc. **Sudan**, for example, exempts property used for personal use, crops and fruits for consumption by the owner, livestock used for ploughing, and salaries to cover essential needs from *Zakat* payments (Obaidullah 2017). The definition of companies' wealth that is liable for *Zakat* is more diverse across countries. In **Saudi Arabia**, companies' adjusted net loss, net fixed assets, advances for the purchase of fixed assets, construction in progress, adjusted losses carried over from previous years, investments in government bonds, and the current account balances of the business owner or partner are all excluded from *Zakat* wealth (Al-Salih 2020). In **Kuwait**, companies' *Zakat* is imposed on annual net profit only (RSM 2015).

Most countries announce the *Nisab* (amount of wealth after which *Zakat* must be paid) by a *fatwa*-making institution, the *Zakat* collecting body or the equivalent of a Ministry of Religious Affairs, which is usually based on the selling price of 85 g of pure (24 carat) gold (see Box 1 for a demonstration of the calculation).

Box 1. Simple *Zakat* calculation method in cash

- If a person has 1,000 units of currency in cash that has been in a savings account for the past year
- And the selling price of 85 g of gold in their country is 8 units in cash, then the *Nisab* is:

$$85 * 8 = 680 \text{ in cash}$$

- As the *Nisab* is 680, and the individual has more than the *Nisab*, then he/she must pay *Zakat* of 2.5 per cent on the amount he/she has:

$$1,000 * 2.5\% = 25 \text{ in cash}$$

- The individual thus has to pay 25 units of currency in cash as *Zakat*.

Source: Office of Religious Affairs (2019).

The *Nisab* weights and categorisations for gold and silver differ slightly from one country to the next (Al-Omar 1990) (see Table 2 for the *Nisab* of gold and silver adopted by some countries and their corresponding amounts in cash in recent years). In **Pakistan**, the central bank announces *Nisab* prior to Ramadan and collects compulsory *Zakat* directly from people's bank accounts. In 2020, the *Nisab* amount was set at PKR46,329 (USD1,238 PPP), and in 2021 at PKR80,933 (USD2,164 PPP). Individuals with less than those amounts did not have to pay *Zakat* (RS 2021). **Sudan's** *Zakat* Chamber is responsible for defining *Nisab*. In 2020, it was set at SDG1,127,652,¹⁵ based on 85 g of 21 carat gold (Baj News 2021). Unlike Sudan, **Libya's** *fatwa*-issuing body indicates that the calculation has to be based on 24 carat gold, as it is pure gold (Al-Mufti Al-Am 2019). Consequently, in 2021 the *Zakat* Fund announced the *Nisab* amount to be LYD23,686 (USD5,251)¹⁶ (Libya Akhbar 2021).

Table 2. *Nisab* amounts and their corresponding amounts in cash in selected countries

Country	<i>Nisab</i>				Year	Cash equivalent (USD or USD PPP)
	Gold		Silver			
Libya	85 g	24 carat	-	-	2021	USD5,251 ¹⁷
Pakistan	87.48 g	-	612.36 g	-	2020	USD1,238 PPP
Sudan	85 g	21 carat	595 g	-	2020	- ¹⁸
Singapore	86 g	-	-	-	2020	USD4,964 ¹⁹

Source: Authors' elaboration based on Republic of Sudan (2001); RS (2021); Baj News (2021); Al-Mufti Al-Am (2019); and MUIS (2020a).

15. USD or USD PPP equivalents are hard to calculate given high inflation rates throughout 2020.

16. Based on the exchange rate on 16 September 2021.

17. Based on the exchange rate on 16 September 2021.

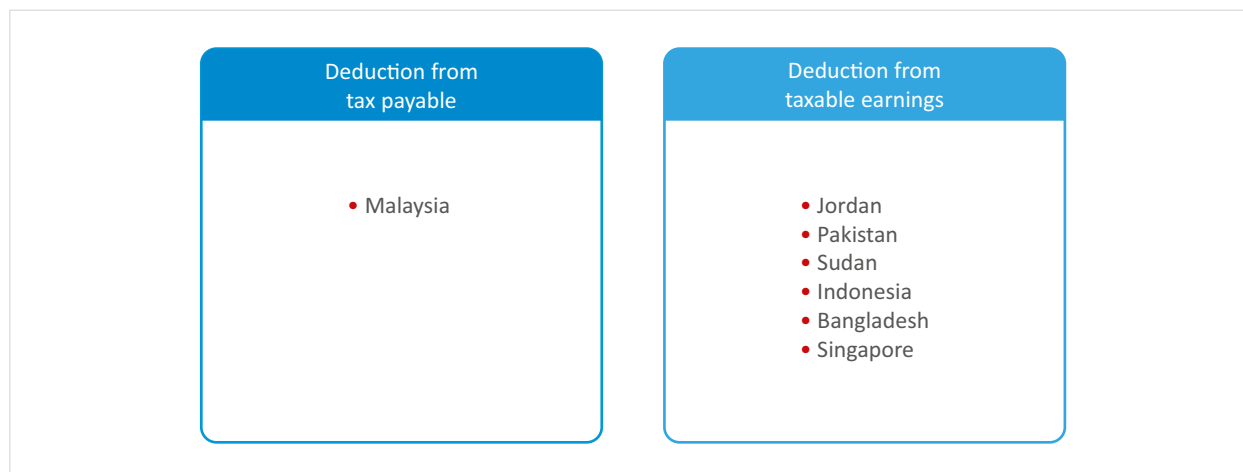
18. USD or USD PPP equivalents are hard to calculate given high inflation rates throughout 2020.

19. Based on the author's calculation of the average *Nisab* value of 2020 and the exchange rate on 1 October.

Incentives to pay *Zakat*

Countries with both voluntary and compulsory State-led *Zakat* payment mechanisms have implemented tax incentives to encourage people to pay *Zakat*. These incentives are in the form of a deduction of *Zakat* paid from tax payable or a deduction of *Zakat* paid from taxable earnings. Figure 10 lists the country examples under each incentive type.

Figure 10. Type of incentive to pay *Zakat*, by country



Source: Author's own elaboration based on the literature review.

Malaysia is the only country example found where ***Zakat* paid is deducted from tax payable**. “For every one ringgit of *Zakat* paid, the tax payable by the *Zakat* payer is reduced by one ringgit during the same assessment year” (Obaidullah 2017).

A larger majority of countries with State-led voluntary or compulsory *Zakat* institutions implement a **deduction of *Zakat* paid from taxable earnings**. **Jordan** is an example of this both when *Zakat* is paid to the State-led *Zakat* Fund and when charities receive a *fatwa* indicating that their programmes are in line with *Zakat* categories (Jordan News Agency 2019); however, a recently suggested update to the law may make *Zakat* deductible from tax payable (Al-Khasawneh 2019). Similarly, in **Pakistan** the Income Tax Ordinance of 1979 indicates that *Zakat* paid should be deducted from total income when determining tax liability (Obaidullah 2017). Likewise, *Zakat* payments are also deducted from taxable income in **Sudan** (ibid.), **Singapore** (MUIS 2020c) and **Bangladesh**, where Article 13 of the *Zakat* Fund Ordinance Act states “no income tax shall be payable by any person in respect of any sums paid by him as *Zakat* to the Fund” (Kibria 2021; Government of Bangladesh 1982). It is important to highlight that problems exist in calculating tax deductions or issuing tax rebates in Sudan due to vague laws (Obaidullah 2017), and in Bangladesh because of a lack of coordination between different entities (Jahoor 2021).

3.3 Eligibility criteria

This subsection provides an overview of three aspects of eligibility criteria for receiving *Zakat*:

- ***Zakat* beneficiary category interpretations**
- **Additional eligibility criteria**
- **Role of local committees.**

A summary of the main takeaways from this section is provided below.

Zakat beneficiary category interpretations

- Most countries interpret the eight *Zakat* beneficiary categories differently, with some countries having somewhat contradictory interpretations (i.e. Malaysia and Jordan; see section Zakat Beneficiary Category Interpretations).

Additional eligibility criteria

- Most countries have stipulated additional eligibility criteria, particularly regarding having income below the poverty line.
- Most countries rely on additional documentation such as proof of lack of asset ownership to determine eligibility.

Role of local committees

- Local committees play a major role in eligibility determination, especially in hybrid Zakat Funds.

Zakat beneficiary category interpretations

Table 3. Fatwa interpretations of Quran-stipulated Zakat categories in different countries

Quran categories	Country	Interpretation
Poor	Pakistan	Includes Muslim citizens living below the poverty line (Government of Punjab n.d.)
	Sudan	Includes students who fail to meet their school fees, and heads of households who do not have a source of income, among others (Obaidullah 2017)
	Jordan	Includes poor people with mental and physical disabilities who require rehabilitation and care services from shelters and non-governmental organisation centres (Al-Iftaa Committee 2018a)
Needy	Sudan	Includes people who do not have food for one day, who cannot earn due to a permanent disability or are a victim of natural disaster (Obaidullah 2017)
New converts to Islam (<i>Al-Mualafa Qulubuhum</i>)	Kuwait	Includes new converts to Islam, as well as institutions that provide religious education and social care to converts (Zakat House 2019)
Slaves and captives	Singapore	Includes student fees, as it contributes to freeing someone from the 'shackles of ignorance' (Mufti of the Republic of Singapore 2020)
	-	Some Islamic scholars have been pushing for the interpretation of this category to include victims of molestation, rape and domestic abuse (Rosli et al. 2018)
Indebted	Jordan	Includes paying the debts of someone who has recently passed away, after ensuring that none # of his/her immediate family are able to do so, and no one has volunteered to donate the money to settle his/her debt (Al-Iftaa Committee 2019)
Stranded traveller	Libya	Includes internally displaced persons, as they have no shelter in their home country (Grand Mufti of Libya 2014)
	Egypt	Includes refugees (Atia 2011)
Zakat administrators	Oman	Indicates that 10 per cent of <i>Zakat</i> goes to either <i>Zakat</i> administrators/social workers or to cover the operational costs of <i>Zakat</i> committees as per the Zakat Law's Executive Regulations (Ministry of Awqaf and Religious Affairs 2017)
	Sudan	Sets the amount of <i>Zakat</i> to be allocated to <i>Zakat</i> administrators at 15 per cent for 2018 (Bilo, Machado, and Bacil 2020)
For the sake of Allah	Egypt	Includes teacher training expenses, as education is a public good (Atia 2011)
	Singapore	Includes any service for the public good, such as building mosques, administering funeral homes (Mufti of the Republic of Singapore 2020)

Source: Author's own elaboration.

The eight categories eligible to receive *Zakat* that are mentioned in the *Quran* are broad enough to necessitate interpretations based on Islamic jurisprudence—i.e. the issuance of *fatwas*. Most countries with State-led *Zakat* collection processes have issued *fatwas* clarifying the meaning of each category eligible to receive *Zakat*. Table 3 provides examples of country interpretations under each category identified in the *Quran*. The purpose of the summary indicated in the table is to showcase the broad coverage that *Zakat* can have and its extension beyond social assistance to also include other wider aspects of social services.

It is important to highlight that *fatwa*-making institutions in different countries sometimes disagree on what/who falls under each *Zakat* category in the *Quran*. For example, as demonstrated in Table 3, Singapore has made it permissible to provide *Zakat* for the building of mosques under the category of ‘for the sake of Allah’ (Mufti of the Republic of Singapore 2020), while Jordan regards it as impermissible under any of the categories (Al-Iftaa Committee 2018b). Moreover, one of Pakistan’s *Zakat* programmes is to provide funding for *madrasahs* (Islamic schools teaching religion and focusing on memorising the *Quran*) (Mumtaz Ahmad 2004). On the other hand, in Jordan, money donated to such schools is not categorised as *Zakat*. The differences in the implementation of *Zakat* categories are heightened with the addition of certain eligibility criteria in some countries, discussed further below.

Additional eligibility criteria

Table 4. Documents required to prove eligibility in selected countries

Country	Programme	Requested documents
Jordan	Monthly cash assistance to poor elderly people	<ul style="list-style-type: none"> • Family booklet • Passport for non-Jordanian applications • Document from Civil Status Department indicating number of married children • Document outlining type of employment of children aged over 20 • Application indicating not receiving any money from or owning any assets under: <ul style="list-style-type: none"> • Department of Pensions and Compensation • Department of Land • Zakat Committees • Unit for Licensing Vehicles and Drivers (Zakat Fund 2019) • National ID
Singapore	Monthly financial assistance for poor people	<ul style="list-style-type: none"> • Birth certificate • Income document showcasing that per capita income is lower than SGD400 • Bank statement (MUIS 2020d)
Bahrain	General application to Zakat Fund	<ul style="list-style-type: none"> • National ID/passport • Number of dependents and their educational level and social status • Type of housing and whether its owned or rented • Total family income for the head of household and/or other members of the family, including salaries from work, pensions and other financial assistance from different government and non-governmental entities • Total monthly expenditure, including debt instalments for cars, assets, health care or rent and/or any other financial commitments • Any commercial licences for the applicant (Zakat and Sadaqa Fund n.d.)

Source: Author’s own based elaboration on several sources.

Additional eligibility criteria such as proof of lack of income and asset ownership are now required by most State-led Zakat Funds. In **Nigeria**, the eligibility criteria differ from the one state to the next, but in Kaduna, for example, both Muslims and Christians can benefit (Development, Research and Projects Centre and Nigeria Research Network 2016). In **Kuwait**, on the other hand, the Zakat House has a set of required documents proving income status, lack of assets owned or a family's social situation (widowed, wife of an imprisoned breadwinner etc.) that are requested from all applicants. It also stipulates that only non-Muslims who fall under the category of those considering converting may benefit (Zakat House n.d.). In **Pakistan**, only Muslim citizens living below the poverty line are eligible (Government of Punjab n.d.). Conversely, in **Jordan**, the Zakat Fund regards both citizens and non-citizens as eligible for *Zakat* and requires non-citizens to provide their passports as proof of documentation. In addition to income and asset documents, applicants are required to fill out a form indicating any public assistance they receive (Zakat Fund 2019). A list of the documents required from a selection of Zakat Funds is provided in Table 4.

Role of local committees

As mentioned in section on Centralised vs Decentralised Modus Operandi, local committees often play a role in assessing eligibility, specifically in hybrid and decentralised Zakat Funds. In **Algeria**, mosques act in lieu of local committees and are free to identify eligible beneficiaries, as the central fund has not set any specific criteria (Manaseri 2020). In **Pakistan**, for example, each province has its own *Zakat* laws which stipulate broad regulations for eligibility and provide the local-level committees with the authority to determine eligibility. In the province of Khyber Pakhtunkhwa, the eligibility criteria for the monthly cash assistance known as the *Guzara* allowance are simply:

- an adult Muslim who is needy, indigent or poor, with preference given to widows, orphans, and people with disabilities;
- should not be a habitual beggar; and
- people affected or rendered homeless by natural disasters (Khyber Pakhtunkhwa *Zakat* and Ushr Council 2021).

If an applicant meets two or more of these broad eligibility criteria, the local committee is responsible for the process of eligibility verification, which is done at its discretion. In **Oman**, a similar process is followed, whereby all committees must follow the requirement that an applicant's income is below OMR80, but committees maintain the authority to determine eligibility otherwise, as they are regarded as better equipped to know local vulnerabilities (Oman KII).

Libya is similar to the two examples mentioned above but differs slightly in that the eligibility criteria set by the central fund are more detailed, and specific criteria are set for each local committee, taking into account the area's particular needs (Libya KII).

3.4 Types of benefits

This subsection provides an overview of the type of benefits provided by *Zakat* by looking at ***Zakat as social assistance vs. Zakat as microfinancing mechanism***. A summary of the main takeaways from this section is provided below.

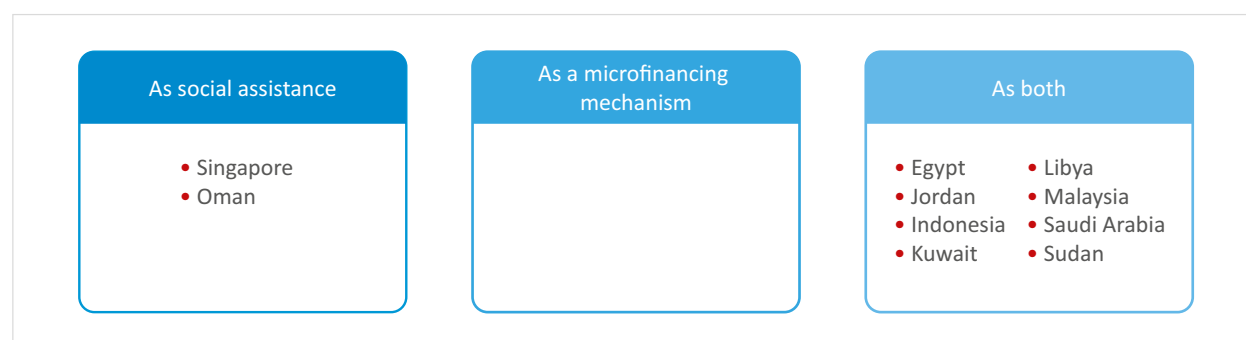
Zakat as social assistance vs. Zakat as a microfinancing mechanism

- Most countries combine temporary and recurrent programmes, as well as cash and in-kind benefits.
- Most countries use *Zakat* to support both productive and unproductive recipients, with the former receiving microfinancing and the latter receiving social assistance.
- **Indonesia** is a good example of *Zakat* as a microfinancing mechanism, since it combines funding with mentoring to ensure success.

Zakat as social assistance vs. Zakat as microfinancing mechanism

Figure 11 provides examples of the countries that use *Zakat* as social assistance and/or as a microfinancing mechanism.

Figure 11. Mechanism of providing Zakat, by country



Source: Author's own elaboration.

Zakat **social assistance benefits** can be **cash, in-kind** or a **combination of both**, and can also be **temporary** or given on a **recurrent basis**. All the State-led *Zakat* Funds studied provide a combination of cash and in-kind benefits, as well as temporary and recurrent programmes. **Pakistan's** different provincial *Zakat* Funds all provide a combination of cash and in-kind benefits, as well as temporary and recurrent ones. For example, the largest programme—the *Guzara* allowance—is a monthly cash benefit, but beneficiaries can also receive free health care services, educational stipends and marriage assistance. In **Sudan**, the *Zakat* Chamber covers the payment of health insurance fees for all its beneficiaries (Bilo, Machado, and Bacil 2020). **Singapore** is one of the few examples that provides *Zakat* as social assistance only, through a combination of recurrent (monthly cash assistance) and ad hoc benefits (burial grants) that can be in cash or vouchers (MUIS 2020b).

Recently, *Zakat* has been emphasised as a **microfinancing mechanism**, as scholars have sought to differentiate between productive and unproductive *Asnaf*. The former are categories of people eligible for *Zakat* who can work and earn their own income, while the latter are people who cannot do so, such as old poor people or people with disabilities. This dichotomy has led to the use of *Zakat* for income-generating projects that contribute to poverty alleviation and transform productive *Asnaf* from *Zakat* recipients into contributors (Ibrahim and Ghazali 2014; Ma'sum Billah 2017). When *Zakat* is used as a microfinancing mechanism it is given as cash or in-kind benefits, not as loans. *Zakat* Funds sometimes also offer *Qard Al-Hassan* (benevolent loans), which are interest-free loans, given that charging interest on loans is not permissible in Islam. In **Libya**, the *Zakat* Fund differentiates between poor people who cannot work and

unemployed poor people. The former receive monthly cash assistance, while the latter receive cash or in-kind benefits to finance their income-generating projects (*Zakat* document provided to the IPC-IG). Similarly, in **Indonesia**, the *Zakat* law particularly references the distribution of *Zakat* to meet people's basic needs and to serve productive purposes (Obaidullah 2017). The country's Zakat Fund (BAZNAS) has four different programmes for productive *Zakat* recipients: community development, farmers' empowerment, microfinance and economic empowerment. The microfinancing mechanism includes providing financing and mentoring, especially in the area of optimising digital marketing tools for product marketing (BAZNAS 2021). Similarly, in **Malaysia**, capital is given to those categorised as 'poor' and 'needy' for the establishment of a micro project, with no requirement for repayment (Ibrahim and Ghazali 2014).

Within the type of benefits provided by Zakat Funds it is important to highlight that *Zakat* is viewed as a tool for poverty reduction, community development and microfinancing. Recently, researchers have found that *Zakat* also plays a role in humanitarian crises by being a major provider of assistance through either informal mechanisms (i.e. non-State actors) or formal State-led Zakat Funds (Stirk 2015; Lawal and Ajayi 2019; IFRC 2018). The role that State-led Zakat Funds played in complementing the financing of the national emergency response to COVID-19 in countries such as Egypt, Jordan and Malaysia is a testament of their ability to respond to shocks in a coordinated manner with other government social assistance providers (UNICEF and JSF 2020; Hammad et al. 2021).

3.5 Transparency, accountability and perceptions

It is important to highlight that as a religious institution, Zakat Funds or State-led *Zakat* collection processes are accountable to *Zakat* recipients, as their main beneficiaries, to *Zakat* payers, as their main contributors, and the *fatwa*-making body, as the entity responsible for setting the parameters for *Zakat* in the country. Furthermore, the latter two groups, as well as the Zakat Fund itself, are all also accountable to Allah, in what Saad et al. (2014) refer to as the 'Islamic accountability framework'. This subsection provides an overview of the transparency, accountability and perceptions of *Zakat*, especially for beneficiaries and payers. It considers the following three main aspects:

- **Monitoring and evaluation (M&E) and grievance redress mechanisms (GRMs) for recipients**
- **Transparency for payers**
- **Perceptions of *Zakat* among both recipients and payers.**

A summary of the main takeaways from this section is provided below.

M&E and GRM for recipients

- Only a few countries have a clearly indicated GRM or M&E processes.

Transparency for payers

- Most countries do not regularly publish financial data about the amount of *Zakat* received and distributed.
- Most countries do not share annual reports or strategic plans indicating the direction and goals of the institution.
- Most countries are working on improving the data available on programmes, especially through the development of apps that provide *Zakat* payers with the ability to track the size of their donations.

Perceptions

- Negative perceptions of State-led Zakat Funds, particularly in South Asia and the Asia-Pacific.

M&E and GRMs for recipients

Limited information is available on the M&E processes and the GRMs followed in all State-led *Zakat* institutions studied. Three positive examples noted were in **Indonesia** for **M&E**, and in **Sudan** and **Jordan** for GRMs.

In **Indonesia**, BAZNAS implements a 'National Zakat Index' and a 'Sharia Compliance Index' to measure the performance of its 500+ offices across the country. The National Zakat Index measures factors such as institutional affairs, the impact of *Zakat* delivered and the use of the database, and scores each office accordingly (BAZNAS 2020).

As for **GRMs**, **Sudan's** Zakat Law (2001) stipulates the creation of a grievance committee at the *wilayah* (provincial) level. **Jordan's** *Zakat* procedure manual stipulates the creation of a taskforce specialised in receiving all complaints and suggestions for **each Zakat committee**. A series of actions is indicated on how 'complaints' should be resolved (Zakat Fund 2019). Complaints and suggestions can be received through nine different mechanisms:

- the government's interactive portal to receive citizens' complaints and opinions;
- the Zakat Fund's email;
- the Zakat Fund's telephone and fax numbers;
- the Zakat Fund's website;
- in person at the Zakat Fund's offices;
- posters within the central office;
- suggestion boxes at the central office; and
- at routine meetings of the General Manager and employees.

Transparency for payers

Based on the transparency criteria prepared by Indonesia's BAZNAS, transparency for Zakat Funds can consist of financial, managerial and programmatic transparency. These aspects are judged based on the publicly available information that the Zakat Funds provide through their own websites or news agencies. Financial transparency occurs through the existence of published and easily accessible financial reports, and the use of external auditors. Managerial transparency can include a readily available work plan and/or strategic plan. Finally, programmatic transparency includes a database of *Zakat* recipients and payers, as well as data on the timeliness of *Zakat* distribution (BAZNAS 2019). Figure 12 provides an overview of countries that are positive examples of financial, managerial or programmatic transparency.

The Accounting and Auditing Organization for Islamic Financial Institutions has a Financial Accounting Standard on Financial Reporting for Zakah, which emphasises that it is essential to disclose sources of *Zakat* (i.e. from companies or individuals) and its uses (i.e. for each type of *Asnaf*), as well as the remaining balance of undistributed *Zakat*, in financial reporting (AAOIFI 2019). A few State-led Zakat Funds exhibit **financial transparency** by publishing financial reports and using external or government auditors, even though both elements are mentioned in the laws

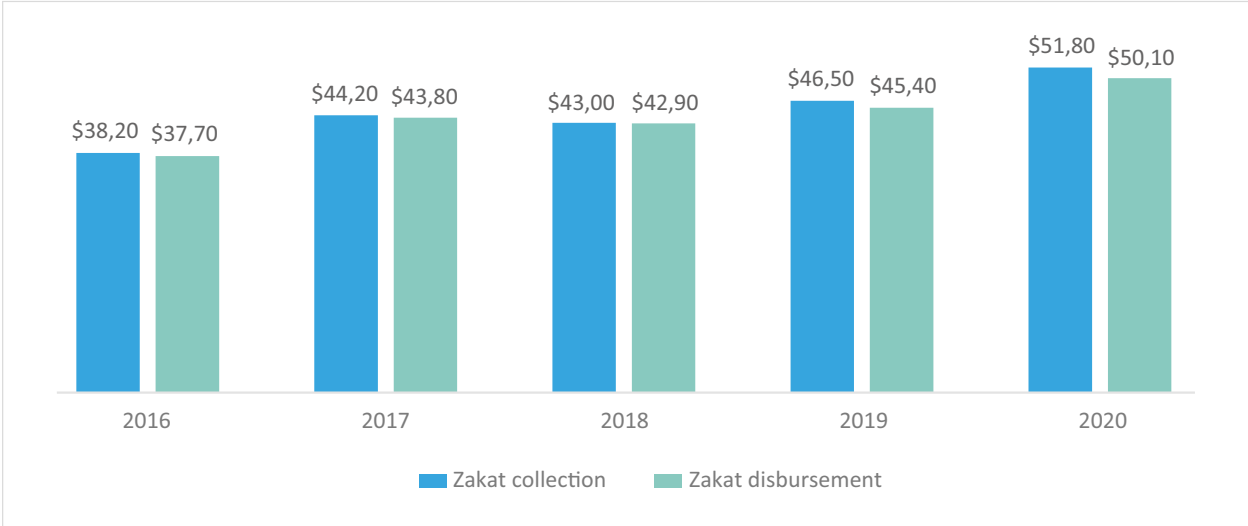
of most Zakat Funds²⁰ (such as in Indonesia, Sudan, Oman, Djibouti, Egypt, Singapore, Qatar). **Indonesia's** law, for example, indicates that financial reporting and its dissemination through the media is a requirement for all *Zakat* institutions at different levels. BAZNAS is responsible for collating reports and sharing them with the provincial and central government (Obaidullah 2017). The BAZNAS 2020 annual report, disseminated on its website, includes the amount of *Zakat* donations and estimates for the years to come (BAZNAS 2020). **Singapore** is another good example of yearly disseminated financial reports that are easily accessible on the Zakat Fund's website, including information on *Zakat* collection (SGD51.8 million or approximately USD38.5 million)²¹ and disbursement (SGD50.1 million or USD37.2 million)²² (see Figure 13), as well as an independent auditor's report (found in the Annex) indicating that "accompanying financial statements were properly drawn up" (MUIS 2021).

Figure 12. Type of transparency followed by Zakat Funds, by country



Source: Author's own elaboration.

Figure 13. Singapore's financial reporting on *Zakat* collection and disbursement, 2016–2020 (in SGD millions)



Source: Author's own elaboration based on data available from MUIS (2021).

20. Applicable only to the Zakat Funds whose laws are available in English and/or Arabic.

21. Based on the exchange rate on 16 September 2021.

22. Based on the exchange rate on 16 September 2021.

As a decentralised Zakat Fund, the strength of financial transparency in **Malaysia** differs from one state to the next. The Federal State Territory of Kuala Lumpur is one that has been producing financial information diligently, including the amount of *Zakat* collected, the means through which it was paid (salary deduction, bank transfer, digital portal), and the type of wealth it was obtained from (income, business, savings). The 2020 annual report indicates that the number of *Zakat* payers increased by 279 per cent and that the total *Zakat* collected reached MYR756 million (USD445.8 million), an 11 per cent increase from 2019 (PPZ MAIWP 2021). A country example of a Zakat Fund that is partially financially transparent is **Oman**. The Zakat Fund does not publish any annual financial reports, but its website includes data on the amount of *Zakat* collected and the number of payers that can be disaggregated by *wilayah* and updated in real time (Zakah Department 2021).

Financial transparency has scope for improvement in **Saudi Arabia, Kuwait, Pakistan, Libya** and **Egypt**.

Saudi Arabia and **Kuwait** are examples of incomplete financial reporting. In **Saudi Arabia**, for example, and to the researcher's knowledge, the state budget does not differentiate between *Zakat* and income tax that come from the General Authority for Tax and Income. While the Central Zakat Fund in **Pakistan** goes through an annual audit process, its results are not positive. For example, the 2018-2019 audit revealed that a number of *Zakat* collection and controlling agencies (banks and companies) and *Zakat* collection offices (post offices and national saving centres) delayed transferring the *Zakat* to the central bank, with some not recording the *Zakat* collected in the first place (Auditor General of Pakistan 2019).

Managerial transparency, in the form of published annual reports and strategic plans, is exhibited in **Indonesia, Jordan, Singapore** and certain states in **Malaysia**. **Indonesia's** BAZNAS's annual report includes a strategic plan and lists all the changes that have occurred in *Zakat* administration (BAZNAS 2020). Likewise, the Zakat Fund of the Federal Territory of Kuala Lumpur has been diligent in its publication of annual reports, with its 2020 report detailing changes to the managerial board and auditing committee (PPZ MAIWP 2021). **Jordan's** Zakat Fund is another institution that produces annual reports detailing important achievements and highlighting set targets and future plans. Unlike Malaysia and Indonesia, Jordan's production of reports is slow. As of August 2021, Jordan's annual report for 2020 had not yet been published. An example of a country whose State-led Zakat Fund has limited managerial transparency is Algeria, where the lack of a *Zakat* law, strategic plans or a set hierarchy means that the operations of the Zakat Fund remain uncoordinated and inefficient (Manaseri 2020).

As for **programmatic transparency**, which is taken to mean data on recipients, payers and the timeliness of *Zakat* distribution, a few countries such as Indonesia and Singapore have achieved this, while others such as **Oman, Libya, Jordan** and **Kuwait** are working on its improvement. **Indonesia's** BAZNAS's annual report includes data for each beneficiary group, as well as projections for *Zakat* distributions in the next year and the number of beneficiaries in each distribution category. This is made possible through the creation of a unified beneficiary database allocating each beneficiary a unique identification number (BAZNAS 2020). In **Singapore**, the Zakat Fund website indicates how much *Zakat* went to each *Asnaf* (MUIS 2020e) and provides further disaggregated data on beneficiary numbers in its annual report (MUIS 2021). In **Oman, Libya** (Libya Zakat Fund 2021) and **Jordan** (Zakat Fund 2021), Zakat Funds have developed apps/portals to enable people who pay *Zakat* to track their contribution amounts over time.

Perceptions

People's perceptions of *Zakat* institutions—or what is known as donor trust in the charitable/voluntary sector—are vital to ensure positive giving behaviour, especially in countries with newly established State-led *Zakat* collection processes (Abioye, Mohamad, and Adnan 2011; Sargeant and Lee 2004). In a study on **Nigeria**, Abioye et al. (2011) find that the Zakat Fund's governance and legitimacy of management structures—in other words, managerial transparency—influence payers' perceptions. Idris et al. (2003) find that perceptions on the quality of the service provided—in other words, programmatic transparency—degree of knowledge of *Zakat*, and degree of exposure to promotional campaigns is positively related to *Zakat* payment behaviour. Furthermore, the less financially transparent

a Zakat Fund is in its disclosure practices, the less trust people have in it, and the less likely they are to perceive it positively and to pay their *Zakat* (Muhammad and Saad 2016; Pangestu and Jayanto 2017).

Some literature has addressed the **positive perceptions of State-led Zakat institutions**. In **Malaysia**, Nahar (2018) finds improvements in the perceptions of people regarding the collection, distribution and reporting of the Malaysian Zakat Fund in Selangor state, which has adopted a corporate administrative structure that has improved programmatic and financial transparency. *Zakat* payers in Malaysia were found to be satisfied with the quality of service provided by the fund in terms of trustworthiness, honesty, and physical evidence of distribution (Saad, Wahab, and Hussain 2016). In **Indonesia**, Riwijanti et al. (2018) showcase how civil servants are willing to have *Zakat* deducted directly from their salaries and routed to BAZNAS annually, given that it makes it easier for them to fulfil their *Zakat* obligations. In a study on **Morocco**, Rouijel and Marzouki (2019) explore Moroccans' perceptions of the creation of a State-led Zakat Fund and find that 74 per cent of respondents support the establishment of such an institution, and that 85 per cent of them believe *Zakat* could be an effective tool for poverty eradication. No research with a comprehensive methodology and a sufficient sample size was found to address *Zakat* recipients' perceptions of State-led *Zakat* institutions, which indicates the need for such institutions to undertake evaluations of their work to assess their beneficiaries' satisfaction.

Some literature has previously addressed the **negative perceptions of State-led Zakat institutions** in South Asia and the Asia-Pacific (Ali and Hatta 2014; Fauzia 2013; Malik 2016; Shaikh 2015; Ismail 2018). In **Indonesia**, State-led *Zakat* collection was resisted due to fears of corruption heightened by the lack of financial transparency (Ali and Hatta 2014; Fauzia 2013). However, recent changes implemented by BAZNAS might have resulted in a change in public perception, possibly evidenced by the rise in *Zakat* contributions (BAZNAS 2020). In **Pakistan**, where *Zakat* is compulsory, there is widespread evasion because of a lack of trust in state institutions (Malik 2016; Shaikh 2015). Evasion tactics include withdrawing the bulk of money from accounts prior to the date that *Zakat* is deducted or providing a statement that their faith or *fiqh* opposes *Zakat* payments. The latter is technically legal under current rules, through the submission of a valid declaration form that has to be studied and confirmed, but it has been exploited to enable evasion (Iqbal 2020; Obaidullah 2017), and exemptions have often been given without valid declaration forms (Auditor General of Pakistan 2019). A similar negative perception permeates the *Zakat* system in **Bangladesh** (Ali and Hatta 2014).

4. RECOMMENDATIONS

This section provides a few general recommendations based on the main topics and sub-topics addressed throughout the paper (see Table 5). However, these recommendations are **general** and **would need to be adjusted and adapted to reflect the perceptions and preferences of the government and to suit the Afghan socio-economic and governance context**.

Table 5. Recommendations on topics and sub-topics of Zakat institutionalisation and operation

Topic	Sub-topics	Recommendation
Management and institutional arrangements	State-led vs. charity-led	Increase the efficiency, effectiveness and <i>Sharia</i> compliance of the <i>Zakat</i> collection and distribution process through the creation of a State-led Zakat Fund to pool all or most <i>Zakat</i> payments in the country. However, this is premised on the assumption that the collection process is transparent, and the existence of public preferences for State-led over charity-led <i>Zakat</i> collection.
	Centralised vs. decentralised	A hybrid mode of operation can enable the unification of service provision in terms of the implementation of similar eligibility criteria, similar programmes and types of benefits, and at the same time it can allow for local committee participation .
	Integration with <i>fatwa</i> -making body	The integration of a Zakat Fund or its separation from a <i>fatwa</i> -making body is not as important as the extent to which both entities coordinate and communicate with one another. Such a decision is premised on the religious authority and governance structure within the country.



Topic	Sub-topics	Recommendation
Management and institutional arrangements	Linkage to social protection systems	<p><i>Zakat</i> can be linked to social protection systems in a number of fruitful mechanisms that depend on the style and design of <i>Zakat</i> collection, as shown below.</p> <p>If a State-led <i>Zakat</i> collection entity is only tasked with collection and not distribution, then <i>Zakat</i> can form part of social protection budgeting and expenditure—i.e. when <i>Zakat</i> financing is used to fund social protection expenditure by the responsible ministry (e.g. Ministry of Social Affairs) that has been proven to be <i>Sharia</i> compliant.</p> <p>If a State-led <i>Zakat</i> collection entity is responsible for both collection and distribution, then it is important for it to have complementary/coordinated databases and/or eligibility criteria with the country's main social assistance provider, to reduce duplication and improve the effectiveness of both programmes.</p> <p>If a country chooses to embark on State-led <i>Zakat</i> collection and/or distribution, then it is important for it to be included in strategising for social protection and poverty reduction.</p>
	Voluntary vs. compulsory	<p>If voluntary <i>Zakat</i> collection is adopted, then it is important to offer certain incentives such as income tax deductions to encourage compliance by <i>Zakat</i> payers.</p> <p>If compulsory <i>Zakat</i> collection is adopted, then it is important to have:</p> <ul style="list-style-type: none"> • incentives as mentioned above; • clear disincentives for non-compliance stipulated in the law (e.g. retroactive payment, payment of a fine); • clear indications of who should pay Zakat (both individuals and businesses or the former only, or the latter only as in Saudi Arabia); • clear indications of types of wealth liable for Zakat stipulated in the law and/or subsequent regulations or <i>fatwas</i>; • clear dates/deadlines for when <i>Zakat</i> should be paid; and • easy payment options for payers (e.g. options to pay in person, by post and/or through automatic deductions from a savings account; however, the latter would require an assessment of financial inclusion, and strong data protection mechanisms).
Financing	Types of wealth liable for <i>Zakat</i>	The decision on the types of wealth to incur <i>Zakat</i> should be based on a thorough assessment of the types of different assets and resources prevalent in Afghanistan.
	Incentives to pay <i>Zakat</i>	Incentives to pay <i>Zakat</i> in the form of deducting Zakat paid from tax payable or from taxable earnings should be based on an assessment of the feasibility and the practicality of implementing either option.
Eligibility criteria	<i>Zakat</i> beneficiary category interpretations	<p>The <i>Asnaf</i> categories and who they apply to have been interpreted differently by <i>fatwas</i> across several countries. A <i>fatwa</i> or several <i>fatwas</i> indicating the definitions of <i>Asnaf</i> to be adopted is required.</p> <p>For the poor and needy category, it is recommended that the definition is in line with the current poverty line calculation (as per the 2020 National Statistics and Information Authority report, the value for absolute poverty is AFN2,268 per person per month (NSIA 2020)) and/or other social assistance programmes implemented by the government.</p>
	Additional eligibility criteria	Additional eligibility criteria such as proof of not benefiting from another institution are necessary to reduce payment duplication, increase coverage and improve verification processes.
Types of benefits	Role of local committees	<p>Local committees should play a role in eligibility verification, as they have a better understanding of the local context; however, it is beneficial for local committees to have set eligibility criteria to follow and assess potential beneficiaries against, to ensure the efficiency of the <i>Zakat</i> programme's poverty targeting.</p> <p>It is also important that local committees have a clear GRM process in place, and that their eligibility determination process is transparent.</p>
	Social assistance vs. microfinancing	A decision to provide <i>Zakat</i> benefits only as social assistance or also including an element of microfinancing is dependent on an assessment of the demographic characteristics of the segment of the population in need. For example, in the Afghan context, the use of <i>Zakat</i> for microfinancing may be justified, given that 58.2 per cent of the working-age population are outside the labour force, and 34.4 per cent of youth (aged 15–24) are not in education, employment or training (NSIA 2020).



Topic	Sub-topics	Recommendation
	Monitoring and evaluation and grievance redress mechanisms	<p>Routine M&E should be conducted on the performance of <i>Zakat</i> collection and distribution processes. If the choice is to develop a State-led <i>Zakat</i> Fund, then it should set clear key performance indicators and targets that can be measured. It would also be important to assess not only the process of <i>Zakat</i> collection and distribution, but also the impact of <i>Zakat</i> on the livelihoods of beneficiaries. If a <i>Zakat</i> Fund has multiple offices and/or committees across the country, then criteria for monitoring their performance have to be established.</p> <p>In terms of GRM processes, the <i>Zakat</i> Fund law and/or its executive regulations should stipulate the creation of a GRM committee/unit within the <i>Zakat</i> Fund tasked with receiving, assessing, resolving and responding to all complaints. It is recommended that the GRM unit adopts a variety of channels through which to receive people's complaints, and sets a timeline for assessing and responding to all complaints.</p>
Transparency, accountability and perceptions	Transparency for payers	<p>Transparency for payers can be achieved by setting a requirement for routine financial reporting and auditing in the <i>Zakat</i> Fund law, and information dissemination regarding the management and programmes of the <i>Zakat</i> Fund. The outcomes of routine financial reporting (covering both <i>Zakat</i> collection and how it is distributed and divided among the different <i>Asnaf</i> (i.e. annual reports, infographs, annual financial statements) can be disseminated through a variety of means (i.e. online, in person, via an app).</p> <p>It is recommended that annual reports include the following information:</p> <ol style="list-style-type: none"> 1. How much <i>Zakat</i> has been collected (disaggregated by province, and by source—i.e. individual or business/company, if applicable) 2. How much <i>Sadaqa</i> has been collected (with similar disaggregation as mentioned above) 3. Yearly tracking of changes in <i>Zakat</i> and <i>Sadaqa</i> collections 4. Projections of <i>Zakat</i> and <i>Sadaqa</i> collection for the coming years 5. How much <i>Zakat</i> has been spent on each programme implemented by the <i>Zakat</i> Fund 6. How many beneficiaries (individuals and/or households) are benefiting from each programme 7. Yearly tracking of the number of beneficiaries per programme 8. How much <i>Zakat</i> has been spent per <i>Asnaf</i> category 9. How many beneficiaries (individuals and/or households) are benefiting under each <i>Asnaf</i> category 10. Yearly tracking of the number of beneficiaries under each <i>Asnaf</i> category. <p>Recommendations 5 and 6 and 8 and 9 can be implemented interchangeably depending on the design of the <i>Zakat</i> Fund's programmes.</p>
	Perceptions of <i>Zakat</i> among both recipients and payers	<p>To ensure positive perceptions of <i>Zakat</i> by both its recipients and payers, a focus on ensuring financial, programmatic and managerial transparency through information dissemination and simplifying the communication processes is important.</p>

Source: Author's own elaboration based on the literature review.

ANNEX

Annex 1. Summary of Zakat collection processes across different countries

Country	State-led Zakat	Zakat Fund	Modus operandi	Overseeing institution	Compulsory/voluntary	Relevant laws/ <i>fatwas</i>
Algeria	Y	Zakat Fund	Hybrid	Ministry of Religious Affairs and Awqaf	Voluntary	No direct law, but listed in Executive Decree No. 2000–146 on the Organisation of the Centralised Management of the Ministry of Religious Affairs and Awqaf (2000) (Chadin and Bekkaye 2019)
Bahrain	Y	Zakat and Sadaqa Fund	Centralised	Ministry of Justice, Islamic Affairs and Awqaf	Voluntary	Law No. 12 on the Establishment of a Zakat Fund (1993)
Bangladesh	Y	Zakat Fund		Under the Islamic Foundation, which is under the Ministry of Religious Affairs	Voluntary	Zakat Fund Ordinance No. VI (1982)
Brunei	Y	Majlis Ugama Islam Bruenei	Centralised	Under the Ministry of Religious Affairs (Muhammad 2019)		
Djibouti	Y	Diwan Al Zakat		Under the leadership of the Ministry of Muslim Affairs	Voluntary	Zakat Law
Egypt	Y	House of Zakat	Centralised	Under Al-Azhar	Voluntary	Law No. 123 on the House of Zakat and Sadaqah (2014)
Indonesia	Y	Badan Amis Zakat Nasional (BANZAS)		Ministry of Religious Affairs	Voluntary	Zakat Management Act (2011)
Iraq	Y	Zakat and Sadaqa Fund	-	Ministry of Awqaf and Religious Affairs	Voluntary	Zakat Fund Law No. 55 (1978) Zakat Fund Instructions No. 1 (1988) Zakat and Sadaqa Fund Law No. 34 (1999)
Iran	N	-	-	-	-	-
Jordan	Y	Zakat Fund	Hybrid (some autonomy for committees, but management, oversight and redistribution of Zakat across the kingdom lies with the central office)	Under the Ministry of Awqaf and Religious Affairs	Voluntary	Zakat Fund Law No. 8 (1988)
Kuwait	Y	Zakat House		Under the Ministry of Awqaf and Religious Affairs	Voluntary for individuals; compulsory for companies, but collected through the Ministry of Finance, not the Zakat House	Law No. 5 on the Creation of a Zakat House (1982) and its subsequent amendments Zakat and Company Contributions to the State Budget Law No. 46 (2006) and its executive regulations
Lebanon	N	-	-	-	-	-



Country	State-led Zakat	Zakat Fund	Modus operandi	Overseeing institution	Compulsory/voluntary	Relevant laws/ <i>fatwas</i>
Libya	Y	Zakat Fund	Hybrid	Under the Council of Ministers	Voluntary	Law No. 13 on Zakat (1997) Decree No. 49 on the Establishment of a Zakat Fund (2012)
Malaysia	Y	Different name depending on state		Under the State Islamic Religious Councils	Voluntary	Each state has its own <i>Zakat</i> laws, which fall under the Administration of Islamic Law (Federal Territories) Act (1994) (Abidin and Saad 2014)
Morocco	N	-	-	-	-	-
Nigeria	Y	Different name depending on state	Decentralised		Differs by state	
Oman	Y	Zakat Department	Decentralised	Within the Ministry of Endowments and Religious Affairs	Voluntary	
Pakistan	Y	Zakat and Ushr Departments that are separate or integrated into others based on the province	Decentralised	-	Compulsory	Differs by province: Punjab Zakat and Ushr Act (2018) Sindh Zakat and Ushr Act (2018) Khyber Pakhtunkhwa Zakat and Ushr Act (2011) Balochistan Zakat and Ushr Bill (2012)
Palestine (West Bank)	Y	Central Zakat Fund		Ministry of Awqaf and Religious Affairs	Voluntary	
Qatar	Y	Zakat Fund		Ministry of Awqaf and Religious Affairs	Voluntary	Law No. 8 on the Establishment of a Zakat Fund (1992)
Saudi Arabia	Y	-	Centralised	Ministry of Finance (Department of Zakat and Income Tax)	Compulsory for individuals engaged in activities subject to <i>Zakat</i> through sole proprietorship, a licensed business activity or a corporation (Zakat and Customs Authority 2019)	Zakat Collection Law Executive Regulations for the Collection of Zakat (2019)
Singapore	Y	Majlis Ugama Islam Singapura		-	Obligatory	Administration of Muslim Law Act
Somalia	N	-	-	-	-	-
Sudan	Y	Zakat Chamber	Hybrid	Ministry of Social Affairs	Compulsory	Zakat Law (2001)
Syria	N	-	-	-	-	-
Tunisia	N	-	-	-	-	-
Turkey	N	-	-	-	-	-
UAE	Y	Zakat Fund	Centralised	Ministry of Islamic Affairs and Endowments	Voluntary	Union Law No. 4 on the Establishment of a Zakat Fund (2003)
Yemen	-				Compulsory but now taken over by Houthis (Al-Kamali 2021)	

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