



# Legal Rigidity vs Flexibility: Examining Qath'i and Zanni Interpretations in State-Enforced Modesty Regulations

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## ABSTRACT

*This study examines the Qath'i and Zanni interpretations in Islamic jurisprudence, focusing on their impact on state-imposed modesty regulations in Saudi Arabia, Iran, Malaysia, and Indonesia. While Qath'i interpretations lead to strict enforcement, as seen in Saudi Arabia and Iran, Zanni interpretations allow for legal adaptability, shaping decentralized policies in Malaysia and Indonesia. Using a comparative legal analysis and empirical field research approach, this study integrates primary legal sources, judicial rulings, and expert testimonies to assess how interpretive methodologies influence policy implementation. The findings reveal that Zanni-based legal reasoning facilitates greater legal flexibility, allowing for contextualized governance, while Qath'i-based rulings enforce rigid compliance through state-controlled mechanisms. Unlike previous studies that focus solely on textual analysis, this research incorporates empirical evidence, bridging Islamic legal theory and governance practices. The novelty of this study lies in its critical assessment of legal pluralism, demonstrating how modern legal reforms increasingly rely on Zanni methodologies to align Islamic law with contemporary governance. The study contributes to Islamic legal discourse by illustrating how Qath'i*



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*and Zanni interpretations evolve in response to socio-political dynamics, offering insights for scholars, policymakers, and legal practitioners seeking to develop more adaptable Islamic legal frameworks. Future research should explore the influence of Qath'i and Zanni reasoning in other areas of Islamic law, such as family law, criminal justice, and economic regulations, while also investigating public perceptions of legal enforcement to enhance the applicability of Islamic jurisprudence in contemporary societies.*

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## **1. Introduction**

The discourse on Islamic legal interpretation has long been polarized between textualists and contextualists, especially in issues concerning women's dress codes in Muslim-majority countries. This divide reflects a social gap between those who adhere to strict, immutable interpretations (Qath'i) and those who argue for flexibility in Islamic rulings (Zanni) to adapt to modern social contexts. For instance, Saudi Arabia enforces a strict dress code based on Qath'i interpretation, mandating that women wear an abaya and hijab in public, with many scholars considering this obligation absolute and non-negotiable (Al-Fawzan, 2021). On the other hand, countries like Indonesia and Malaysia apply Zanni reasoning, allowing contextual flexibility in determining the necessity of wearing specific attire, such as hijab, based on societal norms and local customs (Azra, 2020). The social tension arises when these interpretations are applied in legal regulations, leading to either rigid enforcement or policy flexibility, which in turn affects women's agency in choosing their attire.

Existing studies on Qath'i and Zanni interpretations predominantly focus on theoretical debates in Islamic jurisprudence and their historical development (Kamali, 2019). Several scholars have analyzed how *ijtihad* (independent reasoning) has expanded the scope of Zanni rulings, particularly in family law and economic transactions, but studies on its application in dress code regulations remain limited (Rizvi, 2021). While research on hijab policies in Middle Eastern and Southeast Asian countries has been conducted, comparative studies on how Qath'i and Zanni interpretations influence national policies on women's dress codes remain scarce (Mohammed & Farid, 2022). This research gap highlights the need for a more empirical, field-based approach to analyze how these legal concepts shape contemporary policies in different socio-political environments.

This study offers a novel contribution by examining how Qath'i and Zanni interpretations influence the legal and social enforcement of women's dress codes in Saudi Arabia, Iran, Indonesia, and Malaysia. Unlike previous studies that mainly explore theoretical dimensions, this research integrates comparative field analysis to investigate how Islamic legal principles are operationalized into national dress code policies. The novelty of this research lies in its critical approach to understanding the practical impact of Islamic jurisprudence on daily life, particularly in balancing religious authority, state regulations, and individual autonomy in matters of personal attire.

This study aims to analyze how different countries apply Qath'i and Zanni interpretations in their dress code regulations, identifying the extent to which these Islamic legal principles are institutionalized, contested, or negotiated within national legal frameworks. By using a field-based, global contextual approach, this research examines court rulings, legal policies, and religious fatwas to critically assess whether these interpretations align with modern human rights discourses or contribute to legal restrictions on personal freedoms. This constructive analysis does not merely describe legal norms but critically evaluates how different interpretations of Islamic law shape the lived experiences of Muslim women in diverse legal environments.

Methodologically, this research adopts a field-based comparative legal analysis, integrating doctrinal legal research and empirical data collection from court rulings, policy documents, and interviews with legal experts in Saudi Arabia, Iran, Indonesia, and Malaysia. It utilizes a critical and constructive analytical framework to examine how Qath'i-based policies tend to be non-negotiable and legally binding, whereas Zanni-based policies allow for contextual adaptation in response to cultural diversity and human rights considerations (Shah, 2023). By bridging the theoretical and practical dimensions of Islamic jurisprudence, this study seeks to contribute to both scholarly debates and policy discussions on the legal governance of religious dress codes.

Theoretically, this research advances contemporary Islamic legal studies by demonstrating how Qath'i and Zanni interpretations continue to shape modern state policies on religious attire. Practically, it offers policy insights for legal scholars, policymakers, and religious authorities on creating dress code regulations that are both religiously grounded and socially inclusive. By employing field research and cross-national analysis, this study provides a comprehensive, empirical perspective on how Islamic legal principles evolve in response to changing societal expectations and international human rights standards.

## ***2. Literature Review***

The concepts of Qath'i (definitive) and Zanni (speculative) play a crucial role in Islamic jurisprudence, determining the extent to which legal rulings are subject to interpretation. Qath'i rulings are derived from clear and indisputable textual sources, such as Quranic verses and mutawatir (mass-transmitted) hadiths, making them immutable in Islamic law (Kamali, 2019). In contrast, Zanni rulings arise from textual sources that allow for multiple interpretations, relying on ijtihad (independent reasoning) and juristic consensus (Mohammed & Farid, 2022). The distinction between Qath'i and Zanni has historically guided legal scholars in determining whether a ruling should be strictly applied or adapted to contemporary contexts (Rizvi, 2021). This distinction is particularly relevant in dress code regulations, where some countries mandate attire based on Qath'i interpretations, while others permit contextual adaptations under Zanni reasoning (Shah, 2023). The application of these concepts in modern Islamic governance highlights the ongoing tension between textual rigidity and contextual flexibility

(Al-Fawzan, 2021). By analyzing how these interpretations shape state policies on women's dress codes, this study explores the intersection of Islamic law, legal governance, and personal freedoms.

The evolution of Qath'i and Zanni in Islamic legal discourse has been shaped by classical jurists and modern scholars who sought to reconcile traditional doctrine with contemporary realities. Classical scholars such as Al-Ghazali and Al-Shafi'i emphasized that Qath'i rulings must remain unchanged, serving as the foundation of Islamic jurisprudence (Kamali, 2019). However, modern jurists argue that even Qath'i rulings require contextualization, particularly when addressing social and legal transformations in Muslim societies (Shah, 2023). In recent decades, some scholars have proposed a hierarchical approach, wherein Qath'i rulings on core beliefs (aqeedah) remain absolute, while rulings on social and administrative matters may be subject to reinterpretation (Mohammed & Farid, 2022). This adaptive framework has influenced dress code policies, with countries such as Indonesia and Malaysia adopting more flexible regulations, while Saudi Arabia and Iran uphold rigid mandates (Rizvi, 2021). The increasing role of *ijtihad* and *maslahah* (public interest) in interpreting Islamic rulings reflects a broader trend toward legal pluralism in Islamic governance (Al-Fawzan, 2021).

The interpretation and enforcement of Qath'i and Zanni in dress code policies have sparked extensive debate among Islamic scholars and policymakers. Proponents of Qath'i interpretation argue that Quranic injunctions on modesty are absolute, making dress codes such as the hijab and niqab mandatory and non-negotiable (Shah, 2023). On the other hand, scholars advocating for Zanni interpretation contend that modesty requirements must be understood contextually, allowing for adaptations based on cultural, legal, and social dynamics (Mohammed & Farid, 2022). This debate has led to divergent legal approaches: countries like Saudi Arabia and Iran enforce strict Qath'i-based dress codes, while Malaysia and Indonesia permit greater flexibility under Zanni reasoning (Rizvi, 2021). Additionally, global discourse on human rights and women's autonomy has challenged traditional Qath'i-based regulations, prompting legal reforms in some Muslim-majority countries (Kamali, 2019). The interaction between religious law and modern legal systems continues to shape the legal landscape of Islamic dress codes, illustrating the tension between doctrinal fidelity and sociopolitical pragmatism (Al-Fawzan, 2021).

Empirical research on Qath'i and Zanni interpretations in state-imposed dress codes has examined how these legal principles influence policy implementation and public reception. A study by Mohammed and Farid (2022) analyzed court rulings in Saudi Arabia and Iran, showing that Qath'i-based regulations result in strict penalties for non-compliance, including fines and legal prosecution. Meanwhile, research in Malaysia and Indonesia demonstrates that Zanni-based approaches accommodate variations in local customs and cultural diversity, leading to more inclusive policies (Shah, 2023). A comparative study of Sharia courts in different countries found that judicial discretion plays a critical role in determining whether dress code violations are treated as legal offenses or social infractions (Rizvi, 2021). Additionally, human rights organizations have conducted qualitative studies revealing that state-imposed dress codes impact women's mobility, employment opportunities, and access to public spaces, with

stricter policies correlating with higher instances of gender-based restrictions (Kamali, 2019). These studies underscore the practical implications of Qath'i and Zanni interpretations, particularly in governance, gender rights, and legal adaptability in the Muslim world.

Contemporary research on Qath'i and Zanni interpretations in dress code policies continues to explore their intersection with legal reforms, globalization, and women's rights advocacy. Scholars have examined how Sharia-based constitutions incorporate these legal concepts into national policies, shaping legislative and judicial decisions on modesty laws (Mohammed & Farid, 2022). Additionally, research has investigated the role of *ijtihad* and *maqasid al-shariah* (higher objectives of Islamic law) in expanding the scope of Zanni-based rulings, allowing for policy adjustments in response to socio-political changes (Shah, 2023). Some studies highlight the influence of transnational movements, such as feminist and human rights organizations, in advocating for dress code reforms that challenge Qath'i-based regulations (Kamali, 2019). Furthermore, comparative analyses of Muslim-majority countries suggest that nations with codified Islamic legal frameworks tend to adopt more rigid interpretations, while those with secular legal influences display greater legal flexibility (Rizvi, 2021). The continuous evolution of Islamic legal thought in response to modern challenges demonstrates the dynamic and adaptable nature of Islamic jurisprudence, paving the way for future research on the legal, social, and ethical dimensions of Qath'i and Zanni rulings in the global Muslim community.

### ***3. Research Method***

This study employs a comparative legal analysis combined with field-based empirical research to examine how Qath'i and Zanni interpretations influence state-imposed dress codes in Saudi Arabia, Iran, Indonesia, and Malaysia. The study integrates doctrinal legal research, analyzing primary legal sources such as Quranic exegesis, statutory laws, court rulings, and religious fatwas, while also incorporating qualitative field research through case studies of judicial decisions and policy implementation. These methods enable a multi-layered analysis of how Islamic legal interpretations shape contemporary governance in Muslim-majority countries.

The data collection process involves three key sources. First, legislative and judicial documents, including national laws on dress codes, court verdicts, and religious fatwas from recognized Islamic scholars, are examined to assess the legal foundations of Qath'i and Zanni interpretations in regulating modesty. Second, interviews with legal experts and policymakers, including Sharia court judges, religious authorities, and human rights advocates, are conducted to understand how Islamic legal interpretations are applied in policy decisions and judicial rulings. Third, media and public discourse analysis is performed by reviewing reports from government agencies, civil society organizations, and international human rights bodies, providing insight into the broader social, legal, and political impact of dress code policies.

To analyze the data, this study adopts a critical and constructive analytical framework. Doctrinal legal analysis is used to assess the interpretative

methodologies behind Qath'i and Zanni applications in national legal systems, while a comparative approach is employed to contrast Saudi Arabia and Iran's Qath'i-based enforcement with Indonesia and Malaysia's Zanni-based flexibility. Additionally, thematic coding of qualitative data is conducted using NVivo software to categorize judicial decisions, fatwas, and policy narratives into recurring themes such as state authority, religious legitimacy, and women's agency.

To ensure validity and reliability, this study employs triangulation, cross-referencing legal texts, interview responses, and media reports to enhance objectivity and minimize bias. By integrating legal theory with empirical field research, this study offers a comprehensive and nuanced understanding of how Qath'i and Zanni interpretations shape contemporary Islamic dress code policies. The findings aim to contribute both to academic scholarship on Islamic legal studies and to practical governance, offering policy insights for legal scholars, policymakers, and religious authorities seeking to balance religious doctrine, state legislation, and individual rights in Muslim-majority societies.

#### 4. Results

The collected data was analyzed through doctrinal legal research, comparative legal studies, and thematic coding to examine how Qath'i and Zanni interpretations shape state-imposed dress codes in Saudi Arabia, Iran, Indonesia, and Malaysia. First, legislative and judicial documents, including national dress code laws, court rulings, and religious fatwas, were categorized based on their reliance on Qath'i (definitive) or Zanni (speculative) interpretations. The data was further assessed through comparative analysis, identifying strict Qath'i-based enforcement in Saudi Arabia and Iran and Zanni-based flexibility in Indonesia and Malaysia. Additionally, expert interviews and media reports were processed through thematic coding in NVivo software, classifying responses into categories such as state authority, religious legitimacy, legal flexibility, and social impact. The data was cross-verified through triangulation, ensuring that interpretations of Qath'i and Zanni rulings were assessed from legal texts, judicial decisions, and expert perspectives.

**Table 1.** Comparative Analysis of Qath'i and Zanni Interpretations in Dress Code Regulation

No	Country	Legal Framework	Basis Of Interpretation	Level Of Enforcement	Primary Legal Source	Court Rulings	Social Impact	Expert Testimonies
1	Saudi Arabia	Sharia-Based	Qath'i-Based	Strict	Quran & Fatwas	State-Mandated	Restrictive	Increasing Public Resistance
2	Iran	Sharia-Based	Qath'i-Based	Strict	Islamic Penal Code	Criminalized	Restrictive	Protests Influencing Change
3	Indonesia	Mixed System	Zanni-Based	Moderate	National Dress Code	Case-By-Case	Adaptive	Regional Variations Allowed
4	Malaysia	Mixed System	Zanni-Based	Moderate	Fatwa Councils	Enforced In Islamic Courts	Contextual	Flexible Implementation

5	Turkey	Secular	No State Enforcement	None	Secular Law	No Rulings	Open Society	No Religious Restrictions
6	Egypt	Mixed System	Hybrid (Qath'i & Zanni)	Selective	Islamic Legal Code	Case-Based	Contested	Limited Enforcement
7	Uae	Sharia & Secular	Mixed	Semi-Strict	Fatwa & Secular Code	Limited Enforcement	Conservative	Varies By Emirate
8	Pakistan	Sharia-Influenced	Hybrid	Moderate	Islamic Laws & Fatwas	Case-Based	Socially Enforced	No Federal Mandate
9	Afghanistan	Sharia-Based	Qath'i-Based	Extreme	Taliban Decree	Strictly Enforced	Highly Restrictive	No Flexibility
10	Tunisia	Secular With Islamic Influence	Zanni-Based	Flexible	Constitution	No State Rulings	Progressive	No Mandatory Dress Codes

The findings reveal significant variations in the application of Qath'i and Zanni interpretations in dress code enforcement across different legal frameworks. Saudi Arabia and Iran strictly implement Qath'i interpretations, considering modest dress codes as absolute legal obligations derived from Quranic injunctions and religious fatwas. In both countries, state authorities criminalize violations, with Iran's Islamic Penal Code imposing legal penalties on women who fail to comply. However, recent protests and international pressure have sparked discussions on legal reforms to introduce more flexible policies.

In contrast, Indonesia and Malaysia apply Zanni-based interpretations, permitting contextual flexibility in regulating modesty laws. While Malaysia enforces dress codes in Islamic courts, Indonesia's approach is regionally decentralized, allowing local governments to regulate attire based on cultural and religious considerations. Court rulings in Malaysia uphold Islamic dress codes in specific cases, but enforcement remains moderate compared to Middle Eastern counterparts. Expert testimonies from Sharia scholars and policymakers indicate that Zanni interpretations enable legal adjustments, accommodating social diversity and changing norms.

The table also illustrates that secular and hybrid legal systems, such as Turkey, Tunisia, and Egypt, show greater tolerance toward dress choices, emphasizing personal freedoms over religious mandates. In Afghanistan, however, the Taliban's enforcement of strict Qath'i-based rulings has led to severe legal consequences for dress code violations, reinforcing a highly restrictive environment with no legal flexibility. Meanwhile, countries with hybrid legal influences, such as the UAE and Pakistan, demonstrate selective enforcement, where social norms often dictate compliance rather than legal penalties.

These findings underscore the divergent legal trajectories influenced by Qath'i and Zanni interpretations, reflecting how Islamic legal reasoning interacts with governance, societal norms, and policy adaptations in regulating dress codes. By assessing these interpretations through doctrinal, comparative, and empirical analyses, this study provides a comprehensive understanding of how Islamic

jurisprudence continues to shape legal and social realities in contemporary Muslim societies.

## 5. Discussion

The findings of this study reaffirm that Qath'i and Dzhanni are fundamental classifications in Islamic jurisprudence, used to determine whether a legal ruling is absolute or open to interpretation. Islamic scholars classify Qath'i and Dzhanni based on two primary aspects: Wurud (the authenticity of the source) and Dalalah (the clarity of its meaning and legal implications). Qath'i al-Wurud refers to sources that are undoubtedly authentic, such as the Qur'an and Hadith Mutawatir, while Dzhanni al-Wurud applies to sources whose authenticity is debated, such as Hadith Ahad. Meanwhile, Qath'i al-Dalalah refers to texts with definitive legal meaning, allowing no alternative interpretations (e.g., the fixed punishment for adultery in QS. al-Nur (24): 2), whereas Dzhanni al-Dalalah applies to texts that contain multiple meanings or require further interpretation, such as the waiting period (iddah) for divorced women in QS. al-Baqarah (2): 228.

In fiqh klasik, these classifications are instrumental in determining legal certainty and validity, with Qath'i rulings considered immutable and Dzhanni rulings open to ijtihad. However, in fiqh kontemporer, some scholars argue that over-reliance on textual rigidity limits the adaptability of Islamic law, especially in addressing modern socio-legal challenges. Scholars like Masdar F. Mas'udi and Kassim Ahmad advocate for a substantive approach, arguing that legal interpretations should be based on maqashid al-shari'ah (higher objectives of Islamic law) rather than rigid textual analysis. This shift in perspective is particularly evident in modern legal debates on dress codes, inheritance laws, and criminal sanctions, where some jurists call for contextual reinterpretation while others maintain traditionalist approaches.

The debate on Qath'i and Dzhanni remains one of the most critical discussions in ushul fiqh, influencing how Islamic legal doctrines evolve over time. One of the central controversies is the status of Hadith Ahad—whether it should be considered Qath'i or Dzhanni al-Wurud. Classical jurists generally regard Hadith Mutawatir as Qath'i, while Hadith Ahad is often classified as Dzhanni due to the possibility of transmission errors (Kamali, 2019). This distinction affects how juridical decisions are made, particularly regarding dress code regulations, where some rulings rely on Hadith Ahad as primary legal evidence (Mohammed & Farid, 2022).

Another major interpretive challenge arises in distinguishing between general (Aam) and specific (Khash) legal texts. This distinction is particularly relevant in hukum waris, zina, and dietary laws, where certain scholars argue that broad legal injunctions should be reinterpreted based on contemporary social contexts (Shah, 2023). The rigidity vs. flexibility debate extends to textualist vs. contextualist approaches, with textualists maintaining that legal rulings must strictly follow traditional interpretations, while contextualists assert that social and historical factors should shape Islamic legal reasoning (Rizvi, 2021).



This ongoing debate is especially significant in dress code enforcement, as seen in countries like Saudi Arabia and Iran, where Qath'i-based rulings impose strict regulations, whereas Malaysia and Indonesia employ Zanni-based flexibility, allowing regional variations in dress codes. The study's findings confirm that the extent to which a country adheres to Qath'i or Zanni reasoning directly influences its legal enforcement mechanisms.

Several recent studies reinforce the significance of Qath'i and Dzahanni interpretations in Islamic jurisprudence. Kamali (2019) argues that Qath'i-based rulings are often upheld in legal systems that prioritize textual rigidity, while Zanni-based rulings are more adaptable to modern governance and human rights frameworks. This aligns with findings from this study, which indicate that countries with hybrid legal systems, such as Indonesia and Malaysia, employ Zanni interpretations to accommodate social diversity. Meanwhile, Mohammed and Farid (2022) highlight how Sharia-based constitutions incorporate Qath'i rulings into national laws, shaping judicial decisions on modesty regulations. These studies support the assertion that the application of Qath'i and Zanni principles significantly influences legal discourse and policy implementation across different jurisdictions.

Furthermore, research by Rizvi (2021) explores the evolution of Ijtihad and its role in modern legal reforms, arguing that Zanni interpretations are increasingly used to align Islamic jurisprudence with contemporary legal standards. This perspective is evident in the dress code policies of Indonesia and Malaysia, where Zanni interpretations allow for regional variations in enforcement. Shah (2023) further examines state legislation and Islamic law, demonstrating that legal flexibility in Muslim-majority countries is often contingent on the extent to which Zanni reasoning is permitted within judicial processes. The present study confirms these findings by showing that Malaysia's legal system incorporates Zanni rulings through fatwa councils and discretionary court rulings, rather than imposing state-mandated enforcement as seen in Saudi Arabia and Iran.

From a theoretical perspective, the classification of Qath'i and Zanni interpretations is deeply rooted in Islamic legal hermeneutics. Classical scholars such as Muhammad Hashim Kamali and Abdu al-Wahab Khallaf emphasize that Qath'i al-Dalalah is reserved for texts with absolute meaning, while Dzahanni al-Dalalah applies to texts requiring interpretive flexibility (Kamali, 2019). This theoretical framework is particularly relevant to the interpretation of Quranic mandates on modesty, where some scholars uphold Qath'i rulings to justify compulsory dress codes, while others advocate for Zanni flexibility in adapting regulations to modern social norms. The distinction between Qath'i al-Wurud and Dzahanni al-Wurud also plays a critical role in determining the legitimacy of hadith-based rulings, influencing legal policies on modesty laws in different jurisdictions (Mohammed & Farid, 2022).

This study also highlights the epistemological debates among Islamic scholars, particularly concerning the validity of Hadith Ahad in constructing legal rulings. While classical scholars maintain that Hadith Mutawatir is Qath'i al-Wurud, the status of Hadith Ahad remains contested, leading to differences in how

legal mandates are derived (Shah, 2023). This debate directly impacts dress code regulations, as some Sharia courts rely on Hadith Ahad to enforce specific modesty laws, whereas others deem them *Dzhanni* and open to reinterpretation. The study's findings confirm that the level of enforcement varies depending on how each legal system classifies and applies these textual sources.

This study provides a new dimension to existing discussions by integrating comparative legal analysis and empirical field research. Unlike previous studies that focus solely on theoretical debates, this research empirically examines how *Qath'i* and *Zanni* interpretations are translated into legal governance. By incorporating primary legal texts, court rulings, and expert testimonies, the study bridges the gap between theoretical Islamic jurisprudence and practical legal enforcement. Additionally, the research demonstrates how judicial discretion plays a crucial role in determining whether *Qath'i* or *Zanni* rulings are prioritized in legal policies, particularly in cases involving dress code regulations (Rizvi, 2021).

The study also contributes to ongoing discussions on the intersection of Islamic law and human rights, offering insights into how different legal systems balance religious mandates with individual freedoms. As Shah (2023) notes, *Zanni* interpretations provide room for legal evolution, enabling Muslim-majority countries to reconcile Islamic legal traditions with contemporary governance. This research builds upon that argument by showing how Malaysia and Indonesia implement *Zanni*-based flexibility, whereas Saudi Arabia and Iran maintain strict *Qath'i*-based enforcement. These findings underscore the importance of interpretative methodologies in shaping legal frameworks, offering policy insights for scholars, legislators, and religious authorities seeking to modernize Islamic legal applications.

The implications of this study extend beyond legal discourse, providing a framework for re-evaluating *Qath'i* and *Zanni* applications in contemporary governance. Policymakers can utilize these findings to develop legal frameworks that respect religious traditions while upholding personal freedoms. Additionally, future research should explore how interpretive methodologies influence other areas of Islamic law, such as family law, economic transactions, and criminal justice (Kamali, 2019). Further empirical studies examining public perceptions of *Qath'i* and *Zanni*-based laws could provide deeper insights into how these interpretations shape societal norms and religious practices.

This research provides empirical evidence of how *Qath'i* and *Zanni* interpretations shape legal governance, particularly in modesty regulations. In Saudi Arabia and Iran, modesty laws are rooted in *Qath'i* interpretations, considering hijab mandates as absolute religious obligations. These regulations are enforced through state-controlled legal mechanisms, with violations resulting in fines or legal penalties (Kamali, 2019). Conversely, Malaysia and Indonesia adopt *Zanni*-based approaches, permitting legal flexibility based on regional norms. In Malaysia, Sharia courts issue dress code rulings, but enforcement is less stringent compared to Saudi Arabia and Iran (Mohammed & Farid, 2022). Meanwhile, Indonesia allows decentralized policy-making, where some provinces impose local dress codes while others do not.

This comparative analysis underscores the impact of legal interpretation on governance, affirming that Zanni reasoning provides greater legal adaptability, while Qath'i-based regulations often result in rigid enforcement. These findings align with Rizvi's (2021) argument that legal pluralism in Muslim-majority countries is influenced by the extent to which Zanni methodologies are employed.

Theoretically, this study builds upon classical and contemporary Islamic legal frameworks by illustrating how Qath'i and Zanni interpretations evolve in response to socio-political changes. While classical jurists emphasized textual consistency, modern scholars increasingly advocate for legal contextualization to align Islamic jurisprudence with contemporary governance (Shah, 2023). This research highlights how Sharia courts and policymakers navigate between textual rigidity and social adaptability, reinforcing that legal reform is an integral part of Islamic legal thought.

For future research, further studies should explore how Qath'i and Zanni methodologies influence other areas of Islamic law, such as family law, criminal justice, and economic transactions. Additionally, sociological studies on public perceptions of these legal categories could provide deeper insights into how Islamic jurisprudence is received by contemporary Muslim societies

## **6. Conclusion**

This study confirms that Qath'i and Zanni interpretations play a central role in shaping Islamic legal frameworks, particularly in defining the extent of legal flexibility in state-imposed policies. The research highlights how Qath'i-based interpretations lead to strict enforcement, whereas Zanni-based approaches allow for legal adjustments, particularly in dress code regulations across different Muslim-majority countries. The study finds that Saudi Arabia and Iran adhere to Qath'i interpretations, enforcing rigid modesty laws, while Malaysia and Indonesia adopt Zanni reasoning, allowing for contextual legal adaptations. These findings reaffirm that legal enforcement in Islamic governance is deeply influenced by the interpretive methodologies employed by religious authorities and state institutions.

The novelty of this study lies in its comparative analysis of Qath'i and Zanni interpretations within state governance, demonstrating how Sharia courts and policymakers navigate between textual rigidity and social adaptability. Unlike previous studies that focus solely on doctrinal analysis, this research incorporates empirical data from legal rulings, policy enforcement, and expert testimonies, bridging the gap between theoretical Islamic jurisprudence and practical governance. Additionally, the study provides a critical assessment of legal pluralism, highlighting how modern legal reforms increasingly rely on Zanni methodologies to balance Islamic jurisprudence with contemporary governance.

Despite its contributions, this study has certain limitations. The research focuses primarily on legal enforcement in four countries (Saudi Arabia, Iran, Indonesia, and Malaysia), excluding broader variations in other Islamic legal systems. Additionally, while the study analyzes legal rulings and policies, it does

not extensively explore public perceptions and sociocultural influences on Qath'i and Zanni applications.

Future research should examine how Qath'i and Zanni interpretations influence other areas of Islamic law, such as family law, criminal justice, and economic transactions. Additionally, further studies could investigate public opinions and societal responses to legal adaptations based on Qath'i and Zanni reasoning, providing deeper insights into how Islamic jurisprudence is received and practiced in contemporary Muslim societies.

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