

# The Legal Landscape: A Comparative Examination of Religious Blasphemy Enforcement in Egypt and Indonesia

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## ABSTRACT

*The objective of this study is to ascertain the comparative analysis of religious blasphemy legislation in Egypt and Indonesia. This study also elucidates the implementation of religious blasphemy legislation in Egypt and Indonesia. This study involves comparative legal research. Comparative research was conducted to gather additional insights on the blasphemy laws in Egypt and Indonesia. This study employs library research methodology to gather both primary and secondary data. The findings of this study indicate that the legislation governing religious blasphemy in Indonesia is law number. 1/ PNPS/1965, but in Egypt it is article 98 of the Egyptian Penal Code. Additionally, this study discovered parallels in the implementation of religious blasphemy legislation in Egypt and Indonesia. The implementation of anti-blasphemy legislation in both nations frequently subjects defendants to a succession of grave human rights infringements perpetrated by both private individuals and government agents.*

## 1. Introduction

Undoubtedly, religious blasphemy remains a subject of global controversy. From the standpoint of proponents of blasphemy laws, such laws are believed essential for safeguarding individuals, religions, or sacred objects against any form of perceived offense.(Eskin et al. 2020) Conversely, individuals who are against the blasphemy law



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argue that it infringes upon fundamental human rights, including the rights to freedom of thought, freedom of speech, and freedom of religion.(Lintang, Martufi, and Ouwerker 2020)

According to data from Komnas HAM, there have been over 200 instances of religious blasphemy in Indonesia since the implementation of the initial statute on the subject. (Lintang, Martufi, and Ouwerker 2020) These instances have sparked concerns that the Blasphemy Law has been implemented and understood in a broad manner, resulting in the criminalization of religious disparities and the infringement of the constitutional entitlement to religious freedom. This has led to demands for a thorough examination and revision of the law.(Crouch 2011)

The extent to which Law no. 1 of 1965 has contributed to the state's failure in safeguarding minority rights has been a subject of intense deliberation. It is believed that this law is responsible for the increasing number of attacks on minority groups, specifically targeted by radical Muslims, who accuse them of committing blasphemy, which is considered a violation of this law. The Ahmadiyya doctrine, which asserts the prophethood of Mirza Ghulam Ahmad after Muhammad, is believed to deviate from the fundamental teachings of Islam and is regarded as an affront to the Islamic faith. This belief system assigns Mirza Ghulam Ahmad the unique responsibility of reforming and reinterpreting Muhammad's messages through his sacred Tadzkira. Similarly, Shiites are regarded as equally perilous as Ahmadis due to their belief in imamate, which is seen as fundamentally different from the predominant Sunni majority in Indonesia.(Hasan 2017)

Indonesia's blasphemy law effectively permits anyone to denounce others, solely based on their religious beliefs, for any behavior they personally deem to be blasphemous. Hence, the regulations pertaining to religious blasphemy are indeterminate statutes wherein the onus of substantiation rests upon the individual or entity that perceives offense. Consequently, the likelihood of the suspect getting acquitted in the religious blasphemy case is minimal. (Faiz 2016) Indonesia's legal framework regarding religious blasphemy is characterized by ambiguous and undefined situations that lack clear limitations. Consequently, it has the potential to generate legal ambiguity that might negatively impact individuals. (Crouch 2011)

Instances of religious blasphemy are not limited to Indonesia; they occur in diverse places, including both Muslim and non-Muslim nations. In Egypt, Nasr Abu Zayd, an Islamic scholar and professor of Arabic at Cairo University, was forced to leave the country with his wife. This was a result of the court annulling their marriage due to allegations of apostasy, which were based on his scholarly writings. The case of Asia Bibi in Pakistan involves her being accused of committing blasphemy and facing the fear of capital punishment through hanging. Asia Bibi was charged with making derogatory remarks against the prophet Muhammad. In accordance with the legal framework in Pakistan, any act of defaming the Prophet Muhammad is subject to severe consequences, including life imprisonment or the imposition of the death sentence.

Instances of religious blasphemy are also prevalent in Western nations. In 2005, the Danish daily *Jylands-Posten* sparked worldwide controversy by publishing cartoons that were said to portray the Prophet Muhammad. (Sutkuté 2019) Despite inciting protests in other nations, Denmark refrained from invoking the blasphemy provision in relation to this caricature incident. The *Corway v. Independent Newspapers Ltd* (1999) case is the most well-known instance of religious blasphemy in Ireland. (Ranalow 2000) This case first involved a legal action against a newspaper for disseminating sacrilegious drawings depicting priests and the Eucharist. Nevertheless, the High Court denied permission for the matter to forward to prosecution. Subsequently, the case was brought before the Supreme Court of Ireland. Here, the Supreme Court concurred with the Court's decision that the blasphemy statute could not be enforced in this instance due to the absence of a legal definition for religious blasphemy. Due to the lack of a specific legal definition, the absence of *actus reus* and *mens rea* in relation to religious blasphemy creates a legal

uncertainty in prosecuting individuals for such offenses. This is particularly significant considering that the constitution also safeguards the freedom of religion and expression for all citizens. (Triwanto and Aryani 2020)

This research seeks to compare the implementation of criminal law involving religious blasphemy in Indonesia and Egypt. This research will specifically focus on the lucidity of religious blasphemy laws that are grounded on the notion of legal certainty. This study aims to address the following inquiry: what are the similarities and differences in the implementation of religious blasphemy legislation in Indonesia and Egypt?

Several prior research have been conducted on the subject of religious blasphemy legislation in specific nations. Loresta Cahyaning Lintanga et al (2021) conducted a comparative analysis of religious blasphemy legislation. Examines the enactment of religious blasphemy legislation in Ireland, Canada, and Indonesia. Priestly Cox (2019) conducted a comparative analysis of religious blasphemy legislation in the United States, Pakistan, England, Australia, and Germany. In his 2021 article, Adam Tyson examines the legislation pertaining to religious blasphemy in Muslim-majority nations like Indonesia, Turkey, and Pakistan. None of these studies have examined the correlation between Islamic criminal law and the implementation of religious blasphemy legislation. Hence, this study will provide valuable insights on the implementation of the blasphemy law and its significance within the framework of Islamic criminal law. In addition, this research will be valuable for policy authorities and the general public, increasing their awareness of engaging in actions associated with religious blasphemy.

## **2. Research Method**

This study involves comparative legal research. Comparative study is employed to gather further insights into religious blasphemy regulations in countries outside from Indonesia. The application of the comparative legal method has significantly contributed to the advancement of domestic law. This study employs library research methodology to gather primary and secondary data. The primary data was collected from many sources, including laws and regulations pertaining to religious blasphemy, scholarly studies that examined religious blasphemy laws, Presidential Decrees, as well as Egyptian and Indonesian religious blasphemy laws. Additionally, secondary data was acquired from pertinent sources regarding religious blasphemy in Egypt and Indonesia, including news articles, scientific journals, books, and other relevant materials.

Upon gathering the pertinent data, the researcher proceeded to conduct an analysis in order to address the research questions and sub-research questions sequentially. Next, an evaluation was conducted on the regulations pertaining to religious blasphemy in the three nations. Subsequently, an analysis was conducted on data pertaining to religious blasphemy in Egypt and Indonesia, each country being evaluated individually. Ultimately, a comprehensive analysis is conducted, comparing the pertinent data on blasphemy from Egypt and Indonesia with the existing blasphemy laws in Indonesia.

## **3. Results and Discussion**

### **a. Implementasi Undang-Undang Penodaan Agama di Indonesia**

Law no. 1/ PNPS/1965 is the legislation that governs blasphemy in Indonesia. The genesis of Law no. 1/ PNPS/1965 is closely intertwined with the legal and political climate throughout the period of 1950-1966. This era witnessed the evolution of national legislation, when two policy options were being considered: the continuation of realism pluralism (the prevailing policy since the colonial era) and the pursuit of unification goals. (Wignyosoebroto 1994) Soetandyo stressed that the legal policies in place at that time were determined by both socio-juridical and political-ideological factors. Consequently, all the laws established during that period primarily embodied the effort to provide a

framework for national legal progress. This is evident from the presence of two distinct sub-periods characterized by differing constitutional foundations. Specifically, there is the sub-period from 1950 to 1959, governed by the 1950 Provisional Constitution, and the sub-period from 1959 to 1966, governed by the 1945 Constitution. The Law no. 1/PNPS/1965 originated during the 1959-1966 period, which was governed by the 1945 Constitution. (Christianto 2013)

The Law Number 1/PNPS/1965, often known as the Act of Blasphemy of Religion, is a historical legislation that has frequently resulted in various interpretations. The execution of this law has resulted in significant losses for multiple parties. The legislation on blasphemy is frequently misused in many countries. The government occasionally exploits these laws to suppress dissent, government adversaries, and other dissident factions, as exemplified in Egypt. (Totten 2013) Occasionally, radical religious factions exploit blasphemy laws to rationalize their assaults on minority religious communities, thereby fostering an atmosphere of intolerance. Similarly, this legislation is occasionally employed to depose political adversaries, as exemplified by the conviction of Ahok, who received a two-year prison sentence for committing blasphemy. (Peterson 2020)

Indeed, a collective of individuals has submitted a petition to the Constitutional Court seeking the nullification of Law Number 1/PNPS/1965. In its judgment Number: 140/PUU-VII/2009 dated 19 April 2010, the Constitutional Court of the Republic of Indonesia (MK) declared that it denied all applications in the Judicial Review hearing for Law No.1/PNPS/1965 about the Prevention of Misuse and/or Blasphemy of Religion. The Constitutional Court recognized the need for change in Law No. 1/PNPS/1965, and even suggested the possibility of creating a new law to better accommodate the essence of the legislation, in order to ensure the protection and freedom of religion. The Constitutional Court determined that the statute was in accordance with both the provisions of the 1945 Constitution and the principles outlined in international human rights instruments. (Simanungkalit and Ilyas 2020)

The Indonesian Criminal Code (KUHP) does not include a dedicated section specifically addressing the crime of blasphemy. Adami Chazawi categorized the crime of blasphemy related to religion into four distinct forms. The first type is showing contempt towards specific religions in Indonesia, as stated in Article 156a. 2) The act of demeaning religious officials in the performance of their responsibilities (Article 177, point 1). 3) Disdain for goods used for religious purposes (as stated in Article 177, point 2). 4) Generating disturbances in the vicinity of religious establishments that are currently being utilized for religious practices (Article 503). (Chazawi 2022)

Article 1 of Law no. 1/PNPS/1965 and Criminal Code article 156a explicitly forbid any parties, sects, or belief systems that stray from the fundamental principles of religion followed in Indonesia. Law no. 1/PNPS/1965 prohibits deviations from religious teachings followed in Indonesia, including the interpretation of religious teachings, the practice of similar religious activities, and other related actions. In order to ascertain the presence of deviations, it is necessary to employ a standard as the foundation for the evaluation. Currently, there is a dearth of clarity regarding the limits and criteria for determining the degree to which a sect or belief system can be said to have exploited or damaged an established religion.

Hence, the author emphasizes the significance of establishing stricter regulations and criteria for evaluating religious blasphemy, as well as empowering authorities to determine any instances of defamation or misuse of the religion followed by the Indonesian population. The concern regarding the possibility for abuse of Article 156a of the Criminal Code is primarily based on the criteria employed to ascertain the veracity of a particular teaching. The responsibility of assessing the appropriateness or compatibility of a concept or interpretation with religious teachings is with the respective religious institutions of each faith.

The MUI endorses the enforcement of Law number. 01/PNPS/1965 on blasphemy due to its strong alignment with the principles and concepts outlined in the MUI's fatwa against deviant factions. Blasphemy laws are commonly employed to legally pursue actions that offend or disrespect religious beliefs. In Indonesia, blasphemy laws are employed to legally pursue organizations that are accused of straying from the dominant religious beliefs. The legislation governs the protocols for dissolving deviant organizations and prosecuting individuals for blaspheming the religion practiced in Indonesia or inciting others to engage in apostasy. MUI classifies deviant groups as those that engage in the act of insulting and belittling Islam. The MUI justified its resistance to Ahmadiyah, Shi'a, and other deviant sects by claiming that their ideas constituted blasphemy or defamation against Islam. MUI has frequently provided assistance in the legal proceedings against Ahmadiyah, Shi'a, and other groups deemed deviant, utilizing this legislation. Therefore, advocating for the enforcement of this legislation is a fundamental approach for MUI to uphold the dominance of their religious beliefs, as they perceive them.

Fatwas are not just directed towards deviations in religious beliefs, but also towards divergent streams of thought. MUI categorizes not only religious ideas as deviant, but also views secular thought as a significant peril. Liberal Islamic factions in Indonesia employ a secular framework to assert that a religion should refrain from passing judgment on other religions. Nevertheless, in 2005, the MUI issued a fatwa denouncing secularism, liberalism, and pluralism, asserting that these concepts were inconsistent with Islamic doctrine. Consequently, Indonesian Muslims are prohibited from adhering to his teachings. (Amin and Saputra 2011)

Nevertheless, extremist Islamic groups exploit this fatwa to target any worldview they deem as liberal and secular. A coalition of extremist groups and Salafis accused progressive Muslim intellectuals, including Abdurrahman Wahid, Nurcholish Madjid, Munawir Sjadjali, Quraish Shihab, and Syafii Maarif, of being liberal collaborators. There is currently a widespread occurrence of stigmatization and public advocacy against liberalism, pluralism, and secularism, which is evident in both traditional and online forms of media. (Hasani and Naipospos 2010)

Consequently, numerous conjectures have arisen regarding the enforcement of blasphemy laws in Indonesia, which are in conflict with fundamental human rights, particularly the rights to freedom of speech, freedom of religion, and freedom of belief. In several instances of blasphemy, the implementation of punishment tends to rely on personal judgment. Incorporating political agendas, authority, and SARA prejudice. (Susetyo et al. 2020)

### *b. Egypt's blasphemy*

The blasphemy laws in Egypt are derived from Article 161 of the National Criminal Code of 1883, which states that any act of disrespect towards established religions is subject to a maximum penalty of one year of imprisonment. According to Article 139 of the Criminal Code 1904, those who commit offenses against openly practiced religions in Egypt, such as printing or spreading distorted religious texts or publicly mocking religious ceremonies, may face a maximum prison sentence of one year for each infraction. These laws are frequently exploited to suppress dissent, government critics, and other dissident factions. According to The Washington Post, President Sisi's detractors have described the recent crackdown on blasphemy as a means for him to consolidate his power, suppress his opponents, and enhance his moral authority. The Egyptian government has utilized its claimed moral authority to rationalize its actions by publicly criticizing social media and its users. Mina Tibet, a human rights advocate, asserted that the government aims to exert influence over individuals by demonstrating their unwavering commitment to moral principles, thereby discouraging any form of dissent or scrutiny. Instead of implementing social media censorship, it is more beneficial to permit individuals to express their

viewpoints, while employing arrests and litigation as means to establish precedents and deter future usage. (Williams 2016) A similar occurrence took place during the tenure of the preceding administration, specifically during the rule of Hosni Mubarak's government.

The anti-blasphemy laws in Egypt were consistently enforced during President Mubarak's tenure to bring legal action against writers, novelists, and bloggers who were accused of violating Islamic doctrine. The prosecution of the Egyptian writer Taha Hussein (1889-1973) in 1926-1927 was contentious and centered around the aforementioned essay. Hussein faced charges of blasphemy because to pressure exerted by al-Azhar when he published his book on pre-Islamic poetry. (Abdullah Saeed, Arafat Mazhar, Kecia Ali 2023) In 1991, Ala' Hamid, an Egyptian novelist, received an eight-year prison sentence for the publication of his novel, *Musafah fi 'Aql Rajul* ("The Distance in a Man's Mind"). In 2001, Egyptian writer Salahuddin Muhsin received a three-year prison sentence for authoring critical literature on Islam and divinity, which the courts deemed as blasphemous. (O'Sullivan 2003) In 2007, Egyptian blogger Karim Amer received a three-year prison sentence for posting items on his site that an Egyptian court deemed disrespectful towards Islam and al-Azhar.

Following the conclusion of the Mubarak regime, incidents of blasphemy reached their highest point. EIPR stands for Egyptian Initiative for Personal Rights. From March 2011 to December 2012, the Egyptian campaign for personal rights recorded 35 instances of blasphemy. The majority of the defendants in the lawsuit belong to minority groups, including Shia, Ahmadiyya, and Christians. There was a persistent increase in the number of blasphemy charges throughout President Mohammad Morsi's tenure. (Chick 2013)

### *c. Enforcement of Blasphemy laws in Egypt*

The majority of Egyptians who are facing prosecution for blasphemy are accused under article 98 of the Egyptian Penal Code. Article 98(f) in Egypt's legal system is commonly known as the "blasphemy" provision. It specifies that individuals who use religion to spread extremist ideas with the intention of inciting civil unrest, defaming or showing disrespect towards a revealed religion or its followers, or undermining national unity can face a penalty of imprisonment ranging from 6 months to 5 years, or a fine ranging from LE 500 to LE 1,000. (Totten 2013) a citizen is said to violate article 98(f), if he or she uses allegedly disparaging material to broadcast or disseminate ideas that are insulting to religion. (Uddin 2011)

Other parts of the EPC specifically handle certain types of religious defamation. Article 160 explicitly prohibits any form of intervention in religious rituals, as well as the act of causing destruction, harm, or desecration to sacred sites, burial grounds, cemeteries, or religious symbols. According to Article 161, it is prohibited to intentionally publish and circulate religious materials that are knowingly untrue for the three officially recognized religions (Judaism, Christianity, and Islam). (Williams 2016) Furthermore, it prohibits the act of mocking religious practices in public, rendering it unlawful. Article 176 stipulates that engaging in public provocation and displaying contempt or animosity against a religious community is subject to legal consequences. While the term "public morals" remains undefined, engaging in the possession, dissemination, or production of materials that contravene these morals can lead to a maximum prison sentence of two years, as stipulated in Article 178. (Freedom House, n.d.)

The Egyptian authorities persist in utilizing Article 98(f) against blasphemy to single out persons who engage in acts of free expression that are intended to be safeguarded by the Constitution. The blasphemy rule applies to all revealed religions, but it is predominantly enforced against non-Muslims and Muslims who deviate from officially sanctioned interpretations of Sunni Islam by adhering to, adopting, or expressing alternative views. Frequently, prosecutions for blasphemy are based on weak or unsubstantial evidence. Notable recent cases involve individuals such as Anas Hassan, who faced legal action for his participation in the Egypt Atheists Facebook group; Reda Abdelrahman, a Quranist who

is now held in custody before trial; and Ahmed Abdo Maher, a lawyer and Islamic intellectual. (Isntitute 2022)

Moreover, both the Universal Declaration of Human Rights and the Egyptian constitution explicitly ensure numerous rights that are violated by Egypt's laws prohibiting blasphemy and religious insult. The application of these laws and the corresponding implementation procedures are in conflict with the nation's obligations under international law. (Freedom House, n.d.)

The Article is ambiguously phrased and has been frequently exploited by government officials. In Egypt, numerous individuals have been subjected to trials and found guilty under Article 98 for "exploiting religion for extremist ideas" in recent years. It is worth noting that none of these defendants employed or endorsed the use of violence. This item is also employed to penalize Muslims who convert to different religions. As an illustration, in 2005, a former Muslim religious leader who had converted to Christianity was apprehended and incarcerated for contravening section 98(f). The capacity of Muslims to convert to a different religion, which is a vital component of religious freedom, has been negatively affected by Egypt's legislation and legal processes. Given that individuals who do not practice the Muslim faith are not bound by the same constraints, these prohibitions can be considered a kind of religious discrimination. The Cairo Administrative Court made an important ruling in 2008, affirming that it is prohibited to change one's faith from Islam to another, as this would be considered apostasy, which goes against Islamic principles. (News 2006)

The laws in Egypt targeting blasphemy predominantly impact individuals who identify as Muslims. In Egypt, the combination of Article 98(f) and the Emergency Law has been employed to legally pursue and incarcerate persons who possess "unconventional" Islamic ideologies, such as Shi'a and other "aberrant" Muslims. This encompasses Sunni Muslims who employ novel scriptural interpretations to challenge the officially endorsed understanding of Islam, as well as Sunni Muslims who criticize long-standing Sunni organizations. Within this particular framework, Abdel Karim Suleiman, a 22-year-old blogger and former student of Al-Azhar University, who is commonly known by his online alias Karim Amer, might be seen as the most widely recognized example. Amer, a Sunni Muslim, expressed his disapproval of Al-Azhar University and the October 2005 assaults on Coptic Christians in Alexandria on his blog. Amer was found guilty and given a four-year prison term by a court in Alexandria: three years for committing blasphemy against Islam and instigating sectarian conflict, and one year for expressing criticism towards Hosni Mubarak. (Uddin 2011)

Several individuals accused of blasphemy or other acts of religious disrespect have received death threats. This also pertains to individuals who are accused of apostasy. Mohammed Hegazy's endeavor to acquire formal acknowledgment for his conversion from Islam to Christianity was received with menacing messages of harm, prompting him to seek refuge in seclusion. (Press 2007) According to a public announcement, two religious scholars from Al-Azhar University reportedly stated that Hegazy's conversion to another religion justifies his potential execution in accordance with Islamic law. (Freedom House, n.d.)

#### 4. Conclusion

The enforcement of religious blasphemy laws in Egypt and Indonesia is similar. Implementing anti-blasphemy legislation can subject defendants to a wide range of serious human rights abuses committed by both individuals and authorities. Victims of this situation include journalists, scholars, bloggers, individuals belonging to minority religions, political dissidents, and ordinary individuals caught up in domestic disputes. In Indonesia, the legislation governing religious blasphemy is Law No. 1/PNPS/1965, but in Egypt, it is Article 98 of the Egyptian Penal Code. The Law Number 1/PNPS/1965, also known as the

Prevention of Abuse and/or Blasphemy of Religion (Acts of Blasphemy) law, is an outdated regulation that often leads to multiple interpretations, similar to article 98 of the Egyptian legislation. The concern that the blasphemy statute may be misused arises from the standards employed to assess the truthfulness of a doctrine and the extent to which an understanding or interpretation aligns with religious teachings.

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