

THE CONVENTIONAL SYSTEM OF ZAKAH VERSUS THE HOLY QURAN: AN ECONOMETRIC MODEL OF PAYERS AND RECEIVERS

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Abstract. Zakah is the obligatory socio-economic act of worship most often mentioned in the Holy Qur'an, along with *Salah*. The rules given by Almighty Allah, especially regarding the obligatory acts, have been changed from the beginning by the plot of *Satan* (Devil). This article examines whether Muslim countries have Zakah management according to the principles and regulations mentioned in the Holy Quran. Contemporary data from forty Muslim-majority countries were collected and analysed to achieve this objective. A thorough review revealed that the conventional system of Zakah has a *Nisab* (minimum amount) and a rate of 2.5%. These two basic elements are not mentioned anywhere in the Holy Quran. Moreover, it appears that all forms of management of Zakah have been developed purely on economic considerations; that is, the social aspect has been completely rejected. In addition, some countries collect this Zakah officially, which is spent in unauthorised ways contrary to the Holy Quran. Although the principle of harvest, excess and *Khumus* (one-fifth) of the Holy Quran identifies the Zakah receiving class, there is no such distribution system among those classes either by Zakah or otherwise. Therefore, this paper humbly requests a more in-depth study on Zakah based on the Holy Quran.

Keywords: Holy Quran, Zakah, Nisab, rate of Zakah, Zakah payer and receiver, socio-economic.

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1. Introduction

We see some of the socio-economic variables in the Holy Quran include *Infaq* (spending in general), *Sadaqa* (giving willingly), *Anfal* (mineral wealth that the state will distribute) and *Zakah* (to attain purity). The only scripture of the principles of Islam is the Holy Quran, which contains the rules and principles of *Infaq*, *Sadaqah*, *Zakah* and *Anfal* in various verses. The word *Khums* (one-fifth) is used in the Holy Quran where it is said, "Surely a fifth of it is for Allah and the Messenger, the near relatives, the orphans, the poor and the traveler if you believe (Q: 8:41)". Nowadays, Majority of Islamic countries have stipulated to pay Zakah at the rate of 2.5% on 'Nisab' amount that is a certain amount of wealth. However, this 2.5% does not exist anywhere in the Holy Quran. However, this paper is only for Zakah. Thus, there is no discussion, review or analysis of *Infaq*, *Sadaqah*, *Anfal* and *Khums*, so these variables have been avoided intentionally.

The basic purpose of this paper is to create a socio-economic profile of Zakah payers and receivers by highlighting the similarities and contrasts between the conventional Zakah system and those mentioned in the Holy Quran. In the traditional system, Zakah (Arabic: زكاة *Zakah*), "that which purifies", also (Arabic: المال زكاة), "Zakah of wealth", is one of the five pillars of Islam (Nasim, 2009). Every independent, adult Muslim male and

female is entitled to a fixed portion of his/her income and property each year if it exceeds Nisab (the limit amount) prescribed by Islamic Shari'ah (Qaraḍawi, 2011), the rule of distribution among the poor and needy is called Zakah (Salehi & AriyanPoour, 2014; Lessy, 2009). Generally, property over the prescribed Nisab during the Hijri year, Zakah will be distributed 2.5% or 1/40th of the total assets (Kulayni *et al.*, 2015).

We believe the fundamental scripture for all Muslims, regardless of time and place, is the Holy Quran of Almighty Allah. This Quran has written rules regarding every matter for the people. The primary holy scriptures are in Arabic; in that case, at least in the case of Arab states, there should be no difference in easily understanding and following the fundamentals of the Holy Quran. Although in most cases, there are various sects (Shia, Sunni, Sufi, Mu'tazila and so on) and schools of Islamic theology on fundamental issues. All these schools of Islamic theology have conflicts, resulting in the most deadly and destructive activity in the modern world, war, which continues day after day, month after month, year after year, even for centuries. However, Almighty Allah, in more than a hundred verses of the Holy Quran, has urged people to think and study the Quran in detail. We know that Zakah is an obligatory act of worship, but states have many differences, especially regarding collection, calculation and enforcement of payers and receivers.

Although the basic objectives of this study are discussed in the introduction, the specific objectives are the following three such as to measure the similarities and contrasts between the conventional Zakah system and the mentioned in the Holy Quran; to propose an econometric model of socio-economic and demographic profiles of Zakah payers and recipients based on the Holy.

2. Literature review

First, we can examine how and to what extent Allah Almighty has told us about Zakah in the Holy Quran. The word Zakah is directly used in thirty verses of the Holy Quran. Twenty-five of these thirty verses are related to *Salah* (prayer), meaning that the Zakah payer must be a *Salah* performer. *Salah* has almost ninety-five statistical variables, the sum of which is *Salah* (Mannan, 2022). Therefore, to fully understand Zakah, one must understand all the variables connected with Zakah, which is the Holy Quran's fundamental principle.

Let us see the direct variables connected with Zakah in the Holy Quran. It can be seen all these variables may divided into four categories, firstly, individual beliefs and self-efficacy variables that are believe in Allah, believe the last day, believe the Angels, believe in the scriptures, believe in the Prophets (Q: 2:177); do not worship except Allah (Q: 2:83); patient in poverty, patient in hardship (Q: 2:177); support to the Messengers, loan to Allah a goodly loan (Q: 5:12); fear to Allah (Q: 7:156); repentant (Q: 9:5); do not fear except Allah (Q: 9:18); obey Allah, obey his Messenger (Q: 9:71); worshippers of only for Allah (Q: 21:73); Allah belongs the outcome of matters (Q: 22:41); The religion of your father, Abraham, Muslim, hold fast to Allah, Allah is the best protector (Q: 22:78); fear a Day in which the hearts and eyes will turn about (Q: 24:37); The hereafter they are certain in faith (Q: 27:3); desiring the countenance of Allah (Q: 30:39); The hereafter, are certain in strong faith (Q: 31:4); recite what is easy for you of the Qur'an (Q: 73:20) and worship Allah, being sincere (Q: 98:5).

Secondly, socioeconomic and sociodemographic variables of the payers, category include twenty-one such as establish prayer, bow with those who bow (Q: 2:43); to parents do good, to relatives to good, to orphans, do good, to the needy do good, speak to

people well (Q: 2:83); honest job (Q: 2:110); fulfill their promise, be patient during battle, truthfulness (Q: 2:177); restrain hands, jihad (Q: 4:77); give Zakah by bowing (Q: 5:55); the Mosques of Allah to be maintained (Q: 9:18); believers are friends to each other (Q: 9:71); used to enjoin family member's for praying (Q: 19:55); active (Q: 23:4), in the business remembrance of Allah (Q: 24:37); stay at home (Q: 33:33); give Sadaka (Q: 58:13). Thirdly, socioeconomic variables of the recipient are seen only five such as those who give wealth despite their attachment to close relatives, orphans, helpless, travelers, supplicants and formerly enslaved people (Q: 2:177). Fourthly, payers' other variables are prohibited activities such as interest (Q: 30:39); abandonment of the decorations of the ancient Jahili era (Q: 33:33) and unbelievers in the hereafter (Q: 41:7). Finally, Allah said a few obey (Q: 2:83).

In the light of the Holy Quran, we can know the complete rules of Zakah with the help of other verses related to the above variables. For example, Allah has not directly told us where and how much Zakah should be given in the verse. However, Khums states in principle, "One-fifth for the Prophet, close relatives, orphans, the poor and the traveler" (Q: 9:35). This class is the recipient of Zakah. Since no other distribution ratio has been prescribed for this category in the Holy Qur'an, it is a matter of consideration whether it is reasonable to accept artificial ratios without accepting this provision. Again, this (2:219) verse shows "And they ask you what they will spend. Say, 'the excess [beyond needs]'". The second question is when to give Zakah. The answer to this question is not in the above verses. However, "give it its right when it bears fruit and on the day, it is reaped" (Q: 6: 141). In addition, Allah has said "And in their wealth is the right of the aspirant and the destitute" (Q: 51:19). Moreover, "those who have their wealth have a fixed right (Q: 70:24). This category is Zakah receivers, but it is clear in the verses of Zakah. Almighty Allah has told us to think and study this Quran several times.

Now we can review how conventional Zakah practices and methods have been taught. In this case, the forty predominantly Muslim countries are considered in this study. Those countries were reviewed in three categories. First are countries where Zakah is compulsory and collected by the state, such as Libya, Malaysia, Pakistan, Saudi Arabia, Sudan and Yemen. Each of these countries has statutory laws and regulations regarding Zakah. For example, in the case of Libya, although there is Zakah Law LIBYAN ACT NO: 89, 1971, there is no statutory provision for calculating Zakah (Ministry of Planning of Libya, 2021). Malaysia has about fifteen laws and even though they have Sharia law and different provisions for each state, there are also various complications related to Zakah (Hasbulah *et al.*, 2022). Pakistan forms its national budget by collecting Zakah from the people at a rate of 2.5%, which plays a massive role in the country's socio-economic sector (Toor & Nasar, 2004). The Kingdom of Saudi Arabia believes in Fiqh, so even though they change Nisab from time to time depending on their country's economy, they keep the Zakah payment rate unchanged at 2.5% (Sadeq, 2002). Collected by Sudan at a rate of 2.5%, they play an important role in providing cash, food, health care and education services to people experiencing poverty (Machado *et al.*, 2018). The Yemeni government has a mandatory 2.5% Zakah system for individuals and corporate entities and all must pay adequate income tax. However, Yemen's Nisab calculation slightly differs from Saudi Arabia (Obaid *et al.*, 2020).

There is no government system for collecting Zakah in several countries, but they have some rules and regulations for the Zakah practice. For example, Zakah has managed asset distribution and project financing by managing and investing Zakah funds as microcredits to contribute to financing local development and encouraging investment by

providing financial support and loans in microfinance, to create jobs, reduce unemployment and poverty in Algeria (Sayah & Musari, 2021). Zakah Institutions in Azerbaijan are intermediary organisations that work to help in the Zakah management process by considering the social impact and in this process, recognise a part of Amil as a Zakah recipient and take all of the operating expenses from the collected Zakah and *Infaq* (spending) funds, albeit to a limited extent from many (Lubis *et al.*, 2018). Zakah is payable at 2.5% of assets above the Burkina Faso Nisab and the Nisab is 85 grams of 24-carat gold (Shirazi & Amin, 2009). A similar provision is found in Guinea (Gomez, 2010) and Chad (Ali & Hatta, 2014), but there are differences in the Nisab.

A study from Iraq shows that Zakah plays an important role in poverty alleviation, but there is no change in the Nisab and rate of Zakah (Subhan, 2018). Soviet rule severely affected conventional Zakah management among other religious practices in Uzbekistan, Kazakhstan, Tajikistan and Turkmenistan, from generation to generation (Mahomed, 2022; Lessy, 2013; Clement, 2020). Zakah collection and distribution systems in these countries are mainly limited to informal practices, due to the absence of Zakah institutions or state intervention since Soviet rule. African countries such as Mali (Weiss, 2020), Mauritania (IMF, 2013), Morocco (Lahjouji & Rouggani, 2016), Niger (Obaid *et al.*, 2020), Nigeria (Ayuba, 2016), Senegal (Herzog & Mui, 2016), Sierra Leone (Thaler *et al.*, 2013), Somalia (Farah & Haji-Othman, 2020) and the Gambia (Gassama, 2021) have seen predominantly NGO-based Zakah management. All these countries also show some differences in other customs of Islam, but not much difference is seen in the case of Zakah.

In other countries, such as the Middle Eastern country of Oman, Zakah plays an important role in poverty alleviation (Al-Hadhramia *et al.*, 2021). Although high-income Islamic countries such as Qatar (Muhammad, 2019) and Turkey (Cokrohadisumarto & Zaenudin, 2022) should be exemplary models to other Islamic countries, the participation of renowned Islamic scholars in issuing opinions and fatwas on Zakah law has included the use of modern technology to promote transparency and compliance. However, no leading role is seen in its implementation. The cases of Syria (Selvik, 2013) and Tunisia (Daly & Frikha, 2015) show that Zakah supports emergency services within the country, such as sponsoring medical professionals, providing equipment and medicine and even providing generators, fuel and other essential items, especially those needed by the healthcare sector. Although there is some variation in how countries determine the Nisab, there is no change in the 2.5% principle for paying Zakah.

The third list of optional countries is Bahrain, Bangladesh, Egypt, Indonesia, Iran, Jordan, Kuwait, Lebanon and the United Arab Emirates. These studies have revealed that Bahrain (Abdelbaki, 2013), Jordan (Machado *et al.*, 2018), Kuwait (Mahmood *et al.*, 2022), Lebanon (Gazar, 2021) and the United Arab Emirates (Younus & Ahmad, 2021) contribute a lot to the GDP of these countries. However, there is much opacity in the distribution management, questioning the principle of Zakah. According to Egypt, the once-a-year Zakah payable to low-income families is likely much higher, meaning that Zakah management has considerable flaws (Bremer, 2013). In Indonesia (Syamsuri *et al.*, 2022), Zakah's role has proven to be an alternative way to reduce poverty for various communities, especially Muslims in Indonesia (Syamsuri *et al.*, 2022). Iranian Muslims usually pay their Zakah to the office of the Higher Religious Authority, a charity organisation approved by the state authorities. However, Iran is a Shia state and the Nisab and Zakah rates are almost the same, but some pay Zakah at a rate of 10% (Sardar *et al.*, 2019). In the case of Bangladesh, 3.79% and 2.33% contribute respectively to the GDP in classical and contemporary systems (Jahangir & Bulut, 2022). There is only one Zakah

Fund Ordinance (The Zakah Fund Ordinance, 1982), which provides for forming a Zakah Board, but there is no law or policy regarding any Nisab or rates. The people of Bangladesh follow their own *Madhhab* (a school of thought within Islamic jurisprudence), *Pir* (a Muslim saint or holy man) and *Mashayek* (Sufis, mystics, holy persons, dervishes) rules.

Of the forty Muslim-majority countries worldwide, Zakah is compulsory and collected by the state in six countries: Libya, Malaysia, Pakistan, Saudi Arabia, Sudan and Yemen. There is no government system for Zakah collection in Afghanistan, Algeria, Azerbaijan, Burkina Faso, Chad, Guinea, Iraq, Kazakhstan, Mali, Mauritania, Morocco, Niger, Nigeria, Oman, Qatar, Senegal, Sierra Leone, Somalia, Syria, Tajikistan, Gambia, Tunisia, Turkey, Turkmenistan and Uzbekistan. Countries that are optional for people are Bahrain, Bangladesh, Egypt, Indonesia, Iran, Jordan, Kuwait, Lebanon and the United Arab Emirates. Despite being a fully Islamic country and even a Muslim-majority country, Zakah varies significantly from country to country and this disparity is the primary motivation for this research paper.

Although there is disagreement among the madhhab of these forty countries, there is no disagreement on the determination of Nisab and the 2.5% rate of Zakah. It has already been mentioned that the Holy Qur'an does not have this type of calculation except for one-fifth. Even this type of Nisab determination is not mentioned anywhere in the Holy Quran. That is, this Nisab and 2.5% came from the fatwa mentioned in *Al-Hidaya*, vol.1, pages 185-195, which is the regulation of Zakah for the modern Muslim world (Mesbah, 2007). *Al-Hidaya* is one of the Hanafi jurisprudences. Imam Burhan Uddin Abul Hasan Ali Abu Bakr wrote this book. He was born in Marginan, Afghanistan and lived in (1117-1179) AD with Hijri year (511-593) (Mesbah, 2007).

In this literature review, it has been realised that mainly the Nisab and 2.5% were established. Although the law of Zakah is from Ibrahim and other prophets and messengers, even the last Prophet has confirmed it. In addition to *Al-Hidaya*, such rulings are found in *Fatwa'i Shami*, *Badayus Sana'i*, *Sunan Abu Dawud*, *Sunan Kubra Bayhaqi*, *Mu'atta Imam Malek*, *Musannaf Abdur Razaq*, *Musannaf Ibn Abi Shayba*, *Albahrur Rayek* and many such books. But Almighty Allah has told us in the Holy Qur'an, "This is the law of Allah, which has come from before; you will not find any change in this law of Allah" (Q: 48:23).

3. Research Methodology

Two methods have been adopted in this study. First, a socio-economic theoretical model is formulated by analysing the verses directly referring to Zakah, which is mentioned in the Holy Quran. Second, based on recent studies on Zakah from forty majority Muslim countries, data will be presented and analysed in comparison with conventional methods and the Holy Qur'an.

3.1. Theoretical model

In this study, thirty verses of the Holy Quran directly mention Zakah. Therefore, only those verses are considered. Some consider thirty-two and others thirty-four to be Zakah verses. Those verses, mainly considered to be related to *Infraq* (spending) and *Sadaqah* (a voluntary charitable act), have been excluded from this study. The verses were identified through analysis as fifty-eight variables, which are detailed in Appendix A-D. All the variables were further divided into five categories, such as individual belief

and self-development (twenty-seven items); Socio-economic and demographic status of the donor (twenty-one), socio-economic status of the recipient (six), related factors of the donor (three) and given by Allah (one). So, to analyse the Zakah payer in a country or at large, we can create an econometrics model combining all the variables (Equation 1).

$$\text{Zak} = \alpha_0 + \alpha_1 \text{BeInAh} + \alpha_2 \text{BeILD} + \alpha_3 \text{BeAls} + \alpha_4 \text{BeKit} + \alpha_5 \text{BePts} + \alpha_6 \text{DnWeA} + \alpha_7 \text{PatPov} + \alpha_8 \text{PatHip} + \alpha_9 \text{SupMgs} + \alpha_{10} \text{LAaGL} + \alpha_{11} \text{FerAlh} + \alpha_{12} \text{Rept} + \alpha_{13} \text{DnFeAlh} + \alpha_{14} \text{ObeAlh} + \alpha_{15} \text{ObeMes} + \alpha_{16} \text{WOAllh} + \alpha_{17} \text{AlhOM} + \alpha_{18} \text{ReFAB} + \alpha_{19} \text{Musl} + \alpha_{20} \text{HFAlh} + \alpha_{21} \text{AlhBP} + \alpha_{22} \text{FeHETa} + \alpha_{23} \text{HCiFth} + \alpha_{24} \text{DCAlh} + \alpha_{25} \text{HCiSFth} + \alpha_{26} \text{RecHQR} + \alpha_{27} \text{WAlgBS} + \alpha_{28} \text{EstdPer} + \alpha_{29} \text{BoWBo} + \alpha_{30} \text{TPrnDG} + \alpha_{31} \text{TRelDG} + \alpha_{32} \text{TOrpDG} + \alpha_{33} \text{TNedDG} + \alpha_{34} \text{SpkPG} + \alpha_{35} \text{HnsJb} + \alpha_{36} \text{FulPr} + \alpha_{37} \text{BPatDB} + \alpha_{38} \text{TrFlns} + \alpha_{39} \text{ResHns} + \alpha_{40} \text{Jhd} + \alpha_{41} \text{GZakBB} + \alpha_{42} \text{MsqAlhM} + \alpha_{43} \text{BeFEO} + \alpha_{44} \text{UsEnFMP} + \alpha_{45} \text{Actv} + \alpha_{46} \text{BusReAlh} + \alpha_{47} \text{StyAH} + \alpha_{48} \text{GivSdka} + \alpha_{49} \text{RiBa} + \alpha_{50} \text{ADAJer} + \alpha_{51} \text{UnbHA} + e_1 \dots\dots\dots (\text{Equation 1})$$

Here, e_1 is the deviation (error term).

Equation 1 above can analyse the Zakah giver separately with twenty-seven individual faith and self-improvement variables. In light of the Holy Quran, only these people give and will only pay for Zakah. These variables are mainly related to the individual's beliefs and psyche, which may not be seen externally but can be considered with related activities. One can code these variables as per the needs of the study. The single-person model is represented by Equation 2 below:

$$\text{InChFSI} = \beta_0 + \beta_1 \text{BeInAh} + \beta_2 \text{BeILD} + \beta_3 \text{BeAls} + \beta_4 \text{BeKit} + \beta_5 \text{BePts} + \beta_6 \text{DnWeA} + \beta_7 \text{PatPov} + \beta_8 \text{PatHip} + \beta_9 \text{SupMgs} + \beta_{10} \text{LAaGL} + \beta_{11} \text{FerAlh} + \beta_{12} \text{Rept} + \beta_{13} \text{DnFeAlh} + \beta_{14} \text{ObeAlh} + \beta_{15} \text{ObeMes} + \beta_{16} \text{WOAllh} + \beta_{17} \text{AlhOM} + \beta_{18} \text{ReFAB} + \beta_{19} \text{Musl} + \beta_{20} \text{HFAlh} + \beta_{21} \text{AlhBP} + \beta_{22} \text{FeHETa} + \beta_{23} \text{HCiFth} + \beta_{24} \text{DCAlh} + \beta_{25} \text{HCiSFth} + \beta_{26} \text{RecHQR} + \beta_{27} \text{WAlgBS} + e_1 \dots\dots\dots (\text{Equation 2})$$

Here, e_1 is the deviation (error term).

Twenty-one variables were highlighted, considering the payer's socio-economic and demographic status. That is, the Zakah payer is somehow connected to society. A scholar can conveniently collect information about Zakah payers by observation or by using the chosen process for his/her study and coding. This model is represented below by Equation 3.

$$\text{SOciPP} = \mu_0 + \mu_1 \text{EstdPer} + \mu_2 \text{BoWBo} + \mu_3 \text{TPrnDG} + \mu_4 \text{TRelDG} + \mu_5 \text{TOrpDG} + \mu_6 \text{TNedDG} + \mu_7 \text{SpkPG} + \mu_8 \text{HnsJb} + \mu_9 \text{FulPr} + \mu_{10} \text{BPatDB} + \mu_{11} \text{TrFlns} + \mu_{12} \text{ResHns} + \mu_{13} \text{Jhd} + \mu_{14} \text{GZakBB} + \mu_{15} \text{MsqAlhM} + \mu_{16} \text{BeFEO} + \mu_{17} \text{UsEnFMP} + \mu_{18} \text{Actv} + \mu_{19} \text{BusReAlh} + \mu_{20} \text{StyAH} + \mu_{21} \text{GivSdka} + e_1 \dots\dots\dots (\text{Equation 3})$$

Here, e_1 is the deviation (error term).

Almighty Allah has informed the recipient's socio-economic status. He mentioned all the moral and social variables in the case of Zakah payers. However, the recipient of the Zakah is not directly mentioned. Therefore, in this study, the model is derived only from the verses that directly refer to Zakah, which is given below as Equation 4.

$$\text{SociSR} = \pi_0 + \pi_1 \text{GWislTR} + \pi_2 \text{GWislTO} + \pi_3 \text{GWislTN} + \pi_4 \text{GWislTT} + \pi_5 \text{GWislTA} + \pi_6 \text{GWislFF} + \dots \quad (\text{Equation 4})$$

Here, e_1 is the deviation (error term).

Equation 1 in the basic model of Zakah payer includes three independent variables related to the donor. However, no new model is presented in this study when one variable related to God's information is included in Equation 1.

3.2. Implementation model

In this study's data analysis and review, ten contemporary published research articles from each of the forty majority Muslim countries were first identified. After initial evaluation, five research papers from each country were re-evaluated for in-depth review. Finally, all the information and data collected from forty study papers from forty countries, one for each country, are presented in Tables 4-7 below. It is to be noted that the list of study papers used in the final review is provided in Tables 1-3 below.

Table 1. Zakah is compulsory and collected by the state

Countries	Literature
Libya	Ministry of Planning of Libya (2021)
Malaysia	Hasbulah et al., (2022)
Pakistan	Toor & Nasar (2004)
Kingdom of Saudi Arabia	Sadeq, (2002)
Sudan	Machado et al., (2018)
Yemen	Obaid et al., (2020)

Table 2. There is no government system for Zakah collection

Countries	Literature
Afghanistan	IMF (2008)
Algeria	Sayah and Musari (2021)
Azerbaijan	Lubis et al. (2018)
Burkina Faso	Shirazi and Amin (2009)
Chad	Ali and Hatta (2014)
Guinea	Gómez (2010)
Iraq	Subhan (2018)
Kazakhstan	Mahomed (2020)
Mali	Weiss (2020)
Mauritania	IMF (2013)
Morocco	Lahjouji and Rouggani (2016)
Niger	Obaidullah (2017)
Nigeria	Ayuba (2016)
Oman	Al-Hadhramia et al. (2021)
Qatar	Muhammad (2019)
Senegal	Luce (2016)
Sierra Leone	Thaler et al. (2013)
Somalia	Farah and Haji-Othman (2020)
Syria	Selvik (2013)
Tajikistan	Lessy (2013)
Gambia	Gassama (2012)
Tunisia	Daly & Frikha (2021)
Türkiye	Cokrohadisumarto & Zaenudin (2022)
Turkmenistan	Clement (2020)
Uzbekistan	Oybekovich et al. (2017)

Among the forty countries, Zakah is compulsory and collected by the state in six, as shown in Table 1. In addition to the study paper of these six countries, the information in Tables 4-7 is added and coordinated by reviewing the existing laws and regulations related to Zakah of the countries.

Zakah is mainly compulsory in the twenty-five countries shown in Table 2, but no state institution can collect it. Zakah payers can pay their Zakah through several institutions or pay it personally.

Table 3 below lists nine states where Zakah is entirely optional for all countries, although there are some Arab states. That is, people can pay for their own Zakah, according to their will, to whomever they want. They can pay or not pay if they want, without accountability to the state.

Table 3. Optional for citizens of countries

Countries	Literature
Bahrain	Hisham H. Abdelbaki (2013)
Bangladesh	Jahangir and Bulut, (2013)
Egypt	Bremer (2013)
Indonesia	Syamsuri et al. (2022)
Iran	Sardar et al. (2019)
Jordan	Machado et al. (2018)
Kuwait	Mahmood et al. (2022)
Lebanon	Sarea (2021)
United Arab Emirates	Younus and Ahmad (2021)

The above three categories of countries are countries where Zakah is compulsory and collected by the state, countries with no government system for Zakah collection and countries where it is optional for the people. A general picture of this study is presented for analysis and review through Tables 4-7.

4. Data Analysis

Table 4 sets out the minimum amount of Zakah (Nisab) concerning various cash, gold, silver, agricultural and mineral assets and the rules for paying Zakah. It can be seen that category “A” includes cash, bank deposits and trading goods with a Nisab value of 612.36 grams. In the current market of Bangladesh, 22-carat silver is fetching about BDT1500 (11.7 per), which is 612.36 grams of silver, worth BDT78,750. According to this calculation, if a person has more than BDT 78,750 in cash, bank deposits and business goods in a year, he/she has to pay Zakah at 2.5% on the total value that year. It can be said that if 100,000 taka is in the bank, there will be a Zakah of BDT 2500.

Class “B” includes only gold, silver, or gold-silver ornaments where the Nisab is 87.48 grams of gold and 612.36 grams of silver; the rate of Zakah remains unchanged, which is 2.5%. The price of silver in Bangladesh in 2022 is mentioned earlier and 22-carat gold was BDT 78,000 (11.7 per), 87.48 grams, about BDT 5,85,000. Class “C” includes shares, banknotes and stocks whose Nisab and rates are similar to class “A”, but in this case, the provision is that if the company/business organisation pays Zakah, then the individual does not have to pay. Class “D” is a partnership business and *Mudaraba* (investment); in that case, the Nisab and rate are unchanged. However, the rule is that Zakah must be paid first on the property, not the capital and profits will then be

distributed. Zakah will be on personal profits and the capital provider will pay one share (2.5%).

Table 4. 'Nisab Amount' of Zakah in respect of various cash, gold and silver, agricultural and mineral commodities

Categories	Assets	Nisab (minimum amount)	Rate of Zakah
A.	Cash, bank deposits and trading products	612.36 grams worth of silver	2.5% of full price
B.	Gold, silver or gold-silver ornaments	Gold 87.48 grams and silver 612.36 grams	2.5% of full price
C.	Shares, bank notes, stocks	612.36 grams worth of silver	2.5% of the full price; however, if the company gives Zakah, it is not necessary to pay Zakah personally
D.	Partnerships and <i>Mudaraba</i> (investment)	612.36 grams worth of silver	Zakah should be paid first on property, not capital; Profits will then be distributed. Zakah will be on personal profits; the capital provider will pay one share (2.5%) and the labour donor will pay one share (2.5%).
E.	Agricultural products	According to Abu Hanifa, any amount; According to the Islamic Ecological Research Bureau, 1568 kg	Rain products 10%
F.	Minerals	Any amount	20% on products
G.	Horse	There are three views in this regard	There is no Zakah or 2.5% of the full price, or 1 dinar for each horse

Category “E” includes agricultural products and variations in Nisab from Islamic school to school. According to the Hanafi school, any amount but the Islamic Ecological Research Bureau, 1568 kg. However, the rate of Zakah for this category is 10% for rainfed produce. Category “F” includes all types of mineral products, the Nisab of which is any amount and the rate of Zakah is 20% of the product. The “G” category is a horse; the horse's provisions are entirely different from those of other domesticated animals and even multiple provisions are seen. There are three notable doctrines: some say no Zakah, some say 2.5% of the full value and the third doctrine is 1 dinar for each horse.

Table 5 shows the 'Nisab amount' and payable rates of Zakah for sheep and goats. According to this classification, those with less than forty sheep or goats do not have to pay Zakah. From forty to two hundred, there will be only two. If there are two hundred or more, then for every eighty, they have to pay one. In the case of 201-400, it is seen that although there were 2 for 200, for the next 200, it is 1, that is, if there are 400 sheep or goats, then only 3 Zakah will be given. Whatever the number after 499, for every 100, Zakah will be 1; if there are 1000 sheep or goats, Zakah will be 10.

Table 5. 'Nisab Amount' of Zakah concerning sheep and goats

Nisab (minimum amount)	Rate of Zakah
40-120	1 sheep or goat
121-200	2 sheep or goats
201-400	3 sheep or goats
400-499	4 sheep or goats
500 or more	5 sheep or 1 per hundred

Table 6 below gives the 'Nisab Amount' and its rate of Zakah concerning cows and buffaloes. In the case of cows and buffaloes, the prevailing rule is that if it is less than 30, he/she does not have to pay Zakah. In the case of Nisab, the first level is taken as 10 in number and the rate is determined by age. A one-year-old calf should be provided for the first 10, followed by a three-year-old calf. If the maximum is more than 100, it will be a two-year-old calf instead of one or three years old.

Table 6. 'Nisab Amount' of Zakah on Cows and Buffaloes

Nisab (minimum amount)	Rate of Zakah
30-39	1 one-year-old calf
40-49	1 two-year-old calf
50-59	2 two-year-old calves
60-69	1 three-year-old and 1 two-year-old calf
70-79	2 three-year-old calves
80-89	3 two-year-old calves
90-99	1 three-year-old and 2 two-year-old calves
100-119	A two-year-old calf will be counted as above.

Table 7 shows the method of determining the 'Nisab amount' and rate of Zakah for camels. If there are fewer than five camels, then no Zakah is payable. In determining the rate of Zakah, Gelid, goats and female camels have been given age quotas by determining gender in this way. In the Nisab, the first level has five camels and one one-year-old goat. It is mentioned that first of all 1 one year old goat is equal to three years old goat. Suppose the number of camels reaches the quota of 25, which is between 25 and 35, then four one-year-old female camels will be. Thus, if the number of camels increases, the number of camels in the Zakah payment decreases, but their age increases. For example, for 61-75, 1 five-year-old female camel should be given. Thus, 150 and above three four-year-old female camels and one goat for every five should be provided.

Table 7. 'Nisab Amount' of Zakah to Camels

Nisab (minimum amount)	Rate of Zakah
5-9	1 three-year-old goat or 1 one-year-old goat
10-14	2 one-year-old goats
15-19	3 one-year-old goats
20-24	4 one-year-old goats
25-35	4 one-year-old female camels
36-45	2 three-year-old female camels
46-60	2 four-year-old female camels
61-75	1 five-year-old female camel
79-90	2 three-year-old female camels
91-120	2 four-year-old female camels
121-129	2 four-year-old female camels and one goat
130-134	2 four-year-old female camels and two goats
135-139	2 four-year-old female camels and three goats
140-144	2 four-year-old female camels and four goats
145-149	2 four-year-old female camels and one two-year-old camel
150 and above	3 four-year-old female camels and one goat in every 5

As mentioned in Tables 4-7 above, all forty countries in this study have set the Nisab and rate of Zakah almost identically. An analysis of the studies and prevailing laws showed that cash, bank deposits, merchandise, gold, silver or gold-silver ornaments, shares, bank notes, stocks, partnership business, *Mudaraba* (investment), agricultural products, minerals, horses, sheep or goats, cows, buffaloes and camels are divided into fifteen basic sectors of Zakah.

5. Discussion

Most of the studies are in economics or socio-economic contexts, which was also seen through the data analysis above, but in light of the Holy Quran, they are insufficient. The fifteen basic sectors identified above, the Nisab determining the rate of Zakah, are comparable to wealth tax in various countries, even in Bangladesh. However, the principle of the Holy Qur'an is to "give it its right when it bears fruit and on the day, it is reaped" (Q: 6:141). It is clearly understood that if a land is harvested three times, this right is created three times and by paying for it, the rest of the wealth is sanctified. It is clearly stated again in the verse (2:219) "And they ask you what they should spend. Say, the excess". This is Zakah. So, the principle of applicability of this basis needs to be rethought annually in all cases.

Nisab has been determined in categories A-D with the value of gold and silver, respectively, as cash, bank deposits and trading goods, gold, silver or gold-silver ornaments, shares, bank notes, stocks, partnership business and *Mudaraba* (investment). The rate payable is 2.5% on the total value, which does not include capital. The existence of this 2.5% is not mentioned anywhere in the Holy Quran. On the other hand, Allah mentions the principle of Khums (one-fifth) in the Quran. That is, this principle of 2.5% is artificial and all these works are not supported in the civil and criminal evidence law of the Holy Quran. For these reasons, differences of opinion are seen regarding agricultural products and horses.

Moreover, *Anfal* (mineral resources) are all countries' state property. However, in this case, one-fifth, 20%, is mentioned. In terms of practical application, such as Bangladesh's gas, Indonesia's coal, oil and gold of Arab countries, the state has taken

everything as state property. Although *Zakah does not cover Anfal (mineral wealth)*, Almighty Allah has informed us of a different principle in the Holy Qur'an. Since this study is unrelated, it could not be discussed in detail.

How it has fixed the amount of Nisab and provided Zakah concerning sheep and goats, cows and buffaloes and camels is entirely contrary to the principles of Zakah in the Holy Quran. People determine all these principles through their own doctrines and religious beliefs. Almighty Allah has not mentioned anywhere that the Zakah payer must be wealthy. On the day of the harvest mentioned above, he/she gave us his rights and explained that even in the mango of a tree, rights are made for our relatives, orphans, poor travellers and supplicants. The Nisab are compiled from other human-authored books. Hence, there is a considerable discrepancy between the amount of Nisab and the calculation of Zakah payable for sheep, goats, cows, buffaloes and camels.

All studies in economics or socio-economic contexts are both quantitative and qualitative. An economist or sociologist does numerous studies based on their knowledge, experience and references and all the results they get certainly make new contributions to their respective academic fields. However, those variables are not considered in the case of the Holy Quran. For example, the contribution of Zakah to poverty alleviation is one of the issues. The Holy Quran, however, does not mention Zakah's association with the poor's relief. Therefore, whether the result of relieving the poor through Zakah is positive or negative has nothing to do with the Holy Quran. Among the fifty-eight variables mentioned, there is no poverty alleviation. Some of those asked to pay Zakah may be poor, but not all may be poor. Such as the near relatives, the orphan, the destitute, the wayfarer, the suppliant and the freeing of captives (enslaved people) despite their attachment to the wealth that bestows them (Q: 2:177). Only these five categories are called to pay Zakah. There is no mention that they must be poor. Even in the verses of Khums (Q: 8:41), this study finds all these five categories and the additional two variables are Allah and His Messenger. These two additional variables require an in-depth study.

In the six Muslim-majority countries where Zakah is compulsory and collected by the state, there is no justification for Zakah. First, Allah has not defined any such state authority in any of the verses of Zakah. Second, the individual's belief and self-improvement variables clearly state that Zakah is what a true believer will give of his own free will, only to five categories. If he/she does not provide it himself, he is also a disbeliever in the Hereafter (Q: 41:7). If he/she is a disbeliever in the Hereafter, there is nothing to do or say, because "there is no compulsion in accepting the Deen" (Q: 2:256). One variable among the five categories mentioned in the Holy Quran is the "prayer". Considering this variable, the state may ask for a share, but it must depend on the circumstances and considerations of the Zakah payer. Therefore, Zakah is compulsory and collection by the state starkly contrasts with the principles of Zakah in the Holy Quran.

The Holy Quran is the scripture of the best theory for humanity, so it is not appropriate to limit the review of Zakah only to the verses of Zakah, because these fifty-eight independent variables are not discussed only in this verse. Instead, each has a different combination of variables. For example, the word Salah appears in the Holy Qur'an 101 times in 91 verses. In separate verses, *Tahajjud* (night prayer) at one time, Ruku-Sajda (bowing down and going in prostration) at one time, standing at one time and Tasbih (a form of dhikr that involves the glorification of God) three times. In the light of the Holy Quran, a person performing Salah can never accept any artificial law regarding Zakah. Because "And He is Allah; there is no deity except Him. To Him is praise in the

first and the Hereafter. And His is the decision and to Him you will be returned” (Q: 28:70). Thus, no doubt, the detailed analysis of other variables is sufficient for the Holy Quran to answer all questions regarding Zakah.

6. Conclusion

The principle of Islam is the Holy Qur'an sent by Almighty Allah, where the most beautiful social system is connected with every activity of human life. The Holy Quran has given us both micro and macro social systems, from creating an ideal family to the global social order. Social order is prioritised in every obligatory worship. This study found that the principles of the Holy Quran are largely neglected in the current system of Zakah, which is mentioned in the Holy Quran. Precisely what the Prophet of the Quran will say to us on the Day of Judgment, “O my Lord, indeed my people have taken this Qur'an as abandoned” (Q: 25:30). Conventional Zakah management has been judged primarily in terms of financial considerations; that is, only wealthy individuals and institutions will pay Zakah and only one class of recipients, namely the poor. The class of near relatives is wholly neglected. However, the principle of harvesting and excess that Almighty Allah mentioned to us has been completely abolished. The kind of social ties this principle urged to strengthen between kin remained out of consideration.

Considering the financial aspects, it is seen that Nisab and the rate of Zakah 2.5% provisions have been implemented following some artificial books, which is a Lahual (Nonsense) Hadith in the language of the Holy Quran (Q:31:6), completely excluding the principle of harvesting, excess and Khums. This principle was not similar to the principles of the Holy Quran. However, the Holy Qur'an has given us a clear idea that Zakah was the same in the era of all the Prophets and Messengers from Ibrahim to the last Prophet. What is particularly striking is that these customary laws began many centuries after the arrival of the last Prophet and most of them originate from the Eurasian region.

Finally, the three most important verses in the analysis of Zakah are not taken into consideration because the primary purpose of Zakah (يَتَزَكَّى) (Q: 92:18), which is one of the elements of success, is (زَكَاةً) (Q: 91:9) and (2: 219) mentioned in the verses “And they ask you what they will spend. Say, ‘the excess [beyond needs]’”. Islamic analysts have never analysed these principles in depth and have considered the Lahual Hadith as the basis for managing Zakah. Allah Almighty has not fixed the rate of 2.5% in this way, but if someone wants to follow the rate, they should adopt the principles of the Holy Quran.

The rules of Zakah, compiled in the 11th or 18th centuries, call for fresh scholarship based on the Holy Quran, as Zakah practice was based on the same principle from Ibrahim to the last Prophet. A more in-depth study of the verses related to Zakah is essential to highlight its social aspects. However, although this study presents a standard system of Zakah in forty countries, there may be different types of customs among the people of those countries, that is, within their respective communities, which are not covered by this study. Therefore, in the future, conducting research based on communities in these countries will give a clearer idea.

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Appendix A. Individual beliefs and self-efficacy variables of the Zakah payer

SL	Verse	Variables	Coding
Dependent Variable			
		Individual beliefs and self-efficacy variables of the Zakah payer	InChFSI
Independent Variables			
1.	2:177	Believe in Allah	BeInAh
2.	2:177	Believe the Last Day	BeLD
3.	2:177	Believe the Angels	BeAls
4.	2:177	Believe in the Kitab	BeKit
5.	2:177	Believe in the Prophets	BePts
6.	2:83	Do not worship except Allah	DnWeA
7.	2:177	Patient in Poverty	PatPov
8.	2:177	Patient in Hardship	PatHip
9.	5:12	Support to the Messengers	SupMgs
10.	5:12	Loan to Allah a Goodly Loan	LAaGL
11.	7:156	Fear to Allah	FerAlh
12.	9:5	Repent	Rept
13.	9:18	Do not Fear Except Allah	DnFeAlh
14.	9:71	ObeY Allah	ObeAlh
15.	9:71	ObeY His Messenger	ObeMes
16.	21:73	Worshippers of only for Allah	WOAllh
17.	22:41	Allah Belongs to the Outcome of Matters	AlhOM
18.	22:78	The Religion of your father, Abraham	ReFAB
19.	22:78	Muslim	Musl
20.	22:78	Hold Fast to Allah	HFAh
21.	22:78	Allah is the Best Protector	AlhbP
22.	24:37	Fear a Day in which the hearts and eyes will turn about	FeHETa
23.	27:3	In the Hereafter, they are Certain in Faith	HCiFth
24.	30:39	Desiring the Countenance of Allah	DCAh
25.	31:4	The Hereafter are certain in Strong Faith	HCiSFth
26.	73:20	Recite what is easy for you of the Qur'an	RechQr
27.	98:5	Worship Allah, being Sincere	WAlgBS

Appendix B. Socio-economic and Sociodemographic Variables of Zakah Payers

SL	Verse	Variables	Coding
Dependent Variable			
Socioeconomic and Sociodemographic Profile of the Payer			SOciPP
Independent Variable			
1.	2:43	Establish Prayer	EstdPer
2.	2:43	Bow with those who Bow	BoWBo
3.	2:83	To Parents Do Good	TPrnDG
4.	2:83	To Relatives Do Good	TRelDG
5.	2:83	To Orphans, Do Good	TOrpDG
6.	2:83	To the Needy Do Good	TNedDG
7.	2:83	Speak to People Good	SpkPG
8.	2:110	Honest Job	HnsJb
9.	2:177	Fulfil their Promise	FulPr
10.	2:177	Be Patient during Battle	BPatDB
11.	2:177	Truthfulness	TrFlns
12.	4:77	Restrain Hands	ResHns
13.	4:77	Jihad	Jhd
14.	5:55	Give Zakah By Bowing	GZakBB
15.	9:18	The Mosques of Allah to be Maintained	MsqAlhM
16.	9:71	Believers are Friends to each other	BeFEO
17.	19:55	Used to Enjoin Family Members for Praying	UsEnFMP
18.	23:4	Active	Actv
19.	24:37	In the Business Remembrance of Allah	BusReAlh
20.	33:33	Stay at Home	StyAH
21.	58:13	Give Sadaka	GivSdka

Appendix C. Socio-economic status variables of the Zakah recipient

SL	Verse	Variables	Coding
Dependent Variable			
Socio-economic status of the recipient			SociSR
Independent Variable			
1.	2:177	to Relatives	GWislTR
2.	2:177	to Orphans	GWislTO
3.	2:177	to the Needy	GWislTN
4.	2:177	to the Traveler	GWislTT
5.	2:177	to those who ask	GWislTA
6.	2:177	For freeing enslaved people	GWislFFS

Appendix D. Other variables of the Zakah payer

SL	Verse	Variables in English	Coding
1.	30:39	Riba	RiBa
2.	33:33	Abandoning the Decorations of the Ancient Jahili era	ADAJer
3.	41:7	Unbelievers in the Hereafter	UnbHA

Information given by Allah

1.	2:83	Few Obeyed	FwObd
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