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Analysis of Obligatory Wills for Non-Muslim Heirs based on Article 209 of the Compilation of Islamic Law

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Abstract

This study analyzes the implementation of *wasiat wajibah* for non-Muslim heirs under Article 209 of the Compilation of Islamic Law (*Kompilasi Hukum Islam*) in Indonesia. The issue of inheritance involving religious differences remains a complex legal problem within Indonesian Islamic inheritance law because classical Islamic jurisprudence generally prohibits inheritance between Muslims and non-Muslims. Nevertheless, judicial practice in Indonesia has demonstrated the expansion of *wasiat wajibah* through several Supreme Court decisions granting mandatory bequests to non-Muslim family members. This research employs normative juridical legal research using statutory, conceptual, and case approaches. The legal materials consist of statutory regulations, judicial decisions, books, and scholarly journal articles related to Islamic inheritance law and *wasiat wajibah*. The results of this study show that Indonesian Religious Courts and the Supreme Court have adopted progressive legal interpretations of Article 209 KHI through legal discovery (*rechtsvinding*) and substantive justice approaches. The implementation of *wasiat wajibah* for non-Muslim heirs reflects efforts to harmonize Islamic legal principles with humanitarian values, social justice, and the pluralistic character of Indonesian society. However, the absence of explicit regulation regarding non-Muslim heirs within Article 209 KHI potentially creates legal uncertainty and inconsistent judicial interpretations. Therefore, clearer legal reform is necessary to strengthen legal certainty concerning inheritance disputes involving religious differences in Indonesia.

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Introduction

Islamic inheritance law is an important component of Islamic family law (Hazairin, 1982) that governs the distribution of the deceased's estate to qualified heirs. The rules regarding inheritance have been explicitly set out in the Qur'an, Hadith, and classical Islamic jurisprudence. One of the basic principles in Islamic inheritance law is the prohibition of inheritance between individuals of different religions. This principle is based on the hadith of the Prophet Muhammad which states that a Muslim cannot inherit from a non-Muslim, and a non-Muslim cannot inherit from a Muslim. As a result, religious differences are recognized as one of the legal obstacles to inheritance (mawani' al-irith) in Islamic law.

In the Indonesian legal system, inheritance issues involving religious differences often arise due to the pluralistic nature of Indonesian society (Rahman, 2017). Interfaith marriages and family relationships often give rise to legal disputes over inheritance rights, especially when one or more family members belong to different religions. Normatively, the Compilation of Islamic Law (KHI) does not explicitly provide inheritance rights for non-Muslim heirs (Fauzan, 2020). However, judicial practice in Indonesia shows progressive development through the implementation of mandatory wills as a legal mechanism to provide protection and justice for non-Muslim family members.

The concept of a mandatory will initially developed as a mandatory will given to certain parties who are not entitled to inherit legally under the faridh system (Nuruddin, 2019). Article 209 of the Drafting of Islamic Law specifically regulates mandatory wills for adopted children and adoptive parents. Nevertheless, Indonesian courts, particularly the Supreme Court, have broadened the interpretation of Article 209 to include non-Muslim heirs through court decisions (*Kompilasi Hukum Islam*, 1991). These developments reflect the dynamic interplay between Islamic legal principles, social justice, and legal reform in Indonesia.

Several previous studies have discussed mandatory wills from various perspectives. Nuruddin explained that the obligatory will functions as an instrument of legal adaptation in Islamic inheritance law in Indonesia (Nuruddin, 2019). Further, Hidayat argues that judicial rulings regarding non-Muslim heirs indicate the emergence of progressive Islamic legal reasoning aimed at achieving substantive justice (Hidayat, 2021). Another study by Ramadhan emphasizes the role of judges in interpreting Article 209 of the KHI beyond its textual limitations (Ramadan, 2022). In addition, Fauzan stated that the development of inheritance law in Indonesia cannot be separated from judicial activism in responding to social changes and legal pluralism (Fauzan, 2020). This study shows that compulsory wills have become an important discourse in Islamic heritage law reform in Indonesia.

However, most previous studies have generally focused on the theoretical concept of compulsory wills or broader issues of inheritance reform, while limited studies have specifically analyzed the implementation of Article 209 of the KHI regarding non-Muslim heirs in judicial practice. Existing studies have not comprehensively examined how Indonesian courts justify the expansion of mandatory wills beyond adoptive children and adoptive parents to individuals who are religiously different from the deceased. Most of the research also emphasizes theoretical debates without specifically analyzing judicial considerations in Indonesian court decisions.

Therefore, this study addresses the following research questions: (1) how is a mandatory will for non-Muslim heirs executed under Article 209 of the Compilation of Islamic Law, and (2) what legal considerations do judges use in granting a mandatory will to non-Muslim heirs in inheritance disputes?

This study aims to analyze the implementation of mandatory wills for non-Muslim heirs based on Article 209 of the KHI and to examine the judicial reasoning applied in inheritance disputes involving religious differences. The novelty of this research lies in its focus on the expansion of Article 209 of the KHI through judicial interpretation and its implications for the development of contemporary Islamic heritage law in Indonesia.

Method

This study employs normative juridical legal research to analyze the implementation of *wasiat wajibah* for non-Muslim heirs under Article 209 of the Compilation of Islamic Law (*Kompilasi Hukum Islam*). This type of research is used because the study focuses on legal norms, legal principles, statutory regulations, and judicial decisions concerning inheritance disputes involving religious differences. The research applies statutory, conceptual, and case approaches in order to examine the legal provisions, theories, and judicial practices related to *wasiat wajibah* in Indonesia.

The legal materials used in this study consist of primary and secondary legal materials. Primary legal materials include the Compilation of Islamic Law, relevant Supreme Court decisions, the Qur'an, Hadith, and other statutory regulations related to inheritance law in Indonesia. Meanwhile, secondary legal materials consist of books, journal articles, legal commentaries, and previous studies discussing Islamic inheritance law, *wasiat wajibah*, and interfaith inheritance disputes. These materials are used to support the legal analysis and theoretical framework of the study.

The technique of collecting legal materials in this study is conducted through library research by examining legal documents, court decisions, books, and scholarly journal articles relevant to the research topic. Furthermore, the collected legal materials are analyzed qualitatively using juridical analysis through the interpretation of legal norms, comparison of legal doctrines, and examination of judicial considerations regarding the implementation of *wasiat wajibah* for non-Muslim heirs under Article 209 of the Compilation of Islamic Law.

Results

Religious Difference as an Impediment to Inheritance in Islamic Law

Islamic inheritance law recognizes several legal impediments to inheritance (*mawani' al-irth*), one of which is religious difference between the deceased and the heir. Classical Islamic jurists generally agree that inheritance rights cannot be granted between Muslims and non-Muslims based on the hadith of the Prophet Muhammad stating that "a Muslim does not inherit from a non-Muslim, and a non-Muslim does not inherit from a Muslim." (Hazairin, 1982) This principle has become one of the fundamental doctrines in Islamic inheritance law and is widely adopted in various Islamic legal systems, including Indonesia. (Syarifuddin, 2015)

In Indonesia, the principle concerning religious difference as an impediment to inheritance is reflected in the Compilation of Islamic Law (*Kompilasi Hukum Islam*).

Although the Compilation of Islamic Law does not explicitly regulate inheritance disputes involving non-Muslim heirs in detail, the general principles of Islamic inheritance law applied by Religious Courts continue to recognize religious difference as a barrier to inheritance rights.(Anshori, 2018) Consequently, non-Muslim family members are generally excluded from receiving inheritance through the faraidh system.

However, the development of Indonesian society characterized by legal pluralism and interfaith family relationships has created complex inheritance disputes involving non-Muslim heirs. In practice, many cases demonstrate that strict application of inheritance barriers based on religious difference may create perceptions of injustice within family relationships.(Rahman, 2017) Therefore, Indonesian courts have gradually developed legal solutions through the application of *wasiat wajibah* as an alternative mechanism to provide legal protection and fairness for non-Muslim family members.

Regulation of Wasiat Wajibah under Article 209 of the Compilation of Islamic Law

The concept of *wasiat wajibah* in Indonesian Islamic law is primarily regulated under Article 209 of the Compilation of Islamic Law. This provision states that adopted children and adoptive parents who are not entitled to inheritance may receive a mandatory bequest with a maximum amount of one-third of the deceased's estate (*Kompilasi Hukum Islam*, 1991). The provision was initially intended to provide legal protection for adopted children and adoptive parents who do not possess inheritance rights under the faraidh system.

Normatively, Article 209 of the Compilation of Islamic Law does not specifically mention non-Muslim heirs as recipients of *wasiat wajibah*. Nevertheless, the existence of this provision has provided opportunities for broader legal interpretation by judges in Religious Courts and the Supreme Court (Nuruddin, 2019). Through judicial interpretation, the concept of *wasiat wajibah* has evolved beyond its original purpose and has been applied to inheritance disputes involving religious differences.

The implementation of *wasiat wajibah* in Indonesia reflects an effort to balance the principles of Islamic inheritance law with considerations of justice and social harmony. Several judicial decisions indicate that judges increasingly view *wasiat wajibah* as a legal instrument capable of accommodating humanitarian considerations without directly violating the prohibition of interfaith inheritance in Islamic law (Bisri, 2020).

Judicial Practice Regarding Non-Muslim Heirs in Indonesia

The development of judicial practice regarding non-Muslim heirs in Indonesia can be observed through several Supreme Court decisions. One of the most significant decisions is Supreme Court Decision Number 368 K/AG/1995, in which the Court granted *wasiat wajibah* to a non-Muslim heir despite the existence of religious differences between the deceased and the heir.(*Putusan Mahkamah Agung Republik Indonesia Nomor 368 K/AG/1995*, 1995) In this case, the Supreme Court considered family relationships, fairness, and humanitarian aspects as important legal considerations in resolving the inheritance dispute.

Another important judicial decision is Supreme Court Decision Number 51 K/AG/1999, which also demonstrated the expansion of *wasiat wajibah* for non-Muslim family members.(*Putusan Mahkamah Agung Republik Indonesia Nomor 51 K/AG/1999*, 1999) Through these decisions, Indonesian courts established a progressive legal

interpretation by allowing non-Muslim heirs to obtain a portion of the deceased's estate through mandatory bequest rather than formal inheritance rights. In the case of Supreme Court Decision Number 368 K/AG/1995, the dispute arose following the death of a Muslim testator, Basyaruddin, who left behind a non-Muslim wife and children. From a strict textual approach to classical jurisprudence, these family members would be completely barred from receiving any share due to religious differences. However, the Supreme Court established a groundbreaking *ratio decidendi*: the court recognized that the non-Muslim wife had spent decades accompanying the testator and actively contributing to the family's shared wealth and social stability. Therefore, the judges used *wasiat wajibah* not to subvert the prophetic prohibition against interfaith *faridh* inheritance, but as a legal bridge to ensure that human dignity and family contribution are not disregarded based solely on a formal religious barrier.

These judicial practices indicate that Indonesian Religious Courts and the Supreme Court have played a significant role in the development of Islamic inheritance law in Indonesia. The application of *wasiat wajibah* for non-Muslim heirs demonstrates the courts' efforts to adapt Islamic legal principles to contemporary social conditions while maintaining the fundamental doctrines of Islamic inheritance law (Fauzan, 2020)

Discussion

Legal Interpretation of Article 209 of the Compilation of Islamic Law.

Article 209 of the Compilation of Islamic Law (*Kompilasi Hukum Islam* or KHI) constitutes the primary legal basis for the implementation of *wasiat wajibah* within the Indonesian Islamic legal system. Normatively, the provision regulates mandatory bequests for adopted children and adoptive parents who are not legally entitled to inheritance under the *faraidh* system (*Kompilasi Hukum Islam*, 1991). The article limits the amount of mandatory bequest to a maximum of one-third of the deceased's estate. However, the provision does not explicitly regulate the legal position of non-Muslim heirs in inheritance disputes involving religious differences.

From a textual perspective, Article 209 KHI appears to provide legal protection exclusively for adopted family relationships rather than for heirs prevented from inheritance due to religious differences. Classical Islamic jurists also generally maintain that religious difference constitutes one of the principal legal impediments to inheritance rights (Syarifuddin, n.d.). This principle is derived from the hadith of the Prophet Muhammad stating that Muslims and non-Muslims cannot inherit from one another. Consequently, the expansion of *wasiat wajibah* toward non-Muslim heirs initially appears inconsistent with the textual construction of Islamic inheritance law.

Nevertheless, Indonesian Religious Courts and the Supreme Court have gradually adopted a broader interpretation of Article 209 KHI through judicial decisions concerning interfaith inheritance disputes. One of the most influential decisions is Supreme Court Decision Number 368 K/AG/1995, in which the Court granted *wasiat wajibah* to a non-Muslim family member despite the existence of religious differences between the deceased and the beneficiary (*Putusan Mahkamah Agung Republik Indonesia Nomor 368 K/AG/1995*, 1995). Through this decision, the Supreme Court introduced a progressive legal interpretation that shifted the function of *wasiat wajibah* from merely protecting

adopted children toward accommodating humanitarian considerations in interfaith family disputes.

The judicial interpretation developed by the Supreme Court reflects the doctrine of legal discovery (*rechtsvinding*) within Indonesian judicial practice. According to Satjipto Rahardjo, judges are not merely law enforcers who apply statutory provisions mechanically, but legal actors responsible for discovering substantive justice within society (Rahardjo, 2009b). In this context, judges are required to interpret legal norms dynamically in response to evolving social realities. The expansion of Article 209 KHI demonstrates that judges actively reinterpret Islamic inheritance law to address legal problems arising from Indonesia's pluralistic society.

Furthermore, the interpretation of *wasiat wajibah* for non-Muslim heirs may also be understood through the theory of progressive law (*hukum progresif*). Progressive legal theory emphasizes that law should prioritize justice, humanity, and social welfare rather than rigid formalism (Rahardjo, 2009b). The Supreme Court's decisions concerning non-Muslim heirs indicate an attempt to balance the formal prohibition of interfaith inheritance with substantive justice for family members who maintain close emotional and economic relationships with the deceased. Through this approach, judges seek to ensure that legal certainty does not eliminate humanitarian values within family relations.

The textual structure of Article 209 KHI is explicitly restricted only to adopted children and adoptive parents. If judges in the Religious Courts merely acted as rigid mouthpieces of the law (*bouche de la loi*) under a strict positivistic paradigm, any inheritance claim by non-Muslim family members would inevitably be dismissed. By adopting Rahardjo's progressive law framework, the Indonesian judiciary performed a conscious act of 'rule-breaking' or more accurately, a creative legal expansion. The judges shifted the core function of *wasiat wajibah* from a narrow adoptive relationship protector into a broader social safety net for interfaith families. This demonstrates that in the Indonesian context, when formal statutory text clashes with human values and economic justice within a pluralistic family, the law must bend to serve human welfare, rather than forcing human realities to fit rigidly into the text.

Several scholars argue that the implementation of *wasiat wajibah* for non-Muslim heirs reflects the application of the Islamic legal principle of *maslahah* (public benefit). Nuruddin explains that *wasiat wajibah* in Indonesia has evolved as a legal adaptation mechanism intended to accommodate contemporary social needs while maintaining the essential principles of Islamic inheritance law (Nuruddin, 2019). Similarly, Hidayat argues that judicial decisions granting mandatory bequests to non-Muslim heirs demonstrate the emergence of progressive Islamic legal reasoning oriented toward substantive justice (Hidayat, 2021). These perspectives indicate that the development of Islamic inheritance law in Indonesia cannot be separated from social transformation and the increasing complexity of family structures within modern society.

However, the expansion of Article 209 KHI through judicial interpretation also raises important academic debates. Critics argue that the Supreme Court's interpretation potentially exceeds the normative limits established by Islamic inheritance law and the textual meaning of Article 209 itself (Ramadhan, 2022). From this perspective, the extension of *wasiat wajibah* toward non-Muslim heirs may create legal uncertainty because the Compilation of Islamic Law does not explicitly regulate such entitlement. Different

judicial interpretations may therefore produce inconsistent decisions among Religious Courts in Indonesia.

Despite these criticisms, the judicial interpretation of Article 209 KHI demonstrates the dynamic nature of Islamic law within the Indonesian legal system. Islamic law in Indonesia continues to evolve through judicial practice, legal interpretation, and social adaptation. The implementation of *wasiat wajibah* for non-Muslim heirs ultimately reflects the effort of Indonesian courts to harmonize Islamic legal doctrine with contemporary principles of justice, social harmony, and humanitarian protection in a pluralistic society (Fauzan, 2020).

Wasiat Wajibah as a Form of Substantive Justice

The application of *wasiat wajibah* for non-Muslim heirs in Indonesia reflects an effort to realize substantive justice within Islamic inheritance law. Substantive justice emphasizes fairness based on social realities and humanitarian considerations rather than merely applying legal provisions formally and rigidly (Rahardjo, 2009a). In many inheritance disputes involving interfaith families, the strict prohibition of inheritance due to religious difference may create inequality and social tension, particularly when non-Muslim family members have maintained close emotional, economic, and social relationships with the deceased throughout their lives. Therefore, judges increasingly consider the broader social consequences of inheritance disputes when resolving such cases.

The implementation of *wasiat wajibah* demonstrates that Indonesian courts attempt to balance normative Islamic inheritance principles with humanitarian values and family protection. Through mandatory bequests, non-Muslim family members may receive a portion of the deceased's property without being formally recognized as heirs under the *faraidh* system (Suparman, 2018). This approach functions as a middle path between preserving the doctrinal prohibition of interfaith inheritance and ensuring fairness for family members who would otherwise be entirely excluded from the distribution of the estate. Consequently, *wasiat wajibah* becomes an alternative legal mechanism capable of reducing potential conflicts within interfaith families.

Furthermore, the application of the maximum one-third (1/3) threshold stipulated in Article 209 KHI serves a dual purpose in judicial practice. In complex interfaith inheritance settlements, judges frequently calculate the non-Muslim's share by equating it to the portion they would have received under the *faraidh* system had they been Muslim, provided that the final amount does not cross the absolute 1/3 ceiling. This methodology represents a highly strategic compromise. On one side, it provides substantial economic protection to the non-Muslim family members who maintained strong socio-economic bonds with the deceased. On the other side, the 1/3 cap acts as a doctrinal safeguard, ensuring that the legal portions of the primary Muslim heirs under the *faraidh* system are not disproportionately diminished or marginalized, thereby preserving internal family harmony.

From the perspective of Islamic legal theory, the application of *wasiat wajibah* for non-Muslim heirs may also be justified through the principle of *maslahah* (*public benefit*). According to Islamic legal scholars, legal interpretation should aim to achieve social welfare, justice, and the protection of human dignity (Ali, 2017). In this context, granting mandatory bequests to non-Muslim family members may preserve family harmony and prevent social injustice in pluralistic societies such as Indonesia. Nevertheless, some

scholars criticize this development by arguing that excessive judicial expansion of *wasiat wajibah* could weaken the certainty of Islamic inheritance norms established in classical jurisprudence (Rofiq, 2015). Despite such criticisms, the practice of granting *wasiat wajibah* continues to develop within Indonesian Religious Courts as part of a broader effort to contextualize Islamic law in contemporary society.

Harmonization Between Islamic Law and Social Pluralism in Indonesia

The development of *wasiat wajibah* for non-Muslim heirs in Indonesia cannot be separated from the pluralistic character of Indonesian society. Religious diversity and the increasing number of interfaith family relationships have created complex legal problems, particularly in inheritance disputes (Afdol, 2019). In many cases, the rigid application of classical Islamic inheritance law may lead to social inequality and family conflict when non-Muslim family members are entirely excluded from inheritance distribution. Consequently, Indonesian courts have attempted to harmonize Islamic legal principles with contemporary social realities through more contextual legal interpretation.

The harmonization between Islamic law and social pluralism is reflected in the judicial expansion of Article 209 of the Compilation of Islamic Law through the mechanism of *wasiat wajibah*. According to Hidayat, Indonesian judges increasingly employ progressive legal reasoning in resolving interfaith inheritance disputes by prioritizing substantive justice and social harmony (Hidayat, 2021). Similarly, Fauzan argues that Religious Courts in Indonesia have demonstrated judicial activism by adapting Islamic legal norms to accommodate social transformation within modern Indonesian society. This approach indicates that Islamic law in Indonesia is not implemented solely through textual interpretation, but also through contextual interpretation that considers humanitarian values and public benefit.

Nevertheless, the harmonization between Islamic law and social pluralism remains a subject of academic debate. Some scholars argue that extending *wasiat wajibah* to non-Muslim heirs may blur the normative boundaries of Islamic inheritance law established in classical jurisprudence. On the other hand, supporters of progressive interpretation maintain that Islamic law should remain responsive to social change and capable of addressing legal issues arising within pluralistic societies (Yunus, 2019). Therefore, the development of *wasiat wajibah* for non-Muslim heirs reflects the continuing interaction between religious doctrine, judicial interpretation, and the socio-legal realities of Indonesia.

Implications of Judicial Practice on the Development of Islamic Inheritance Law

The expansion of *wasiat wajibah* for non-Muslim heirs through judicial decisions has significant implications for the development of Islamic inheritance law in Indonesia. One important implication is the emergence of progressive legal interpretation within Religious Courts and the Supreme Court. Through decisions such as Supreme Court Decision Number 368 K/AG/1995, judges have demonstrated a more contextual approach in interpreting Islamic inheritance law by considering social justice and humanitarian aspects alongside normative religious principles. This development indicates that Indonesian Islamic law continues to evolve dynamically in response to contemporary social conditions and legal challenges.

In addition, the judicial practice concerning *wasiat wajibah* has contributed to broader discussions regarding Islamic legal reform in Indonesia. According to Yunus, the reform of Islamic inheritance law in Indonesia reflects an effort to harmonize classical Islamic jurisprudence with the realities of modern pluralistic society (Maimun, 2021). The judicial expansion of Article 209 KHI also illustrates the increasing role of judges in legal development through judicial interpretation and legal discovery (*rechtsvinding*) (Rohman, 2021). Consequently, Religious Courts are not only functioning as law-applying institutions but also as active actors in shaping contemporary Islamic legal discourse in Indonesia.

Nevertheless, the development of judicial interpretation regarding *wasiat wajibah* for non-Muslim heirs also creates challenges concerning legal certainty and consistency. The absence of explicit regulation within the Compilation of Islamic Law regarding non-Muslim beneficiaries may result in differing interpretations among judges and courts (Nelli, 2022). Some legal scholars argue that clearer statutory regulation is necessary to prevent inconsistencies in judicial decisions involving interfaith inheritance disputes (Fauzi, 2021). Therefore, the practice of granting *wasiat wajibah* to non-Muslim heirs not only reflects the dynamic nature of Islamic law in Indonesia but also highlights the need for future reform and clarification within the national Islamic legal framework.

Conclusion

This study concludes that the implementation of *wasiat wajibah* for non-Muslim heirs under Article 209 of the Compilation of Islamic Law reflects the progressive development of Islamic inheritance law in Indonesia. Although Article 209 KHI normatively regulates mandatory bequests only for adopted children and adoptive parents, Indonesian Religious Courts and the Supreme Court have expanded its interpretation through judicial decisions involving interfaith inheritance disputes. The application of *wasiat wajibah* to non-Muslim heirs demonstrates that judges increasingly prioritize substantive justice, humanitarian considerations, and family protection in resolving inheritance conflicts within Indonesia's pluralistic society.

The findings of this study indicate that judicial interpretation plays a significant role in the development of Islamic inheritance law in Indonesia. Through legal discovery (*rechtsvinding*) and progressive legal reasoning, judges have adapted Islamic legal principles to contemporary social realities without entirely disregarding the fundamental doctrines of Islamic inheritance law. The implementation of *wasiat wajibah* for non-Muslim heirs therefore represents an effort to harmonize religious legal norms with social justice and public benefit (*maslahah*) within the Indonesian legal system.

Nevertheless, this study also finds that the absence of explicit regulation concerning non-Muslim heirs in Article 209 KHI potentially creates legal uncertainty and inconsistent judicial decisions among Religious Courts. Different interpretations regarding the scope and application of *wasiat wajibah* may lead to varying legal outcomes in similar inheritance disputes. In addition, this research is limited to normative juridical analysis based on statutory regulations, legal doctrines, and selected judicial decisions. Therefore, the study does not comprehensively examine the sociological impact of *wasiat wajibah* implementation on interfaith families in Indonesian society.

Based on the findings of this study, future legal reform is necessary to provide clearer regulations regarding the legal status of non-Muslim heirs within the Indonesian

Islamic inheritance system. More explicit legal provisions may contribute to greater legal certainty and consistency in judicial practice concerning interfaith inheritance disputes. In addition, the Supreme Court and Religious Courts should continue developing balanced legal interpretations that maintain Islamic legal principles while accommodating contemporary social realities and humanitarian values.

Further studies are also recommended to examine the implementation of *wasiat wajibah* from socio-legal and empirical perspectives, particularly regarding its social impact on interfaith families and dispute resolution practices within Religious Courts. Comparative studies involving inheritance law practices in other Muslim-majority countries may also enrich academic discourse concerning the reform and contextualization of Islamic inheritance law in pluralistic societies.

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