

THE ‘KALIMAH ALLAH’ DEBATE: COMPETING NARRATIVES IN POLITICS, LAW, AND RELIGION

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Abstract: This article studies the various competing narratives concerning the legal battle to use the word ‘Allah’ in Malaysia. Beginning in 2008, two court cases involving the word Allah drew considerable national attention and challenged the relationship between Malaysia’s Muslim majority and Christian minority. The first case, which received the most attention and generated the most substantive debates, involved the Catholic newspaper, the *Herald: The Catholic Weekly*. The second case involved Jill Ireland, a native Christian Sarawakian bumiputra, whose religious CDs were confiscated upon her arrival at the LCCT airport in Sepang, Negeri Sembilan. These two court cases serve as primary sources of information for analysing the multiple narratives present in the Kalimah Allah debate across three dimensions: politics, law, and religion. The three dimensions will then be incorporated into a heuristic model based on feedback loops, a systems thinking tool, in which interrelations between various narratives are visualised for a better understanding of the complexity of the Kalimah Allah issue, particularly within Malaysia’s unique political, legal, and religious contexts.

Keywords: Kalimah Allah, Islam, Malay Politics, Law, Religion, Heuristic Model, Systems Thinking.

Introduction

This article attempts to study the various competing narratives concerning the legal battle to use the word ‘Allah’ in Malaysia. Between 2008 and 2021, two court cases involving the *Kalimah Allah* (in Malay: the word Allah) drew significant national attention and challenged the relationship between Malaysia’s Muslim majority and Christian minority. These two court cases will here serve as primary sources when analysing the various competing narratives furnished by both opposing sides of the debate.

The legal battle over the use of the word ‘Allah’ began in 2009, when the Home Ministry barred a local Catholic Church newspaper, *Herald: The Catholic Weekly* (or the *Herald*), from using the word ‘Allah’ in its Malay

section. Over the course of six years, the ban was reversed several times. It was initially quashed by the High Court (31 December 2009),¹ reinstated by the Court of Appeals (14 October 2013),² and finally banned by the Federal Court (the highest court in Malaysia) in 2014.³ The Catholic church eventually exhausted its last legal avenue when the Titular Roman Catholic of Malaysia had his request for judicial review denied on 12 January 2015. In this case, the primary focus revolved around issues of constitutionality (Article 3, 10, 11, and 12), the premise of maintaining public order, and lengthy deliberations on the theology behind the use of the word 'Allah' by Christians.

The second case was *Jill Ireland Lawrence Bill v. Menteri Bagi Kementerian Dalam Negeri Malaysia & Anor*,⁴ which followed closely the *Herald's* court decisions. Unlike the *Herald*, this legal case did not delve too deeply into constitutional and theological issues, instead focusing on the legality of a directive dated 1986 that served as the government's source of authority for prohibiting Christians from using the word 'Allah'. Jill Ireland is a native Sarawakian bumiputra Christian of Melanau ethnicity, and her case began when religious CDs that she bought from Indonesia with the word 'Allah' in their titles were confiscated upon her arrival at LCCT airport (now KLIA2) on 11 May 2008. Five years later, the High Court granted two orders (out of eleven) sought by Jill Ireland, including quashing the Home Ministry's decision to seize her CDs and ordering their return. The court, however, made no ruling on her constitutional rights, prompting Jill to file a judicial review with the Court of Appeal. Consequently, the case was remitted to the High Court where it was resolved in favour of Jill on 10 March 2021. In her final judgement, Justice Nor Bee Ariffin affirmed Jill's constitutional right to freedom of religion and education, as well as the right against religious discrimination, and declared the Home Ministry's 1986 directive banning the word Allah in Christian publications to be unlawful and unconstitutional.

The outcome of this court case saw the groundbreaking nullification of the 1986 government directive, thus marking the latest development in the Kalimah Allah saga, with all eyes on the government's next actions. In response, Perikatan Nasional Home Minister, Hamzah Zainuddin, announced that a new government directive on the use of 'Allah' by Christians will be issued soon, citing that the government will first consult with faith leaders unrelated to the Sarawakian Christian's court case.⁵

The two court cases mentioned above will serve as primary source material that in addition to secondary sources, will identify the key narratives or factors dominating the Kalimah Allah controversy— politics, law, and religion. While these three dimensions clearly do not carry the same weight in court or generally, they do provide important information that can help us

better understand the complex debates within the larger context of Malaysian politics. This article attempts to accomplish this by incorporating these narratives into a heuristic model that visualises their dynamic relationship. It is hoped that visualising the relationship (or interrelationship) between the prevailing narratives will not only provide a clearer picture of the issues surrounding Kalimah Allah but will also benefit the wider study of Malaysian politics.

This article will begin its discussion by providing an overview of Malaysia's unique political and legal context, which serves as the backdrop for Muslim-Christian relations in the country. The discussion will then proceed to an in-depth study of the primary constitutional issues surrounding the Kalimah Allah debate, followed by the religious ones. These narratives will be incorporated into a heuristic model based on causal loops, a systems thinking tool, that visualises the relationship between the three dimensions. Finally, this article proposes several policy recommendations based on the model for resolving the conflict surrounding the use of the word 'Allah'.

The Malaysian Political Context

To gain a better understanding of the situation in Malaysia between the majority Muslim population and non-Muslim minority, it is necessary to understand the country's unique political and legal context. These include its current state of ethnic relations, the influence of Malay politics, its history of Islamisation, and existing legal-bureaucratic structures, namely the Malaysian constitution and the state's federalist character.

A. The Colonial Legacy

Historically, since its 1957 independence, Malaysian society has been comprised of three major communities, namely the *bumiputera* (lit. sons of the soil) who are mostly Muslim and Malay (currently 69.8 per cent),⁶ the Chinese (22.4 per cent),⁷ and the Indians (6.8 per cent).⁸ Malaysian Christians account for 9.2 per cent of the total population, with about two-thirds being East Malaysian *bumiputeras* who live in Sabah and Sarawak, and speak Bahasa Malaysia as their mother tongue. These Malay-speaking Christians make up roughly two million of three million Christians in Malaysia. For generations, these Malay-speaking Christians have relied on an Indonesian translation of the bible, or *Alkitab*, that uses the word Allah.

This pluralistic society was inherited from British colonialism in the late 19th and 20th centuries. Decades of British policies impacted the Malaysian

population in three ways:¹⁰ 1) a surge in Chinese and Indian workers challenged the demographic status quo, which until then had favoured the indigenous Malays; 2) there was a reinforcement of ethnic-based politics as a form of political expediency, using one community (Malays) to control others; and 3) the establishment of a strong but authoritarian bureaucratic government.

As a result of this colonial legacy, Malaysian society became complex, with ethnicity and religion (especially Islam) serving as driving forces in political discourse. This is echoed by Judith Nagata in her seminal work, *The Reflowering of Malaysian Islam*, where urgent issues in Malaysian politics are frequently made to revolve around defining identities “as a basis for rights and obligations, and hence their relationships with one another.”¹¹ In other words, identity politics has become a permanent feature of Malaysian politics.

B. Islam and Malay Politics

Article 3 (1) stipulates that Islam is the “religion of the federation”, with the Malay Rulers of each state and the Yang Dipertuan Agong serving as its gatekeepers (Clause 2). While the article itself states that nothing in the said article should be construed as contradicting any other provisions in the constitution (Clause 4), interpretations of Article 3 have become a source of ongoing debate about the position of Islam in the country. On one hand, there is an argument that the special position of Islam elevates it above other religions and that its interests should be prioritised. On the other hand, the argument that Malaysia is a ‘secular’ state and that Islam only serves as the ‘official’ religion allows it to be evoked only in government ceremonies and national events.¹² The role of Islam and its interpretation vis-à-vis the constitution is crucial in the Kalimah Allah case, as will be elaborated further in this article, because it determines whether Islam’s interests on the matter will take precedence over Christianity’s.

For the Malays, who are the largest ethnic group and most politically dominant,¹³ Islam is not only the religion of the federation but is closely tied with their identity as Malays. Article 160 defines a Malay as “a person who professes the religion of Islam, habitually speaks the Malay language, conforms to Malay custom” and is of Malaysian/Singaporean origin. In this regard, Hussin Mutalib, a Singapore-based scholar who specialises in Islam and Malay politics, argues that understanding the Malay-Islam dialectic is essential for deciphering Malaysian politics. He refers to the Malay-Islam dialectic as an:

...inherent ambiguity, if not tension, between Malays as an ethnic community separate from all non-Malays, and Malays as Muslims

belonging to a universal brotherhood or *ummah*, although the distinction between the two has not been something of which Malays are generally conscious.¹⁴

The inseparability of Islam from Malay identity consequently gave rise to several waves of political Islam in Malaysia, beginning with the 1970s ‘Dakwah Movement’ and the 1980s ‘Islamic Resurgence’. The former sought social reform and Islamic revivalism within Malay Muslim society,¹⁵ whereas the latter incorporated Islam into national politics and governance.¹⁶ In the case of Kalimah Allah, identity politics fueled sentiments that led political actors and society to focus more on theological differences and the irreconcilability of Islam and Christianity.

C. Nation-building

Nation-building, in Malaysia has always revolved around constructing an identity that unites the three major groups (Malays/*bumiputera*, Chinese, and Indians). To add to its significance, throughout the country’s 64 years of independence, the federal government has always been formed by a coalition of political parties representing the three major ethnic groups, albeit at various levels of power balance. Furthermore, the centrality of identity in Malaysian society may have contributed to the country’s adoption of the acculturation model rather than assimilation. The difference between these two models lies in how diversity is addressed:

The assimilation process demands a mandatory removal of ethnic origin and forces the minority to assimilate with most indigenous social cultures and structures. On the contrary, the accommodation process requires a different means of recognition to accept ethnicities’ identity. Malaysia is a state that intentionally promotes diversity as an identity. The multiethnic society can cohesively live and work together, although they are not united socially in terms of identity.¹⁷

The acculturation model, while advantageous in its celebration of diversity, may have contributed to the current situation involving the Kalimah Allah issue. Preserving the identity of each community may have the unintended effect of reinforcing social divides that have long existed along ethnic, cultural, and religious lines. Consequently, the Malay-speaking Muslim majority may interpret the Christian attempt to use the word Allah, an integral Islamic term, as an encroachment upon their identity—and therefore view it with mistrust and suspicion. On the other hand, the Kalimah Allah ban, as well as other high-profile interfaith disputes, such as burial

claims, child custody, and raids by religious officers, exacerbate the feeling of 'disempowerment' among non-Muslims, especially when seeking judicial redress against Muslims.¹⁸

Building a national identity for Malaysia has always been an ongoing project. Nationalism in the country is described as a "nations-of-intent"¹⁹ where multiple versions of nationalism are competing for centre stage. This dynamic and ever-changing conceptual ideation of national identity, nevertheless, has almost never escalated into large-scale interethnic violence—except for the relatively brief racial riots of 1969. Such stability can be attributed to the country's consistent economic growth, high social mobility, reliable public services and health care providers, and high standards of human rights, among other things.²⁰ While there are several 'social deficits' involving ethnic relations that arise from time to time, including the subject matter of this article, the Kalimah Allah issue, the nation's stability was never been in jeopardy. For this reason, ethnic relations in the country are considered to be in a state of "stable tension."²¹

Legal Issues Surrounding Kalimah Allah

The Catholic Church, in its initial response to the Home Minister regarding the 'Allah' ban, stated that it is "a serious violation of our constitutional freedom of expression and speech" and diminishes the right of Catholics to express and communicate in the national language.²² Following that, the Kuala Lumpur High Court, the first court in the *Herald* case, quashed the government's decision on the basis of articles 10 (Freedom of Speech), 11 (Freedom of Religion), and 12 (Rights in Respect of Education) of the Federal Constitution—calling it "illegal and null and void".²³ However, as the case progressed, concerns about Article 3 (Religion of the Federation) took centre stage, with provisions such as "Islam is the religion of the Federation" and "other religions may be practised in peace and harmony" being carefully deliberated.

In Jill Ireland's case, Articles 3, 11, and 12 were similarly invoked, but with the addition of Article 8 (Equality), emphasising its guarantee against religious discrimination in administrative laws, particularly Act 301 (Printing Presses and Publications Act 1984) and Act 235 (Customs Act 1967). The primary contention in this case was the validity and legality of the 1986 Government Directive by the Ministry of Home Affairs which prohibits the use of the word 'Allah' (as well as other terms related to Islam) in Christian publications published in Malay.

A. The Position of Islam and Public Order

In the *Herald*, one of the questions posed by the Titular Roman Catholic Archbishop of Kuala Lumpur regarding Article 3 was whether the position of Islam in Article 3 (1) is merely declaratory and could not by itself impose any qualitative restrictions on the fundamental liberties guaranteed by Articles 10, 11(1), 11(3), and 12 of the Federal Constitution.²⁴ The presiding Court of Appeal Judge, Mohd Apani Ali, explained that the inclusion of Article 3 (1) in the constitution was the result of a social contract entered into by the founding fathers of the country, taking into account the consensus between stakeholders of various racial and religious groups as provided in the 1957 White Paper.²⁵

Mohd Apani also clarified that the inclusion of the phrase “in peace and harmony” in the same clause was intended to preserve public order and prevent turmoil arising from threats to the sanctity of Islam and its status as the religion of the country.²⁶ He also asserted that it was for this exact reason that Article 11 (4) allows state and federal laws to restrict propagation among Muslims.²⁷ To date, since the 1980s, 10 out of 13 states in Malaysia have enacted laws forbidding non-Muslims from using ‘Islamic terms’ in their respective Shariah courts.²⁸

Professor Andrew Harding, a leading scholar in Asian legal studies and comparative constitutional law, distinguishes between freedom to ‘practise’ and freedom to ‘propagate’, stating that restricting the latter “has more to do with the preservation of public order than with religious priority”, and this has to do, to some extent, with the potential threat against Malay dominance whose identity is inextricably linked to Islam.²⁹ According to Shad Saleem Faruqi, a Malaysian legal scholar and law professor, the constitutional provision that protects against proselytisation among Muslims (i.e. Article 11 (4)) reflects the historical need to protect the Malay-Muslims from an unequal and disadvantageous position when dealing with heavily-funded foreign missions coming from “merchants, the military, and the missionaries of colonial countries.”³⁰ Faruqi claims that even today, the negative impacts on social harmony in many Asian and African societies resulting from proselytising by international and Western-dominated religious movements can distinctly be seen, especially when it involves practices like deathbed conversions or conversions of minors.³¹

Throughout the Kalimah Allah legal tussle, Muslim NGOs organised several mass protests, and arsonists attacked several churches.³² Several reports of Muslim proselytisation, as well as subsequent raids by JAIS (Selangor State Religious Department), such as the Thanksgiving Dinner in

Damansara (2011)³³ and the seizure of 351 Malay-language bibles from the premises of Bible Society Malaysia (2014), exacerbated the situation.³⁴

Nevertheless, the premise of 'preserving public order' has been challenged in court numerous times. For example, in his dissenting judgement in the *Herald's* case, Federal Justice Richard Malanjum argued that the *Herald* had been in circulation for fourteen years prior to the ban and had shown no evidence of being prejudicial to public order throughout that period.³⁵ Similarly, Justice Nor Bee, in her court judgment for Jill's case, said that the government failed to demonstrate "adequate, reliable, and authoritative" evidence in justifying its 1986 directive since there was no evidence of disruption or potential threat to public order prior to or at the time the directive was issued.³⁶

B. The "Assertion's Test": is the Word 'Allah' Integral to Christianity?

Another aspect of Article 11 discussed during the Kalimah Allah issue was whether the use of the word 'Allah' in the *Herald* constituted an essential part of Christianity.³⁷ The relevance of this point was based on the legal interpretation that religious freedom is extended "only to practices and rituals that are essential and integral part[s] of the religion."³⁸ It protects against the "assertion's test," in which anyone could simply assert that a specific practice is part of a religion and thus claim it as a religious right.³⁹

Several case studies were cited in this regard. In *Hjh Halimatussaadiah bte Hj Kamaruddin v Public Services Commission, Malaysia & Another [1994]*, the court rejected the appellant's claim that she had been wrongfully dismissed from her job due to her *purdah* (a headdress covering a woman's entire face except for the eyes) because the latter is considered to be optional and non-essential to Islam.⁴⁰ For similar reasons, in *Meor Atiqulrahman bin Ishak & Others v Fatimah Sihi & Others [2005]*, the court rejected the appellant's claim that wearing a turban at school is a religious right.⁴¹

In the *Herald*, the centrality of the word Allah in Christianity was challenged in the Court of Appeal on the basis that the word 'Allah' does not appear in the original Bible.⁴² In this regard, the original Bible refers to both the Septuagint (LXX)⁴³ and the Greek New Testament.⁴⁴ Based on this fact, Justices Mohd Zawawi Salleh and Mohamed Apandi Ali made their learned judgment that the word 'Allah' is insignificant to Christianity, allowing the government to challenge the High Court decision. The Catholic Church contested this notion, citing, among other things, Article 11 (3), which guarantees religious groups the right to manage their internal affairs, including the choice of words in their publications.

C. The Source of Executive Power: The 1986 Government Directive

In both the *Herald* and Jill Ireland cases, the Home Minister's authority to prohibit the use of the word 'Allah' stemmed from a government directive dated 5 December 1986 (from hereon referred to as the 1986 Directive). This was especially evident in Jill Ireland's case,⁴⁵ although it took the *Herald* several court sessions to clear the matter.⁴⁶

In brief, the 1986 Directive prohibited non-Muslims from using four words: Allah, *Kaabah*, *Baitullah*, and *Solat*. Additionally, 12 other 'Islamic' words were allowed but under condition that the phrase "for Christians only" be mentioned on the front cover. The government, as respondents, claimed that the Directive was a cabinet decision with public order as the underlying basis.⁴⁷

In Jill's case, it was argued that the 1986 Directive served as justification for the seizure of her CDs under section 9(1) of the Printing Presses and Publications Act 1984 (Act 301) and Customs Act 1967 (Act 235).⁴⁸

Nevertheless, the court case discovered that the 1986 Directive did not reflect the cabinet's policy decision in May 1986, having "marked discrepancies" therewith. For instance, it was pointed out that the words in the cabinet decision did not actually impose a "total ban" on the four words (including 'Allah') but rather permitted them if the cover page stated "for Christians only."⁴⁹ Additionally, the broad prohibition in the 1986 Directive was in direct conflict with the still-in-force 1982 gazetted government order that allowed the use of the Indonesian-language bible, *Alkitab*, within church premises. For these reasons, Justice Nor Bee declared the 1986 Directive "irrational and perverse."⁵⁰

Finally, in response to the claim that the Home Minister was exercising his power under the Printing Presses and Publications Act (PPPA), the judge stated that the PPPA is a "specific law" that regulates the licensing of printing presses, the issuance of permits to publish newspapers, and the control of undesirable publications; not a "general law on public order" that the original cabinet decision was based on. Therefore, the government erred in allowing the 1986 Directive to be enforced under Section 9(1) of the PPPA.⁵¹



Figure 1: The Cabinet Decision on 16 May 1986 apparently allowed the use of four words (Allah, *Kaabah*, *Baitullah*, *Solat*) under the condition that the phrase “for Christians only” be written on the cover.

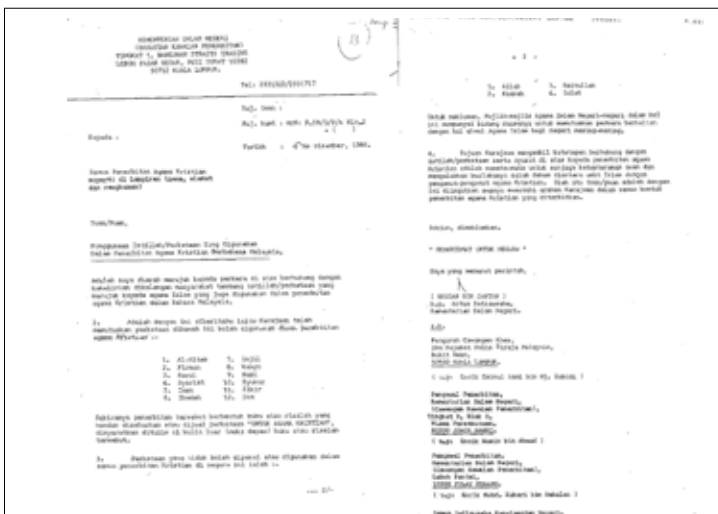


Figure 2: The 1986 Directive effectively imposed a total ban on the four words—in contrast with the more lenient Cabinet decision.

Religious Narratives

Muslims have conflicting opinions about the Kalimah Allah issue. Mainstream international Muslim scholars are generally more open on the subject because the word ‘Allah’ pre-dates the advent of Islam—Christian and pre-Muslim Arabs have been using the word for centuries. World-renowned Qatar-based Islamic scholar, Yusuf al-Qaradawi, after being made aware of the current debate in Malaysia, made it a point in one of his Friday sermons and emphasised Allah’s universality by highlighting that the first chapter of the Qur’an (*al-Fatihah*) introduces Allah as the “Lord of the Worlds”, while the last chapter (*al-Nass*) concludes by reiterating Allah’s supreme position as the “God of humankind”—not the God of Muslims or the God of Arabs.⁵² This opinion is also echoed by prominent Muslim scholars like Wahbah al-Zuhaili and Tariq Ramadan.⁵³

On the other hand, several international Muslims figures who support the Malaysian government’s ‘Allah’ ban are Abdul Fattah ‘Allam, Egypt’s Deputy Sheikh of al-Azhar; Abdul Mohsen al-Obeikan, Saudi Arabia’s Advisor to the Ministry of Justice; and prominent Kuwaiti figure, Abdul Hamid al-Ballali—mostly citing the need to prevent misuse of the word.⁵⁴

In general, state Muftis (Muslim legal experts who have the authority to give rulings on religious matters) in Malaysia opposed the use of the word ‘Allah’ by non-Muslims, although to varying degrees of intensity. This stand is in line with the resolution of the 82nd meeting of the *Muzakarah Jawatankuasa Fatwa Majlis Kebangsaan* (National Fatwa Council Conference) held between 5-7 May 2008, which concluded that the use of the word ‘Allah’ (and three other words) are restricted to Muslims only.⁵⁵

On the firmer side of this debate, Selangor Mufti Tamyas Abdul Wahid condemned the use of the word ‘Allah’ in the Bible, warning that allowing it would be tantamount to ‘associating’ (*menyukutkan*) God with the doctrine of the trinity.⁵⁶ Noh Gadut, the religious advisor to the Johor Islamic Religious Administration (MAIJ), claimed that Muslims have an exclusive right to the word ‘Allah’ and that non-Muslims should instead use other generic Malay words denoting God, such as *Tuhan*.⁵⁷ Zulkifli Mohammad al-Bakri, then Mufti of the Federal Territories, argued that the word ‘Allah’ has been “absorbed” into Malay language and culture (*uruf*), and thus must be understood from the Malay perspective.⁵⁸ Therefore, according to Zulkifli, any attempts by other religions to use the word in the Malay language will only cause confusion.⁵⁹ On the contrary, the Mufti of Perlis, Mohd Asri Zainal Abidin, believes that non-Muslims are free to use the word ‘Allah’ provided that it is not used for provocative purposes.⁶⁰ Mohd Asri also stated that an absolute prohibition against using the word ‘Allah’ for non-Muslims has no roots in Islamic law.⁶¹

A. Karim Omar, a Muslim activist and blogger affiliated with Muslim NGOs MUAFAKAT (*Pertubuhan Muafakat Sejahtera Masyarakat Malaysia*) and PEMBELA (*Pertubuhan-pertubuhan Pembela Islam*), investigated the matter from a Christian missiological perspective.⁶² In his opposition to Christian use of the word 'Allah', Karim highlighted the presence of deceptive elements in the 'contextual strategy' of Christian missions to "acclimate" new or potential converts in Muslim majority countries. Extensively citing a doctoral thesis based on the interview of two dozen Malay Christians,⁶³ Karim pointed out that the controversial practice of contextualisation includes adopting practices familiar to Muslims, such as having service on Fridays,⁶⁴ performing religious rituals similar to Islam,⁶⁵ as well as using Islamic terminology in liturgy.⁶⁶

Mujahid Yusuf Rawa, a Muslim politician known as a progressive Islamist, argued that restricting the use of the word 'Allah' among Malay-speaking Christians contradicts the 'higher objectives of shariah' (*maqasid al-shariah*), which promote good inter-faith relations and compassion for all (*rahmatan lil 'alamin*).⁶⁷ Mujahid also emphasised the principle of 'no compulsion' in religion and reiterated that diversity is a deliberate creation of God (Qur'an 10:99).⁶⁸ According to Mujahid, these combined values will propel Islam to the forefront of civilisation as a source of reference for humanity.⁶⁹

Referring back to the *Herald's* discussion on the centrality of 'Allah' in Christianity (particularly in the Court of Appeal), it was argued that the absence of the word 'Allah' in the original language of the Old and New Testaments (Koine Greek) invalidates the Malay Bible's justification for using the word 'Allah'. Other reasons cited by the judges included the claim that non-Arabic speaking Christians (especially in the West) are actually opposed to the notion of using 'Allah' in the English Bible,⁷⁰ and that the decision to use it in Malaysia was made not for theological or linguistic reasons,⁷¹ but for expediency and proselytisation purposes in Asia and other parts of the world where there is Muslim-Arabic religious influence.⁷²

Another point of contention is whether the word 'Allah' is a Proper or Common Noun. For instance, Muslim scholar Mohamed Ajmal in his book, *Christians in Search of a Name for God: The Right to Allah*, claimed that 'Allah' is a proper name and hence cannot be used by Christians since their concept of God is diametrically opposed to that of Islam.⁷³

In response to these claims, Christians note that 'Allah' has been used in churches and Malay Bibles for many centuries. In a fact sheet released by the Christian Federation of Malaysia (CFM), the Christian use of the term 'Allah' can be traced back to the year 1629 and the translation of the Gospel of Matthew by A. C. Ruyl. The first complete Malay Bible by M. Leijdecker published in 1733 and the second by H. C. Klinkert in 1879.⁷⁴ Malay-speaking

Christians have used the word Allah for *Elohim* in the Old Testament and *Theos* in the New Testament for generations.⁷⁵ It is argued that any attempts to change the word will be nearly impossible and will only cause major confusion. For instance, replacing ‘Allah’ with *Yahweh* in the Malay Old Testament will be extremely difficult because *Yahweh* has already been used to refer to several different entities in the *AlKitab*.⁷⁶ Likewise, replacing ‘Allah’ with the Malay word *Tuhan* will result in awkward or nonsensical sentences because it has already been used to translate the word *Yahweh*—for instance, the Hebrew term ‘*Yahweh Elohim*’ (in English, ‘Lord God’) will see the word *Tuhan* repeated twice in a row (‘*Tuhan Tuhan*’), and thrice in Ulangan 6:4 (*Dengarkanlah hai Israel, Tuhan, Tuhan kita, Tuhan itu esa*).

In response to these linguistic aspects of the debate, *Lembaga Al-Kitab Indonesia* and the Bible Society of Malaysia (BSM) initiated a collaboration to correct any discrepancies or translation errors in the *AlKitab*.⁷⁸ Similarly, the Christian Federation of Malaysia (CFM) and the National Evangelical Christian Fellowship (NECF), Malaysia’s two largest umbrella Christian organisations, have expressed their commitment to revising any terminological errors in order to avoid hurting any religious or social sensitivities.⁷⁹ Potential revisions, however, are subject to genuine errors; otherwise, they will maintain their religious right to use the word ‘Allah’.⁸⁰

Developing a Heuristic Model Based on Systems Theory

Structures of which we are unaware hold us prisoner
—Peter Senge, *The Fifth Discipline*.⁸¹

Systems theory, which was developed in the 1970s, has become an essential framework for addressing complex or “wicked problem” situations. One of the defining features of systems thinking is the distinction between “simple” and “complex” systems. A simple system has a single chain of cause and effect, whereas a complex system’s chain of cause and effect does not have an end point but instead becomes a feedback loop.⁸² A feedback loop is:

... a circular connection between two or more system elements in which a change in one element, or input, causes other elements to generate a response, or output, that eventually feeds back to the original element.⁸³

A popular expression for summarising the essence of systemic thinking is “seeing the forest for the trees”. This means that rather than examining individual components of a situation, we examine the entire system and, most importantly, the relationship between its components. Stephen E. Brown and Daniel C. Lerch, in their introduction to systems thinking, provided an illustrative summary using the “forest” as an example:

If we put a bunch of trees, bushes, a pile of dirt, a tub of water and a family of squirrels together in a big room, however, we clearly wouldn't have a forest: we'd have a mess (or a bad art project). What makes a true forest are the relationships between all of its parts: the soil and water nourish the trees, the trees shelter the animals, the animals eat the plants, and so on.⁸⁴

Peter Senge, a pioneer of systems thinking and author of *The Fifth Discipline*, identified several *systems archetypes* to describe the distinctive relationships in systemic structures.⁸⁵ These archetypes serve as general guidelines when finding solutions to complex issues.

In proposing a formal theory for systems thinking, Derek Cabrera coined the acronym DSRP, which stands for distinctions, systems, relationships, and perspectives.⁸⁶ According to Cabrera, these four patterns are essential for all cognition and universally relevant in processes involving structuring information.⁸⁷ Appropriately, when developing a framework based on systems thinking, one must ensure that it clarifies all of its distinct parts, systems and subsystems, interrelationships and interconnections, and the presence of multiple perspectives.

Since its creation, systems thinking has permeated popular culture as well as a wide range of scientific domains, such as planning and evaluation, education, business and management, public health, sociology and psychology, cognitive science, human development, agriculture, sustainability, environmental sciences, ecology and biology, earth sciences, and other physical sciences.⁸⁸ Additionally, international organisations such as the United Nations (UN)⁸⁹ and the World Health Organisation (WHO)⁹⁰ have extensively adopted systems thinking to address a variety of pressing global issues, including the COVID-19 pandemic.⁹¹

As a complex issue, the Kalimah Allah debate contains multiple distinctive elements (e.g. politics, law, religion), multiple systems and sub-systems (e.g. federal and state laws, religious bureaucracy, Malay politics), verified interrelationships and interconnections between its components (e.g. politics affecting lawmaking, demography affecting laws, laws affecting religious

practice), and multiple narratives from various perspectives (as previously elaborated).

It would be difficult to argue that the Kalimah Allah controversy originates from a single source with no interaction or connection to other factors. For instance, singling out the constitutional position of Islam as the primary source of conflict will not explain the role of identity in Malaysian politics and its influence in interpreting and enforcing the law.

Similarly, focusing on religion and dismissing the issue as proof of the irreconcilability of Islam and Christianity, without considering the underlying Malaysian legal framework, is a form of reductionism. It will not explain the countless examples found around the world where the two religious communities have shared the word ‘Allah’ in relative peace for centuries.

For these reasons, this article proposes the heuristic model depicted in Figure 3 in relation to the Kalimah Allah issue. This basic heuristic model, based on causal loop diagrams (CLD), attempts to provide a simple yet useful visual representation of an otherwise abstract issue. One of the goals of this model is to provide a general awareness of the interconnection between the three dimensions, which will provide beneficial policy insights on the complex situation—and thus avoid being blindsided by what Peter Senge refers to as “structures that we are unaware of.”

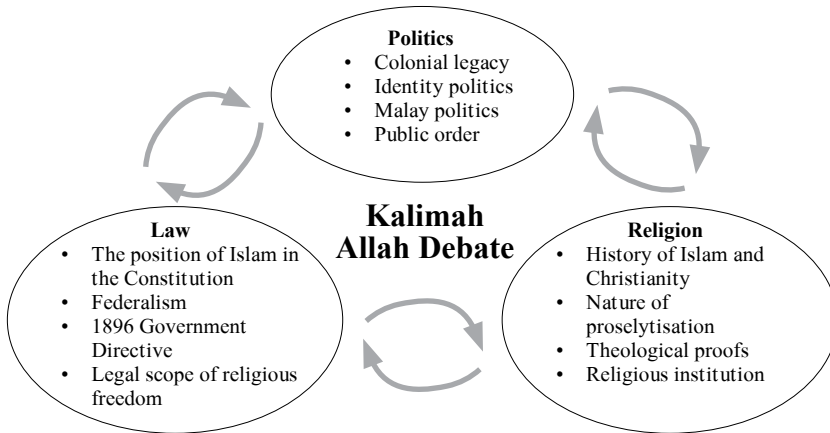


Figure 3: A Proposed Heuristic Model for the Kalimah Allah Debate based on Feedback Loops.

Figure 3 illustrates the three primary dimensions discussed in this article (politics, law, and religion) as three ovals, each with smaller components (which

are non-exhaustive). Each oval interacts with and influences the others in two ways, forming a feedback loop. Several examples of how the model illustrates the relationship between the multiple dimensions are as follows:

A. Politics and Law

The form of identity politics inherited from the colonial era had a significant impact on the way in which the Malaysian constitution was drafted. The political context of the pre-independence era and the consensus reached by representatives of the three major ethnic groups resulted in the inclusion of the provisions on Islam (Article 3), anti-propagation (Article 11 (4)), as well as Malay and *bumiputera* special rights (Article 153).⁹² Subsequently, these provisions heavily influenced the Kalimah Allah adjudication in court.

On the flip side, these enshrined constitutional provisions continue to sustain, if not reinforce, the relevance of identity in Malaysian politics. In our previous discussion, we saw how narratives opposing the use of the word 'Allah' by Christians frequently cite the position of Islam and the definition of what it is to be Malay in the constitution.

B. Law and Religion

Constitutional provisions and their subsidiary legislation influence how religion is defined and practised. This is apparent in the case of Christianity (i.e., the permissibility of using the word Allah), but also holds true for Islam in several ways.⁹³ The present relegation of Islamic law to matters of family law and Malay custom, and its subsumption under state jurisdiction, has resulted in a particular form of Islamic bureaucracy that has been described as 'colonial modern'.⁹⁴ Such bureaucracy has a distinctive impact on religious administration and enforcement, and does not always align with the opinions of major Islamic scholars. On the issue of Kalimah Allah, we can see a clear divide between Malaysian government religious officers and Muslim scholars who have no obvious government attachment.

Religion and Politics

In the Malaysian political setting where identity is a source of contention, Islamic discourse is frequently drawn into issues of inter-ethnic or religious relations (including the Kalimah Allah debate). The restraining and remoulding of Islam in its current socio-political framework has created a situation in which identity politics has a significant influence on the formulation of *ijtihad*.

These religious positions, such as emphasising the irreconcilability of Islam and Christianity, influence the political sentiments of Malaysians, which in turn influences the political will of politicians to initiate the necessary law reforms or amendments. For example, if the Malaysian government has the political will, it could revoke the 1986 Directive at any time. This would, however, imply that the government is willing to defy the apparently overwhelming opposition from Muslim NGOs and pressure groups to Christians using the term ‘Allah’. On the other hand, non-Muslims naturally respond to increased Islamisation in politics by asserting their rights.⁹⁵

Conclusion and Policy Recommendations

The interrelation between the three dimensions—politics, law, and religion—in the outcome of the Kalimah Allah issue is a critical feature that policymakers and political or religious leaders must be aware of. In systems theory, such a multifactorial-based outcome is called *emergent properties*. Realising this *emergent* behaviour will force us to broaden our search for a solution. Reducing or atomising the problem will only serve to solve one aspect of the matter temporarily, with no regard to sustainable solutions. The model proposed in this article is intended to serve as a starting point for further policy research on the subject. This article concludes with the following policy recommendations:

- The new government directive, which will replace the one issued in 1986, must consider the various narratives and dimensions of politics, law, and religion. This includes, but is not limited to, Malaysia’s political and legal backdrop, Muslim concerns about proselytisation, as well as the long-standing tradition of Malay-speaking Christianity.
- Reaching a consensus on the Kalimah Allah issue will require policymakers and community leaders to avoid reductionist tendencies that fixate on one dimension (or narrative) in isolation from others. Neglecting the interrelationships and complexities of the issue will be detrimental to society in the long term.
- Open and consistent consultations between political leaders, legal experts, and faith leaders from various backgrounds are essential for widening perspectives on the Kalimah Allah debate—which is a core requirement of systemic models.

Notes

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 6. Department of Statistics Malaysia on 15 July 2021.
 7. *Ibid.*
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23. Titular Roman Catholic Archbishop of Kuala Lumpur v Menteri Dalam Negeri & Anor [2010] 2 MLJ 78 (High Court, Kuala Lumpur). P56.
24. Dissenting Judgment of Justice Richard Malanjum. [2013] 6 MLJ 468 (Court of Appeal, Malaysia). P20.
25. Judgment of Justice Mohamed Apandi. [2010] 2 MLJ 78 (High Court, Kuala Lumpur). P28
26. Ibid. P28
27. Ibid. P29
28. See Control and Restriction of the Propagation of Non-Islamic Religions (Johore) Enactment 1991 (Enactment 12/1991); Control and Restriction of the Propagation of Non-Islamic Religions (Kedah) Enactment 1988 (Enactment 11/1988); Control and Restriction of the Propagation of Non-Islamic Religions (Kelantan) Enactment 1981 (Enactment 11/1981); Control and Restriction of the Propagation of Non-Islamic Religions to Muslims (Malacca) Enactment 1988 (Enactment 1/1988); Control and Restriction (Propagation of Non-Islamic Religions Among Muslims)(Negeri Sembilan) Enactment 1991 (Enactment 9/1991); Control and Restriction of the Propagation of Non-Islamic Religions (Pahang) Enactment 1989 (Enactment 5/1989); Control and Restriction of the Propagation of Non-Islamic Religions Enactment 1988 (Enactment 10/1988); Non-Islamic Religions (Control of Propagations Among Muslims) (Selangor) Enactment 1988 (Enactment 1/1988); Control and Restriction of the Propagation of Non Islamic Religions Enactment 1980 (Enactment 1/1980). Freedom of Religion in Malaysia. Control and Restriction of the Propagation of Religious Doctrine and Belief which is Contrary to the Religion of Islam Enactment 2002 (Perlis) (Enactment 6/2002). Source: Kuala Lumpur High Court Judicial Review:R1-25-28-2009.
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37. Judgment of Justice Zawawi Salleh. [2013] 6 MLJ 468 (Court of Appeal, Malaysia). P3
38. Ibid., 8.
39. Ibid.
40. Hjh Halimatussaadiah bte Hj Kamaruddin v Public Services Commission, Malaysia & Another [1994] 3 MLJ 61
41. Meor Atiqulrahman bin Ishak & Others v Fatimah Sihi & Others [2005] 2 MLJ 25
42. Judgment of Justice Zawawi Salleh. [2013] 6 MLJ 468 (Court of Appeal, Malaysia).p10.
43. The first Greek translation of the original Hebrew Bible (also known as the *Tanakh*)
44. Judgment of Justice Zawawi Salleh. [2013] 6 MLJ 468 (Court of Appeal, Malaysia). p10.
45. Jill Ireland Lawrence Bill V. Menteri Bagi Kementerian Dalam Negeri Malaysia & Anor. [2021] CLJ JT (7) (High Court, Malaysia).
46. “Justice Abdul Aziz JCA held the power was to be found in Section 12 of the Act together with the Form B conditions while Mr. Justice Mohd Apandi Ali JCA (as he then was) relied on section 26, or the implied power under section 40 of the Interpretation Act 1967 as the source of the power. Thus it was submitted that the source of the Minister's power to impose a ban on the use of a word by a religious body should be clearly settled by this Court”, in Dissenting Judgment of Justice Richard Malanjum. [2013] 6 MLJ 468 (Court of Appeal, Malaysia). P26
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