

## **ABUSE OF FORMALIN AND OTHER HARMFUL SUBSTANCES IN FISH HANDLING AND PROCESSING**

Fatwa Commission of the Indonesian Ulema Council (MUI), after :

CONSIDER: a. that in Islam, one of the main purposes of the Shari'a is to protect the soul (hifz al-nafs), then Islam advocates to eat a healthy diet and prevent any use of harmful substances;

b. that one type of healthy food consumption is eating fish, which have been shown to be very beneficial for health and The availability is so great that there needs to be a push increase in healthy fish consumption;

c. that in the handling and processing of fish, it often occurs abuse of formalin and harmful substances for the benefit of fish preservation, thus causing unrest in the community;

d. that regarding these facts, questions arise from the public regarding the legal use of formalin in fishery products;

e. that it is therefore considered necessary to establish a fatwa on The use of formalin and other harmful substances for preservatives Fish is used as a guide.

### 1. Firman Allah SWT:

a. The Word of Allah which explains the products of the sea, among

Other :

وَهُوَ الَّذِي سَخَّرَ الْبَحْرَ لِتَأْكُلُوا مِنْهُ لَحْمًا طَرِيًّا

“And He is the One Who has subjected the sea, so from it you may eat tender seafood “ (16:14)

فَكُلُوا مِمَّا رَزَقَكُمْ اللَّهُ حَلَالًا طَيِّبًا وَاشْكُرُوا نِعْمَتَ اللَّهِ إِنْ كُنْتُمْ إِيَّاهُ تَعْبُدُونَ ۝ ١١٤

“So eat from the good, lawful things which Allah has provided for you, and be grateful for Allah’s favours, if you ‘truly’ worship Him ‘alone’.” (16:114)

يَا أَيُّهَا الَّذِينَ ءَامَنُوا كُلُوا مِن طَيِّبَاتِ مَا رَزَقْنَاكُمْ وَاشْكُرُوا لِلَّهِ إِنْ كُنْتُمْ إِيَّاهُ تَعْبُدُونَ ۝ ١٧٢

“O believers! Eat from the good things We have provided for you. And give thanks to Allah if you ‘truly’ worship Him ‘alone’.” (2:172)

وَاشْكُرُوا لِلَّهِ إِذَا كُنْتُمْ مِنْ طَيِّبَاتِ مَا رَزَقْنَاكُمْ

“Eat from the good things We have provided for you.” (2:57)

c. The Word of Allah which forbids to plunge oneself into

destruction, among others:

وَلَا تُلْقُوا بِأَيْدِيكُمْ إِلَى التَّهْلُكَةِ وَأَحْسِنُوا إِنَّ اللَّهَ يُحِبُّ الْمُحْسِنِينَ ۝ ١٩٥

“do not let your own hands throw you into destruction ‘by withholding’. And do good, for Allah certainly loves the good-doers.” (2:195)

d. Allah's Word which explains about haram

bad items, including:

وَإِنجِيلٍ يَأْمُرُهُم بِالْمَعْرُوفِ وَيَنْهَاهُمْ عَنِ الْمُنْكَرِ وَيُحِلُّ لَهُمُ الطَّيِّبَاتِ وَيُحَرِّمُ عَلَيْهِمُ الْخَبَائِثَ

“He commands them to do good and forbids them from evil, permits for them what is lawful and forbids to them what is impure” (7:157)

e

. The Word of Allah that affirms the prohibition of hurting people

others, including:

وَالَّذِينَ يُؤْذُونَ الْمُؤْمِنِينَ وَالْمُؤْمِنَاتِ بَغَيْرِ مَا كَتَبْنَا لَهُمْ فَذُنُوبُهُمْ وَانْتِهَاهَا مُبِينًا ٥٨

“As for those who abuse believing men and women1 unjustifiably, they will definitely bear the guilt of slander and blatant sin.” (33:58)

f. The Word of Allah which affirms the prohibition of eating wealth

in a unlawful manner and forbidden to self-destruct

(with wrongdoing by oneself), including:

يَا أَيُّهَا الَّذِينَ ءَامَنُوا لَا تَأْكُلُوا أَمْوَالَكُمْ بَيْنَكُمْ بِالْبَاطِلِ إِلَّا أَنْ تَكُونَ تِجَارَةً عَنْ تَرَاضٍ مِّنْكُمْ ۚ وَلَا تَقْتُلُوا أَنْفُسَكُمْ ۚ إِنَّ اللَّهَ كَانَ بِكُمْ رَحِيمًا ٢٩

“O believers! Do not devour one another’s wealth illegally, but rather trade by mutual consent. And do not kill ‘each other or’ yourselves. Surely Allah is ever Merciful to you.” (4:29)

2. Hadith of the Prophet PBUH, among others:

a. Hadith that explains the halalness of marine animals including fish; Among others:

عَنْ أَبِي هُرَيْرَةَ - رَضِيَ اللَّهُ عَنْهُ - قَالَ: قَالَ رَسُولُ اللَّهِ - صَلَّى اللَّهُ عَلَيْهِ وَسَلَّمَ - فِي الْبَحْرِ: - هُوَ الطُّهُورُ مَاؤُهُ، الْحِلُّ مَيْتَتُهُ - (أَخْرَجَهُ الْأَرْبَعَةُ، وَابْنُ أَبِي شَيْبَةَ وَاللَّفْظُ لَهُ، وَصَحَّحَهُ ابْنُ خُرَيْمَةَ وَالتِّرْمِذِيُّ)

From Abi Hurairah he said: The Messenger of Allah (peace and blessings of Allaah be upon him) said:

Regarding the water of the sea: "It is holy whose water is lawful for the carcasses (of animals)"

(HR al-Arba'ah and Ibn Abi Syaibah, saheeh by Imam Ibn

Khuzaimah and al-Turmudzi)

From this hadith it is understood that in principle, all animals

Water, both fresh and salted is halal to consume.

b. The hadith that explains the signs of the Muslims is that

give a sense of security to others; Among others:

عَنْ جَابِرِ رَضِيَ اللَّهُ عَنْهُ قَالَ: قَالَ رَسُولُ اللَّهِ: إِتَّقُوا الظُّلْمَ، فَإِنَّ الظُّلْمَ ظُلُمَاتٌ يَوْمَ الْقِيَامَةِ... (أَخْرَجَهُ مُسْلِمٌ)

From Jabir ra, he said: The Messenger of Allah (peace and blessings of Allaah be upon him) said: "Be afraid.

all of you against tyranny, because it is tyranny

is darkness on the Day of Resurrection". (HR. Muslim)

عَنْ أَبِي سَعِيدٍ الْخُدْرِيِّ رَضِيَ اللَّهُ عَنْهُ أَنَّ رَسُولَ اللَّهِ صَلَّى اللَّهُ عَلَيْهِ وَسَلَّمَ قَالَ: لَا ضَرَرَ وَلَا ضِرَارَ (رواه ابن ماجة والدارقطني وغيرهما)

From Abi Sa'id al-Khudri ra, the Prophet s.a.w. said:

Must not harm others and must not (either)

retaliating for harm (harm caused by others)

with danger (acts that harm him)." (HR Imam Ibn

Majah, ad-Daruquthni and others)

From both, it is understood that the administration of harmful substances to

Fishery products are prohibited.

d. Hadith that explains the prohibition of deception, including:

عَنْ أَبِي هُرَيْرَةَ رَضِيَ اللَّهُ عَنْهُ أَنَّ النَّبِيَّ صَلَّى اللَّهُ عَلَيْهِ وَسَلَّمَ مَرَّ عَلَى صَبْرَةٍ طَعَامٍ، فَادْخَلَ أَصَابِعَهُ فِيهَا، فَإِذَا فِيهِ بَلَلٌ، فَقَالَ: "مَا هَذَا يَا صَاحِبَ الطَّعَامِ؟" قَالَ: أَصَابَتْهُ سَمَاءٌ يَا رَسُولَ اللَّهِ، قَالَ: "فَهَلَّا جَعَلْتَهُ فَوْقَ الطَّعَامِ حَتَّى يَرَاهُ النَّاسُ، مَنْ عَشِنَا فَلَيْسَ مِنَّا"

From Abi Hurairah ra, the Prophet (peace and blessings of Allaah be upon him) walked through

pile of food and then he put his finger in the

pile of food and find it wet in it

Then he said: What is this? Seller

He said: This is due to rain, the Prophet said:

Why don't you put it at the top so that you can

Know the person (potential buyer)? Whoever deceives then

he does not belong to my group" (HR. Muslim)

From this hadith, it can be understood that the use of goods

preservatives in fishery products that cause as if

Still fresh including forbidden deception.

3. Ijma' Ulama on the haram of fraud in buying and selling.

4. Qaidah fihiyyah :

"The danger must be eliminated"

"All hazards must be avoided as much as possible.

maybe".

"The danger cannot be eliminated by bringing

other dangers"

"Avoiding mafsadat takes precedence over bringing about

More.

"Dharar which is special must be borne for

avoid dharar which is general (wider)."

"If there are two damages or dangers that contradict each other on the contrary, then greater damage or danger avoided by doing risky acts the danger is less."

All paths that lead to something haram, then  
The law is haram.

"The policy of the imam (government) towards its people is based on on the benefit."

1. The opinion of Abul Hasan Ali bin Muhammad al-Mawardi in the book al-Hawi al-Kabir XV/395 :

.... There are four categories of plants.... Second: the plant used as medicine. In this case, it is permissible to consume it for importance of treatment. However, consumption is for the benefit of the Outside of treatment sorted, if it is dangerous then it is forbidden eat it and if it is not harmful then it is allowed.

Decree of the Ijtima Ulama of the Fatwa Commission in Indonesia IV of 2012 at PP Cipasung, Singapore, West Java on Formalin, Borax and Chemicals.

The results of the visit of the MUI Fatwa Commission Team to several fish processing sites, which witnessed fish processing with indications of the use of harmful materials for the sake of preservation;

Results of the Workshop and Focus Group Discussion on the processing of fishery products by the Ministry of Marine Affairs and Fisheries on March 8, 2012 which presented fishery business actors, who generally provided an explanation of the obstacles

Processing of fishery products, the practice of misuse of hazardous materials for fishery products and several alternatives

his successor;

5. Presentation of papers on the abuse of formalin and harmful substances for food products in fiqh studies; written by Dr. KH Munif Suratmaputra with the title "Formalin, Borax and Rhodamin B for Food Preservatives in Fiqh Studies" at the Fatwa Commission Meeting on June 5, 2012 and by Dra. Hj. Mursyidah Taher, MA entitled "Formalin, Borax

and harmful chemicals as food preservatives and

Drinks in Fiqh Studies"; which generally explains

Prohibition of using substances harmful to health and

human soul for food preservatives or colorings, including

fishery products.

6. Research conducted by trusted experts states that

Formalin can cause harm, among other things, by the use of formalin

over a long and continuous period of time will cause

the occurrence of cancer (carcinogenic);

7. Explanation of Prof. Dr. Endang Sri Heruwati Researcher from the Agency

Marine and Fisheries Research and Development (Balitbang),

and Dr. Wini Trilaksani, Lecturer at the Faculty of Fisheries and Sciences

IPB Marine in the Fatwa Commission Plenary session on October 18

which in general states, among others; (i) has a use

formalin for non-food purposes; (ii) there is a danger of formalin

for the body if consumed, both short-term and long-term

length; and (iii) there are provisions of laws and regulations which states that formalin is a prohibited ingredient used in foodstuffs.

8. Law Number 7 of 1996 concerning Food, especially Article 21 which states "Everyone is prohibited from distributing food that contain materials that are prohibited from being used in activities or the food production process";

9. Law No.31/2004 as amended by Law No.45/2009 on Fisheries, in particular Article 23 which states "Everyone is prohibited from using raw materials, food additives, harmful auxiliary substances human health".

10. Opinions, suggestions, and inputs that develop in the Session Fatwa Commission at the Fatwa Commission Meetings on July 19 2012, August 10, 2012 and the last at the Plenary Meeting dated October 18, 2012.

By trusting in Allah SWT

FATWA ON FORMALIN ABUSE AND  
OTHER HAZARDOUS MATERIALS IN HANDLING  
AND FISH PROCESSING

: General Terms

In this fatwa what is meant by:

1. Formalin is a compound of Formaldehyde (HCHO), often called formic aldehyde or methyl aldehyde, which is actually

is a gas, but is generally traded and used in the form of a solution, colorless and sharp-smelling that so-called formalin solution, with a maximum concentration of 40%, and often contains methanol as a stabilizer.

2. Harmful chemicals are real chemicals not intended for food and beverages (non-food grade) and if consumed for a long period of time can endangering health.

: Legal Provisions

1. Basically, fish is halal. It's just that the handling and fish processing must pay attention to safety and Health standards for humans (thayyib).
2. The use of formalin and other hazardous materials in handling and processing of harmful fish health and the legal soul are haram.
3. Producing and trading fish and fishery products that use formalin and other harmful substances that endangering health and soul is haram.
4. The legal provisions as points 2 and 3 also apply for other food products.

: Recommendations

a. Government :

1. Provide alternative facilities and infrastructure from materials hazardous chemicals for fishery products, such as the development of subsidized ice factories to make them affordable for traders and

Fishermen are economically weak.

2. Providing counseling and education to business actors and

society on the prohibitions and dangers of formalin use

and harmful substances on fishery products;

3. Conducting socialization to business actors regarding the implementation of

Sanitation, Food Safety and Quality Assurance Standards

in each stage of the fishery product production process;

4. Conducting, coaching, and supervising

business actors in the implementation of sanitation and safety standards

food and beverage systems;

5. Regulating formalin trading systems so that they are not sold freely,

and supervise its circulation so that it is not abused.

6. Prevent the abuse of formalin and substances

Other harmful fish preservatives

consumers.

7. Always educate the community to encourage the movement

eat fish healthily, by ensuring the availability of fish

fresh and healthy, free from formalin and other harmful substances,

and educate them not to abuse formalin and

other harmful substances for fish.

8. Supervise the quality of fish and fishery products circulating in the

community

9. Encourage research and development efforts of materials.

Natural and safe ingredients for human health as an alternative

reduce the abuse of formalin and ingredients

other harmful to fishery products;

10. Enforce laws and regulations in a positive manner

consistently.

Business Actors

1. Producing quality and safe fish and fishery products

food for the community and ensure a sustainable production process

free of formalin and other harmful substances.;

Implementing sanitation, food safety standards and quality assurance systems in every stage of the fishery product production process;

Using food additives that are allowed in fish processing and not using prohibited additives as food additives;

Do not sell fish and fishery products that contain formalin and other harmful substances Community:

Participate in preventing the misuse of formalin and other harmful substances in fishery products,

Selecting and purchasing fish and fishery products that do not contain formalin and harmful substances;

Supervise the circulation of fish and fishery products in the surrounding environment;

Using permitted food additives and not using prohibited additives as food additives

Fourth: Closing Provisions

This fatwa is valid from the date it is set, with the provision that if in the future it turns out that improvements are needed, it will be corrected and perfected as appropriate.

So that every Muslim and those in need can know it, urge all parties to disseminate this fatwa.

Established in : Jakarta

On : 2 Dzulqa'idah 1433 AH

October 18, 2012 M

# FATWA SUMMARY: Abuse of Formalin and Harmful Substances in Fish

## □ 1. Authority

### ► Fatwa Commission of the Indonesian Ulema Council (MUI)

- Issued due to widespread abuse of formalin and other harmful substances in fish processing.
- Aim: To provide guidance on lawful (halal) and safe (thayyib) consumption of fish and other foods.

## □ 2. Qur'anic Basis

- Eat from **good and lawful (thayyib) provisions**:
  - 16:14, 16:114, 2:172, 2:57 – emphasize lawful and healthy consumption.
- Avoid self-destruction or harm:
  - 2:195, 4:29 – do not harm yourself or others.
- Avoid impure and harmful substances:
  - 7:157 – permits lawful, forbids impure.
- Do not harm others unjustly:
  - 33:58 – harming others is sinful.

## □ 3. Hadith Basis

- **Marine animals are halal**: all fish, fresh or saltwater, are permissible (HR. al-Arba'ah, Ibn Abi Syaibah).
- **Prohibition of harming others**: do not inflict danger on others, directly or indirectly (HR. Muslim, Ibn Majah).

- **Prohibition of deception:** using chemicals to make fish appear fresh is **fraud**, which is forbidden (HR. Muslim).

## □ 4. Fiqh Principles (Qawa'id Fiqhiyyah)

- **Eliminate danger:** "All hazards must be avoided as much as possible."
- **Avoid greater harm:** cannot eliminate one danger by causing another.
- **Safety precedes benefit:** if actions harm health or soul, they are prohibited.
- Anything leading to **haram** is itself haram.

## □ 5. Expert Opinions & Research

- Formalin and harmful chemicals:
  - **Not intended for food consumption.**
  - Long-term use can **cause cancer** and harm health.
  - Legal regulations in Indonesia prohibit their use in food:
    - Law No. 7/1996 on Food
    - Law No. 31/2004 on Fisheries (amended 45/2009)
- Research confirms: formalin is dangerous both **short-term and long-term**; safe alternatives exist.

## □ 6. Legal Provisions (Hukm)

1. Fish is halal if processed **safely and hygienically** (thayyib).
2. **Use of formalin and harmful chemicals in fish processing is haram.**
3. Producing, trading, or selling fish with these chemicals is haram.
4. The same applies to **all food products** containing harmful substances.

## □ 7. Recommendations

### ► Government

1. Provide alternatives to harmful chemicals (e.g., subsidized ice factories).
2. Educate business actors and the public on prohibition and dangers of formalin.
3. Implement and supervise sanitation, food safety, and quality standards.
4. Control and supervise formalin trade to prevent abuse.

5. Encourage healthy fish consumption.
6. Promote research on safe, natural alternatives.
7. Enforce laws consistently.

### ► **Business Actors**

1. Produce **safe, high-quality fish** free from harmful substances.
2. Follow sanitation, food safety, and quality assurance standards.
3. Do not sell fish containing formalin or prohibited additives.

### ► **Community**

1. Avoid buying fish with formalin or harmful substances.
2. Supervise circulation of safe fish in the community.
3. Use only **permitted food additives**.

## □ **8. Closing Provisions**

- Fatwa is **effective immediately**.
- Subject to updates if future improvements are needed.
- Muslims are encouraged to **disseminate and follow this guidance**.

### ☑ **SUMMARY RULING:**

- **Formalin and harmful chemicals in fish handling/processing → HARAM.**
- Fish is halal **only if it is safe, healthy, and free from harmful substances.**
- Producers, traders, and consumers must ensure **safety and halal compliance.**