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Discretion and Coping Strategies of Halal Product Process Facilitators in a Muslim-Minority City: The Case of Manado, Indonesia

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Abstract: Indonesia's transition to mandatory halal certification has positioned halal product process facilitators (Pendamping Proses Produk Halal/PPH) as key frontline actors in the self-declare scheme for micro and small enterprises (MSEs). This article examines how PPH facilitators in Manado, a Muslim-minority city, understand the self-declare programme, exercise discretion, and develop coping strategies under persistent operational and systemic constraints. By situating the analysis in a Muslim-minority context, the study illustrates how Lipsky's theory of street-level bureaucracy applies to the implementation of Indonesia's national halal certification regime. Theoretically, the article contributes to street-level bureaucracy scholarship by showing that, in a Muslim-minority setting, discretion may involve not only rationing and simplification but also legitimating and interpretive work, as frontline actors reframe policy meaning when engaging with clients who vary in their understanding of halal certification. Using a qualitative case study based on an open-ended online survey analysed through thematic analysis, the study finds that facilitators predominantly frame the self-declare scheme as an instrument of procedural facilitation, legal certainty, and market access for MSEs, while reporting persistent limitations such as personally borne operational costs, incomplete documentation, time pressures, and recurrent technical problems when entering data into the SIHALAL system. In response, they rely on discretionary prioritisation of cases, procedural simplification, and intensive communicative work with Muslim and non-Muslim business owners, with potential distributive implications for how convincingly and consistently the legitimacy of halal certification is articulated to different groups of business owners.

Keywords: Halal Certification, Street-Level Bureaucracy, Discretion, Halal Product Process Facilitators, Muslim Minority Context

INTRODUCTION

Indonesia's halal industry is experiencing rapid growth along with the rise of the global Muslim population and awareness of halal products (Kamil et al., 2025), making Indonesia-with about 246 million Muslims residents, representing 87% of its population in 2024-highly

competitive in the global halal market and contributing over USD 41 billion in halal products between January-October 2024 (Ministry of Religion, 2024). The state regulates this halal ecosystem through Law No. 33 of 2014 on Halal Product Assurance, which makes halal certification mandatory for products entering, circulating, and being traded in Indonesia (Prasetyanti, Surachman, & Ciptagustia, 2025). The halal certification not only ensures compliance with Islamic law but also plays a strategic role in enhancing consumer trust and supporting business sustainability amid domestic and international competition, while providing economic benefits to businesses that are able to leverage the halal label as a unique selling point (Basyir & Jumaidi, 2024; Masriani et al., 2025).

However, most existing studies on Indonesia's halal certification and halal industry development remain largely concentrated on macro-level dynamics, with a primary focus on normative, financial, or procedural barriers by governments and institutions in rolling out mandatory halal certification schemes (Darmalaksana, 2023; Fathoni et al., 2025). Although discussions regarding PPH facilitators may have begun to emerge, systematic empirical analyses that foreground as frontline actors in diverse local contexts have not yet been widely documented in the available literature.

Articles 4 and 67 of Halal Product Assurance Law, reinforced by the Job Creation Law and PP No. 42 of 2024, require all products circulating in Indonesia to be halal certified (Ilmiyah et al, 2024; Muna & Putri, 2026), with a phased implementation for MSEs from October 2019 until the final deadline in October 2026, when all relevant products must be included in BPJPH's integrated halal assurance system. Within this phased scheme, the government introduced a self-declaration mechanism as the basis for the free halal certification program (SEHATI), in which business owners are responsible for the halal claim and halal product process (PPH) facilitator becomes the minimum standard (Hasan & Jailani, 2024; Suriyani, Karjoko, & Handayani, 2024). This mechanism gives PPH facilitator a crucial role in both accelerating MSEs certification to achieve the mandatory halal target by October 2026, and managing new implementation challenges, including standard ambiguities and moral hazard risks.

Based on Minister of Religion Affairs Regulation (PMA) No. 20 of 2021 on Halal Certification for MSEs, PPH facilitators are tasked with verifying ingredients, validating halal production processes, and providing recommendations that serve as the basis for the continuation of the halal certification process for MSEs. This role positions the facilitators not merely as a technical implementer, but as an intermediaries between the state's formal regulations and the diverse realities of day-to-day business operations. They interact directly with MSEs who vary in terms of halal literacy, administrative readiness, motivation to pursue certification, and religious and social backgrounds (Fathoni et al., 2024; Dawam et al., 2023). In such situations, policy implementation never proceeds entirely in accordance with the letter of the law, rather, it requires ongoing practical judgment and continual on-the-ground adjusments. Despite this strategic role, there is limited empirical research that investigates how PPH facilitators actually exercise discretion and make on-the-ground judgments when implementing the self-declaration scheme, especially in socially plural settings where business actors hold different understandings of, and commitments to, halal certification.

These implementation dynamics become especially visible in Muslim-minority settings, such as Manado, where halal policy operates within a socially plural environment. Manado is predominantly Protestant, Muslim account for roughly one-third of the population, and the city hosts more than five thousans MSEs across sectors such as traditional food, bakeries, processed fish, beverages, and snacks (Widianto et al., 2023; Abbas, 2016). In this setting, facilitators work with both Muslim and non-Muslim business owners who differ not only in administrative capacity but also in how they understand the meaning and relevance of halal certification,

requiring facilitators to manage technical verification together with communication, trust-building, and resistance.

Michael Lipsky (1980, 2010) defines street-level bureaucrats as public service workers who interact directly with citizens and exercise substantial discretion in the distribution of benefits, sanctions, and access to public services. For Lipsky, frontline workers-such as teachers, police officers, social workers, and similar actors-are not merely passive implementers of policy; because they make decisions in concrete encounters with citizens, they effectively become policymakers in practice (Lipsky, 2010; 1980). The relevance of Lipsky's framework lies in its emphasis on the structural conditions under which frontline actors work: inadequate resources, rising demand, ambiguous or conflicting goals, difficulty in measuring performance, and ongoing interaction with clients whose needs cannot be fully handled through standardized procedures alone. Because the tasks they perform are too complex and too humanly variable to be entirely reduced to rules, discretion remains an intrinsic feature of their work rather than a residual deviation from formal policy.

Subsequent developments in SLB scholarship have shown that implementing actors are not merely policy executors but also active agents who adjust and even redesign policy at the implementation level (van Gestel et al., 2019). Contemporary literature has also expanded the scope of SLB actors beyond the boundaries of traditional public organisations to include non-state actors in hybrid governance contexts (Sager et al., 2014; Steinbacher, 2025), as shown in studies of parabureaucracy in Mexico (González-Vázquez et al., 2024) and implementation practices in China (Cai et al., 2022). In addition, technological developments have given rise to new forms of street-level bureaucracy, such as screen-level bureaucracy, where discretion shifts into digital data processing without entirely eliminating the human role (Gordon et al., 2024). In the Indonesian context, Hadna et al. (2022) show that the use of discretion by implementing actors can increase during crisis situations, influenced by economic factors and client characteristics. This finding underscores the importance of local context-including religious demographics and socio-economic structures-in understanding street-level behaviour.

Despite this development, Lipsky's original insight remains relevant for the present study. His core argument that discretion arises from structural condition of resource scarcity, policy ambiguity, and the complexity of client interactions, continues to hold true. The fact that discretion transforms rather than disappears in response to changing context (e.g. hybrid governance, digital interfaces, or crisis situations) does not contradict Lipsky; rather, it confirms his foundational claim that frontline workers, whether state employees or non-state actors, inevitably exercise discretion when structural conditions make rule-based implementation alon sufficient. This article proceeds from the premise that PPH facilitators in Manado, although formally working in partnership with the state, can be understood as SLB actors in an expanded sense: they perform public service functions, interact directly with diverse clients, and exercise significant discretion under conditions of resource scarcity, even though they are not civil servants. Thus their role can be understood most clearly through Michael Lipsky's theory of street-level bureaucracy.

Lipsky further argues that discretion is closely tied to routines and coping practices developed in response to work pressure. Frontline workers must process large caseloads, respond to uncertainty, and manage the gap between official expectations and actual working conditions, so the develop shortcuts, simplifications, and practical routines to make their jobs manageable. These routines may include rationing access, prioritizing some cases over others, reduing complexity through categorization, withholding or simplifying information, and structuring interactions in ways that protect time, emotional energy, and organizational survival. In this sense, what appears as administrative pragmatism is politically significant, because the accumulated effect of these routine judgments shapes who gets what, when, and how from the state.

A central contributon of Lipsky's theory is the claim that the decisions of street-level bureaucrats, the routines the establish, and the devices they invent to cope with uncertainty and pressure effectively become the public policies they carry out. Policy is therefore not exhausted by statutes, administrative regulations, or official directives from above, it is also produced in daily encounters between frontline workers and citizens. This insight is especially important for polivy domains in which direct interaction, case-by-case judgment, and uneven client readiness strongly influence implementation outcomes.

Therefore, PPH facilitators can be conceptualized as actors within the street-level bureaucracy who exercise discretion in translating abstract policies provisions into concrete actions under actions of resource constraints, client diversity, and procedural ambiguity (Lipsky, 2010). This discretion is evident in how they simplify explanations of regulatory requirements, interpret unclear rules, prioritize case handling, adapt modes of communication, and extend limited tolerance for administrative shortcomings, which on one hand, keeps policies functioning under real-world conditions, but on the other hand, introduces the risk of uneven standards across facilitators.

At the same time, facilitators develop a range of coping mechanisms, including simplifying procedures, screening clients, prioritizing less complex cases, mobilizing personal resources, adjusting communication strategies, and in some instances avoiding cases perceived as particularly difficult, as strategies for managing work pressures. Consequently, the implementation of self-declared halal certification can only be comprehensively understood by examining how such discretion and coping mechanisms are enacted at the on the front lines of policy delivery (Cahyaningrum, Fatwa, & Al Asyhar, 2026; Wijaya & Priantina, 2024).

These issues of discretion and coping mechanisms become even more complex in region where Muslims are not the majority, where halal certification must operate within a context of religious plurality, limited understanding of halal standards, and varying levels of policy support. In this setting, PPH facilitators engage with Muslim and non-Muslim business owners who differ markedly in socio-cultural backgrounds and levels of halal literacy. Empirical findings indicate that some Muslim vendors do not fully comprehend halal food standards, while many non-Muslim enterpreneurs treat halal certification mainly as religious label that does not directly concern their own communities (Ayu et al., 2023). These conditions intensify the relevance of Lipsky's insight that frontline public service work is marked by a persistent tension between rule-based uniformity and responsiveness to individual situations.

The empirical importance of this problem in reinforced by uneven implementation outcomes among facilitators in Manado. Performance data extracted from SIHALAL system (provided by Kantor Kementerian Agama Kota Manado) show sharp disparities among PPH facilitators, with only few of the 91 registered facilitators having completed more than fifty certificates, while the majority have fewer than ten, and some have none at all. This suggests that, even under the same legal framework, implementation is shaped by differences in how facilitators interpret their roles, manage constraints, prioritise cases, and cope with everyday demands of frontline work. In Lipsky's terms, these differences are not marginal administrative details, but part of the practical process through which policy in enacted and experienced.

Although Lipsky's original framework primarily emphasizes discretion, routines, and coping as the core mechanisms through which street-level bureaucrats shape policy in practice, more recent scholarship has also begun to examine how SLB retes to policy capacity at the individual level, especially analytical capacity. In this line of inquiry, Aimo & Cuomo (2025) show that the relationship between discretion and policy capacity deserves closer attention because frontline actors do not only adapt policy underpressure, but may also develop practical capacities through the very process of implementation. Their study find that street-level actors used their discretionary space to modify policy tools and everyday intervention formats, while simultaneously developing a pragmatic and qualitative form of analytical capacity grounded in

daily practice rather than a formal statistical analysis alone. Their main finding is that frontline implementation can generate policy learning through repeated problem identification, reflection on what works, adaptation of action in response to contextual obstacles, and interpretation of qualitative feedback from the field. This contribution is relevant for the present study because it suggest that the exercise of discretion by PPH facilitators may be understood not only as a coping response to limited resources, ambiguous rules, and client diversity, but also a part of broader process through which frontline actors build practical judgment in implementing halal certification policy.

Building on Lipsky's street-level bureaucracy framework and recent work on street-level redesign, this article addresses the above research gap by examining how PPH facilitators in Manado exercise discretion in the implementation of halal certification for MSEs under the self-declaration scheme, and how this discretion is shaped by local social, religious, and administrative contexts. Accordingly, the study is guided by the following research question: "How do halal product process (PPH) facilitators in Manado exercise discretion and develop coping strategies in implementing the self-declaration-based halal certification for micro and small enterprises (MSEs), and how these discretionary and coping practices shape both access to certification and the consistency with which halal standards are applied in a Muslim-minority context".

METHOD

This article employs a qualitative case study design to examine how PPH facilitators exercise discretion in implementing the self-declare halal certification scheme in Manado City, Indonesia. The case study approach is suited to the aim of capturing context-specific practices and judgments of frontline actors operating in a Muslim-minority urban environment. Data were collected through an open-ended online survey administered to halal product process facilitators working in Manado. The study involved 40 PPH facilitators as respondents, who had diverse backgrounds in terms of their length of experience as facilitators, the number of MSEs they had assisted, and their achievements in supporting the issuance of halal certificate. Data were collected through an open-ended online survey distributed to to PPH facilitators working in Manado. The survey was conducted from April 30 to May 10, 2026.

The use of an open-ended survey enabled respondents to describe their experiences, perceptions, and practices in narrative form, thereby generating rich qualitative data while still reaching a larger number of facilitators than would typically be feasible through in-depth interviews alone. An open-ended online survey was selected because it enabled the study to reach a broader range and more varied group of PPH facilitators within a relatively short period, while also accomodating their uneven availability and field-based responsibilites. The format further allowed respondents to provide reflective narrative accounts in their own time, which was particularly valuable for capturing routine discretionary practices that may not be easily elicited through more time-intensive interview arrangements. for eliciting detailed accounts of discretionary practices. This strategy is appropriate for research on street-level bureaucracy, where implementation practices are flexible, adaptive, and not fully captured by closed-ended instruments, and where open-ended responses can reveal how frontline actors understand their roles, interpret rules, and exercise discretion in ways that shape program access and policy outcomes (Bell & Smith, 2022; de Andrade & Pekkola, 2024).

The survey link was first distributed directly to facilitators using available contact information, and, in response to a low initial response rate, recruitment was subsequently extended through a snowball approach whereby early respondents were invited to share the survey with colleagues in their networks. Data analysis followed a thematic approach. All responses were read repeatedly and inductively coded to identify recurring patterns in how facilitators interpret and apply rules, prioritise and sequence cases, adjust or simplify

procedures, cope with limited resources, and interact with diverse business owners. The resulting codes were then grouped into broader themes, which constitute the basis of the empirical sections of this article. Given the non-probability sampling strategy and reliance on voluntary participation, the findings are not intended to be statistically generalisable; rather, they offer an in-depth qualitative account of discretionary practices and everyday implementation dynamics among participating facilitators in Manado.

RESULT AND DISCUSSION

The findings of this study reaffirm a central insight of the street-level bureaucracy literature: frontline implementers do not simply execute policy, but actively interpret, adapt, and sometimes redesign it through their everyday practices. Beyond reaffirming this core insight, the findings nuance Lipsky's account by showing how discretion and coping are configured when frontline actors operate within a state-regulated religious policy field in a Muslim-minority city. In the case of halal certification under the self-declare scheme in Manado, halal product process facilitators operate in conditions characterised by ambiguous rules, limited operational support, and a plural socio-religious environment. Their responses—ranging from the use of digital communication and task-management techniques to the development of simplified templates and direct assistance with data entry—suggest that coping strategies and discretionary judgments are embedded in everyday implementation practices, rather than appearing as peripheral anomalies. These dynamics resonate with Lipsky's original argument that discretion, routines, and coping strategies can both enable and reshape public policy at the street level, even though the present study does not directly measure the extent to which such practices transform the policy itself.

The Manado case shows that facilitators' efforts to keep the self-declare scheme workable under resource and information constraints are associated with a selective emphasis on certain goals (speed, feasibility, continuity) and the pragmatic de-emphasis of others (completeness of documentation, depth of MSEs understanding, strict role separation between state and beneficiaries). While such practices sustain day-to-day implementation, they may also create room for variation in how rigorously halal standards are interpreted and applied across different cases.

At the same time, the evidence aligns with the contribution of Aimo & Cuomo (2025), who show that street-level actors may engage in "street-level redesign" of policy while developing pragmatic analytical capacities in the process. Their study shows that social workers used their discretionary space to modify interventions and tools, thereby both adapting the policy to complex local realities and building qualitative, practice-based forms of analytical capacity. A similar pattern can be discerned in Manado: facilitators' use of checklists, simplified financial methods, and flexible communication strategies can be interpreted as micro-redesigns of the self-declare scheme that make it more compatible with the literacy, resources, and constraints of micro and small enterprises in a Muslim-minority setting. From this perspective, these practices may be help bridge the gap between formal policy design and implementation realities, even though the present study does not empirically establish a direct causal link between facilitators' perceptions and their discretionary actions.

Across the survey responses, halal product process facilitators framed the self-declare scheme as a policy instrument designed primarily to facilitate micro and small enterprises (MSES) in obtaining halal certificates through a process that is faster, simpler, and more affordable. Many respondents explicitly emphasised ease as the core purpose of the programme, describing self-declare as a way to "simplifying the halal certification process for MSEs" (R5), and "accelerate the fulfilment of halal certification obligations for micro and small business" (R4). In this view, self-declare functions first and foremost as a gateway that

lowers administrative barriers for resource-constrained businesses rather than as a mechanism for tight regulatory control.

At the same time, a substantial number of facilitators linked this facilitative role with the goal of providing legal certainty and reassurance for Muslim consumers. Respondents stated that the programme seeks to "provide legal certainty and a sense of security for Muslim consumers" (R11), "ensuring that a product is halal for consumers" (R39), and "building public trust in purchasing food from SME products" (R37). In these accounts, self-declare is not merely an administrative shortcut for MSES, but also a means of strengthening public trust in halal assurance by formalising and certifying practices that might otherwise remain implicit. This dual framing—procedural facilitation for producers and legal-religious protection for consumers—positions facilitators as intermediaries between state regulation, market dynamics, and everyday religious concerns.

Several facilitators articulated a more elaborate understanding that integrates facilitation, legal protection, and economic benefits. These respondents highlighted that self-declare is intended to increase MSES competitiveness, enable access to wider markets (including modern retail and export), and support government targets for halal certification. They described the programme as designed "to streamline the halal certification process by making it faster, simpler, and more affordable, thereby increasing public trust in the products" (R34), "enhancing competitiveness, consumer confidence, and market expansion" (R30), and "encourage MSEs" (R28).

From the perspective of street-level bureaucracy, these various framings can be understood as perceptions that have the potentional to influence how discretion is exercised in practice. Survey responses suggest that facilitators who describe their role primarily in terms of facilitating MSEs also tend to emphazise speed, procedural simplification, and, in some cases, taking over tasks that formally fall to business owners, whereas those who highlight legal certainty and consumer protection report a more cautious stance in ambiguous cases and a stronger emphasis on documentation and compliance. These patterns are indicative rather than conclusive, and future research would need to examine systematically how such frames translate into observable discretionary practices.

Working under constraints: operational and systemic challenges

The survey indicate that halal product process facilitators in Manado operate under a dense cluster of constraints related to time, resources, and system design. A first cluster of constraints concerns time and competing obligations. Several respondents point to limited time for assistance due to other employment or responsibilities, as well as the challenge of scheduling meetings with multiple MSES in different locations, often described simply as "time allocation" or "limited time compared to the number of MSEs" (R30). When the number of MSES is high and each is at a different level of readiness, facilitators struggle to allocate sufficient time for detailed guidance, leading to prolonged processes and difficult trade-offs between depth and coverage.

A second cluster relates to financial and institutional support. Many facilitators explicitly mention that transportation and other operational costs are borne personally, noting that "there's no transportation subsidy from the government", that they "using personal funds" (R3), and that incentives are both small and paid out with significant delay. In addition, some respondents underline the lack of structured training and reinforcement from BPJPH, indicating that "there is no additional training" (R4) to match the complexity of field challenges. These conditions indicates that the effective execution of state-mandated tasks depends heavily on facilitators' willingness and ability to absorb costs and invest in self-learning, rather than on stable organisational support.

A third set of obstacles stems from the technical and infrastructural environment. Facilitators report recurrent difficulties related to the SIHALAL system—login problems, data input errors, document upload failures, GPS disturbances when determining business locations, and application errors or slowness—compounded by unstable internet connections and limited data packages in certain areas. Some respondents also emphasise broader issues of data quality and management, referring to "inaccurate data" (R27), "field and digital system sinchronization" (R25), and "inefficiencies in workflows and processes" (R29), including reliance on outdated or undocumented manual workflows that increase the risk of human error.

Finally, a substantial part of the constraint structure lies on the MSES side. Many business owners lack basic legal and administrative documentation, such as business permit number (Nomor Izin Berusaha/NIB), or have incomplete records of ingredients and production processes. Several facilitators note that "documents are incomplete" (R31), and that MSEs often have limited understanding of online systems and halal standards, requiring repeated explanations and extended mentoring. In practice, respondents describe investing time in helping MSEs prepare foundational documents and to translate technical requirements into accessible language before the formal certification stages can even begin.

Taken together, these constraints create pressure conditions in which facilitators perceive a need to deliver results despite insufficient time, resources, and institutional support. From Lipskyan perspective, this constellation of high demand, chronic resource inadequancy, ambiguous goals, and clients with uneven readiness constitutes a classic street-level environment in which formal rules cannot be implemented mechanically, and where discretion becomes an intrinsic condition of everyday work rather than a deviant exception. Under such circumstances, many of them describe relying on discretionary judgments and coping strategies in their everyday implementation work-for example, deciding which MSEs to prioritise when time is scarce, adjusting how strictly they enforce documentation completeness when owners lack capacity, or compensating for perceived systemic weaknesses by using personal funds, simplifying procedures, or taking over tasks that formally belong to MSEs.

These responses closely mirror the routines and coping mechanisms that Lipsky identifies-rationing access, simplifying procedures, and structuring interactions to protect scarce time and energy-through which street-level bureaucrats manage overload and uncertainty while effectively shaping how policy is delivered in practice. At the same time, and in line with Aimo and Cuomo's argument that the exercise of discretion in highly uncertain, experimental settings can foster the development of pragmatic, practice-based analytical capacities, facilitators' repeated afforts to diagnose bottlenecks, adapt sequencing and documentation rules, and refine their use of personal and digital resources can be read as a gradual, bottom-up process of street-level redesign through which they learn what is feasible, for whom, and under what conditions in the Manado self-declare scheme. In this sense, those clusters of constraints (time and competing obligations, limited financial and institutional support, fragile technical and data infrastructures, and low administrative and digital capacity among MSEs) do not merely create a backdrop for discretion, but actively configure the specific forms of discretion, coping, and incremental policy learning that emerge at the street-level in this Muslim-minority city.

Discretion in prioritising and sequencing cases

The survey responses indicate that the sequencing of assistance is not determined by a single formal rule, but is instead described as the outcome of a series of discretionary judgments made by facilitators in response to time pressure, uneven MSEs readiness, and the practical demands of fieldwork. When asked how they organise their assistance activities and decide which MSEs should be handled first, respondents described a range of prioritisation logics, including geographical proximity, document readiness, urgency, and the perceived feasibility

of completing the process. Some facilitators reported prioritising the nearest businesses in order to reduce travel time and operational costs, while others focused first on MSEs that already possessed core documents such as NIB or complete ingredient information.

A second pattern concerns the prioritisation of cases on the basis of administrative readiness and procedural efficiency. Several respondents stated that they tend to handle first those MSEs whose files are already relatively complete, whose understanding of the process is sufficient, or whose certification can be advanced with fewer obstacles. In practice, this means that cases requiring more explanation, repeated follow-up, or basic document preparation are more likely to be postponed. Other facilitators referred to urgency-based criteria, such as external deadlines, business opportunities, or cases where delay might have more immediate consequences for MSEs.

From the perspective of Lipsky's street-level bureaucracy theory, these prioritisation practices are not merely administrative efficiencies but constitute policy making in action. Lipsky argues that street-level bureaucrats develop routines and simplifications to manage the gap between job demands and available resources. In this case, prioritisation functions as a rationing mechanism-one of the core patterns of practice Lipsky identifies. By implicitly deciding which MSEs receive faster service and more intensive assistance, facilitators are effectively allocating a scarce public good (facilitator time and attention) without explicit policy guidance.

This practice also exemplifies what Lipsky calls "creaming"-the tendency of select clients who are most likely to succeed or easiest to process. Facilitators who prioritise administratively ready MSEs are engaging in a classic street-level coping strategy: reducing complexity to make caseloads manageable. As Lipsky notes, this is not necessarily driven by prejudice but by the structural imperative to "process work consistent with their own preferences and only those agency policies so salient as to be backed up by significant sanctions". The absence of sanctions for postponing difficult cases reinforces this prioritisation logic.

Furthermore, these discretionary sequencing decisions illustrate Lipsky's claim that "the decisions of street-level bureaucrats, the routines they establish, and the devices they invent to cope with uncertainties and work pressures, effectively become the public policies they carry out. Formal self-declare policy does not distinguish between applicants by readiness or location. Yet, through their aggregated daily judgments, facilitators produce a de facto policy in which "easy" cases are accelerated and "hard" cases are delayed.

The findings also resonate strongly with Aimo & Cuomo's recent work on street-level redesign and the development of pragmatic analytical capacity. Aimo & Cuomo demonstrate that frontline workers do not merely cope passively but actively redesign policy tools and intervention formats based on experiential learning. In Manado, facilitators' prioritisation strategies can be seen as an informal redesign of the implementation sequence. The formal policy assumes a first-come first-served logic, but facilitators have redesigned this into a triage system based on feasibility. This is a micro-level policy innovation born of necessity.

Moreover, Aimo & Cuomo identify a four-stage mechanism of capacity building: problem identification-reflective inquiry-adaptation strategies-qualitative feedback. This mechanism is clearly visible in the prioritisation practices described by facilitators. Facilitators identified the problem (too many MSEs, too little time), engaged in reflective inquiry (recognising that some cases consume disproportionate resources), developed adaptation strategies (prioritising by readiness and proximity), and received qualitative feedback (observing that this approach kept the workflow moving). Over time, this iterative process builds what Aimo & Cuomo term pragmatic analytical capacity-the ability to diagnose implementation bottlenecks and devise workable solutions without formal statistical tools.

In this sense, discretion in prioritising and sequencing cases can be seen as both functional and ambivalent: it appears important for keeping the policy workable under constraint, yet it also has the potential to generate unequal access and variable implementation standards across MSEs. MSEs with lower literacy, incomplete documentation, or weaker digital access risk being systematically delayed not because their need is lower but because they are more costly to assist-a classic unintended consequence of creaming.

Adapting procedures: simplifying, interpreting, and bending the rules

The survey suggests that facilitators' technical and interpretive work frequently extends beyond the formal remit of "assistance" and approaches what the literature describes as street-level redesign of the self-declare scheme. Respondents emphasise that adequate technical capacity makes their work significantly easier, as many micro and small enterprises do not understand the terminology and procedures used in data input. In practice, facilitators therefore not only accompany but also perform technical tasks: they simplify explanations into everyday language, design checklists and user-friendly ingredient forms, and introduce tools such as the "three cash boxes" method to help owners structure financial data through simple steps of recording daily revenues, collecting receipts, and separating personal and business funds. Some facilitators request that all documents be compiled into a single PDF file to streamline SIHALAL data entry, and in some cases they directly input data on behalf of business owners.

These practices are often described as responses to uncertainty in the rules and to the limited capacity of clients. Facilitators report encountering ambiguous guidance regarding which product categories can be processed under self-declare, how to verify unlabelled natural ingredients, and when assistance should formally end. In response, most return to official guidelines, basic halal principles, and a precautionary stance, seeking further information from FAQs, peer forums, and other sources. While many state that they avoid making completely independent decisions when rules are unclear, those who do describe such situations typically mention delaying the process, advising owners to replace non-labelled ingredients with certified ones, or meticulously documenting each step taken as evidence of compliance.

From the perspective of Lipsky's street-level bureaucracy framework, these adaptations illustrate how frontline workers construct the operational rules of the policy through daily practice. Lipsky notes that when formal guidelines are ambiguous, contradictory, or silent, street-level bureaucrats do not stop working, instead, they develop informal decision rules to keep the process moving. These patterns also can be read as echoing what Aimo & Cuomo (2025) describe as street-level redesign: frontline actors use their discretionary space to adjust tools, workflows, and interaction scripts in ways that make the policy operable in complex local settings, while potentially reshaping how the policy functions in practice. In their study, social workers did so by modifying intervention formats and building pragmatic analytical capacities through experience; in Manado, facilitators redesign the self-declare scheme from within by creating simplified financial methods, tailored documentation formats, and informal decision rules for handling ambiguous cases.

On the one hand, respondents portray these adaptations as helping to sustain policy implementation: they report that such measures keep the certification process moving despite limited digital literacy, incomplete documentation, and unclear guidance, and they help align formal requirements with the realities of small businesses. On the other hand, these same adaptations introduce the possibility of variation in standards. Where facilitators differ in how far they simplify requirements, how strictly they enforce ingredient labelling, or how readily they take over tasks, the threshold for what counts as "sufficient" compliance may shift across cases and over time. Lipsky warns that such variation is not merely an administrative detail but a political outcome, shaping who benefits and who does not.

Coping strategies under workload and resource pressure

The survey reveals that halal product process facilitators in Manado deploy a range of coping strategiesnec to manage workload and resource constraints while trying to maintain the continuity of assistance. One important strategy is the use of digital communication to reduce time pressures: several respondents noted that online channels enable them to provide guidance, verify documents, and clarify requirements without always having to visit business premises in person. This allows certain tasks to progress even when field visits are not immediately feasible and, in facilitators' accounts, helps prevent delays in the certification process.

Another prominent pattern concerns the use of personal resources. All respondents indicated that they had used personal assets—such as mobile phones, laptops, data packages, and even private funds for transportation and other operational costs—to support the assistance process, with some stating that they always rely on such resources. These tools are used to access SIHALAL, communicate with business owners, and digitise documents for later input when adequate devices or internet access are available. Respondents also reported simplifying technical terms during assistance, preparing templates and simple standard operating procedures to streamline repetitive tasks, and directly helping to prepare documents or even taking over data input that should formally be completed by business owners in order to accelerate progress.

According to Lipsky's framework of street-level bureaucracy, these coping strategies are classic responses to chronically inadequate resources-one of the defining working conditions of street-level work. Lipsky argues that when formal institutional support is lacking, frontline workers develop unsanctioned routines to keep the job manageable, often at the cost of shifting implementation toward speed and feasibility rather than substantive quality. In Manado, the reliance on personal funds and devices is particularly striking.

In facilitators' own narratives, these strategies play an important role in sustaining policy implementation under everyday constraints. By reorganising tasks, stretching personal resources, and adapting communication and documentation practices, they report that they are able to keep the self-declare scheme operational even when institutional support is perceived as limited. These coping strategies also resonate with Lipsky's discussion of alienation, when workers must invest personal resources to perform state-mandated tasks, the gap between their commitment to service and the organisation's failure to support them can produce what Lipsky calls inauthentic work-the appearance of responsiveness masking underlying conditions of neglect.

From the perspective of Aimo & Cuomo, these coping practices can be understood as both evidence of pragmatic analytical capacity and a potential limit to its developmental potential. Aimo & Cuomo demonstrate that street-level workers build capacity through iterative problem-solving: identifying problems, reflecting on what works, adapting strategies, and learning from qualitative feedback. Facilitators' use of digital communication, task-batching, and templates clearly reflects this process. However, Aimo & Cuomo also caution that when coping strategies rely heavily on personal resource depletion rather than organisational learning or collective problem-solving, the capacity being developed may be individual resilience rather than sustainable policy capacity. In the Manado case, a facilitator who learns to work around system deficiencies using personal funds has built individual coping capacity, but this does not translate into organisational capacity-and may even shield the institution from recognising the need for systemic reform.

Discretion and coping in a Muslim-minority city

The findings suggest that the exercise of discretion by halal product process facilitators in Manado is closely intertwined with the city's position as a Muslim-minority setting, where

halal certification intersects with diverse religious identities and varying levels of awareness among business owners. In this context, facilitators must simultaneously uphold halal standards and manage sensitivities around religion, state regulation, and perceived administrative burdens.

Survey responses indicate that the most common forms of doubt and resistance among business owners include the belief that Muslim entrepreneurs automatically provide halal food and therefore do not need certification, doubts about the legitimacy and added value of the self-declare scheme, concerns that certification will increase obligations such as taxes, administrative costs, and paperwork, perceptions that the process is overly complex and time-consuming, and the view that very small businesses do not yet require a halal certificate. These perceptions illustrate some of the ways in which owners may frame halal certification as either redundant (because "we are already halal") or burdensome (because it is associated with bureaucracy and potential fiscal consequences), which in turn creates a discretionary space for facilitators to decide how far to encourage, persuade, or accept such reluctance in practice.

When assisting non-Muslim business owners, facilitators report that they do not alter the formal procedures but adjust the substance and framing of their communication. They emphasise universal aspects of halal standards—such as the prohibition of pets entering production areas and the importance of cleanliness—alongside economic benefits, hygiene, and consumer trust. Facilitators explicitly stress principles of equality and universality, explaining that, procedurally and normatively, halal requirements apply equally to Muslim and non-Muslim producers because halal is presented as a general quality and safety standard rather than a marker of religious identity. In doing so, they use discretion in choosing which arguments to foreground—religious, legal, or economic—depending on the background and concerns of each business owner.

Not all respondents reported experiencing resistance based on religion or culture, and none described extreme or hostile rejection. Where religiously framed resistance does occur, it typically takes the form of non-Muslim owners viewing halal certification as irrelevant to their business, fearing that it will force changes to long-standing non-halal practices, or assuming that certification is primarily about imposing Islamic belief. Facilitators respond by reframing halal certification in pragmatic terms—as a tool for market expansion, a signal of cleanliness and legal assurance, and a process that is relatively cheap and straightforward—and by clarifying that certification concerns the product and its ingredients rather than the owner's faith. These discretionary adjustments in framing and emphasis are described by respondents as coping strategies that help facilitators adress religiously framed resistance, maintain working relationships with diverse business owners, and support the continued implementation of halal policy in a plural social environment such as Manado.

From the perspective of Lipsky's street-level bureaucracy framework, this case helps extend the application of the theory to a state-regulated policy implemented in a plural socio-religious setting. Lipsky acknowledges that street-level bureaucracies reflect and reinforce societal values, particularly regarding stigma, race, and class. However, his original formulation pays relatively less explicit attention to how frontline workers navigate policy fields where the legitimacy of the policy itself may be contested along religious lines, not merely on grounds of efficiency or fairness.

In Manado, facilitators face a distinctive challenge: they must not only implement halal certification but also continually re-legitimise the policy to business owners who do not share its religious premises. This nuance complements Lipsky's classic account of "nonvoluntary clients", where clients depend on services despite dissatisfaction. Here, some non-Muslim owners question whether the service (halal certification) is relevant to them at all-a form of legitimacy-based resistance rather than dependency-based compliance. Facilitators respond by strategically reframing the policy's meaning (from religious obligation to market access and

quality assurance), effectively performing an additional layer of discretionary work that Lipsky did not fully anticipate: the interpretive labour of translating policy across religious boundaries.

Relative to the assumptions that may underlie Muslim-majority areas, the distinctive feature of the Manado case lies in the need for facilitators to negotiate not only procedural compliance but also the social meaning and perceived relevance of halal certification across different religious backgrounds. This constitutes the primary theoretical contribution of the study to the street-level bureaucracy literature: the specification of how discretion and coping operate in a religiously infused policy field within a plural society. While Lipsky analysed discretion in welfare, policing, and education-domains where the basic legitimacy of state involvement is often more implicitly assumed in his discussion-the Manado case reveals an additional layer of complexity. Facilitators must manage what could be termed legitimation work: the ongoing effort to justify the policy's very existence to clients who do not share its normative foundation. This requires a form of discretionary communication that is less about rationing or simplifying and more about translation across moral and religious boundaries.

Taken together, these patterns indicate that, in Muslim-minority settings like Manado, discretion is exercised more intensively through communication, framing, and trust-building than through technical or administrative adjustments. This dimension has received comparatively less emphasis in prior SLB research, which has often focused on majority-religious or secular contexts. Viewed from this perspective, the findings point to an implication for national policy design: efforts to strengthen halal certification implementation may need not only technical guidelines but also to equip facilitators with context-sensitive communication strategies for plural social environments. This study does not claim that all facilitators in Muslim-minority settings exercise discretion identically or that religious plurality is the sole determinant of discretionary practice; rather, it demonstrates a coherent narrative pattern in which facilitators themselves describe their communicative adjustments as necessary responses to legitimacy-based resistance.

Implications for policy and practice

The findings of this study suggest that the effectiveness and fairness of the self-declare halal certification scheme in Manado are not determined solely by formal regulations or digital infrastructure, but also by the discretionary judgments and coping strategies of halal product process facilitators. At the street level, facilitators decide how far to encourage or follow up passive MSEs, how intensively to assist in preparing documents, and how to prioritise among multiple cases under tight time and resource constraints. Respondents themselves emphasise that success is not only a matter of mastering rules, but of combining work methods, communication styles, persistence, and technical skills, while failure is often associated with passivity, lack of consistency, overly rigid administrative behaviour, and weak engagement with MSEs. Taken together, these patterns indicate that, in this case, discretion and coping can both sustain the operation of the self-declare scheme and influence who benefits from it, in what way, and with what level of support. Where discretion is exercised in ways that favour administratively “easier” or more motivated MSES, while those with lower literacy or weaker capacity receive less intensive assistance, the scheme risks reproducing or amplifying inequalities in access and in the quality of support received. This finding directly reflects Lipsky’s warning that the routines and simplifications developed by street-level bureaucrats are “political” in their consequences: they determine who gets what, when, and how from government services, often in ways that unintentionally advantage the already advantaged.

These results carry several practical implications. First, they highlight the need to strengthen operational support for facilitators. Current practice, in which facilitators rely heavily on personal resources and face high workloads with limited institutional backing, appear to encourage coping strategies that prioritise speed and case completion at the expense

of thorough follow-up, post-submission monitoring, and revision support. From Aimo & Cuomo's perspective, such reliance on personal resource depletion builds individual resilience but not sustainable policy capacity. Without institutional intervention, the cycle of adaptation may perpetuate rather than resolve the underlying resource problem. Providing more adequate incentives, reimbursable operational budgets, and basic digital infrastructure would reduce the pressure to cut corners and allow facilitators to allocate time more evenly across different types of MSEs.

Second, there is a strong need for more systematic training on ambiguous and complex cases, including product categories at the boundary of the self-declare scheme, treatment of unlabelled ingredients, and criteria for ending assistance. Such training should be case-based and focused on developing shared interpretive repertoires, so that discretion is exercised consistently rather than typically. Lipsky emphasises that peer support and collctive case review are critical for preventing the erosion of service ideals: without such mechanisms, individual facilitators may develop divergent standards in isolation, amplifying the variation documented in this study.

Third, given the Muslim-minority context of Manado, policy practice in similar setting should invest in cross-religious and community-based support, equipping facilitators with communication tools and forums that help them explain halal certification as both a religious obligation and a market and quality standard in ways that resonate with Muslim and non-Muslim MSES alike. As demonstrated in the previous section, facilitators in Manado perform an additional layer of discretionary work-legitimation work and interpretive labour-that is not required in Muslim-majority contexts. National policy design has not yet recognised this distinctive need.

Fourth, improvements to the SIHALAL system-in terms of stability, usability, and alignment with field realities-are important so that digital constraints do not themselves become a driver of compensatory coping at the street level. Aimo & Cuomo note that digital transformation can either constrain or enable street-level discretion; in Manado, technical problems with SIHALAL currently consume discretionary energy that could otherwise be directed toward substantive assistance.

At a more conceptual level, the study suggests that facilitators should be viewed as street-level actors who need to be enabled and supported, rather than merely controlled through targets and procedural checklists. Respondents' accounts portray them as translators of policy, technical problem-solvers, and motivators who bridge complex halal regulations and digital procedures with the everyday practices of small businesses. Their proximity to MSES, knowledge of local culture, and ability to simplify technical requirements position them as agents of change rather than as purely administrative operators.

CONCLUSION

The study shows that the effectiveness and fairness of Indonesia's self-declare halal certification scheme are shaped not only by formal regulations and digital systems, but also by the discretionary judgments and coping strategies of halal product process facilitators who operate in constrained and unequal conditions, particularly in Muslim-minority settings such as Manado. In this context, facilitators act as translators of policy, technical problem-solvers, and motivators who sustain implementation by prioritising cases, simplifying procedures, and tailoring communication to diverse business owners. At the same time, these practices may also produce unequal access and variation in the application of halal standards accross cases. The findings therefore point to the need for stronger operational support, case-based training for ambiguous situations, cross-religious community engagement, and improvements to SIHALAL, along with a more explicit recognition of facilitators as street-level actors who must be enabled-rather than merely controlled.

Conceptually, the Manado case suggests refinements to street-level bureaucracy theory. First, it shows that discretion and coping in a state-regulated religious policy field are intertwined not only with administrative demands, but also with ritual compliance, market access, and inter-religious relations. Second, it illustrates that street-level redesign can emerge not only in professionalised welfare or education services, but also through semi-formal facilitators who devise simplified financial tools, documentation formats, and communication scripts to keep a digitalised certification scheme workable for resource-constrained MSEs. Third, the case points how prioritisation and framing decisions in a Muslim-minority may contribute to unequal access and variable standards under identical formal rules, underscoring the importance for street-level bureaucracy research to take socio-religious context seriously when analysing the distributive effects of discretion and to understand halal product process facilitators in Indonesia as context-sensitive street-level actors whose discretionary practices both sustain and subtly reshape the self-declare halal certification scheme.

This study has several limitations. First, it is based on a single case study in Manado, which means the findings are context-spesific and should not be generalised uncritically to other regions with different religious compositions, administrative capacities, or implementation environments. Second, the analysis relies on primarily on self-reported accounts from PPH facilitators, which may not fully capture how discretion is perceived by MSE actors or how it operates in actual field interactions. Third, because the study draws on online survey responses rather than direct observations, it may not capture the full depth of interactional dynamics or informal negotiation processes that shape everyday implementation. Future research could address these limitations by comparing multiple contexts and incorporating the perspectives of MSEs, auditors, and other actors involved in halal certification.

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