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Islamic Legal Reform on Child Marriage in Southeast Asian Muslim Countries: A Systematic Literature Review

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Abstract
Child marriage remains a persistent social and legal challenge in Southeast Asian countries, particularly in Indonesia and Malaysia. Although international human rights conventions and national legal reforms have been implemented, the practice of child marriage continues to occur; in some cases, it is even encouraged through religious interpretations, customs, and cultural traditions. This study aims to analyze the dimensions, driving factors, legal framework, and direction of child marriage reform within Southeast Asian Muslim communities, whilst mapping out the research agenda that needs to be developed in the future. This study employs a Systematic Literature Review (SLR) approach guided by the PRISMA 2020 guidelines, synthesizing 34 peer-reviewed scientific articles from 82 Scopus-indexed documents. The findings identified five main thematic clusters, namely: (1) legal dimensions and Islamic doctrine; (2) state law and institutional responses; (3) social, cultural, and economic determinants; (4) feminist and community-based resistance; and (5) digital influences and contemporary dynamics. The research findings reveal an ongoing tension between Islamic jurisprudence (fiqh), customary law (adat), and international standards on children's rights. This research concludes that there is a need for policy interventions that are sensitive to children's rights whilst being rooted in the local cultural context, and for a reorientation of Islamic legal reasoning that prioritizes children's welfare and protection. Directions for future research recommend the development of longitudinal studies on the individual experiences of child marriage, comparative studies, and research into the role of the digital sphere in reshaping marriage norms amongst young Muslims.

[*Perkawinan anak masih menjadi tantangan sosial dan hukum yang persisten di negara-negara Asia Tenggara, khususnya di Indonesia dan Malaysia. Meskipun konvensi hak asasi manusia internasional dan reformasi hukum nasional telah diterapkan, praktik perkawinan usia anak masih tetap terjadi bahkan dalam beberapa kasus didorong memalui melalui interpretasi keagamaan, adat istiadat, dan budaya. Penelitian ini bertujuan menganalisis dimensi, faktor pendorong,*

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Child Marriage, Southeast Asia, Islamic Family Law, Muslim Communities, Legal Reform.

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*kerangka hukum, serta arah reformasi perkawinan anak di kalangan komunitas Muslim Asia Tenggara, sekaligus memetakan agenda penelitian yang perlu dikembangkan ke depan. Kajian ini menggunakan pendekatan tinjauan literatur sistematis (*Systematic Literature Review/*SLR) yang dipandu oleh pedoman PRISMA 2020, dengan mensintesis 34 artikel ilmiah peer-reviewed dari 82 dokumen terindeks Scopus. Hasil kajian mengidentifikasi lima klaster tematik utama, yaitu: (1) dimensi hukum dan doktrin Islam; (2) hukum negara dan respons kelembagaan; (3) determinan sosial, budaya, dan ekonomi; (4) resistensi feminis dan berbasis komunitas; serta (5) pengaruh digital dan dinamika kontemporer. Temuan penelitian menunjukkan adanya ketegangan yang terus berlangsung antara yurisprudensi Islam (fiqh), hukum adat (adat), dan standar internasional mengenai hak-hak anak. Penelitian ini menyimpulkan perlunya intervensi kebijakan yang sensitif terhadap hak anak sekaligus berakar pada konteks budaya lokal dan reorientasi penalaran hukum Islam dengan menempatkan kesejahteraan dan perlindungan anak sebagai prioritas. Arah penelitian mendatang merekomendasikan pengembangan studi longitudinal terhadap pengalaman individu perkawinan anak, studi komparatif, serta kajian mengenai peran ruang digital dalam membentuk ulang norma perkawinan di kalangan generasi muda Muslim.*]

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Introduction

Child marriage, defined by UNICEF as a formal or informal union in which one or both parties are under the age of 18, continues to cast a long shadow over the lives of millions of girls and boys worldwide. Nowhere is this phenomenon more layered, contested, and resistant to simple resolution than in Southeast Asia, where Islamic religious identity, post-colonial legal systems, and deeply embedded cultural customs converge in complex ways. In countries such as Indonesia and Malaysia, home to two of the largest Muslim populations in the world, child marriage is not merely a statistical anomaly. For many communities, it is a practice embedded in tradition, legitimized through selective readings of Islamic texts, and perpetuated by poverty and gender inequality.[1]

[1] Muhammad Al-Ghazalli Abdol Malek, Mohd Al Adib Samuri, and Muhammad Nazir Alias, 'Child Marriage in Malaysia: Reforming Law through the Siyasa al Shar'iyya Framework', in *Samarah*, no. 1, Universitas Islam Negeri Ar-Raniry, 2023, 7:58–83, https://doi.org/10.22373/sjhk.v7i1.16011; Mies Grijns and Hoko Horii, 'Child Marriage in a Village in West Java (Indonesia): Compromises between Legal Obligations and Religious Concerns', in *Asian Journal of Law and Society*, no. 2, Cambridge University Press, 2018, 5:453–66, https://doi.org/10.1017/als.2018.9.

The global discourse on child marriage has evolved considerably in the past two decades. International frameworks, such as the United Nations Convention on the Rights of the Child (UNCRC) and Sustainable Development Goal 5.3, have established a clear normative floor: no child should be married before the age of 18. Yet, in Muslim-majority contexts, the path from international commitment to domestic practice is rarely linear. Religious conservatives often resist reform as a form of cultural imperialism; progressives and feminists, including Muslim scholars and women's organizations, push back with their own Qur'anic and hadith-based arguments.[2] The result is a dynamic, often heated public debate that reflects deeper tensions about religious authority, gender, childhood, and the state.

Indonesia and Malaysia offer particularly instructive cases. Indonesia, the world's most populous Muslim-majority nation, enacted a revised Marriage Law in 2019, raising the minimum age for girls from 16 to 19 years, a landmark reform that emerged from years of feminist advocacy, constitutional litigation, and Islamic scholarly debate.[3] Malaysia, operating a dual legal system in which Sharia courts govern Muslim personal law, continues to grapple with the coexistence of civil and religious legal frameworks, each with different provisions on marriage age.[4] In both countries, child marriage is not simply a legacy of the past, it is actively debated, practiced, and contested in the present.

Despite this growing body of scholarship, existing knowledge on child marriage in Southeast Asian Muslim contexts remains fragmented and dispersed across disciplinary silos, Islamic legal studies, sociology, gender studies, and human rights scholarship rarely engage with one another's findings. Much of what is known has been produced through country-specific case studies, doctrinal commentaries, or advocacy-oriented reports, rather than

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2 Nikmatullah Nikmatullah, 'The Controversy of the Hadith Interpretation of Early Marriage among Muslim Communities', in *International Journal of Religion and Spirituality in Society*, no. 3, Common Ground Research Networks, 2023, 14:45–69, https://doi.org/10.18848/2154-8633/CGP/v14i03/45-69; Inayah Rohmaniyah, Samia Kotele, and Rr Siti Kurnia Widiastuti, 'Reclaiming an Authority: Women's Ulama Congress Network (KUPI) and a New Trend of Religious Discourse in Indonesia', in *Academic Journal of Interdisciplinary Studies*, no. 3, Richtmann Publishing Ltd, 2022, 11:60–70, https://doi.org/10.36941/ajis-2022-0068.

3 Ken Miichi, 'Feminist Strategies in a Muslim Democracy: Case Study of the 2019 Marriage Law Revision in Indonesia', in *Contemporary Islam*, no. 3, Springer Science and Business Media B.V., 2025, 19:559–75, https://doi.org/10.1007/s11562-025-00599-8.

4 Mohd Al Adib Samuri, Noor Aziah Mohd Awal, and Muhamad Abral Abu Bakar, 'Curbing Child Marriage Amongst Muslims In Malaysia: Towards Legal Reform', in *UUM Journal of Legal Studies*, no. 1, Universiti Utara Malaysia Press, 2022, 13:1–20, https://doi.org/10.32890/uumjls2022.13.1.1.

through a transparent and replicable synthesis of the accumulated evidence. Consequently, the field still lacks a consolidated understanding of how religious, legal, and socio-cultural drivers of child marriage interact across jurisdictions, how reform efforts have unfolded on the ground, and where critical evidentiary and conceptual gaps remain. Addressing this fragmentation matters precisely because the debate is still evolving in real time, legal reforms, fatwas, and grassroots resistance movements continue to emerge, yet no systematic review has yet mapped this fast-moving body of literature using a transparent, replicable protocol.

This systematic literature review (SLR) was undertaken to synthesize the existing body of scholarly knowledge on child marriage within Southeast Asian Muslim communities. By applying the PRISMA 2020 methodology, this review seeks to answer three guiding research questions: (1) What are the primary religious, legal, and socio-cultural drivers of child marriage in Southeast Asian Muslim communities? (2) How have state and Islamic legal institutions responded to child marriage? and (3) What forms of resistance, reform, and community-based change are emerging in this context?

This systematic literature review (SLR) responds to this gap by synthesizing the existing body of scholarly knowledge on child marriage within Southeast Asian Muslim communities, through a rigorous PRISMA 2020-guided protocol rather than another narrative or ad hoc summary. By applying this methodology, this review seeks to answer three guiding research questions: (1) What are the primary religious, legal, and socio-cultural drivers of child marriage in Southeast Asian Muslim communities? (2) How have state and Islamic legal institutions responded to child marriage? and (3) What forms of resistance, reform, and community-based change are emerging in this context?

The urgency of this review lies not only in its scholarly contribution but also in its policy relevance. Child marriage is associated with school dropout, domestic violence, adverse maternal and child health outcomes, and the intergenerational reproduction of poverty.[5] Understanding why it persists—and how reform can be made both legally

[5] Any Ismayawati and Inna Fauziatal Ngazizah, 'Criminal Acts in Completing Early Marriage Requirements: Tuku Umur Practices in Islamic Communities in Central Java, Indonesia', in *Samarah*, no. 1, Universitas Islam Negeri Ar-Raniry, 2022, 6:449–67, https://doi.org/10.22373/sjhk.v6i1.13001; Mohamad Rana, Tajul Arifin, and Cecep Soleh Kurniawan, 'When Religion And Culture Meet Economy Socio-Legal Factors for the Early Marriages of Muslim Families in Cirebon', in *Al-Ahwal*, no. 1, Al-Ahwal Research Centre Department of Islamic Family Law, Faculty of Sharia and Law, UIN Sunan Kalijaga, 2022, 15:83–102, https://doi.org/10.14421/ahwal.2022.15105.

enforceable and culturally legitimate, is a question that matters profoundly for millions of children across the region.

Method

Protocol and Registration

This review adheres to the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) 2020 guidelines established by Page et al., which represent the most current international standard for transparent and reproducible reporting in systematic reviews. [6] The protocol was designed to ensure transparency, replicability, and comprehensiveness in identifying and synthesizing relevant literature, allowing readers to independently assess the validity and coverage of the evidence.

Studies were included if they (a) focused on child marriage or early marriage practices; (b) were situated within or substantially addressed Southeast Asian Muslim communities (primarily Indonesia, Malaysia, and related diasporic or comparative contexts); (c) engaged with Islamic legal, religious, or cultural dimensions; (d) were published in peer-reviewed journals in English or Indonesian/Malay with English abstracts; and (e) were published between 2015 and 2026. Studies were excluded if they focused exclusively on non-Muslim or non-Southeast Asian populations, were purely biomedical without social-legal analysis, or were not accessible in full texts.

The search was conducted through the Scopus database, one of the largest and most widely recognized repositories of peer-reviewed literature in the social sciences, law, and Islamic studies, yielding a curated export of 82 records. Records were retrieved using Boolean combinations (AND, OR) of the search terms "child marriage," "early marriage," "underage marriage," "Islamic family law," "Muslim communities," "Southeast Asia," "Indonesia," and "Malaysia," applied across the title, abstract, and keyword fields to maximize retrieval sensitivity. No additional databases, grey literature, or unpublished reports were included in this iteration. Prior to screening, all 82 records were checked for internal duplicates; none were found, and all records proceeded to title and abstract screening.[7]

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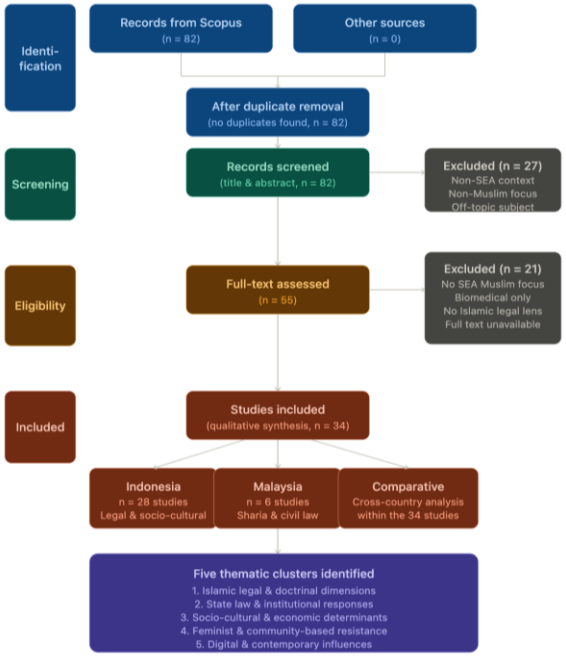
6 Matthew J. Page et al., 'PRISMA 2020 Explanation and Elaboration: Updated Guidance and Exemplars for Reporting Systematic Reviews', *BMJ*, 29 March 2021, n160, https://doi.org/10.1136/bmj.n160.

7 Ibid.

Selection followed a four-phase PRISMA 2020 process, identification, screening, eligibility assessment, and inclusion, summarized in the flow diagram (Figure 1). At the title and abstract screening stage, 27 of the 82 records were excluded because they did not engage with Southeast Asian Muslim communities as their primary population of interest, focused on unrelated geographic contexts (e.g., sub-Saharan Africa or South Asia) without substantive engagement with Islamic legal frameworks, or addressed unrelated thematic areas such as nutritional epidemiology or livelihood in fisheries. The remaining 55 records proceeded to full-text eligibility assessment, at which stage a further 21 were excluded for lacking a genuine Southeast Asian Muslim community focus despite surface-level relevance, relying on an exclusively biomedical or demographic methodology without social, legal, or religious analysis, failing to engage with Islamic jurisprudence or Islamic family law as an analytical lens, or, in a small number of cases, being unavailable in full text. This process yielded a final corpus of 34 peer-reviewed studies that were eligible for qualitative synthesis.

Figure 1. PRISMA 2020 Flow Diagram of Study Selection Process



Source: compiled by author

Data from the 34 included studies were extracted systematically using a structured matrix capturing the author(s), year, country/region, methodology, theoretical framework, key findings, and thematic focus. Because the majority of included studies were qualitative

or doctrinal-legal in nature, meta-analysis was not appropriate; instead, thematic synthesis was used as the primary analytical approach, grouping findings into emergent thematic clusters, with interpretive synthesis employed to construct a coherent narrative across studies. This process yielded five overarching thematic clusters, which form the organizing framework for the findings presented in the Results and Discussion sections.

Results and Discussion

This section presents the findings of the systematic review in two stages, moving from general to specific. It begins with a general overview of the corpus of included studies—their geographic distribution, methodological composition, and publication trends—to situate the reader within the broader shape of the literature. It then turns to a more specific, thematic discussion, in which the findings are organized around five overarching clusters identified through thematic synthesis: (1) Islamic legal and doctrinal dimensions; (2) state law and institutional responses; (3) socio-cultural and economic determinants; (4) feminist and community-based resistance; and (5) digital and contemporary influences. Together, these two levels of analysis are intended to show not only what the literature contains, but how its various strands speak to the review's three guiding research questions.

Overview of Included Studies

A total of 34 studies met the full inclusion criteria for this review. The majority (n = 28) were grounded in the Indonesian context, reflecting the relatively higher volume of academic output from Indonesian Islamic universities, law faculties, and social science institutions on this subject. Six studies focused primarily on Malaysia, several of which engaged directly with the country's dual civil–Sharia legal system, while a number of studies employed comparative frameworks that extended the analysis to other Muslim-majority countries, including Pakistan, Egypt, and Tunisia.

The included studies were methodologically diverse. Legal-doctrinal and normative approaches (n = 14, approximately 41%) dominated the corpus, reflecting the centrality of Islamic jurisprudence (*fiqh*) and state law in the discourse. Qualitative sociological and ethnographic studies (n = 10, approximately 29%) provided rich contextual depth, while mixed-methods and comparative legal approaches (n = 10, approximately 30%) offered broader analytical reach. Publication years ranged from 2018 to 2025, with a pronounced concentration in 2022–2025, a pattern that likely reflects the surge in scholarly attention

following Indonesia's landmark 2019 Marriage Law revision, which raised the minimum marriage age for both sexes to 19 years. Table 2 presents a summary of the studies included and their key contributions.

Table 1. Summary of Included Studies

Author(s) & Year	Country/Region	Methodology	Key Finding
Al Adib Samuri et al. (2022)	Malaysia	Islamic legal text analysis (content analysis)	Hadith of Aisha; Maslaha; Siyasah Shar'iyya frameworks
Al-Ghazalli Abdol Malek et al. (2023)	Malaysia	Qualitative; content analysis of Islamic texts	Siyasa al-Shar'iyya as tool for legal reform against child marriage
Samuri et al. (2022)	Malaysia	Legal-doctrinal analysis	Sharia court reform needed; dual legal system gaps
Yasin et al. (2024)	Malaysia	Content analysis; Maqasid & Fiqh frameworks	Guardian's obligation to prioritize child welfare in marriage
Miichi (2025)	Indonesia	Case study; socio-legal	Feminist civil society role in 2019 Marriage Law revision
Barkah et al. (2023)	Indonesia	Qualitative; naskh/Qur'anic analysis	Manipulation of religious text in legalizing underage marriages
Grijns and Horii (2018)	Indonesia (W. Java)	Ethnographic; legal sociology	Community-level compromises between state law and religious custom
Widiyanto et al. (2024)	Indonesia	Socio-legal analysis	State–religious authority tension in enforcing marriage age laws
Azni et al. (2025)	Indonesia	Normative legal; epistemological critique	Maslaha misapplication in religious court marriage dispensations
Rana et al. (2022)	Indonesia (Cirebon)	Qualitative; socio-legal	Economic, cultural, religious drivers of early marriage
Sibawaihi et al. (2025)	Indonesia (Cirebon)	Qualitative field study	Kyai influence vs. state regulation; informal religious authority
Muhammadi et al. (2021)	Indonesia	Normative-empirical legal	Islamic triangle concept: baligh, 'aql, and legal marriage age

Huzaimah et al. (2024)	Indonesia	Qualitative; mixed legal approach	Tension between religious doctrine and adat in minority communities
Malek et al. (2024)	Malaysia	Fiqh methodology analysis	al-Qaradawi's balanced framework for child marriage discourse
Qomaro et al. (2024)	Indonesia	Mixed methods; Maqasid al-Usrah	Family resilience measurement in early marriages
Nikmatullah (2023)	Indonesia/Broader	Discourse analysis	Competing hadith interpretations among millennial Muslims
Adawiyah et al. (2022)	Indonesia	Islamic legal analysis	Reconstruction of Aisha's marriage age to resolve child marriage practice
Ropei et al. (2023)	Indonesia (comparative)	Comparative legal; normative	Baligh concept across Egypt, Tunisia, Pakistan, Indonesia
Al Adib Samuri et al. (2022)	Indonesia (C. Java)	Socio-legal; criminal law	'Tuku umur' fraud practices to circumvent marriage age law
Al-Ghazalli Abdol Malek et al. (2023)	Indonesia	Normative legal	Future orientation impacts of early marriage under Islamic law
Samuri et al. (2022)	Indonesia	Socio-legal evaluation	Post-reformation legal policies on child marriage
Yasin et al. (2024)	Indonesia (Jayapura)	Field study; Islamic law	Unregistered marriages in Muslim minority communities
Miichi (2025)	Indonesia (Toraja)	Socio-legal; ethnographic	Islamic law vs. local tradition in Toraja Muslim minority
Barkah et al. (2023)	Indonesia	Content analysis; feminist	KUPI fatwa as new religious authority against early marriage
Grijns and Horii (2018)	Indonesia	Socio-legal; digital society	Online promotion of early marriage; Islamic romance movement
Widiyanto et al. (2024)	Indonesia	Qualitative; hadith criticism	Hijrah movement and conservative shift toward nikah muda

Note: Studies were selected based on the PRISMA 2020 criteria. SEA = Southeast Asia.

Islamic Legal and Doctrinal Dimensions

Perhaps no issue is more central to the debate on child marriage in Southeast Asian Muslim communities than the interpretation of Islamic sacred texts, particularly the hadith concerning Prophet Muhammad's marriage to Aisha, which classical scholars cited at a young age. This hadith has served as a cornerstone of traditionalist arguments defending child marriage as being religiously sanctioned. However, contemporary Islamic scholars increasingly challenge this position. Al Adib Samuri and colleagues conducted a meticulous content analysis of classical and contemporary hadith commentaries, concluding that although the hadith is considered technically authentic (*sahih*), it should not be interpreted as a blanket justification for child marriage in contemporary contexts. They proposed alternative Islamic legal frameworks, particularly *maslahah* (public interest) and *siyāsah shar'iyyah* (state governance within Islamic law), as more appropriate lenses for evaluating modern child marriage practices.[8] This position was echoed by Al-Ghazalli Abdol Malek and colleagues, who argued that governments possess both the authority and obligation under *siyāsa al-shar'iyya* to prohibit otherwise permissible acts when they generate demonstrable harm, classifying child marriage as a form of *mafsadah* (social harm).[9]

Adawiyah et al. adopted a different approach, arguing that the age historically attributed to Aisha at the time of marriage has been misunderstood and that reconstructing the historical account using contextual and biographical evidence substantially weakens the hadith's authority as a justification for child marriage.[10] Although controversial among conservative scholars, this perspective reflects a growing tendency to employ *ijtihad* (independent reasoning) to support child protection within contemporary Islamic scholarship. Similarly, Nikmatullah documented the emergence of progressive Muslim scholars who argue that hadith-based defenses of child marriage fail to capture the broader ethical objectives of Islam, particularly when applied to modern adolescents whose

8 Mohd Al Adib Samuri et al., 'Hadith of Aisha's Marriage to Prophet Muhammad: An Islamic Discourse on Child Marriage', in *International Journal of Islamic Thought*, National University of Malaysia, 2022, 21:93–105, https://doi.org/10.24035/ijit.21.2022.229.

9 Al-Ghazalli Abdol Malek, Al Adib Samuri, and Alias, 'Child Marriage in Malaysia: Reforming Law through the Siyasa al Shar'iyya Framework'.

10 Robi'Atul Adawiyah et al., 'The Reconstruction of Aisyah's Marriage Age as a Resolution for Child Marriage Practices Phenomenon; [Rekonstruksi Usia Perkawinan Aisyah Sebagai Penyelesaian Fenomena Praktik Perkawinan Anak]', in *Al-'Adalah*, no. 1, State Islamic Institute Raden Intan Lampung, 2022, 19:69–98, https://doi.org/10.24042/adalah.v19i1.11706.

biological, psychological, and social circumstances differ significantly from those of seventh-century Arabia.[11]

The concept of *baligh,* Islamic legal maturity commonly associated with puberty, constitutes another doctrinal point of contention in this regard. Ropei et al. conducted a comparative legal study in Egypt, Tunisia, Pakistan, and Indonesia and found that all four countries interpret *baligh* differently within their family law systems.[12] Indonesia's post-2019 legal framework demonstrates the strongest shift toward prioritizing chronological age over biological indicators as the legal threshold for marriage.[13] Malek et al. further examined al-Qaradawi's *fiqh* methodology and found that it offers a balanced approach by maintaining fidelity to classical texts while applying *maqāṣ id al-sharīʿah* (the higher objectives of Islamic law) to prioritize child welfare as a central concern.[14]

Table 2. Studies Addressing Islamic Legal and Doctrinal Dimensions

Author(s) & Year	Focus/Key Contribution
Al Adib Samuri et al. (2022)	Hadith of Aisha reinterpreted via *maslahah* and *siyāsah sharʿiyyah*
Al-Ghazalli Abdol Malek et al. (2023)	State authority under *siyāsa al-sharʿiyya* to prohibit child marriage as *mafsadah*
Adawiyah et al. (2022)	Historical reconstruction of Aisha's marriage age; use of *ijtihad*
Nikmatullah (2023)	Progressive scholars' critique of hadith-based defenses of child marriage
Ropei et al. (2023)	Comparative legal analysis of *baligh* across Egypt, Tunisia, Pakistan, Indonesia
Malek et al. (2024)	Al-Qaradawi's *fiqh* methodology and *maqāṣid al-sharīʿah*

Source: compiled by author

[11] Nikmatullah, 'The Controversy of the Hadith Interpretation of Early Marriage among Muslim Communities'.

[12] Ahmad Ropei et al., 'Managing Baligh In Four Muslim Countries: Egypt, Tunisia, Pakistan, and Indonesia on the Minimum Age for Marriage', in *Al-Ahwal*, no. 1, Al-Ahwal Research Centre Department of Islamic Family Law, Faculty of Sharia and Law, UIN Sunan Kalijaga, 2023, 16:112–40, https://doi.org/10.14421/ahwal.2023.16106.

[13] Ahmad Ropei et al., 'Managing Baligh In Four Muslim Countries: Egypt, Tunisia, Pakistan, and Indonesia on the Minimum Age for Marriage', in *Al-Ahwal*, no. 1, Al-Ahwal Research Centre Department of Islamic Family Law, Faculty of Sharia and Law, UIN Sunan Kalijaga, 2023, 16:112–40, https://doi.org/10.14421/ahwal.2023.16106.

[14] Muhammad Al-Ghazalli Abdol Malek et al., 'Child Marriage Discourse According to Al-Qaradawi's Fiqh Methodology; [Wacana Perkahwinan Kanak-Kanak Menurut Manhaj Fiqh al-Qaradawi]', in *Islamiyyat*, no. 1, Penerbit Universiti Kebangsaan Malaysia, 2024, 46:3–14, https://doi.org/10.17576/islamiyyat-2024-4601-01.

Future Research Potential: While these studies collectively demonstrate a sophisticated intra-Islamic debate on textual and doctrinal grounds, comparatively little attention has been paid to how ordinary religious court judges and local ulama, as opposed to elite scholars, interpret and apply these doctrinal frameworks in everyday adjudication. Future research could productively examine the gap between elite doctrinal reasoning and grassroots juridical practice, particularly through empirical studies of religious court decision-making.

State Law and Institutional Responses

The relationship between state law and Islamic legal authority is a defining feature of child marriage governance in Southeast Asia. Both Indonesia and Malaysia operate plural legal systems in which civil law, adat (customary law), and Islamic law intersect, often uncomfortably. Indonesia's 2019 Marriage Law revision raised the minimum marriage age for both males and females to 19, closing a significant gender gap that had previously set the female minimum at 16. [15] This reform is a victory for feminist civil society organizations that strategically engaged both the Constitutional Court and Islamic women's organizations such as Muslimat NU and Aisyiyah, demonstrating that gender-sensitive legal reform within a Muslim democracy is achievable when feminist actors build broad interfaith and intrafaith coalitions.[16] Saepullah and colleagues offered a nuanced socio-legal evaluation, noting that although the legal reform represented a significant advancement, its implementation remains uneven, particularly in rural areas and among communities where marriage dispensations from religious courts are readily obtained.[17]

Marriage dispensation, judicial authorization for underage marriage, has emerged as one of the most critical loopholes in Indonesia's reformed framework. Azni and colleagues delivered a sharp epistemological critique of this practice, arguing that religious court judges frequently misapply the concept of *maslahah* to justify dispensations, a phenomenon they term "pseudo-maslahah." Their study found that many dispensations are granted on the basis

15 Miichi, 'Feminist Strategies in a Muslim Democracy: Case Study of the 2019 Marriage Law Revision in Indonesia'.

16 Ibid.

17 Asep Saepullah et al., 'A Contemporary Socio-Legal Evaluation of Indonesia's Post-Reformation Child Marriage Policies', in *MIL.Rev: Metro Islamic Law Review*, no. 2, Faculty of Sharia, IAIN Metro, 2025, 4:1393–426, https://doi.org/10.32332/milrev.v4i2.10322.

of pregnancy or social pressure rather than genuine child welfare considerations, representing a fundamental failure of Islamic jurisprudential reasoning at the institutional level.[18] Widiyanto et al. similarly documented the tension between state authorities seeking to enforce the revised law and local religious figures (*kyai* and *ulama*) who retain significant informal authority over marriage decisions in their communities.[19]

In Malaysia, Samuri et al. examined the dual-track legal system in which civil law establishes the minimum marriage age at 18 years, while Sharia courts retain authority over Muslim marriages and may authorize marriages below this age with judicial consent. They argued that this structural ambiguity creates systematic vulnerabilities for Muslim girls who fall outside the protection of civil law while remaining subject to Sharia jurisdiction.[20] Yasin et al. foregrounded the issue of *wali* (guardian) responsibility, arguing from within Islamic legal doctrine that guardians who arrange child marriages without adequate consideration of the child's welfare violate their core fiduciary duty under Islamic law, a finding that challenges traditionalist defenses of guardianship-based child marriage.[21]

Ismayawati and Ngazizah documented a troubling pattern in Central Java: the practice of *tuku umur,* literally "buying age", in which fraudulent documentation is used to inflate a child's recorded age to circumvent the legal marriage age requirements. They argued that this practice constitutes a form of administrative criminal conduct, enabled by weak regulatory oversight and entrenched community norms favoring early marriage.[22]

Table 3. Studies Addressing State Law and Institutional Responses

Author(s) & Year	Focus/Key Contribution
Miichi (2025)	Feminist civil society role in Indonesia's 2019 Marriage Law revision

[18] Azni Azni et al., 'Pseudo-Maṣlaḥah And Epistemological Failure In Marriage Dispensation At Indonesian Religious Courts', in *Jurnal Ilmiah Peuradeun*, no. 2, SCAD Independent, 2025, 13:1399–420, https://doi.org/10.26811/peuradeun.v13i2.2047.

[19] Asfa Widiyanto, Siti Zumrotun, and Heru Saputra, 'The Prevention Of Underage Marriage In Indonesia: State, Religious Authority, and Human Rights', in *Justicia Islamica*, no. 2, Ponorogo State Institute Of Islamic Religion, 2024, 21:401–22, https://doi.org/10.21154/justicia.v21i2.9771.

[20] Samuri, Awal, and Bakar, 'Curbing Child Marriage Amongst Muslims In Malaysia: Towards Legal Reform'.

[21] Redwan Yasin et al., 'Guardian's Responsibility For The Welfare Of Children In Marriage: A Study According To Islamic Law', in *Malaysian Journal of Syariah and Law*, no. 3, Faculty of Syariah and Law, Islamic Science University of Malaysia (USIM), 2024, 12:778–89, https://doi.org/10.33102/mjsl.vol12no3.765.

[22] Ismayawati and Ngazizah, 'Criminal Acts in Completing Early Marriage Requirements: Tuku Umur Practices in Islamic Communities in Central Java, Indonesia'.

Saepullah et al.	Uneven implementation of the 2019 reform, especially in rural areas
Azni et al. (2025)	"Pseudo-*maslahah*" critique of marriage dispensation practices
Widiyanto et al. (2024)	Tension between state authority and local *kyai/ulama*
Samuri et al. (2022)	Malaysia's dual civil–Sharia system and jurisdictional gaps
Yasin et al. (2024)	*Wali* (guardian) fiduciary obligation under Islamic law
Ismayawati & Ngazizah	*Tuku umur* age-falsification practices in Central Java

Source: compiled by author

Future Research Potential: Existing studies map the structural gaps between civil and religious legal authority well but rarely evaluate the actual outcomes of judicial or administrative interventions for the children involved. Future research could focus on outcome-based studies, for instance, longitudinal tracking of cases granted marriage dispensation, to assess whether institutional reforms translate into measurable improvements in child welfare rather than legal compliance alone.

Socio-Cultural and Economic Determinants

Child marriage in Southeast Asian Muslim communities cannot be adequately understood without attention to the socio-economic and cultural conditions that sustain it. Poverty, limited educational opportunities, patriarchal gender norms, and the perceived social honor associated with early female marriage all interact to create an environment in which child marriage is not merely tolerated but, in some communities, actively valued. Rana and colleagues conducted a qualitative socio-legal study in Cirebon, West Java, finding that, for many families, early marriage is perceived as a rational, although ultimately harmful, economic strategy. Daughters who marry early reduce household financial burdens, bride-price practices incentivize early marriage, and for girls who have dropped out of school, marriage represents one of the few socially legitimate pathways available to them.[23] Grijns and Horii similarly documented in their study of villages in West Java that local governance structures routinely negotiate compromises between state law and community preferences

[23] Rana, Arifin, and Kurniawan, 'When Religion And Culture Meet Economy Socio-Legal Factors for the Early Marriages of Muslim Families in Cirebon'.

for early marriage, reflecting a broader political economy in which child protection norms are subordinated to local social order.[24]

The intersection of religion and culture is particularly complex in Muslim minority communities. Takdir and colleagues, in their study of the Toraja Muslim minority community in South Sulawesi, found that local Islamic authorities actively engage with both Islamic law and Toraja *adat* to prevent early marriage, creating a context in which minority status may foster a more protective stance toward children's rights, an important and somewhat counterintuitive finding.[25] Huzaimah et al. examined similar minority dynamics in other Indonesian regions, documenting ongoing tensions between religious doctrine and customary practices and demonstrating that attitudes toward early marriage vary considerably according to local contexts and styles of religious leadership.[26]

Qomaro and colleagues introduced an innovative methodological contribution to this thematic area by developing a family resilience measurement instrument grounded in *Maqāṣ id al-Usrah* (the objectives of Islamic family law). Their instrument captures the differential impacts of early marriage on family cohesion, economic stability, and child welfare outcomes.[27] This framework offers a potentially valuable tool for both researchers and policymakers seeking culturally resonant approaches to assessing the harms associated with early marriage.

Table 4. Studies Addressing Socio-Cultural and Economic Determinants

Author(s) & Year	**Focus/Key Contribution**
Rana et al. (2022)	Early marriage as household economic strategy in Cirebon
Grijns & Horii (2018)	Local governance compromises between state law and community preference in West Java
Takdir et al.	Protective dynamics of Toraja Muslim minority community
Huzaimah et al. (2024)	Tension between religious doctrine and *adat* in minority communities

[24] Grijns and Horii, 'Child Marriage in a Village in West Java (Indonesia): Compromises between Legal Obligations and Religious Concerns'.

[25] Takdir et al., 'Islamic Law and Local Traditions in Preventing Early Marriage in the Toraja Muslim Minority Community', in *Jurnal Ilmiah Al-Syir'ah*, no. 2, Institut Agama Islam Negeri Manado, 2024, 22:274–87, https://doi.org/10.30984/jis.v22i2.2931.

[26] Arne Huzaimah et al., 'Controversy of Early Marriage Between Religious Doctrine and Customs in Minority Areas in Indonesia', in *Jurnal Ilmiah Al-Syir'ah*, no. 2, Institut Agama Islam Negeri Manado, 2024, 22:139–51, https://doi.org/10.30984/jis.v22i2.2344.

[27] Galuh Widitya Qomaro et al., 'Navigating Early Marriages: A Methodological Breakthrough in Family Resilience Measurement', in *Mazahib Jurnal Pemikiran Hukum Islam*, no. 2, Faculty of Sharia, Sultan Aji Muhammad Idris State Islamic University, 2024, 23:477–528, https://doi.org/10.21093/mj.v23i2.8027.

Qomaro et al. (2024)	Family resilience instrument grounded in *Maqāṣid al-Usrah*

Source: compiled by author

Future Research Potential: Most sociocultural studies to date rely on qualitative case studies from a limited number of provinces (primarily West Java). Future research could broaden this geographic base, particularly to eastern Indonesia and rural Malaysia, and apply Qomaro et al.'s family resilience instrument across diverse settings to build a more generalizable and comparative evidence base on the economic drivers of child marriage.

Feminist and Community-Based Resistance

One of the most striking developments in the contemporary child marriage landscape in Southeast Asia is the emergence of organized, religiously grounded feminist resistance. This movement does not reject Islam; on the contrary, it claims Islamic authority for its positions, drawing on *maqasid al-Shari'ah*, feminist hadith scholarship, and the voices of female Islamic scholars to challenge child marriage from within the tradition. Rohmaniyah et al. examined the *Kongres Ulama Perempuan Indonesia* (KUPI), the Women's Ulama Congress Network, as a groundbreaking institution through which female Islamic scholars issued a *fatwa* (religious ruling) opposing child marriage. This constituted a historic development, given that female scholars have traditionally been excluded from the formal fatwa-issuing authority within Indonesia's Islamic establishment. The emergence of KUPI represents what the authors describe as a new pattern of religious authority that directly challenges patriarchal control over the interpretation of Islamic family law.[28] Miichi further documented how organizations such as Muslimat NU and Aisyiyah played pivotal roles in the parliamentary and judicial processes that culminated in the 2019 Marriage Law reform, demonstrating that feminist mobilization within Islamic social organizations can generate enduring legislative change.[29]

Barkah and colleagues analyzed the discursive strategies through which religious texts have been employed to legitimize underage marriage, arguing that the selective application

[28] Rohmaniyah, Kotele, and Widiastuti, 'Reclaiming an Authority: Women's Ulama Congress Network (KUPI) and a New Trend of Religious Discourse in Indonesia'.

[29] Miichi, 'Feminist Strategies in a Muslim Democracy: Case Study of the 2019 Marriage Law Revision in Indonesia'.

of *naskh* (abrogation) and other hermeneutical tools by conservative actors constitutes a form of epistemic violence against children's rights. Their study advocates for a more rigorous and child-centered methodology in Islamic textual interpretation.[30] Rifandanu and Febrianti explored the implications of early marriage for future orientation among young people within the framework of Islamic law, finding that early marriage significantly constrains girls' aspirations and life trajectories, with important implications for both Islamic developmental ethics and public policy.[31]

Table 5. Studies Addressing Feminist and Community-Based Resistance

Author(s) & Year	**Focus/Key Contribution**
Rohmaniyah et al.	KUPI's fatwa against child marriage as new religious authority
Miichi (2025)	Role of Muslimat NU and Aisyiyah in the 2019 Marriage Law reform
Barkah et al. (2023)	Discursive/textual strategies legitimizing child marriage; *naskh*
Rifandanu & Febrianti	Impact of early marriage on youth future orientation

Soruce: compiled by author

Future Research Potential: Current literature documents the emergence of feminist religious authority (e.g., KUPI) but offers limited insight into its actual reception and influence at the grassroots level, particularly among conservative rural communities. Future research could examine how KUPI's fatwas and similar feminist religious interventions are received, contested, or adapted by local religious leaders and communities over time.

Digital and Contemporary Influences

The digital revolution has introduced new dimensions to the child marriage debate in Southeast Asian Muslim communities. Social media platforms, Islamic lifestyle apps, and online religious communities have become significant arenas in which early marriage is both promoted and contested. Wahib and Raushan examined the phenomenon of digital Islamic romance communities in Indonesia that actively promote early marriage as an expression of

[30] Qodariah Barkah et al., 'The Manipulation of Religion and The Legalization of Underage Marriages in Indonesia', in *Samarah*, no. 1, Universitas Islam Negeri Ar-Raniry, 2023, 7:1–20, https://doi.org/10.22373/sjhk.v7i1.13316.

[31] Farei Rifandanu and Ayu Febrianti, 'Early Marriage and Implications for Future Orientation in Islamic Law', in *Contemporary Issues on Interfaith Law and Society*, no. 2, Universitas Negeri Semarang, 2023, 2:167–88, https://doi.org/10.15294/ciils.v2i2.69114.

religious piety and resistance to Western-influenced dating culture. Their study found that these online movements mobilize a distinctive vocabulary of *hijrah* (religious transformation) and *nikah muda* (early marriage) to frame marriage as an act of personal and communal purification, making it particularly appealing to young people undergoing religious identity transitions.[32] Rahman, Suganda, and colleagues conducted a critical hadith analysis of the *Nikah Muda* movement, documenting how anti-dating communities selectively deploy prophetic traditions to construct a form of conservative masculinity that valorizes early marriage as a safeguard against sexual temptation.[33]

Sibawaihi et al. added an important institutional dimension to this digital landscape by documenting how *kyai* in Cirebon Regency navigate the tension between state law, which establishes 19 years as the minimum legal age for marriage, and community expectations rooted in traditional Islamic authority structures. Their findings reveal that informal religious authority remains a powerful force in shaping marriage practices and that digital platforms are increasingly utilized by both *kyai* and their followers to consolidate and disseminate perspectives on early marriages.[34] The tension between online activism promoting early marriage and feminist digital counter-movements represents an emerging frontier in the child marriage landscape that warrants sustained attention.

The synthesis of 34 studies across the five thematic clusters reveals a rich but troubling portrait of child marriage in Southeast Asian Muslim communities. Three overarching tensions animate the field and carry significant implications for both scholarship and policy. The first and most fundamental tension is between Islamic jurisprudence and international child rights standards. The studies reviewed do not support a simplistic narrative of Islam versus human rights. Rather, they reveal an intra-Islamic debate of considerable sophistication, in which Muslim scholars, women's organizations, and legal

[32] Ahmad Bunyan Wahib and Novin Raushan, 'Promoting New Muslim Romance In The Digital World: State Law in Society in Advocating Early Marriage', in *Ulumuna*, no. 2, Universitas Islam Negeri (UIN) Mataram, 2025, 29:701–30, https://doi.org/10.20414/ujis.v29i2.1057.

[33] Encep Taufik Rahman et al., 'How Does the State Regulate the Administration of Unregistered Marriages in Muslim Minority Communities? The Practice of Mass Weddings in Jayapura City', in *Jurnal Ilmiah Al-Syir'ah*, no. 2, Institut Agama Islam Negeri Manado, 2024, 22:207–20, https://doi.org/10.30984/jis.v22i2.3210.

[34] Muhammad Sibawaihi et al., 'The Role of Kyai and the State in Regulating Child Marriage: A Study in Cirebon Regency', in *Jurnal Ilmiah Mizani*, no. 2, Fatmawati Sukarno Bengkulu State Islamic University, 2025, 12:667–79, https://doi.org/10.29300/mzn.v12i2.8230.

reformers argue, on Islamic grounds, for child protection.[35] What is most notable is that the most powerful arguments for reform are being made from within the Islamic tradition, not against it. Frameworks such as *maqasid al-Shari'ah, maslaha*, and *Siyasah Shar'iyya* provide ample doctrinal resources for states and religious institutions to justify the protection of children from early marriage.[36] The challenge is to mobilize these frameworks against entrenched patriarchal interests within Islamic legal institutions.

The second tension lies between formal legal reforms and informal social practices. Indonesia's 2019 Marriage Law reform represents a significant legislative achievement; however, several studies reviewed in this article indicate that its implementation continues to be undermined by the widespread use of marriage dispensations,[37] fraudulent age documentation practices,[38] and the persistent influence of local religious authorities in shaping marriage decisions.[39] Malaysia faces a different set of structural challenges, particularly the coexistence of civil and Sharia legal systems, which create jurisdictional gaps that may be exploited to the detriment of Muslim girls' rights.[40] In both contexts, legal reforms alone are insufficient. Sustainable progress requires complementary measures, including community education, judicial capacity building, and the empowerment of local actors capable of advocating for children's rights through culturally and religiously resonant frameworks.

The third tension is generational and digital. The Nikah Muda movement and similar online communities represent a new form of conservative mobilization that uses the language of personal piety and *hijrah* to promote early marriage among young Muslims who may be

35 Al Adib Samuri et al., 'Hadith of Aisha's Marriage to Prophet Muhammad: An Islamic Discourse on Child Marriage'; Malek et al., 'Child Marriage Discourse According to Al-Qaradawi's Fiqh Methodology; [Wacana Perkahwinan Kanak-Kanak Menurut Manhaj Fiqh al-Qaradawi]'; Rohmaniyah, Kotele, and Widiastuti, 'Reclaiming an Authority: Women's Ulama Congress Network (KUPI) and a New Trend of Religious Discourse in Indonesia'.

36 Al-Ghazalli Abdol Malek, Al Adib Samuri, and Alias, 'Child Marriage in Malaysia: Reforming Law through the Siyasa al Shar'iyya Framework'.

37 Azni et al., 'Pseudo-Maṣlaḥah And Epistemological Failure In Marriage Dispensation At Indonesian Religious Courts'.

38 Ismayawati and Ngazizah, 'Criminal Acts in Completing Early Marriage Requirements: Tuku Umur Practices in Islamic Communities in Central Java, Indonesia'.

39 Sibawaihi et al., 'The Role of Kyai and the State in Regulating Child Marriage: A Study in Cirebon Regency'; Widiyanto, Zumrotun, and Saputra, 'The Prevention Of Underage Marriage In Indonesia: State, Religious Authority, and Human Rights'.

40 Samuri, Awal, and Bakar, 'Curbing Child Marriage Amongst Muslims In Malaysia: Towards Legal Reform'.

disconnected from traditional religious authority structures but are deeply embedded in digital Islamic communities.[41] In contrast, feminist Islamic scholars and organizations are also increasingly using digital platforms to disseminate progressive positions on child marriage. The outcome of this digital contest for Islamic interpretive authority will have significant real-world implications for marriage practices across the region.

This review also highlights the importance of minority community contexts, which are often overlooked in national analyses. Evidence from minority Muslim settings suggests that child marriage in Southeast Asia is far from uniform. The local configurations of geography, ethnicity, and the interplay between religious and customary authority significantly shape marriage practices and community responses to child protection concerns.[42] These findings underscore the need for policy interventions that are locally sensitive and responsive to diverse socio-cultural contexts rather than relying on one-size-fits-all approaches to policy-making.

Table 6. Studies Addressing Digital and Contemporary Influences

Author(s) & Year	**Focus/Key Contribution**
Wahib & Raushan	Digital Islamic romance communities promoting *nikah muda* as piety
Rahman, Suganda et al.	Hadith analysis of the *Nikah Muda* movement and conservative masculinity
Sibawaihi et al. (2025)	*Kyai* in Cirebon navigating state law vs. digital community expectations

Source: compiled by author

Future Research Potential: This remains the most underdeveloped thematic cluster in the reviewed literature, with only three studies identified. Notably absent are studies examining the digital counter-movements led by feminist Muslim actors, the algorithmic dynamics through which pro-early-marriage content is amplified on social media, and youth-

41 Rahman et al., 'How Does the State Regulate the Administration of Unregistered Marriages in Muslim Minority Communities? The Practice of Mass Weddings in Jayapura City'; Wahib and Raushan, 'Promoting New Muslim Romance In The Digital World: State Law in Society in Advocating Early Marriage'.

42 Takdir et al., 'Islamic Law and Local Traditions in Preventing Early Marriage in the Toraja Muslim Minority Community'; Rahman et al., 'Nikah Muda: The Hijrah Movement of Anti-Dating Communities from Progressive to Conservative in Indonesia (A Critical Study of Hadith)', in *Millah: Journal of Religious Studies*, no. 1, Program Studi Ilmu Agama Islam Program Magister, Universitas Islam Indonesia, 2024, 23:67–102, https://doi.org/10.20885/millah.vol23.iss1.art3.

perspective research capturing how adolescents navigate these competing online narratives. Given the rapid growth of digital Islamic spaces, this represents one of the most urgent and underexplored frontiers for future research on child marriage in the region.

Conclusion

This systematic literature review synthesizes 34 peer-reviewed studies to construct a comprehensive understanding of child marriage in Southeast Asian Muslim communities, with particular focus on Indonesia and Malaysia. The findings confirm that child marriage in this context is a multidimensional phenomenon, driven by the interaction of Islamic doctrinal debates, plural legal systems, socioeconomic pressures, patriarchal gender norms, and increasingly, digital cultural movements.

In terms of its contribution to scholarship and practice, this review offers several distinct contributions to the field. First, it demonstrates that the most promising arguments for child marriage reform are grounded in Islamic legal frameworks themselves, particularly *maqasid al-Shari'ah, maslaha*, and *Siyasah Shar'iyya,* rather than those relying solely on secular international human rights norms. Reformers who speak in Islamic vernaculars are more likely to achieve cultural legitimacy and durable social change. Second, the review highlights the critical role of feminist Muslim actors, particularly organizations like KUPI in Indonesia and progressive legal advocates in Malaysia, as essential agents of reform within Islamic institutional frameworks. Third, it identifies the marriage dispensation system, informal religious authority, and digital normalization of early marriage as three critical challenges that must be addressed in the next phase of policy and advocacy work.

Despite these contributions, this review is subject to several limitations that should be acknowledged. First, the search was restricted to a single database (Scopus) and studies published in English or Indonesian/Malay with English abstracts; relevant scholarship indexed elsewhere, published in other languages, or circulated as grey literature, such as NGO or government reports, may therefore have been excluded, potentially narrowing the evidentiary base. Second, the included literature is geographically concentrated, with the substantial majority of studies (n = 28) focused on Indonesia and a smaller subset (n = 6) on Malaysia; this imbalance limits the extent to which the findings can be generalized across the broader Southeast Asian Muslim world, including Brunei, southern Thailand, and the southern Philippines, which remain underrepresented in the reviewed literature. Third,

because most included studies are qualitative, doctrinal, or normative in nature, this review relied on thematic and interpretive synthesis rather than meta-analysis; while appropriate given the nature of the evidence, this approach does not permit statistical aggregation or the establishment of causal relationships between the identified drivers and marriage outcomes. Finally, as a review of secondary literature, this study did not generate primary data and cannot capture very recent legal, digital, or grassroots developments that may have emerged beyond the publication window of the included studies.

Building on these limitations, future research should focus on (1) longitudinal studies tracking the lived experiences of individuals who marry early in Muslim Southeast Asian communities; (2) comparative studies examining how different Islamic jurisprudential schools approach the baligh-and-age question; (3) rigorous evaluations of community-based intervention programs informed by Islamic ethics; and (4) analysis of how digital Islamic communities are reshaping marriage norms among Muslim youth. Future studies would also benefit from broadening the geographic and linguistic scope of evidence synthesis to include underrepresented Muslim-majority contexts within Southeast Asia. The stakes could not be higher: the elimination of child marriage is both a human rights imperative and, as this review demonstrates, a goal that can and must be pursued from within the rich, dynamic tradition of Islamic thought..

Declarations

Author contribution statement

A.S conceived the study design, conducted the literature search and screening, analyzed and synthesized the included studies, and wrote the original draft and final version of the manuscript.

Declaration of interests statement

The authors declare that they have no known competing financial interests or personal relationships that could have influenced the work reported in this paper.

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