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Policy Design Failure in the Implementation of Halal Tourism Regulation: Evidence from Bandung Regency

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Abstract: *The implementation of halal tourism policies has expanded globally, yet formal regulatory adoption does not necessarily lead to effective implementation. Existing studies largely explain implementation failure through institutional capacity or contextual factors, while paying limited attention to how policy design shapes governance outcomes. This study investigates why Bandung Regency Regional Regulation No. 6 of 2020 on Halal Tourism has remained largely unimplemented despite being enacted nearly six years ago. This study employs a qualitative case study approach using Peter J. May's policy design framework, focusing on capacity building, commitment-building, and signaling provisions. Data were collected through semi-structured interviews. Documentary analysis and media reports were used to triangulate the findings. The findings indicate that the regulation has remained dormant not simply because of bureaucratic incapacity or stakeholder resistance, but because its design provided incomplete conditions for institutional activation. The absence of capacity-building provisions contributed to an institutional vacuum marked by a lack of implementation regulations, dedicated financing, clear organizational mandates, and operational guidance. Weak commitment-building provisions resulted in symbolic ownership without sustained institutional responsibility, incentives, or stakeholder participation. Weak signaling provisions generated policy ambiguity and interpretive uncertainty concerning policy objectives, standards, terminology, and implementation direction. These conditions interacted to produce hollow governance, in which formal legal authority existed without the institutional architecture required to activate it. The study extends May's policy design framework by proposing the Hollow Governance Mechanism of Design-Induced Implementation Failure, where policy design deficiencies indirectly influence the non-initiation of implementation through governance conditions and constrained administrative interpretation.*
Keywords: *halal tourism, policy design, regulation implementation*

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1. Introduction

The global rise of halal tourism has reshaped how governments, industries, and destinations conceptualize tourism governance in Muslim-majority as well as Muslim-minority countries (Abdullah et al., 2025). Motivated by the growing economic potential of Muslim travelers, numerous countries in Southeast Asia, the Middle East, and Europe have adopted regulatory and institutional measures designed to attract, accommodate, and segment Muslim travel markets (Biancone et al., 2019). The halal tourism sector is one of the fastest-growing segments in the global tourism industry, with rising demand for halal-certified products, Muslim-friendly services, and religiously appropriate recreational experiences (Widodo et al., 2022). Governments have thus been drawn to regulate halal tourism not merely as a cultural or religious necessity, but as an economic opportunity (Hennida et al., 2024).

Halal tourism has diverse definitions and practices globally (Farhat et al., 2025). Global studies, such as Battour and Ismail (2016), show that the concept of halal tourism differs between Muslim-majority and Muslim-minority countries. In Muslim-minority countries, halal services are seen as essential needs that require formal facilitation, whereas in Muslim-majority countries, halal services are often considered part of daily practice, making additional policy interventions appear less urgent (Adinugraha et al., 2025). In the Indonesian context, halal tourism has evolved as a governance innovation shaped by national religious authority, regional autonomy, and local political economy dynamics (Paramarta et al., 2021; Samudra et al., 2024). Despite Indonesia having the world's largest Muslim population, the adoption of halal tourism policies remains fragmented and inconsistent across regions (Santoso et al., 2022). Nationally, regulatory clarity is limited: the government has not enacted a law on halal tourism, and the Ministry of Tourism employs varied and sometimes ambiguous terminology—ranging from "halal tourism" to "Moslem-friendly tourism" (Satriana & Faridah, 2018). Subnational governments therefore often operate in a policy vacuum, relying on local interpretations of halal tourism concepts and on the influence of religious, political, and economic constituencies.

Against this backdrop, Bandung Regency in West Java stands out as one of the first local governments to enact the formal Halal Tourism Regulation (Bandung Regency Regional Regulation No. 6/2020). The regulation was intended to be a legal foundation for developing halal tourism in a region characterized by scenic natural attractions, cultural heritage, and a predominantly Muslim population (Jalaluddin et al., 2024; Rahman et al., 2025). When the regulation was passed in 2020, local policymakers framed it as a strategic response to rising global demand for halal tourism and an effort to enhance the competitiveness of Bandung Regency's tourism sector.

While implementation problems have been widely examined in public policy research, existing approaches emphasize different points in the policy process. Implementation-oriented perspectives, including Sabatier's (1988) advocacy coalition framework, highlight interactions among policy actors, belief systems, institutional settings, and broader political conditions that shape policy implementation over time. Subsequent implementation research has likewise emphasized administrative capacity, political resistance, inter-organizational coordination, and stakeholder conflict as important conditions affecting implementation outcomes (Hudson et al., 2019; Selepe, 2023). These perspectives are less equipped to explain cases in which a policy remains dormant before substantive implementation activity begins. In such cases, it is analytically useful to distinguish failure from non-initiation: the former concerns difficulties within an ongoing implementation process, whereas the latter concerns the absence of the organizational and administrative steps needed to start. This distinction directs attention upstream toward the policy design and institutional conditions it creates or leaves unspecified.

Peter J. May's (2012) policy design framework provides an important analytical starting point for examining this upstream dimension. May identifies three design provisions relevant to implementation —capacity-building, commitment-building, and signaling—that help assess whether a policy has the resources, institutional support, and policy signals needed to facilitate implementation. However, May's framework does not specify an intervening governance condition through which deficiencies in these design provisions may become consequential before substantive implementation begins. In particular, it does not fully explain how incomplete design provisions may translate into an incomplete implementation architecture, organizational uncertainty, and constrained administrative interpretation at the pre-initiation stage. This study addresses this narrower theoretical gap by examining how formal legal authority can coexist with incomplete institutional arrangements for activating that authority. We conceptualize this condition as hollow governance and examine its relationship with actor-reported interpretive uncertainty and implementation non-initiation. The contribution is therefore not to replace May's framework, but to extend its analytical reach by specifying a possible governance pathway through which policy design deficiencies may become consequential before substantive implementation

commences, as summarized in Table 1.

Table 1. Research Positioning

Literature/framework	What it explains	Remaining limitation	Contribution of this study
May (2012)	Capacity building, commitment-building, and signaling as design provisions relevant to implementation.	Does not fully specify how deficiencies become a pre-implementation governance condition or shape actor interpretation before implementation begins.	Adds an intervening analytical pathway from design deficiencies to hollow governance and then to implementation non-initiation.
Implementation-failure literature (e.g., Hudson et al., 2019; Selepe, 2023)	Administrative, political, coordination, and contextual explanations of implementation problems.	Often assumes an implementation process is underway.	Distinguishes non-initiation/ policy dormancy from failure within an ongoing implementation process.
Institutional void/policy gap concepts	Absence or weakness of institutional or policy arrangements.	Do not necessarily capture the coexistence of formal legal authority with incomplete activation architecture.	Defines hollow governance around formal regulatory existence plus incomplete implementation architecture.
This study	Connects design provisions, governance architecture, actor-reported uncertainty, and observed non-initiation.	Single-case and limited bureaucratic representation constrain generalization.	Offers a case-derived mechanism for future comparative testing.

Policy design is viewed not merely as a statement of goals or normative arrangements, but as a construction that determines the feasibility of implementation even before the policy is executed (Cairney, 2021; Fontaine et al., 2020). Foundational literature, such as that presented by Linder and Peters (1984), positions policy design as a process that links policy objectives with the instruments chosen to achieve them. Policy design therefore stands at the intersection of technocratic and political concerns, making it vulnerable to ambiguity, fragmentation, and compromises that are not always productive (Peters, 2017). Howlett (2014) emphasizes that policy design is not neutral; political dynamics, power structures, and actors' perceptions of public problems shape it. The selected policy instruments often reflect policymakers' perceptions of target groups, as Schneider and Ingram (1997) explain through the concept of the social construction of target populations. Target groups perceived as capable of adapting or not requiring additional support tend to receive softer, more responsive policy instruments (Koski & Manson, 2024). This approach is relevant to the context of halal tourism in Muslim-majority regions, where governments assume that tourism services are naturally halal and do not require additional complex regulatory instruments. In this context, policy design tends to be symbolic rather than instructional (Bovens & 't Hart, 2016).

Bandung Regency provides an analytically valuable case for examining this unresolved mechanism. As one of the earliest local governments in Indonesia to enact a formal Halal Tourism Regulation (Regional Regulation No. 6/2020), Bandung was expected to institutionalize halal tourism governance through regulatory intervention. Yet nearly five years after its enactment, no implementation regulation had been issued, no budget had been allocated, no implementing organization had been established, and no substantive implementation program had been initiated. Rather than representing a conventional case of unsuccessful implementation, Bandung illustrates a more fundamental phenomenon in which a formally enacted regulation remains institutionally dormant. This makes the case well suited to investigating how deficiencies embedded in policy design generate implementation failure before activities can even begin.

This article argues that policy design deficiencies should not be understood as directly determining implementation outcomes. Rather, evidence from the Bandung case suggests that the absence of capacity building, commitment-building, and clear signaling provisions is associated with a condition of hollow governance, characterized by an institutional vacuum, unclear administrative authority, and limited implementation infrastructure. Within this condition, policy ambiguity and uncertainty appear to have constrained the ability of implementing actors to translate formal legal objectives into concrete administrative action. The study therefore interprets the relationship between

policy design and implementation non-initiation as an indirect and contingent process rather than a deterministic causal sequence.

2. Materials and Methods

A qualitative case study analysis has been used to explore the regulation's nature, its design components, and the policy environment surrounding its implementation (Creswell & Creswell, 2017). The analytical framework is derived from Peter J. May's (2012) theory of policy design, which identifies three categories of design provisions essential for implementation: capacity building, commitment-building, and signaling. These categories were used as structured analytical lenses throughout data collection and analysis. Bandung Regency was selected as a critical case because it was among the earliest subnational governments in Indonesia to formally enact a halal tourism regulation, yet the policy has not progressed beyond its juridical existence. As of December 2024, no implementing Regent Regulation, budget allocation, or formal programmatic activity implementing Regional Regulation No. 6/2020 had been identified. The media review was subsequently extended through December 2025. This review did not identify evidence that the implementation architecture had changed: no implementing Regent Regulation, dedicated implementation program, or dedicated halal-tourism budget allocation was identified through to the end of the media review period. Accordingly, the finding of non-implementation refers to the absence of dedicated implementation architecture for Regional Regulation No. 6/2020, rather than an absence of general tourism activity in Bandung Regency.

Data were collected from three primary sources: (1) policy and administrative documents, (2) media coverage and secondary materials, and (3) in-depth interviews. Rather than treating these materials independently, the study analytically examined discrepancies among sources. The study considered claims robust only when supported by at least two independent sources of evidence. The documentary corpus included the Academic Draft of the Bandung Regency Halal Tourism Regional Regulation, Bandung Regency Regional Regulation No. 6/2020, relevant Ministry of Tourism regulations and guidelines, and DSN-MUI Fatwa No. 108/DSN-MUI/X/2016. The media component is described here as supplementary media tracking.

Ten interviews were conducted between May and October 2024: one representative of the Bandung Regency Government responsible for tourism (GOV-01), one representative of the Bandung Regency Regional People's Representative Council (LEG-01), two academics (ACA-01 and ACA-02), one mosque-based community/organizational informant (COM-01), four tourism-business representatives affiliated with the Indonesian Hotel and Restaurant Association, including its chair and vice-chair (BUS-01 to BUS-04), and one local media representative (MED-01). The sample was purposive and designed to capture institutional perspectives relevant to the formulation, implementation, or public discussion of Regional Regulation No. 6/2020, as shown in Table 2. Because government representation consisted of one tourism official, claims about bureaucratic behavior are limited to the evidence and perspective available from GOV-01 and are not presented as representative of the entire Bandung Regency bureaucracy.

Table 2. Informant

Code	Stakeholder perspective	n	Analytical use
GOV-01	Bandung Regency government	1	Implementation authority and administrative interpretation
LEG-01	Regional legislature	1	Legislative/political perspective
ACA-01–02	Academics	2	Contextual and interpretive perspectives
COM-01	Mosque-based community/ organizational informant	1	Specific organizational perspective; not community representation
BUS-01–04	Tourism businesses	4	Business incentives, guidance, and perceived market effects
MED-01	Local media	1	Public discourse and implementation reporting

Given the small and heterogeneous sample and the deductive use of May's framework, we do not claim thematic saturation in the strong sense of exhaustive saturation across all stakeholder categories. Instead, the interviews were assessed for analytical sufficiency within the three predefined dimensions. Later interviews largely confirmed previously identified issues rather than generating a new design dimension. This convergence supports the adequacy of the available material for the case analysis, while the limited number of participants, especially government actors, remains a limitation of the study. The

authors conducted all interviews in Bahasa Indonesia. Quotations were translated into English by the authors, prioritizing semantic rather than literal equivalence. Participants were informed of the study purpose, the voluntary nature of participation, and their right to decline questions or withdraw. Verbal informed consent was obtained before interviews. Participants are identified by anonymized codes throughout the revised manuscript.

Data analysis followed a deductive–dominant coding strategy based on May's three design provisions. The coding process involved three stages. First-cycle coding: Segments of documents, interviews, and media texts were coded under the three primary provision categories of capacity building, commitment-building, and signaling. Second-cycle coding: Subcategories were developed within each provision (e.g., "absence of implementation regulation," "no budget allocation," "no incentive mechanism," "terminological ambiguity"). Third-stage pattern/theoretical synthesis compared these subcategories across sources and asked whether the same empirical condition appeared in more than one source. The synthesis then separated three analytical levels: (a) observed conditions, such as absence of a Regent Regulation or dedicated program; (b) participant-reported interpretations, such as uncertainty about the basis for action; and (c) researcher-level theoretical interpretation, through which these patterns were organized into the concepts of hollow governance and interpretive paralysis. No numerical intercoder-agreement coefficient was calculated. Coding boundaries and interpretations were reviewed collaboratively within the research team, with disagreements resolved through discussion and consensus.

3. Results and Discussion

3.1. Absence of Capacity-Building Provisions

The findings indicate that the failure of Bandung Regency Regional Regulation No. 6/2020 cannot be explained simply by limited bureaucratic resources or administrative inefficiency. Rather, implementation had not substantively commenced because the regulation was enacted without the institutional capacity-building provisions required to transform legal objectives into administrative action. Consistent with May's (2012) policy design framework, effective implementation depends not only on the existence of legal rules but also on policy instruments that equip implementing actors with operational authority, organizational infrastructure, financial resources, and technical guidance. Across documentary analysis and interview data, these institutional foundations are largely absent. Consequently, implementation failure originated not during policy execution but within the policy design, creating what this study conceptualizes as an institutional vacuum, as illustrated in Figure 1.

The clearest institutional gap is the absence of a dedicated Regent Regulation to operationalize Regional Regulation No. 6/2020. The reviewed material and GOV-01 indicate that no such instrument was issued during the period examined. GOV-01 stated, "There is no Regent Regulation yet, so we have no basis to proceed. Everyone is still confused." The quotation is treated as evidence of actor-reported uncertainty, while the absence of the implementation regulation is treated as documentary evidence. Together, they support the narrower inference that lack of a derivative regulatory instrument was associated with uncertainty about how the policy should be activated; they do not establish that all bureaucratic actors shared the same view.

The absence of dedicated fiscal support is another indicator of the incomplete implementation surrounding Regional Regulation No. 6/2020. Since the regulation came into force, the documentary review did not identify a dedicated Regional Government Budget (APBD) allocation linked to halal-tourism implementation. No regulation-specific outreach activities, certification assistance, business training, or promotional programs funded through a dedicated allocation were identified in the materials reviewed. GOV-01 associated the absence of program activity with the lack of funding, stating, "The program is not being run because there is no budget…it's impossible for us to proceed without funding." This account is treated as evidence of the actor's reported understanding of a resource constraint rather than as proof of the institutional cause of an absent budget.

The available evidence does not permit reconstruction of the full local budgetary decision chain or establish that the absence of a dedicated allocation was directly caused by the design of Regional Regulation No. 6/2020. Rather, the regulation appears not to have established a sufficiently identifiable financing mechanism or implementation sequence that could clearly facilitate subsequent resource allocation. The finding is therefore interpreted as a design condition that may have constrained the translation of the regulatory mandate into resource planning, rather than as evidence that policy design directly caused the absence of budgetary allocation.

The COVID-19 pandemic provides an important alternative explanation for the limited fiscal support observed during the regulation's early period. The regulation was enacted in 2020, when tourism-related resources were subject to substantial disruption and competing recovery priorities. However, official regional planning data indicate that tourism remained an active budgetary domain after the acute pandemic period. In the Strategic Plan of the Bandung Regency Tourism and Creative Economy Office 2025–2029, the Performance Achievement and Budget section for 2022–2024 reports expenditures of approximately Rp34,61 billion in 2022, Rp29,66 billion in 2023, and Rp33,22 billion in 2024. These indicate that tourism remained an active budgetary domain even after the pandemic shock, although annual allocations fluctuated. Yet the reviewed documents and media materials through December 2025 did not identify a dedicated budget line, implementation plan, or implementation regulation for Regional Regulation No. 6/2020. The persistence of non-implementation therefore cannot be explained solely by temporary fiscal scarcity. Instead, it points to the absence of institutional arrangements capable of activating the regulation even when resources for general tourism activities were available.

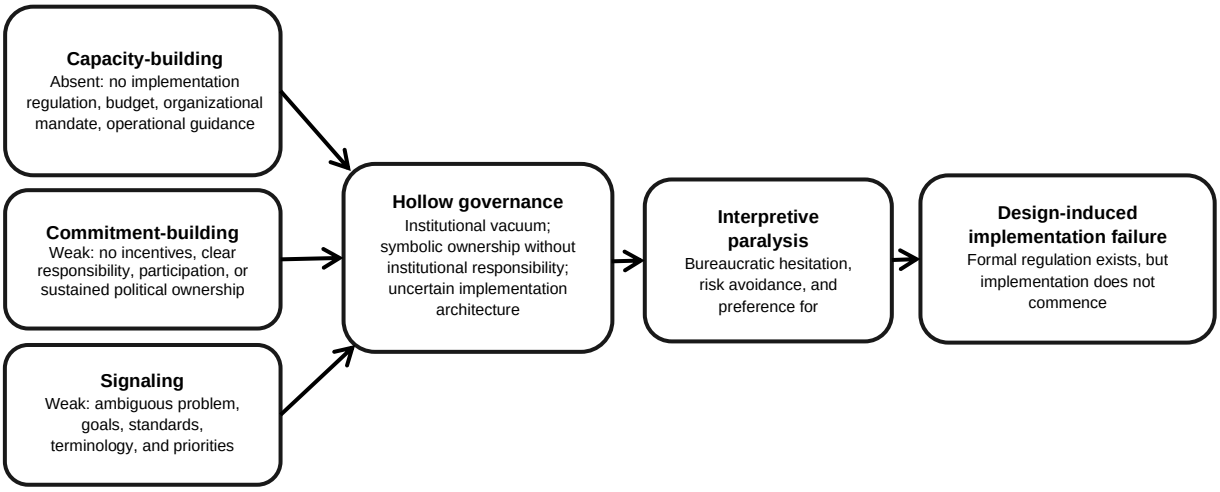


Figure 1. Proposed analytical framework of design-induced implementation failure.

Article 2 paragraph (2) of Bandung Regency Regional Regulation No. 6/2020 on Halal Tourism assigns responsibility broadly to regional agencies coordinated by the tourism office. The regulation does not specify organizational roles, inter-agency responsibilities, or coordination procedures with external institutions such as the Indonesian Ulema Council (MUI) or the Ministry of Tourism. Consequently, no organization perceived itself as possessing an operational mandate. Rather than creating a governance structure, the regulation distributed responsibility without defining accountability. As the tourism office representative indicated, halal tourism was not regarded as an institutional priority because no agency had been formally authorized to lead implementation. This reflects what May describes as a design void, where implementation structures are insufficiently specified to support policy execution. Capacity constraints also extend to private sector actors. No technical guidance, training program, or certification assistance mechanism linked to implementation was identified in the evidence reviewed. BUS-01 reported, "We were never given any halal tourism guidelines." This statement supports the conclusion that at least one organized business perspective experienced a lack of operational guidance. It should not, however, be generalized to every tourism business in Bandung.

Taken together, these findings demonstrate that the Bandung Halal Tourism Regulation was implemented in the absence of the institutional architecture required for administrative action. Missing derivative regulations deprived bureaucrats of legal authority, the absence of budget allocations eliminated operational resources, undefined organizational responsibilities weakened institutional accountability, and the lack of technical guidance prevented government agencies and businesses from developing implementation capabilities. Rather than representing isolated administrative shortcomings, these deficiencies interacted to produce an institutional vacuum—a condition in which a formally enacted policy exists without the governance infrastructure necessary for implementation. In this context, bureaucratic capacity was not inherently weak; rather, it remained structurally inactivated because the policy design failed to provide the institutional mechanisms through which existing administrative competence could be translated into implementation.

This finding extends May's policy design framework in an important way. While May (2012) argues that the absence of capacity building provisions increases the likelihood of implementation failure, the Bandung case demonstrates that these deficiencies first generate an institutional vacuum in which administrative action becomes practically impossible. Implementation failure therefore emerges not because bureaucratic actors lack competence, but because policy design fails to create the institutional conditions through which that competence can be exercised. Capacity, in other words, is not simply an organizational attribute but a policy-induced condition that must be deliberately constructed through design.

3.2. Weak Commitment-Building Provisions

Beyond the absence of capacity-building provisions, the findings demonstrate that Bandung Regency Regional Regulation No. 6/2020 failed to cultivate commitment among the actors expected to implement and support the policy. Within May's (2012) policy design framework, commitment-building provisions are intended to motivate organizations and stakeholders to invest resources, prioritize implementation, and sustain policy objectives over time. The Bandung case, however, reveals that commitment cannot simply be assumed because a regulation has been enacted. Instead, commitment must be institutionally constructed through incentives, responsibilities, participation, and political leadership. Across government agencies, tourism businesses, and local communities, these mechanisms were largely absent. As a result, the regulation generated symbolic acceptance as a legal instrument but failed to create institutional ownership among the actors responsible for its implementation.

The weakness of commitment-building provisions is most visible among tourism businesses. Although the regulation expected hotels, restaurants, and other tourism enterprises to adopt halal tourism standards, it provided no incentive structure capable of encouraging voluntary compliance. The policy neither offered financial assistance for halal certification nor introduced tax incentives, promotional benefits, market advantages, or other forms of institutional support that could offset the costs of compliance (Huda et al., 2024; Zainuri et al., 2025). Consequently, businesses interpreted halal tourism not as an economic opportunity but as an additional administrative and financial burden. BUS-01 reported that some members initially rejected the idea because they were concerned that the market could become narrower. Rather than reflecting ideological opposition to halal tourism, this response illustrates a rational economic calculation in which the expected costs outweigh the perceived benefits. In the absence of commitment-building provisions, the regulation failed to reshape this cost–benefit calculation, leaving businesses with little reason to participate voluntarily (Irwandi et al., 2025; Setiawati & Mastarida, 2024).

Commitment was equally weak within the local bureaucracy. Unlike effective implementation frameworks that assign explicit institutional responsibilities, measurable targets, and administrative accountability, Bandung Regency Regional Regulation No. 6/2020 provides no mechanism requiring government agencies to prioritize halal tourism implementation. Bureaucratic actors therefore faced neither political incentives nor administrative consequences for inaction. GOV-01 indicated that "the level of understanding and interest like in Bali is not yet felt," suggesting that halal tourism had never become an organizational priority within the local government. Leadership transitions further weakened continuity, as changing political priorities allowed the regulation to gradually disappear from the administrative agenda. Rather than producing sustained bureaucratic commitment, the policy became administratively peripheral because its design failed to embed implementation responsibilities within governmental institutions. As May (2012) argues, policies lacking commitment-building mechanisms are vulnerable to discretionary neglect when competing policy priorities emerge.

Weak commitment also extends to the broader policy environment. Documentary evidence and media reports indicate that local communities and tourists expressed little demand for formally branded halal tourism services. As one local media report noted, "not a single visitor or resident asked about halal certification." Moreover, tourism stakeholders were not meaningfully involved during policy formulation, nor were sustained communication campaigns undertaken to explain the policy's objectives or potential benefits (Hanafi et al., 2024). Consequently, the regulation failed to establish social legitimacy or collective ownership among the groups expected to support implementation. In a policy domain where consumer demand remained limited, public engagement should have functioned as a mechanism for generating commitment rather than merely responding to existing preferences. Instead, the regulation assumed stakeholder commitment without creating the institutional conditions necessary for it to emerge.

Taken together, the evidence suggests a combination of limited business incentives, weakly operationalized government responsibility, and limited visible demand or constituency building. These

conditions are consistent with weak commitment-building provisions in May's (2012) framework. More cautiously, they appear to have reduced the organizational ownership needed to move the regulation from formal adoption toward implementation. The evidence does not support a claim that stakeholder opposition was the principal cause of dormancy. Analytically, the case suggests that commitment-building is not only an attitudinal matter but can be institutionalized through incentives, responsibilities, participation, and sustained political ownership. The Bandung evidence illustrates a distinction between symbolic acceptance of a regulation and operational ownership of its implementation. This distinction contributes to the hollow governance concept by showing how formal legitimacy may coexist with weak organizational responsibility.

3.3. Weak Signaling Provisions

The preceding analysis identified incomplete capacity and weak commitment-building conditions. A further issue concerns signaling: the extent to which the regulation communicates what problem is being addressed, what actors should do, and how implementation should proceed. The evidence suggests that several aspects of the regulation were broad or insufficiently operationalized. We treat these features as possible contributors to interpretive uncertainty rather than as direct proof of a deliberate bureaucratic strategy. One signaling issue concerns problem definition. The regulation frames halal tourism as a means of developing tourism and improving services, while the available supporting material does not provide a detailed operational diagnosis of a service deficiency requiring intervention. Interview evidence also suggests limited visible demand for formal halal tourism certification among visitors. This combination may have weakened the perceived urgency of implementation. The inference is limited to problem-policy alignment; it does not establish that the policy problem was nonexistent.

Policy ambiguity was reinforced by the regulation's abstract formulation of objectives. Statements such as "developing halal tourism" and "improving competitiveness" express broad aspirations but provide little operational guidance regarding what constitutes successful implementation. The regulation establishes no measurable targets, implementation timelines, or sectoral priorities. More importantly, it fails to define essential operational concepts, including what qualifies as a halal tourism destination, which halal standards should be adopted, whether certification is mandatory or voluntary, and how compliance should be monitored. Business actors consistently reported that they had never received technical guidance regarding halal tourism implementation. As a result, implementers possessed no common reference point for translating policy objectives into administrative practice. Rather than reducing uncertainty, the regulation institutionalized ambiguity by leaving fundamental implementation questions unanswered. Consistent with previous implementation studies, high levels of policy ambiguity tend to discourage bureaucratic initiative because officials lack confidence that their actions will align with policy expectations.

Weak signaling also emerged through the regulation's use of the term "halal tourism." Although widely employed in national policy debates, the term carries social, political, and religious connotations that require careful communicative framing (Slamet et al., 2022). GOV-01 noted that the nomenclature "halal tourism" could evoke religious sensitivities. Yet the regulation offers no communication strategy capable of addressing these concerns. It neither frames halal tourism as an inclusive service quality initiative nor explains its relationship to hospitality standards that benefit Muslim and non-Muslim visitors. Consequently, ambiguity surrounding the policy's terminology increased reputational risks for bureaucrats and tourism businesses. Rather than actively promoting the regulation, stakeholders became increasingly cautious about publicly associating themselves with an initiative whose meaning remained contested. The regulation also provides limited directional cues about where implementation should begin. The evidence reviewed did not identify a dedicated implementation sequence, priority destinations, or a clearly articulated first-stage program linked to Regional Regulation No. 6/2020. The relationship between the local regulation and broader national halal certification system also required interpretation by actors. These gaps may have reduced the clarity of the first administrative steps available to implementers.

Taken together, these findings demonstrate that signaling provisions perform a far more consequential role than merely communicating policy objectives. In the Bandung case, weak problem framing, ambiguous goals, undefined operational standards, contested terminology, and the absence of implementation priorities interacted to produce pervasive policy ambiguity. Importantly, this ambiguity did not simply make implementation more difficult—it fundamentally altered bureaucratic behavior. Implementing actors were unable to determine what constituted appropriate administrative action, who possessed legitimate authority to act, or how implementation success would be evaluated. Under such conditions, administrative inaction became the safest organizational response. Rather than risking

procedural error, exceeding institutional authority, or allocating resources without clear legal justification, bureaucratic actors strategically chose not to initiate implementation.

This condition is conceptualized in this study as interpretive paralysis: an organizational state in which administrative actors suspend policy action because regulatory expectations remain too ambiguous to support legitimate decision-making. Interpretive paralysis should therefore not be understood as bureaucratic passivity or lack of motivation. Instead, it represents a rational institutional response to policy ambiguity, where non-action becomes a strategy for minimizing legal, political, and administrative risk. The Bandung case thus demonstrates that weak signaling provisions do not merely reduce implementation effectiveness; they reshape bureaucratic incentives in ways that make administrative non-action understandable and organizationally rational.

Theoretically, this finding refines May's policy design framework by specifying the cognitive mechanism through which signaling deficiencies evolve into implementation failure. While May argues that signaling provisions communicate policy direction, the Bandung case demonstrates that their absence generates interpretive paralysis among implementing actors. Consequently, implementation failure is not produced directly by weak policy design but emerges through an intervening process in which policy ambiguity reshapes bureaucratic decision-making.

3.4. From Policy Design Deficiency to Hollow Governance

The three design dimensions are analytically distinct but empirically interconnected. The evidence does not show that any single deficiency independently caused dormancy. Instead, the documentary and interview materials reveal a configuration in which missing implementation instruments, weakly specified ownership, limited incentives, and ambiguous signals coexisted. We term this configuration hollow governance because formal legal authority remained present while the institutional arrangements required to activate it were incomplete.

Hollow governance does not simply refer to weak governmental performance or limited administrative capacity. Rather, it describes an institutional condition in which formal legal authority exists without the organizational structures, financial resources, administrative responsibilities, political commitment, and interpretive guidance necessary to transform policy into collective action. In such circumstances, governance becomes largely symbolic: regulations are enacted, and policy objectives are formally declared, yet the institutional system required to operationalize those objectives never materializes. Consequently, implementation failure originates not at the execution stage but within the governance architecture established by the policy design.

The proposed mechanism is best understood as a sequential analytical pathway rather than a proven deterministic causal chain. The first stage concerns design conditions: the evidence identifies missing or weak capacity building, commitment-building, and signaling provisions. The second stage is the governance condition: these gaps coexisted with an incomplete implementation architecture, which is what we call hollow governance. The third stage concerns actor response: GOV-01 reported uncertainty about the basis for proceeding, while the absence of dedicated implementation activity is observable in the documentary record. The fourth stage is the outcome: implementation non-initiation or policy dormancy. This evidence-to-mechanism sequence is summarized in Table 3.

The Bandung case can be situated within the wider halal tourism literature, but the cross-national evidence is used here only as contextual comparison. Studies of Malaysia and Turkey describe stronger regulatory and institutional integration in particular settings, while research on Japan and South Korea emphasizes market-oriented approaches and challenges of institutional coordination and cultural adaptation (Aminah & Bhakti, 2023; Marlinda et al., 2021, 2023, 2025; Musthofa et al., 2023; Wajdi et al., 2026a; Wajdi et al., 2026b). These studies are not empirical evidence from Bandung and are not used to establish the mechanism proposed in this article. Bandung differs from these cases in institutional context, but the comparison should be read as contextual rather than causal. The Bandung evidence concerns a Muslim-majority Indonesian district where formal halal tourism regulation exists but dedicated implementation architecture remained incomplete during the study period. The contrast with Muslim-minority contexts is useful for showing that formal adoption and implementation can diverge under different institutional arrangements, but it does not demonstrate that the same mechanism operates identically across countries.

Within the Bandung case, administrative non-action should be interpreted cautiously. The documentary record establishes non-initiation, while GOV-01 reports uncertainty about the basis for proceeding. These data are compatible with the interpretation that institutional uncertainty constrained action, but they do not establish that non-action was consciously selected as a risk minimization strategy. The revised argument therefore treats constrained interpretation as a plausible mechanism rather than a

demonstrated intention. These findings extend May's (2012) policy design framework in several important respects. May argues that effective implementation depends on the presence of capacity building, commitment-building, and signaling provisions. The Bandung case confirms the importance of these three policy design elements but further demonstrates that their absence does not translate directly into implementation failure. Instead, policy design deficiencies first generate an intervening governance condition characterized by institutional vacuum, symbolic ownership without institutional responsibility, and interpretive paralysis. Only through this intervening condition do policy design deficiencies ultimately evolve into implementation failure.

Table 3. Empirical Evidence and Theoretical Mechanisms

Empirical evidence	Evidence source	Observed empirical condition	Actor-reported interpretation	Analytical mechanism	Theoretical outcome
No implementing Regent Regulation identified through the study period	Regional Regulation No. 6/2020; administrative/ documentary review; GOV-01	The formal regulation exists, but no derivative regulation operationalizes its provisions	GOV-01 stated that without a Regent Regulation, there was "no basis to proceed" and actors remained confused	Formal authority is not translated into an operational rule for administrative action	**Hollow governance**
Responsibility is broadly assigned to regional agencies coordinated by the tourism office	Regional Regulation No. 6/2020; GOV-01	Formal responsibility exists, but operational accountability and coordination procedures remain insufficiently specified	GOV-01 indicated that no agency had been formally authorized to lead implementation	Distributed responsibility without clear operational ownership weakens institutional activation	**Hollow governance**
No dedicated halal tourism budget allocation identified	Regional budget/planning documents; media tracking	General tourism expenditure continued, but no dedicated implementation allocation for Regional Regulation No. 6/2020 was identified	GOV-01 associated the absence of program activity with lack of funding	The regulation did not provide a clearly identifiable financing mechanism that facilitated subsequent resource allocation	**Incomplete implementation architecture**
No specific technical guidance, training, or certification-assistance mechanism identified	Documentary review; BUS-01	Implementing businesses lacked evidence of regulation-specific operational guidance	BUS-01 reported that businesses had not received halal tourism guidelines	Formal regulatory objectives were not translated into operational guidance for non-state actors	**Hollow governance**
Ambiguity concerning the basis and direction of administrative action	GOV-01; regulatory documents	No substantive implementation activity was identified despite formal enactment	GOV-01 reported uncertainty about the basis for proceeding	Institutional incompleteness appears to constrain administrative interpretation	**Interpretive uncertainty**
Continued absence of implementation architecture through December 2025	Documentary review and supplementary media tracking	No implementation regulation, dedicated program, or dedicated budget allocation linked to Regional Regulation No. 6/2020 was identified	-	The governance condition persisted beyond the immediate post-enactment period	**Policy dormancy/ implementation non-initiation**

For halal tourism governance, the case indicates that formal regulation alone may be insufficient where implementation institutions, incentives, responsibilities, and operational signals are not assembled. This observation is consistent with, but does not by itself overturn, existing literature emphasizing regulation and certification. The contribution is to shift analytical attention toward the pre-initiation stage of implementation and the governance architecture surrounding formally adopted rules. The Bandung Regency case demonstrates that policy implementation is ultimately a governance

problem before it becomes an administrative problem. Policies do not fail merely because bureaucrats lack competence or because stakeholders resist implementation. They fail when policy design is unable to construct the institutional architecture through which collective action becomes possible. Hollow governance therefore represents the critical missing link connecting policy design deficiencies with implementation failure. By specifying this mechanism, the study contributes not only to policy implementation scholarship but also to broader debates on governance design in emerging policy domains such as halal tourism.

4. Conclusion

This study set out to explain why Bandung Regency Regional Regulation No. 6/2020 has remained unimplemented despite being formally enacted for almost five years. Drawing on Peter J. May's policy design framework, the findings demonstrate that implementation failure cannot be attributed solely to bureaucratic performance or stakeholder resistance. Instead, the regulation lacked the capacity-building, commitment-building, and signaling provisions necessary to construct the institutional conditions for implementation.

The study further demonstrates that these policy design deficiencies interact cumulatively rather than independently. The absence of capacity-building provisions created an institutional vacuum, weak commitment-building provisions generated symbolic ownership without institutional responsibility, and weak signaling provisions produced interpretive paralysis among implementing actors. Together, these conditions formed a state of hollow governance in which formal regulation existed without the governance architecture required to transform legal authority into collective administrative action.

Theoretically, the study extends May's policy design framework by identifying the Hollow Governance Mechanism of Design-Induced Implementation Failure. Rather than assuming a direct relationship between policy design deficiencies and implementation failure, the findings demonstrate that governance conditions mediate this relationship. Policy design influences bureaucratic behavior indirectly by shaping institutional capacity, organizational ownership, and interpretive certainty. This conceptual mechanism contributes to implementation theory by providing a more explicit explanation of how design deficiencies evolve into administrative non-action.

From a policy perspective, the findings suggest that future halal tourism regulations should move beyond symbolic legal adoption toward the deliberate construction of governance architecture. Regulatory success depends not only on formal legal authority but also on derivative regulations, organizational mandates, sustainable financing, stakeholder incentives, communication strategies, and operational guidance. These elements should be embedded during policy design rather than developed after enactment. Although the analysis is based on a single case, the proposed mechanism provides an analytical framework that may be examined in future studies across other policy sectors and governance contexts.

This study has several limitations. First, it examines one regional regulation in one district, so the proposed mechanism should be treated as an analytical explanation rather than a universally generalizable model. Second, only one tourism-government official was interviewed; consequently, claims about bureaucratic behavior are limited to that informant's institutional perspective. Third, the heterogeneous and relatively small sample does not justify a strong claim of thematic saturation. Fourth, the available research record does not contain complete platform-level metrics for the media search, so the media component is more appropriately described as a targeted review. Fifth, the available evidence cannot fully reconstruct the local budget-programming chain, so the absence of a dedicated budget is not interpreted as direct proof of design failure. Future research should compare multiple regions and include several implementing officials, budget actors, and longitudinal administrative records to test the proposed mechanism more rigorously.

CRediT Authorship Contribution Statement

Muhammad Arfi Hatim: Conceptualization (lead); Methodology (lead); Writing – original draft (lead); Formal analysis (lead). **Andy Fefta Wijaya:** Conceptualization (equal); Writing – review and editing (equal); Supervision (lead). **Firda Hidayati:** Conceptualization (equal); Writing – review and editing (equal); Supervision (equal). **Rahmat Husein Andri Ansyah:** Methodology (equal); Writing – review and editing (equal); Conceptualization (supporting).

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