

A large, stylized graphic of an arrow pointing right, composed of several overlapping segments in yellow, orange, and red, with a light teal outline. The arrow is positioned on the left side of the cover, pointing towards the right.

Working Paper 167

# Between God, the People, and the State: Citizen Conceptions of Zakat

Max Gallien, Umair Javed  
& Vanessa van den Boogaard

May 2023

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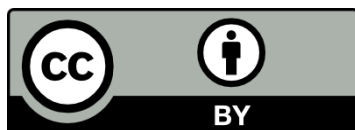
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Max Gallien, Umair Javed, and Vanessa van den Boogaard

## Summary

The global pool for zakat – one of the five pillars of Islam mandating an annual payment typically equivalent to 2.5 per cent of an individual's productive wealth – is estimated to make up between USD 200 billion and 1 trillion. States have long sought to harness zakat for their own budgets – and legitimacy. To date, however, there has been no systematic empirical discussion of how citizens perceive and engage with state involvement in zakat and how they perceive state-run zakat funds. These perceptions and experiences are central to important questions of how we conceptualise fiscal transfers and the relationship between citizens and states: if it is legally treated as one, does zakat function like a tax? Do citizens engage with it differently? Does its formalisation strengthen or undermine the social norms in which it is embedded?

This paper provides, to the best of our knowledge, the first comparative analysis of how citizens in Muslim-majority countries conceptualise zakat, attempting to situate it between religion, charity, and the state. We do so in the context of three lower middle-income countries (LMICs) – Morocco, Pakistan, and Egypt – representing variation in state involvement in zakat, relying on nationally representative surveys covering 5,484 respondents, of whom 2,648 reported that they had paid zakat in the preceding 12 months.

Despite heterogeneity in state practice across the three countries, and in contrast to our expectations, we find commonalities in how citizens perceive zakat. Across our cases, citizens understand zakat as existing beyond the state, even where the state is involved in zakat administration and enforcement. Rather than viewing it as a legal obligation akin to taxation or merely as a charitable payment, Muslims across diverse religious and institutional contexts predominately conceive of zakat as a form of informal tax, rooted in social pressures and sanctions in the afterlife, but existing beyond the limits of state authority. This has important conceptual implications for the study of public finance, which has been predominately state-centric, while suggesting that there are clear limits to states' ability to harness zakat payments into public finance systems. It also suggests clear limits to the ability of states to 'harness' zakat as a fiscal tool through centralised administration or mandated enforcement.

**Keywords:** zakat, taxation, informal tax, state, Pakistan, Egypt, Morocco.

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# Contents

Summary	3	
Acknowledgements	5	
Acronyms	5	
<b>Introduction</b>	<b>6</b>	
<b>1 Zakat: theological and theoretical foundations</b>	<b>8</b>	
<b>2 Research design</b>	<b>10</b>	
<b>3 Data</b>	<b>12</b>	
<b>4 The state of zakat</b>	<b>13</b>	
<b>5 The state in zakat</b>	<b>15</b>	
<b>6 Zakat beyond the state</b>	<b>22</b>	
<b>7 Conclusions</b>	<b>25</b>	
<b>Appendix</b>	<b>28</b>	
<b>References</b>	<b>31</b>	
<b>Tables</b>		
Table 1	Distribution of state involvement in zakat in a selection of Muslim-majority countries	11
Table 2	Sample size	13
Table 3	Case selection	29
Table 4	Descriptive statistics	29
<b>Figures</b>		
Figure 1	Reported zakat, sadaqah, and tax payment	14
Figure 2	Recipients of zakat payments	16
Figure 3	Hypothetical distribution of zakat payments	17
Figure 4	Willingness to contribute to the state fund	18
Figure 5	Fairness perceptions of zakat	19
Figure 6	Importance of knowing zakat recipients	20
Figure 7	Who should have primary responsibility to organise zakat?	21
Figure 8	Ease of evasion	22
Figure 9	Justifying non-payment	23
Figure 10	Reasons for non-payment	24
Figure 11	The government can be trusted to collect taxes fairly	30

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# Acronyms

CATI	Computer-assisted telephone interview
EGP	Egyptian Pound
LMIC	Lower middle-income country
MAD	Moroccan Dirham
PKR	Pakistani Rupee

# Introduction

Zakat, one of the five pillars of Islam, likely represents one of the largest redistributive measures across the globe. Defined by Islamic scripture, interpretation, and practice, it typically requires the annual payment of 2.5 per cent of productive wealth over a certain threshold. Although precise estimates of the volume of zakat paid every year are difficult to come by, the annual global zakat pool is estimated to make up between USD 200 billion and 1 trillion (Rehman and Pickup 2018). It makes up significant parts of the total social spending in many Muslim-majority countries and potentially rivals global overseas development aid in its size.<sup>1</sup>

Given these figures, it comes as no surprise that states have long sought to harness zakat for their own budgets – and legitimacy. Over two dozen Muslim-majority countries have already set up state-administered zakat funds, some of which they have legally mandated their citizens to pay into. Especially in the context of fiscal pressures after the Covid-19 pandemic, more states are looking to zakat as a way to fund public goods. For example, during the electoral campaign of 2021, the Moroccan prime minister proposed a new state-run zakat fund, with revenues earmarked for public health resources (RNI 2021), arguing that the state would be able to provide a more efficient and trustworthy administration of zakat payments (Gallien, Remmal, Javed and van den Boogaard 2021). Similarly, in late 2022 Mauritania also begun setting up a state fund. A range of academic and policy literature has speculated that states can play a role both in improving the efficiency of zakat administration, increasing its distributional reach or drawing on zakat funds to support redistributive policies (Owoyemi 2020; Shaikh 2016). In a sense, states leveraging zakat practices could be framed as a form of ‘development with the grain’ (Kelsall 2011; Booth 2011), with states drawing on deeply embedded informal institutions to support redistribution and social welfare provision.

What is curiously absent, however, is any systematic empirical discussion of how citizens perceive and engage with state involvement in zakat, how they perceive state funds, and how this relates to the feasibility of states ‘harnessing’ zakat. And yet zakat relates directly to important questions of how we conceptualise fiscal transfers and the relationship between citizens and states: if it is legally treated as one, does zakat function like a tax? Do citizens engage with it differently? Does its formalisation strengthen or undermine the social norms in which it is embedded? Given its magnitude, scope, and relationship to contemporary states, it is surprising how little attention zakat has received as a topic of study within political science and development studies. While there is a long-standing discussion on zakat and states in Islamic jurisprudence, the evidence base on its practice is extremely sparse. In focusing on zakat practice, we build on work that focuses on ‘real governance’ and the lived realities of institutions of public finance and giving (e.g., van den Boogaard 2020; van den Boogaard, Prichard and Jibao 2019; Titeca and De Herdt 2011).<sup>2</sup>

A key contribution of this paper is the novel and comparative empirical data upon which our analysis relies, representing, to the best of our knowledge, the first large-scale, comparative analysis of citizens’ experience and perceptions of zakat. We draw on three nationally representative surveys conducted simultaneously in 2020 and covering 5,484 respondents,

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<sup>1</sup> According to a study in Indonesia, Malaysia, Qatar, Saudi Arabia and Yemen, state funds in these countries alone collect at least USD 5.7 billion every year through zakat, while the global volume of zakat surpasses tens of billions of dollars (Stirk 2015). In Pakistan alone, it is estimated that zakat was equal to 1.5 per cent of gross domestic product (GDP) in 2012 (Hasan 2015).

<sup>2</sup> This motivation to focus on citizens’ experience and perceptions closely mirrors motivations to understand informal taxation. While informal taxes are not defined by the state as taxes, people experience them as such; accordingly, they need to be considered in order to understand tax burdens and the overall fairness of the tax system (van den Boogaard *et al.* 2019). Conversely, though state practice defines zakat as a tax, we argue that it is necessary to understand how citizens perceive it.

of whom 2,648 reported having paid zakat in the past 12 months.<sup>3</sup> This allows us to compare zakat practices and perceptions in three Muslim-majority Sunni lower middle-income countries (LMICs): Morocco, Pakistan, and Egypt. Besides covering about 20 per cent of the global Muslim population (Lipka 2017; World Bank 2020b) they contain critical variation in state involvement in zakat. In Pakistan, the state enforces zakat payment and has a state fund to which citizens can give their zakat payment; in Egypt, the state does not enforce zakat, but has a state fund to which citizens can voluntarily give their zakat payments. In Morocco, the state is involved in neither enforcement nor collection and distribution through a state fund, though it is planning to set up a fund in the future.

Despite the heterogeneity in state practice across the three countries, and in contrast to our expectations, we find commonalities in how citizens perceive zakat. Across our cases, citizens understand zakat as existing beyond the state, even where the state is involved in zakat administration and enforcement. Rather than viewing it as a legal obligation akin to taxation or merely as a charitable payment, Muslims across diverse religious and institutional contexts predominately conceive of zakat as rooted in social pressures and sanctions in the afterlife, existing largely beyond state authority.<sup>4</sup> Most people pay zakat to their social relations rather than institutions and purposefully organise their payment so as to circumnavigate state structures, with state sanctions not shaping their reasons for payment. This holds true even in Pakistan, where zakat is legally enforced similarly to a tax.

Our findings suggest that there are clear limits to the ability of states to ‘harness’ zakat as a fiscal tool through centralised administration or mandated zakat enforcement. Where they do exist in our case studies, state-run zakat funds perform extremely poorly. In Egypt, fewer than 15 per cent of respondents report having contributed to the state fund; in Pakistan this number is less than 5 per cent. We suggest that this is in part because of limited trust in the state; citizen conceptions about zakat and its redistributive role; and the relatively limited reach of state-led zakat mandates. These findings both provide practical indications of the role that state zakat funds can likely play and deepen our conceptual understanding of zakat and the role of the state in contemporary Muslim societies, through the ways in which citizens perceive of state and religious authority.

Critically, our findings also speak to broader discussions of the politics of taxation, religion, and redistribution by highlighting a critical limitation in how we typically analyse and categorise redistributive payments. We note that contemporary approaches to public finance are excessively state-centric. In contexts where zakat is an obligatory payment that is collected and distributed by the state, such as Saudi Arabia or Pakistan,<sup>5</sup> zakat not only looks like a tax: it is a tax according to common categorisations in political science or economics. Similarly, in countries with no state interference, like Morocco, it fits the definition of charitable giving. However, as we demonstrate, both categorisations are incomplete and do not adequately capture what zakat actually represents and how citizens engage with it in practice. We believe that this points to a wider inadequacy in how we categorise redistributive payments – namely, that they are categorised primarily in relationship to the role of the state. We argue that the case of zakat illustrates the need to look beyond the state, focusing instead on both formal and informal systems of public finance and the lived experiences, everyday realities, and perceptions of citizens, which should be more central in how we categorise and analyse redistributive payments.

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<sup>3</sup> Within Islamic scholarship, there is a long-standing debate on what zakat represents (Al Qardawi 1973); we do not seek to engage in this discussion, or to make any normative or theological contributions. Instead, we seek to conceptualise zakat based on how it manifests in practice across the world today and how citizens themselves understand the obligation.

<sup>4</sup> Benthall (1999) explores the ‘moral imperatives’ imposed by zakat and alms giving.

<sup>5</sup> Saudi Arabia, for instance, combines the administration of zakat and tax through the Zakat, Tax and Customs Authority (ZATCA n.d.), while in Pakistan, the state automatically deducts zakat from bank accounts (Shaikh 2015).



The remainder of this paper is structured as follows: Section 1 considers the theological and theoretical foundations of zakat and perspectives on how it relates to taxation, informal taxation, charity, and the state. Section 2 describes the research design and context of the case studies, while Section 3 outlines the data upon which we rely. Section 4 considers the state of zakat payment in Egypt, Morocco, and Pakistan, presenting an empirical overview of reported zakat payment in relation to tax and sadaqah. Section 5 then considers the role of the state in zakat administration, exploring citizens' perspectives of state-run zakat funds and considering why existing state funds in Egypt and Pakistan perform poorly. Section 6 explores how citizens perceive and conceptualise zakat as an obligation in relation to other fiscal and charitable obligations. Section 7 concludes by summarising the key findings, discussing the theoretical and policy implications, and pointing to future avenues for research.

# 1 Zakat: theological and theoretical foundations

Zakat is one of the five pillars of Islam. The most common modern representation is an annual obligation to pay 2.5 per cent of total productive wealth above a defined eligibility threshold (nisab). The Quran mentions zakat 30 times and contains multiple exhortations to give it, such as through the command to 'establish prayer and give zakat' (Quran 2:110). Zakat is theologically described in the Quran as an entitlement of the poor on the wealth of those who are well-off, and as a system that allows contributors to purify their belongings through almsgiving (Quran 9:103). Payments to the poor and community institutions are common in monotheistic religions: tithing in Christianity and maaser in Judaism require the provision of 10 per cent of either income, profits, or agricultural yields for charitable purposes, under religious or legal obligation.

If, how and when zakat should be treated or defined in relationship to taxation is an ongoing discussion within Islamic jurisprudence to which this paper does not seek to contribute. However, within political science categorisations, a discussion of zakat in relationship to tax and charity is possible. Here, the conceptualisation of zakat generally starts with the question of whether it is mandatory and enforced by the state (Powell 2009). Tax is commonly defined as a mandatory unrequited payment codified in state law and paid to the government.<sup>6</sup> In instances where zakat is legally mandated or collected by state agencies, it is thus often conceptualised as a tax (e.g., Djatmiko 2019; Evans, Harkness and Salomon 2020; Powell 2009).<sup>7</sup> For example, Evans and Khan (2022) classify zakat as a formal tax where it is paid to state organisations. Noting the progressivity of the rate, it is often seen to fit a definition of a wealth tax (e.g., Kuran 2020), while in some countries, including Kuwait, non-Muslims likewise have to pay, making it even more conceptually like a tax. Accordingly, some treat tax and zakat as interchangeable, with the idea that they are substitutes and should be treated the same. For instance, Djatmiko (2019) refers to the payment of both tax and zakat as 'double taxation', making the case that zakat should be deducted from income tax returns – not because it is like a form of charity, but because it is equivalent to a tax.<sup>8</sup> Notably, taxation in itself is a broad category. Categorising zakat as a tax still requires a recognition of zakat as a particular public finance instrument, given that revenues are earmarked for particular

<sup>6</sup> The OECD (n.d.), for example, defines tax as 'a compulsory unrequited payment to the government'.

<sup>7</sup> As described by Lorenz (2013: 7), 'Zakat and taxes have certain similarities. 1) In countries where Zakat is compulsory it is liable to be collected by force like tax, if the payer does not pay it willingly. 2) Zakat, like tax, is paid though there is no direct and equivalent economic benefit obtained by the payer; indirect the Zakat payer may expect return in the life hereafter and the tax payer may receive some public service from the state in return, but there is no direct correlation.'

<sup>8</sup> In several countries, including Sudan and Malaysia, zakat is deducted from income tax assessments or is associated with tax incentives, while in Saudi Arabia and Kuwait, zakat is fully integrated with income tax.

purposes and that citizens may sometimes have greater say in how revenues are spent.<sup>9</sup> And, of course, as with all formal taxes, enforcement of zakat may vary in practice, with taxation representing a less than mandatory obligation in cases where state capacity or will is weak.<sup>10</sup>

Distinct from formal taxes, meanwhile, informal taxes are neither sanctioned nor mandated by state law, but are mandatory insofar as they are enforced through social institutions.<sup>11</sup> Indeed, informal payments 'are often subject to meaningful forms of enforcement and sanction, including through systems of fines, detainment, exclusion from essential services, social pressures, and ostracism from socioeconomic networks', with these forms of enforcement distinguishing informal taxes from voluntary contributions or charity (van den Boogaard 2020: 57).<sup>12</sup> Accordingly, where there is meaningful non-state enforcement but no state role in collection, zakat has often been conceptualised as a form of informal taxation (e.g., Evans and Khan 2022; May 2013).<sup>13</sup>

Categorically, this leaves charity, which is neither mandatory nor involving the state.<sup>14</sup> Typically, zakat is seen to be distinct from the Quranic command to give sadaqah, which refers to the non-compulsory act of charity in Islam. However, there are some Quranic interpretations of zakat that see it as voluntary (see discussion in Kuran 2020). Focusing on the relationship with the state rather than religious obligation, some have suggested that in many countries zakat falls under the common definition of charity, as payments are used to support those in need, without enforcement by state or non-state actors (see Bremer 2013). And akin to other charitable giving, in some contexts, including Bangladesh and Pakistan, zakat contributions are tax deductible.<sup>15</sup> Conceptually, there is often a fuzzy distinction made between zakat as an informal tax or a form of charity (see e.g., Evans and Khan 2022), while the voluntary nature of payment is often difficult to ascribe.<sup>16</sup>

States have long leveraged informal taxation and charity, though the implications of doing so for public finance analyses and citizen perceptions are underexplored. States often indirectly benefit from non-state fiscal flows, as they can relieve fiscal pressures on the state to deliver services, provide political benefits by reducing pressure to tax citizens, and result in service outcomes that may be attributed to the state (for a deeper discussion of this see van den Boogaard 2020 and van den Boogaard and Santoro 2022). Co-financing arrangements,

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<sup>9</sup> For example, in Kuwait, payments are collected by the state, but individuals have a choice in where the revenues go (Zakat House n.d.), which is, of course, unusual for tax payments.

<sup>10</sup> In such instances, 'formal tax payments may be flagrantly evaded without likely consequence, while any individual paying taxes is effectively doing so on a voluntary basis' (van den Boogaard 2020: 56).

<sup>11</sup> The most well-cited definition of informal tax conceptualises informal taxation 'as a system of local public goods finance coordinated by public officials but enforced socially rather than through the formal legal system' (Olken and Singhal 2011: 2; see also van den Boogaard 2020: 53).

<sup>12</sup> Enforcement in this category may vary considerably, with payments existing 'on a spectrum of compulsion and voluntarism', with enforcement existing on a spectrum of coercion and consent (van den Boogaard 2020: 56–58; van den Boogaard *et al.* 2019: 5); this recognises that no taxes are truly voluntary, but also that taxpayers do not simply pay as a result of being forced to, whether through armed force, as where non-state armed groups levy zakat, social sanction, or theological roots.

<sup>13</sup> While tithing can likewise be treated as an informal tax (e.g., Kauppinen 2020), some argue that Christian tithes are more like formal taxes due to the 'state-like' functions adopted by churches in some contexts (Freeman 2012; Piot 2012).

<sup>14</sup> Of course, the state may play a role in charity in various ways, including by regulating charitable organisations and providing tax deductions for charitable giving or organisations, with the Islamic waqf as a key example of state involvement in charity. A waqf is 'an unincorporated trust established under Islamic law by a living man or woman for the provision of a designated social service in perpetuity', and was a popular vehicle for the provision of public goods in the premodern Middle East (Kuran 2001: 842).

<sup>15</sup> The tax deductibility of zakat contributions highlights the challenge of categorising zakat in Pakistan's country context. On the one hand, tax offsets are associated with charitable giving, making zakat more like charity. However, given that zakat payments are also enforced on a number of financial instruments by the Pakistani state, it resembles a tax, with tax deductibility provided as a way of avoiding 'double taxation'. We are more partial to the latter interpretation.

<sup>16</sup> More generally, there is a fine line in classifying charitable versus obligatory giving, perhaps most famously illustrated by Mauss (1990: 3), who problematises the idea of free gifts or voluntary giving by recognising that such things are often reciprocated obligatorily.

relying on both informal and formal taxes, are common in low-income contexts, though states also implicitly rely on direct non-tax citizen contributions in high-income contexts when services are underfunded. This may be seen as a way of ‘working with the grain’ of informal institutions (Kelsall 2011; Booth 2011), though can also be seen as a failure of formal public finance and an unwillingness of the state to fill fiscal gaps through taxation. In relation to religious taxes, the state has long played a role in managing, collecting, and spending citizen contributions. In some countries – including Austria, Denmark, Finland, Germany, Iceland, Italy, and Sweden – the state plays a role in levying church taxes (Evans *et al.* 2020). As described above, the state plays a role in the administration of zakat in many countries around the world. How citizens view this state role and the associated levies remains an open question.

In the rest of the paper, we explore how zakat operates in practice across three Muslim-majority countries and, importantly, how citizens view it in relation to taxation, charity, and the state. Recognising the conceptual complexities of defining what zakat is, we follow existing studies of informal public finance institutions in not assigning *ex ante* designations of voluntarism or obligation – which risks romanticising certain activities and payments that individuals may have no choice but to comply with (van den Boogaard 2020: 57–58). Instead, we rely on citizens’ own views about how they perceive what is mandatory and situate these with common categorisations of zakat as tax or charity. We hypothesise that the practical context correlates with perceptions: that citizens may be particularly likely to view zakat as akin to an informal tax where it is seen as mandatory but is not enforced by state institutions, more like charity when it is seen as voluntary, and more akin to a form of formal taxation where the state plays a greater role in its administration.

## 2 Research design

In order to explore the state’s role in zakat administration and how it impacts citizens’ practice, experience and perception we have selected cases that capture variation in the state’s role in zakat management. Expanding on Powell (2009), we categorise state involvement in zakat along two axes, illustrated in Table 3.<sup>17</sup> First, we consider whether the state plays a role in the distribution of zakat through a state-administered zakat fund to which citizens can contribute their zakat payments.<sup>18</sup> We define a state fund as an institution for the distribution of zakat payments that is either located within or directed by a state institution or agency, or administratively and financially dependent on state institutions.<sup>19</sup> Second, we consider whether states are directly involved in enforcing zakat. Here, our threshold is whether states legally mandate and enforce zakat payments for their Muslim population, with enforcement mechanisms including, for example, collection from savings accounts. From this emerges four levels of potential state involvement, as summarised in Table 3: no direct state involvement, the presence of a state fund but the absence of state involvement in enforcement, and the presence of a state fund alongside state enforcement.<sup>20</sup> Hypothetically,

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<sup>17</sup> Powell (2009) categorises the role of the state into three types of arrangements: one in which states do not at all engage with zakat collection or distribution; one in which states seek to facilitate zakat distribution, for example through the setting up of state-run zakat funds; and one in which states directly enforce the collection of zakat and then arrange its distribution.

<sup>18</sup> There are other ways through which states can get involved in the distribution of zakat – for example through providing certifications for eligible zakat recipients. However, we have identified the creation of a dedicated state fund as a suitable step change in state involvement in distribution to divide our universe of cases along this line.

<sup>19</sup> We do not mean to imply that all state funds are similar – there are naturally differences in their organisational structure, system of distribution or political function. As (Kuran 2003: 200) notes, ‘In every country with a government-sponsored or government-operated zakat system (including Malaysia, Pakistan, and Saudi Arabia), rates, exemptions, collection methods, and disbursement patterns have varied over time; and variations across countries are sufficiently sharp to make one wonder whether the designers of the different systems were interpreting the same religion.’

<sup>20</sup> Due to recent political changes and volatility, we have not categorised Afghanistan, Yemen, Somalia and Syria in this table. We also recognise that in some contexts there may not be a uniform level of control of one set of state structures

there is a fourth type of state involvement, in which no state fund exists but zakat payment to non-state funds or recipients is mandated by law and enforced – for example through the provision of receipts – however, there are currently no countries that fall into this category.

**Table 3 Distribution of state involvement in zakat in a selection of Muslim-majority countries**

	Contributions enforced by state	Contributions not enforced by state
<b>State-run zakat fund</b>	Kuwait, Malaysia, Maldives, <b>Pakistan</b> , Saudi Arabia, Sudan, Libya	Algeria, Bahrain, Bangladesh, Brunei, Djibouti, <b>Egypt</b> , Indonesia, Iran, Iraq, Jordan, Kazakhstan, Kuwait, Mauritania, Oman, Palestine, Qatar, United Arab Emirates
<b>No state-run zakat fund</b>	n/a	Azerbaijan, Lebanon, <b>Morocco</b> , Tajikistan, Tunisia, Turkey, Senegal, Uzbekistan

We selected one country from each category, capturing variation in the role of the state in the administration of zakat. First, in Pakistan, zakat is both enforced by the state and the state runs a zakat fund.<sup>21</sup> The Ministry of Religious Affairs operates a Central Zakat Fund, which collects zakat and distributes revenue to provincial zakat councils, which in turn transfer the funds to district and local zakat councils, which are ultimately responsible for identifying eligible recipients in line with Islamic law and giving them transfers. Second, in Egypt, zakat payment is neither legally mandated nor enforced by the state, though there is a state-established zakat fund, known as Bayt al-Zakat or ‘House of Zakat’, which is an independent legal entity but closely tied to the politics of the Egyptian state.<sup>22</sup> The Bayt al-Zakat is tasked with distributing aid to the poor and the needy, while supervising mid-term and long-term livelihood/development projects.<sup>23</sup> The fund receives 15 billion Egyptian Pounds (approx. USD 949 million) annually and provides food and in-kind support, educational and medical assistance to those in need (Ameta and El Shafie 2015: 8).<sup>24</sup> Third, in Morocco, zakat donations are completely voluntary and managed by citizens and non-state organisations. There is no institutional mechanism for zakat collection and distribution; however, as noted above, the newly elected government is considering setting up a zakat fund.<sup>25</sup>

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across the territory. Kuwait has been included twice, both in the ‘contributions enforced’ and ‘not enforced’ categories, as payments are enforced for companies but not for individuals. While Mauritania has recently begun setting up a central zakat fund, this is ongoing so has not yet been included in this table.

<sup>21</sup> The ‘Zakat and Ushr Ordinance No. XVII of 1980’ promulgated by General Zia-ul-Haq’s regime, after the law was drafted by the Council of Islamic Ideology, brought zakat collection into the ambit of the state. The law lays down 11 kinds of assets on which the zakat deduction applies, exempting an equal amount. The law: Zakat and Ushr Ordinance, 1980 (National Assembly Secretariat 1980). Deductions are carried out on behalf of the state by organisations (banks, insurance companies, brokerage houses) with which assets are held and then routed to the state’s Central Zakat Fund.

<sup>22</sup> The fund is under the direct supervision of Al-Azhar’s Grand Imam. We recognise that, as across the Islamic world, the relationship between the Egyptian state and Egypt’s religious authorities has not been static and has seen shifts in the relative balance of power, especially in recent years. For the time being we categorise the Bayt al-Zakat fund to be sufficiently connected to the structures and politics of the Egyptian state to consider it a state fund. Furthermore, as Bremer (2013) notes, there are also other state-owned entities involved in zakat distribution in Egypt, including the Nasser Social Bank (Ahram Online 2014).

<sup>23</sup> Al-Azhar University/Mosque has played an important role in zakat collection and distribution for decades, issuing for example fatwas (legal opinions) on what items of wealth can be considered for zakat, or transferring zakat abroad. (UNHCR 2020).

<sup>24</sup> Throughout the paper, currency equivalents are calculated using the ‘Official exchange rate (LCU per US\$, period average’: <https://databank.worldbank.org/metadataglossary/world-development-indicators/series/PA.NUS.FCRF>

<sup>25</sup> The introduction of a centralised zakat system in the form of a Zakat Fund has been mentioned at different points in Morocco’s contemporary history. The government even passed legislation (Morocco Code 3.1/2.0.0.1.13.017) creating a Special Fund for Zakat in 1980. However, the fund was never implemented. The activation of the zakat fund was brought up again on several occasions in the past decade (Filali 2016) and is being discussed again in the context of the country’s economic response to the Covid-19 pandemic (Gallien *et al.* 2021; Hespress 2021).

Beyond this key variation, these countries share a range of features that make them broadly comparable: though Pakistan has a lower GDP per capita, all are lower middle-income countries; broadly autocratic; and Sunni-majority (Appendix, Table 3 Case selection).<sup>26</sup> In all three countries, non-state actors are active in the collection and distribution of zakat through charities and NGOs and there exists some form of state recognition for these organisations, especially with regards to their tax exemption and tax deductibility benefit status.

Nevertheless, some additional differences across the countries may affect their comparability. Primarily, while zakat exists across Sunni madhahib, or schools of thought within Islamic jurisprudence, our cases represent variation in jurisprudential differences (with Morocco mainly Maliki, Pakistan mainly Hanafi, and Egypt a mix), with these jurisprudential frameworks reflecting some difference in the interpretation and practice of zakat, including with respect to the threshold at which individuals are obligated to pay (the nisab). Eligibility for zakat is operationalised differently in the three countries, given that the nisab was originally denoted in both gold and silver. Since the days of the first Muslim community, however, the values for gold and silver have diverged significantly, providing two very different nisab values. In Pakistan, a predominantly Hanafi country, the silver nisab is generally used, which was 46,000 Pakistani Rupees (PKR) (USD 284.3) in 2020. In Egypt and Morocco, alongside most other madhahib, a nisab based on the gold value – and hence a higher threshold, is more common. In 2020, this was set at 87,000 Egyptian Pounds (EGP) (USD 5,506.33) in Egypt and 41,000 Moroccan Dirham (MAD) (USD 4,315.79) in Morocco. We have accounted for this difference in the analysis below.

### 3 Data

Given the enormous diversity in zakat practices both cross- and sub-nationally, systematic data on zakat is sparse. State funds typically only publish partial accounts, and themselves only represent a small fraction of total zakat payments. Some studies (e.g., Evans and Khan 2022; Shaikh 2015; Azam, Iqbal and Tayyab 2014; Lorenz 2013) try to estimate incidence and distributional impacts in single countries, though largely relying on pre-existing general-purpose surveys (e.g., demographic and living standards surveys) that do not capture citizen perspectives. Data on perception and decisions about recipients is rare; to the best of our knowledge, this study represents the largest and first cross-country data collection on attitudes toward zakat.

We ran nationally representative computer-assisted telephone interviews (CATI) of Sunni Muslim populations in all three countries in August–November 2020 (Table 4).<sup>27</sup> The surveys were conducted in Arabic and Urdu and include questions about the experiences and perceptions of zakat, taxation, and charity.<sup>28</sup> As noted above, the differences in the nisab

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<sup>26</sup> We have limited our selection to Sunni countries as ‘a basic difference between Sunni and Shi’i Muslims is that the latter do not recognize the right of an Islamic state to organize the compulsory levy of zakat which is often considered the core element of the Sunni system of taxation’ (Nienhaus 2006).

<sup>27</sup> We don’t expect that key conceptual questions about zakat (e.g., recipients of zakat, feelings about state-run zakat funds) to be affected by the outbreak of the Covid-19 pandemic. Questions about amounts paid may, however, be impacted, which we discuss further in Gallien, Javed and van den Boogaard (forthcoming). While phone-based surveys allowed us to collect data during the Covid-19 pandemic, there are limitations to this form of data collection. The methodological challenges inherent in CATI surveys are well established (Lavrakas 2008). The maximum length of phone interviews is often substantially more limited than other forms of surveys. The relatively focused nature of our survey overcame this challenge, with surveys taking about 15–25 minutes. Selection issues with phone-based surveys can likewise be more problematic than with in-person surveys. In our case study countries, reliance on phone-based surveys led to an under-representation of groups that are less likely to own phones or less likely to respond. This includes women; while our sample is balanced across men and women in Egypt and Morocco, only 16 per cent of respondents in Pakistan are women. However, detailed additional analysis of the data from Pakistan shows that this gender skew does not substantially influence our results. Results available upon request.

<sup>28</sup> For a more extensive description of the data collection and the dataset, see Appendix: Survey design and implementation. Appendix: Table 4 reports descriptive statistics of the sample.

between the three countries meant that a general population sample gave us a comparatively limited number of zakat-eligible respondents. This was particularly pronounced in Morocco. In order to ensure a sufficient sample of zakat-eligible respondents and zakat payers to allow us to explore whether their perceptions are markedly different, we supplemented these representative surveys in Egypt and Morocco with surveys of an additional 500 respondents who self-declared that they were eligible for zakat payment. We refer to these as the ‘additional eligible’ sample. We refer to the sum of the ‘additional eligible’ sample and those respondents from the general sample who self-declared as zakat eligible as the ‘zakat eligible’ sample. The slight differences in general sample sizes were driven by practical implementation constraints, while the choice to focus on CATI was also necessitated by Covid-19 safety protocols. We provide further information about the survey and its implementation in the appendix.

**Table 4 Sample size**

Dataset	Egypt: general	Egypt: additional eligible	Morocco: general	Morocco: additional eligible	Pakistan: general	Total
Observations	1,000	500	1,500	500	1,984	5,484
Of which reported to have paid zakat	773	445	172	425	833	2,648

Studies on payments like zakat and charitable giving need to account for social desirability bias – that is, misreporting by respondents who want to make themselves appear to comply with the social norms governing some behaviours and attitudes (Kreuter, Presser and Tourangeau 2008). This may affect our analysis in two main ways. First, there are well-established issues concerning accurate recall with asking respondents about charitable giving (Hall 2001; Kennedy and Vargus 2001) and good reasons to believe that people would over-report zakat payment. This primarily affects those questions that directly refer to payment, which we discuss in the relevant sections below. However, our argument primarily rests on perceptions of zakat, rather than an estimation of actual payments, and comparisons of perceptions across zakat and taxation between countries, which gives us reason to believe that differentials in bias are smaller than total bias. Second, there are well-established concerns about misreporting in questions regarding trust in the state, particularly in autocratic states, and consequently about state-run zakat funds. There is no way to eliminate these concerns in their entirety, and we have taken them into account in our interpretation of the data throughout – for example, by taking data on trust in state funds or payments to state funds as upper bound estimates.

## 4 The state of zakat

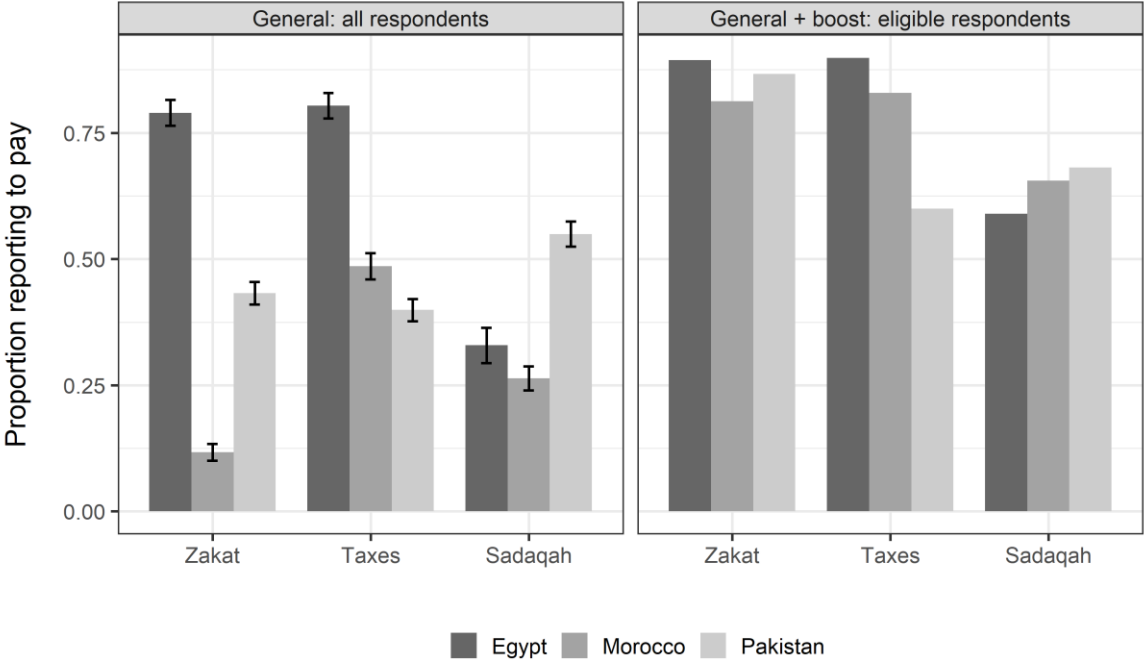
We begin by exploring reported zakat payment in Pakistan, Egypt and Morocco, alongside reported payment of tax and sadaqah over a specified threshold.<sup>29</sup> The left side of Figure 12 reports data for the total population, with zakat payments largely driven by the varying eligibility thresholds and levels of wealth across countries. Unsurprisingly, the comparatively high nisab threshold in Morocco produces the lowest level of recorded zakat payment in the population at large. The right side of Figure 12, meanwhile, considers only those

<sup>29</sup> Note that zakat as we capture it does not include zakat ul Fitr, a form of charity given specifically at the end of Ramadan to ensure that poor families can break the fast, or ushr, a levy on agricultural production. The sadaqah threshold used for each country is approximately 2.5 per cent of the nisab, or EGP 1,500, MAD 1,000, and PKR 1,600 – thereby being equivalent to the smallest mandatory zakat payment that could be obligatory in a particular context.

respondents above the relevant eligibility threshold, and is thus more instructive for understanding rates of payment among those that *should* pay zakat.<sup>30</sup> Here, the differences that are driven by country-level differences in wealth and nisab disappear, with greater similarities in payment across countries – despite the different role of the state in zakat administration and collection. Looking at the overall level in reported zakat payment of only the zakat-eligible population, we find remarkably high rates of reported zakat payment, surpassing 80 per cent in all countries. While our findings are in line with other studies of zakat giving,<sup>31</sup> this estimation is likely affected by some social desirability bias and consequently is best interpreted as an upper bound of zakat payment.

Most notably, however, the distribution of reported payment does not match the expectation of how the role of the state in zakat administration and enforcement should affect payment rates. Despite differences in the role of the state in zakat administration, the differences in payment levels among those who should pay are small, while the direction of these differences is also surprising. For one, payment is higher in Egypt than in Pakistan, despite the state only actively enforcing payments in the latter. Further, while zakat payment closely tracks tax payments in Egypt and Morocco, reported tax payment in Pakistan is substantially lower than reported zakat payment. And in Morocco, where there is no state role in zakat administration – that is, where zakat is more theoretically similar to charity – reported zakat payment is similar to tax payment and higher than charitable giving.

**Figure 12 Reported zakat, sadaqah, and tax payment**



Notes: Bars correspond to mean proportions of respondents in a given country that reported to have paid zakat, taxes and sadaqah, respectively, excluding missing responses. Missing responses and refusals to answer made up less than 2.5% of the total responses on zakat, less than 5% of responses on taxes, and less than 20% of responses for sadaqah. Accordingly, even if non-response is indicative of non-compliance, we do not expect our results to be unduly affected. The survey question for zakat asked: 'Have you paid zakat in the past 12 months?' The survey question for taxes asked: 'Does your household or business normally pay any taxes, fees or charges to the government?' The survey question for sadaqah asked: 'Aside from zakat, have you paid any sadaqah above the sum X this Ramadan?' 95% confidence intervals are based on standard errors for the proportion of payers in each country. Panel 'General: all respondents' is the representative sample of respondents, excluding the additional boost samples. Panel 'General + boost: eligible respondents' is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible. For the sadaqah threshold used see footnote 29.

<sup>30</sup> For a more systematic discussion of who pays zakat and the determinants of reported payment, see Gallien *et al.* (forthcoming).

<sup>31</sup> E.g., Evans and Khan (2022) estimate that 82 per cent of households pay religious taxes, though their definition of religious tax is not limited to zakat.

## 5 The state in zakat

A good starting point to discuss the role of the state in zakat is to examine how payments are made. While the theological foundations of zakat clearly specify eligible recipients of zakat donations (including the poor and needy, zakat administrators, debtors, recent converts, and stranded travellers),<sup>32</sup> there is no theological agreement on how the payment should be made and how its administration should be organised. As discussed above, our case studies differ in part in the heterogenous involvement of the state in the collection and distribution of zakat payments, with state funds mediating payments between donors and recipients in Pakistan and Egypt.

Figure 13 summarises the destinations of zakat payments. Once more, we would expect these results to vary with the degree of state involvement and the presence of a state fund. Once again, we find substantial commonalities across the three cases. Notably, where state funds exist, they perform poorly even where states actively enforce payment into them. In Pakistan, for example, only 5 per cent of respondents reported contributing to the state fund or having zakat deducted from their bank accounts. While striking, this is in line with existing data on the performance of the state fund in Pakistan, with, for example, Evans and Khan (2022) estimating that only 0.5 per cent of households pay religious taxes through the state-regulated zakat fund or similar organisations. In 2020, total zakat collection by the state-regulated zakat fund amounted to PKR 7.1 billion (approx. USD 44 million), or less than 0.1 per cent of total federal government revenue. Even though the Egyptian state has not made zakat payments into the state fund mandatory, and does not actively collect or enforce them, the Egyptian state fund performs substantially better than the Pakistani fund. Still, contributions are lower than could have been expected – just over 10 per cent of respondents who reported paying zakat paid any zakat to the Egyptian state fund, much fewer than gave directly to mosques, for example. Given the potential that there is social desirability bias toward the state fund in Egypt, we take this to represent an upper bound estimate.

Instead of state funds, the majority of zakat payments across all three countries are made not via any organisation, but directly to social relations: to people within people's neighbourhoods, tribes, kinship groups and extended families.<sup>33</sup> Notably, this preference for direct distribution of zakat to social relations is not just a feature of the preference of those who actually pay zakat. As described in Figure 3, when we asked non-payers how they would distribute a hypothetical zakat payment, a relatively similar pattern emerged: even if these individuals were eligible to pay, most of them would not pay to the state.

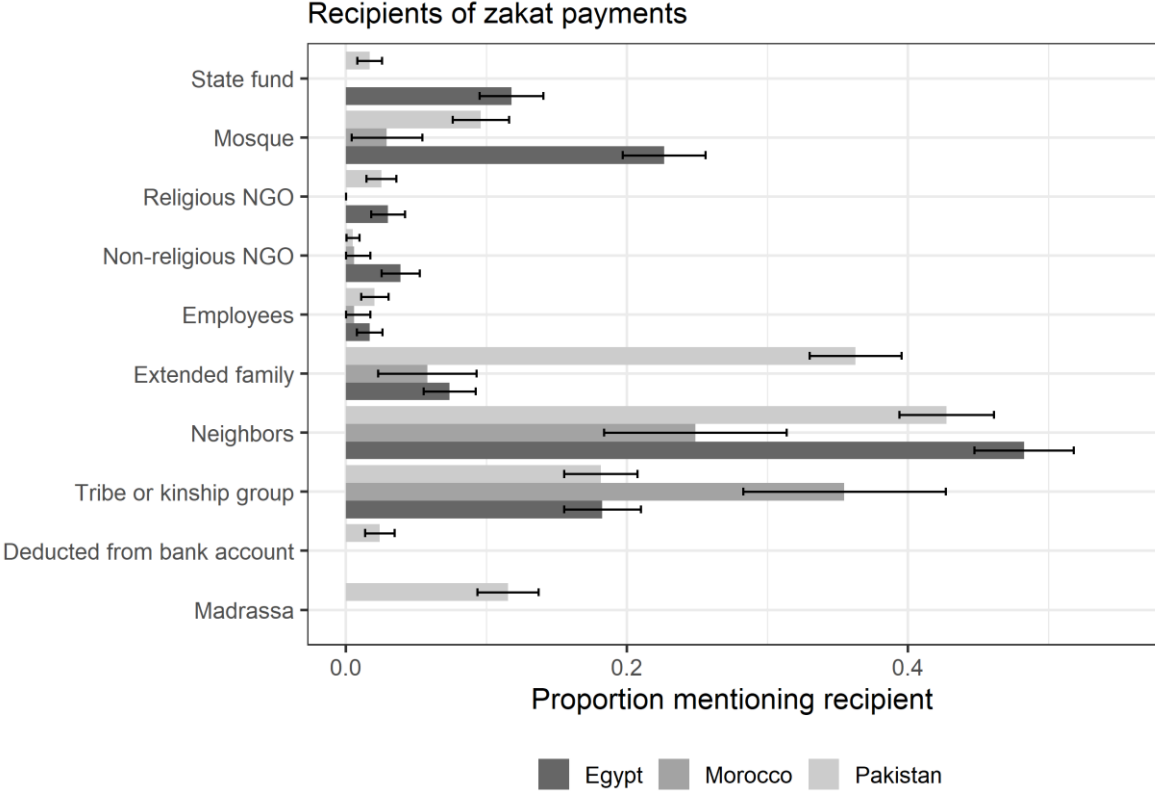
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<sup>32</sup> Quran 9:60: 'Indeed, [prescribed] charitable offerings are only [to be given] to the poor and the indigent, and to those who work on [administering] it, and to those whose hearts are to be reconciled, and to [free] those in bondage, and to the debt-ridden, and for the cause of God, and to the wayfarer. [This is] an obligation from God. And God is all-knowing, all-wise.'

<sup>33</sup> The most notable difference between the three countries appears to be the category of social relations that people prefer to pay zakat to, with 'people in the neighbourhood' particularly dominant in Egypt, and 'extended family' particularly notable in Pakistan.

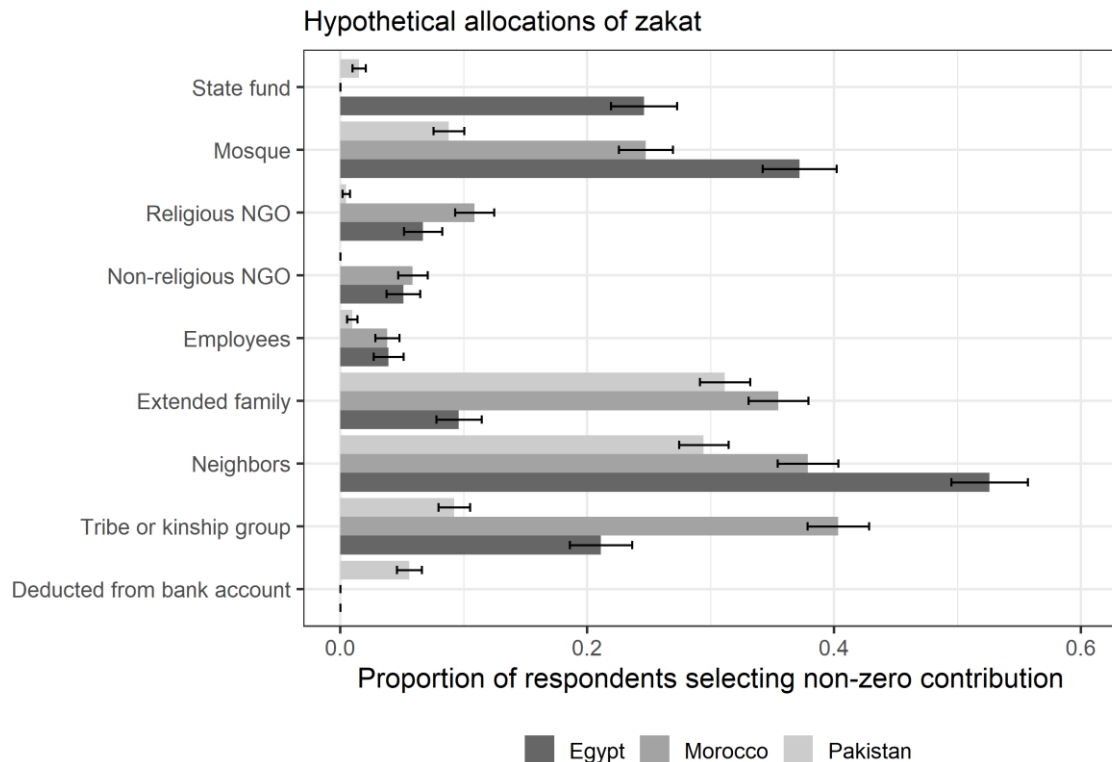


**Figure 13 Recipients of zakat payments**



Notes: Bars correspond to mean proportions of respondents in a given country that reported to have paid zakat towards a particular recipient, excluding missing responses. The survey question asked those who reported to have paid zakat: 'Which of the following have you paid to?' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Here we use the representative sample of all respondents, excluding the additional boost samples, without restricting to zakat-eligible respondents. In Morocco, respondents could only select one option while the question was multi-select in Pakistan and Egypt due to an administrative error. On average, in Egypt, respondents contributed to only one actor, while in Pakistan respondents contributed on average to three different actors. In any event, the lack of a multiple response option for Morocco does not affect reporting on the state fund as a recipient given that the country does not have a state fund. Additionally, findings from another question asking respondents to hypothetically allocate zakat across multiple actors mirror this one.

**Figure 14 Hypothetical distribution of zakat payments**



Notes: Bars correspond to mean proportions of respondents in a given country that made a non-zero contribution of zakat to a particular actor. Here, we treat NA values as 0 contributions since there are no respondents who answered NA on all actors, which would be an indication of refusal to answer the question. The survey question asked: 'Imagine that you had \$10 – which is the equivalent of X in local currency – to contribute to zakat this year. How would you distribute these dollars?' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Here we use the representative sample of all respondents, excluding the additional boost samples, without restricting to zakat-eligible respondents. Since Morocco does not have a state-run zakat fund, we have excluded 'state fund' as an option for the hypothetical distribution of zakat payments.

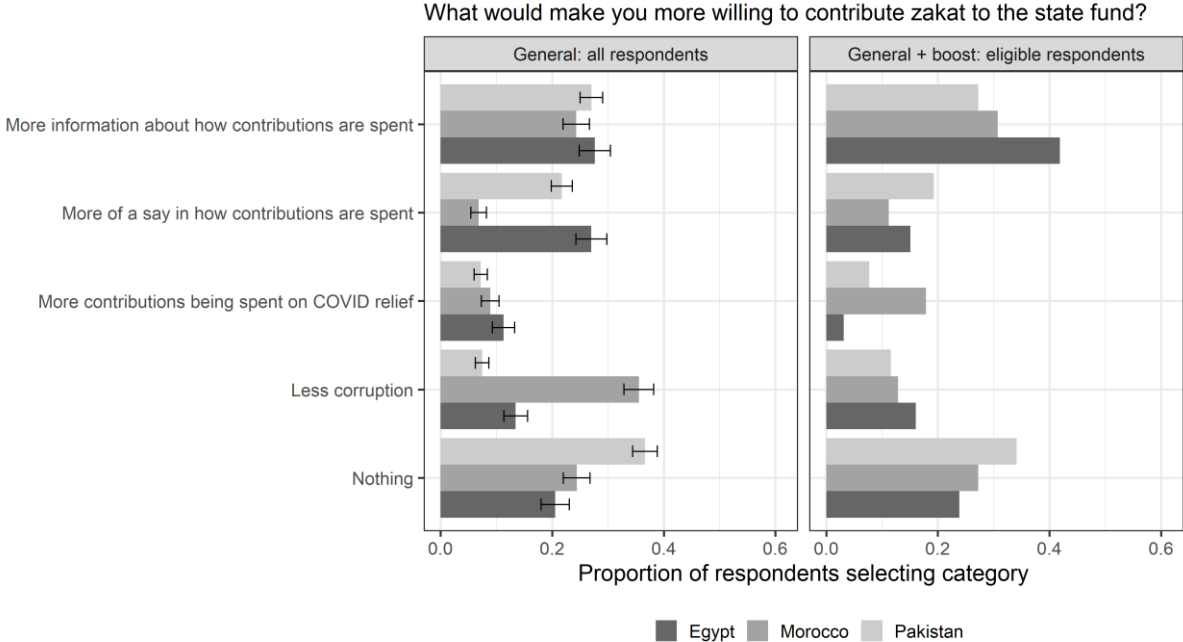
Why do state funds perform so poorly? Poor performance is particularly surprising if we consider the fact that much of the discourse on states 'harnessing' zakat assumes that the state has inherent resources that it can bring to the organisation of zakat, including organisational and enforcement capacity and information about citizens and their wealth. We suggest that four factors help to explain this apparent anomaly: lack of trust in the state, weak state capacity, a desire to know the recipient of funds, and questions about the appropriateness of the state playing a role in zakat collection or distribution. Notably, while they are interconnected, the relative importance of these factors has different implications for the potential of state funds more widely.

First, it seems likely that the choice of whether to pay to state funds may be influenced by trust, either in the state in general or in the state's involvement in zakat in particular. In all three countries, there is concern about corruption within state institutions. Further, when asked what would make them more likely to contribute to the state fund (and in Morocco, a hypothetical state fund), many highlighted a lack of information, opportunities for participation, and corruption as potential concerns regarding a state fund (Figure 15). This is perhaps unsurprising given high levels of corruption across the three countries,<sup>34</sup> and is in part in line with May (2013: 149) who argues that '[government] attempts to dominate and

<sup>34</sup> The majority of Pakistani (56.2 per cent) and Moroccan (50.3 per cent) respondents believed that either all or most state authorities are corrupt (Haerpfer, Inglehart, Moreno, Welzel, Kizilova, Diez-Medrano, Lagos, Norris, Ponarin and Puranen 2022) while 79 per cent of Egyptians believe that corruption by national state agencies exists to a large or medium extent (Arab Barometer 2018).

regulate zakat have been met with widespread resistance’ and that ‘informal zakat, reclaimed from the state, explicitly critiques the nation-state at the level of corruption, failure, and illegitimacy’.<sup>35</sup> In this way, non-payment to state funds may both reflect lack of trust in the state and represent an implicit critique of the state, or a form of ‘state exit’ (Hirschmann 1970). Moreover, though the practice of zakat is perceived as relatively fair in all three countries, it is notable that it is perceived as least fair in Pakistan, where we find the largest degree of state involvement in zakat practice (Figure 16). In part, this may further reflect criticism of the credibility of the state’s role in zakat administration in Pakistan in particular. The state’s intervention in zakat originated as part of a programme of Islamisation during the 1980s, where religious legal reform was used with the instrumental purpose of building the legitimacy of the central state apparatus under a military regime (Ziring 1984). Furthermore, the existing system of state-controlled zakat distribution is widely considered to be inefficient and corrupt, with political appointments controlling local-level zakat committees and using disbursements as a source of targeted patronage. For instance, past reviews have shown that upwards of 30 per cent of all zakat related disbursements are accrued by non-poor households (World Bank 2007).

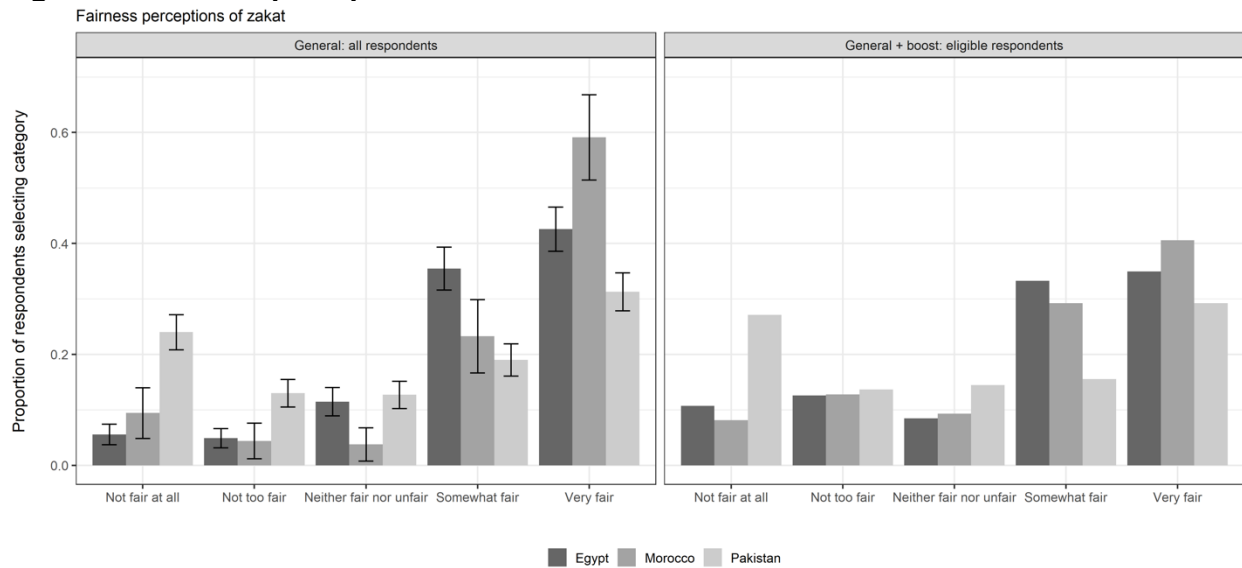
**Figure 15 Willingness to contribute to the state fund**



Notes: Bars correspond to mean proportions of respondents selecting a particular reason that would make them more willing to contribute zakat to the state fund, excluding missing values and ‘don’t knows’. The survey question asked: ‘What, if anything would make you more willing to contribute zakat to the state fund?’ 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel ‘General: all respondents’ is the representative sample of respondents, excluding the additional boost samples. Panel ‘General + boost: eligible respondents’ is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

<sup>35</sup> Similarly, several academic and policy studies point to the importance of trust and transparency in zakat administration (e.g., Suhaib 2009; Wahab and Rahman 2011; Djamiko 2019) while other studies highlight the poor performance of zakat funds in terms of their efficiency of distribution, with, for example, the zakat fund in Malaysia distributing less than it collects (Saad, Aziz and Sawandi 2014).

**Figure 16 Fairness perceptions of zakat**



Notes: Bars correspond to mean proportions of respondents selecting a particular fairness assessment of zakat payment, excluding missing values and 'don't knows'. The survey question asked those who reported to have paid zakat: 'Do you feel like zakat, as it is normally practiced today, is very fair, somewhat fair, not too fair, or not fair at all?' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel 'General: all respondents' is the representative sample of respondents, excluding the additional boost samples. Panel 'General + boost: eligible respondents' is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

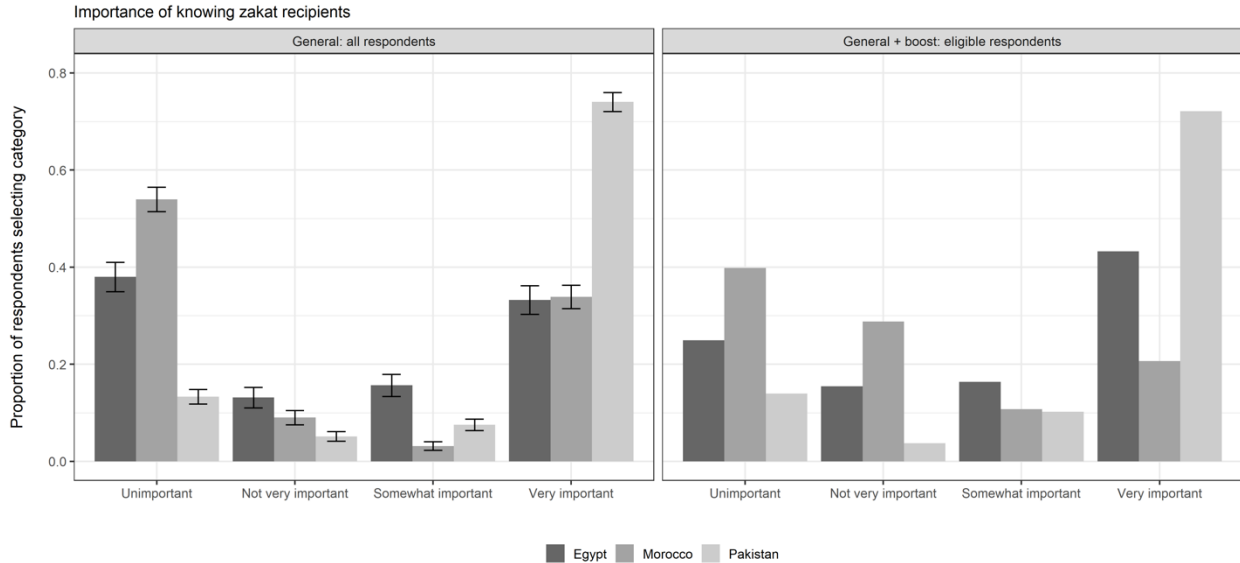
Second, weak state capacity can limit the performance of state funds in multiple ways. If organisational capacity is low, it can decrease the attractiveness of the state as a manager of zakat. If enforcement capacity is low, the state's capacity to compel citizens to pay into state funds may also be limited. There is certainly evidence of enforcement being easy to subvert, particularly when it comes to deductions from bank accounts in Pakistan. There are ways to avoid state collection through withdrawing money from savings accounts in the run-up to the zakat collection, which seems to be a common practice (AP 2012). More broadly, the Pakistani state's ability to collect and enforce zakat payment is directly connected to its ability to estimate the productive wealth of its citizenry. According to the World Bank, only 21.3 per cent of adults in Pakistan have access to a bank account – this is below the average for LMICs (57.8 per cent) and makes Pakistan the third largest unbanked population worldwide (World Bank 2018). Furthermore, a comparatively low tax base and a sizeable informal economy further complicates this task, as mandatory zakat deductions are applied only to formal financial instruments, such as savings accounts, stock portfolios, and mutual fund investments.

Notably, however, it is also legally possible to avoid paying into the Pakistani state fund from several financial instruments through an affidavit that confirms that zakat has been paid to a recipient that is not the state fund. This suggests another possibility – namely that low collection is a consequence of low collection efforts by the state through offering some legal avenues to avoid payment and broadly tolerating illegal avoidance in an act of forbearance (Holland 2016). This could indicate a generally lower prioritisation of zakat collection among other uses of limited state capacity, or a political motivation to tolerate other forms of giving or not to push the state's role in this field too aggressively. While we return to this point in the conclusion, the politics of weak state enforcement and zakat administration deserve further exploration in future research.

Third, our evidence suggests that the preference for payment to social relations is at least partly influenced by payers' belief that it is important to personally know the recipients of zakat, limiting support for contributing to state funds. In this way, zakat may be seen to establish direct interactions and ties within communities, strengthening social capital. As

Figure 17 highlights, more than half the respondents report that it is very or somewhat important that people know the zakat recipients. Here, the substantial differences between the three countries are noteworthy: over two-thirds of respondents in Pakistan find this ‘very important’, as opposed to about a fifth in Morocco. Further research is needed to understand these differences as well as their drivers. These could be rooted in a different understanding of how zakat should be administered, or different preferences on the possibility of extracting social capital from the process – though in the latter case we would expect a larger preference for direct distribution among those who actually pay, which we do not observe. Nonetheless, across all three countries, the fact that there is either a majority or a non-negligible minority that sees knowing zakat recipients as important clearly diminishes the appeal of state funds for citizens.

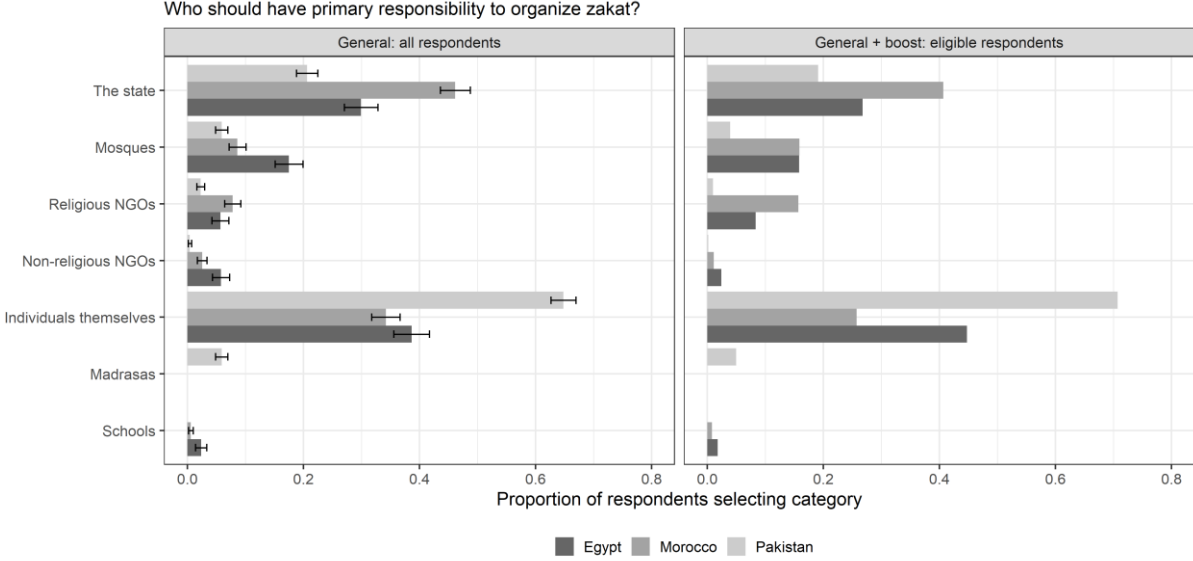
**Figure 17 Importance of knowing zakat recipients**



Notes: Bars correspond to mean proportions of respondents selecting a particular importance assessment of knowing zakat recipients, excluding missing values and ‘don’t knows’. The survey question asked: ‘Do you think that it is important that people know the people they are giving zakat to or is it enough to know that they are deserving?’ 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel ‘General: all respondents’ is the representative sample of respondents, excluding the additional boost samples. Panel ‘General + boost: eligible respondents’ is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

Finally, the low performance of state funds could have been shaped by respondents’ broader views about the appropriateness of the state playing a role in zakat collection or distribution. When asked who should be primarily responsible for the management of zakat, citizens in Egypt and Pakistan, where state funds exist, were more likely to respond that ‘individuals themselves’ should have the primary responsibility to organise zakat (Figure 18). By contrast, in Morocco, where, notably, the state does not play a role in zakat distribution, the state is the most frequently cited answer. It is notable, moreover, that even in Egypt and Pakistan, the state is more preferred by citizens than is suggested by actual payments. This indicates that some of the opposition to state funds is likely not merely principled opposition to the state’s role in general, but a critique of the actual fund and state performance in practice.

**Figure 18 Who should have primary responsibility to organise zakat?**



Notes: Bars correspond to mean proportions of respondents who report a given actor should have primary responsibility in organising zakat, excluding missing values and ‘don’t knows’. The survey question asked: ‘Who do you think should have the primary responsibility to organise zakat?’ 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel ‘General: all respondents’ is the representative sample of respondents, excluding the additional boost samples. Panel ‘General + boost: eligible respondents’ is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

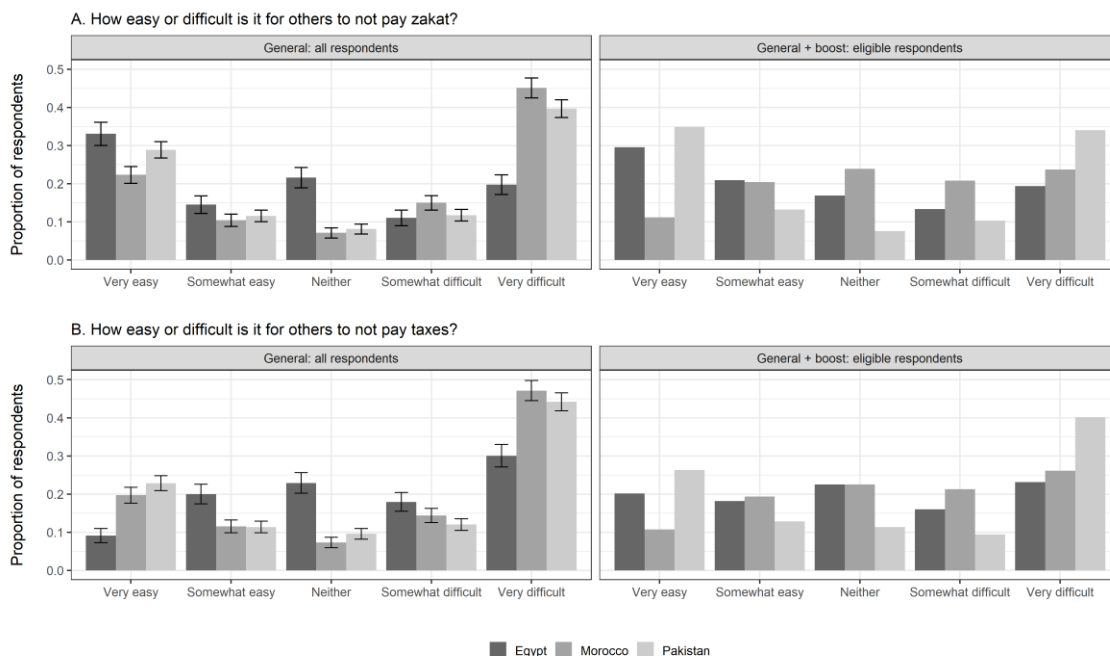
While our main finding here is that different views on zakat management do not seem to correlate with the degree of state intervention, some heterogeneity in these views exists throughout our analysis. For example, while in Pakistan a clear majority reports that it is important to know zakat recipients, most people in Morocco consider it unimportant. While our understanding of the cross-country differences in perceptions about the role of the state in zakat management is constrained, a range of factors likely drive some of these differences. First, as Powell (2009) highlights, there are differences between the role that Hanafi and Maliki jurisprudence assign to the state. The former is common in Pakistan, while the latter is more common in Morocco, and there is no dominant school of jurisprudence in Egypt. While Hanafi jurisprudence considers a role for the state to collect ‘visible’ property only (primarily livestock and crops), the Maliki school does not include this restriction and considers a potential role for the state across all forms of property. However, it is important not to overstate the importance of this explanation, as there is a contrast here between common jurisprudential explanations and actual practice, most notably by the Pakistani state, which in a Hanafi context practices active state involvement in zakat on non-visible property. Similarly, Hanafi scholarship has pointed to the importance of ‘proper beneficiaries’ of zakat payments rather than wider public purposes (Powell 2009: 53), and Pakistani respondents in particular put more emphasis on knowing recipients. Second, it appears likely that the actual presence of a state fund might affect people’s perception of its appropriateness. It is notable, for instance, that the country in our sample which does not have a state fund, Morocco, reports the highest support for one, while Pakistan, which has a state fund that both collects and distributes zakat, has the lowest. Finally, variations in perceptions of the state and its religious legitimacy itself may drive willingness to see it play a role in zakat distribution. The fact that Morocco’s ‘Alawi dynasty traces its heritage to the family of the prophet and explicitly uses this to shore up the religious legitimacy of its rule may thus influence citizens’ views of the appropriateness of a role for the state in zakat administration.

## 6 Zakat beyond the state

As the previous sections have highlighted, zakat compliance is high across all three cases, independent of the role of the state in zakat administration, while payment to state funds and the ability of states to enforce payment is comparatively low. Consequently, questions emerge on how citizens perceive and conceptualise zakat as an obligation in relation to other fiscal and charitable obligations. If not state enforcement, what motivates payment? And does this differ according to the role of the state in the administration of zakat? Our data shows that respondents across all three case studies consider zakat to be a mandatory payment and one that is difficult to avoid. At the same time, we find that the role of the state does not systematically impact how citizens conceive of zakat in terms of its mandatory or voluntary nature. Accordingly, even where the state is involved, people view zakat as more like an informal tax – something that is enforced through social institutions beyond the state.

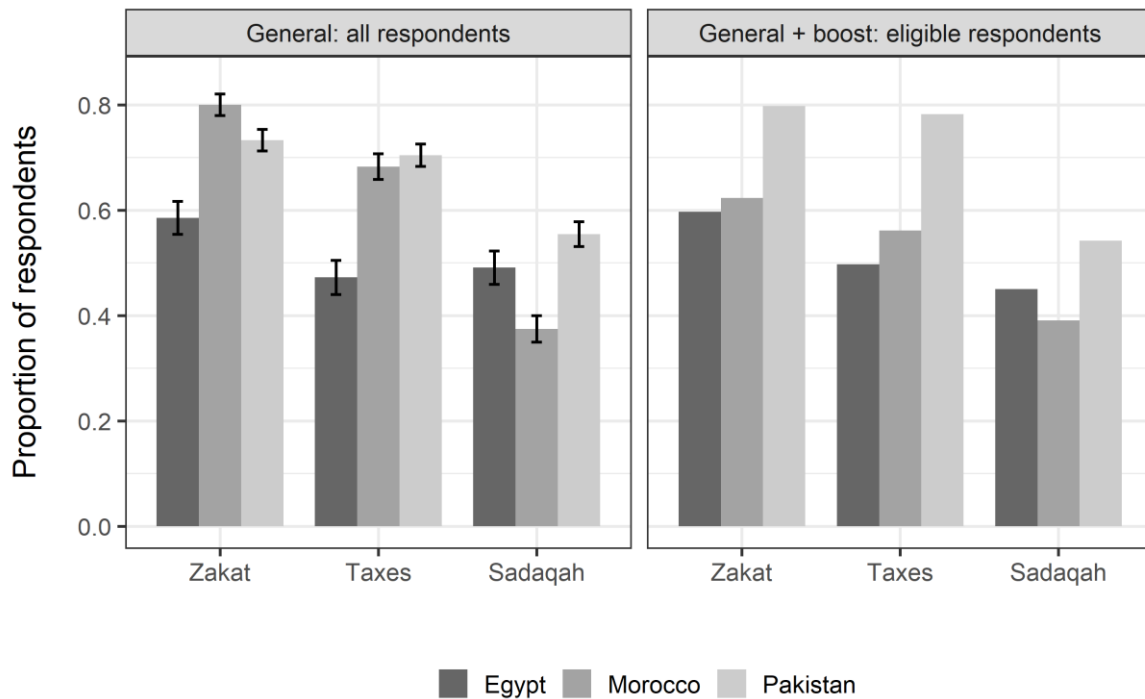
First, across all three case studies, individuals see zakat as difficult to evade (Figure 19). In all three cases, respondents see evading zakat as a little easier than taxes, but not as much as one might have expected. Notably, and surprisingly, these perceptions do not align with the state’s role in administration. More than half of the respondents in Morocco – where there is no state enforcement whatsoever – find it hard or very hard not to pay zakat. At the same time, in Pakistan, where there is state enforcement of zakat, the proportion of respondents finding it hard or very hard to evade zakat is lower than in Morocco. Further illustrating the seriousness of the obligation that people feel to pay zakat, we find that a majority of citizens across all three countries feel that non-payment of taxation and sadaqah is more justified than non-payment of zakat (Figure 20). Once more, these responses do not map upon state enforcement – the proportions of respondents who believe non-payment of zakat is never justifiable are highest in Morocco.

**Figure 19 Ease of evasion**



Notes: Bars correspond to mean proportions of respondents selecting a given degree of difficulty of non-compliance with zakat (Panel A) and taxes (Panel B), excluding missing values and 'don't knows'. The survey question asked: 'How easy or difficult is it for others to not pay the zakat/taxes they should?' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel 'General: all respondents' is the representative sample of respondents, excluding the additional boost samples. Panel 'General + boost: eligible respondents' is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

**Figure 20 Justifying non-payment**  
'It is never justified to not pay'



Notes: Bars correspond to mean proportions of respondents stating that paying is never justified, separately for zakat, taxes and sadaqah and excluding missing values and 'don't knows'. The survey question asked: 'Please tell me for the following statements whether you think it can always be justified, never be justified, or something in between. (a) Some people not paying the taxes that they owe. (b) Some people not paying the zakat that they should. (c) Some people not making charitable contributions.' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel 'General: all respondents' is the representative sample of respondents, excluding the additional boost samples. Panel 'General + boost: eligible respondents' is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

The high rate of zakat payment and perceptions of difficult evasion seem to reflect a general acceptance of the obligatory nature of zakat across the population, though the source of sanction is largely situated beyond the state – below and above it. While social pressures and a sense of communal obligation likewise influence the payment of both formal and informal taxation, the religious nature of obligation to pay zakat is particular in reference to its ultimate authority.<sup>36</sup> Mirroring tithing and similar religious obligations, accountability and duty are seen in reference to something beyond this life.<sup>37</sup> As described in Section 1, the Quran and hadith – the reported words and actions of the prophet – contain multiple commands and exhortations for believers to pay zakat (i.e., Quran, 103.10). In a religious context that perceives the ultimate authority to be omniscient, evasion in relationship to this authority is likely to be perceived as impossible, even if accountability for this is delayed until after death. Meanwhile, when it comes to zakat the relationship of accountability and obligation is removed to a higher authority, implying a lesser relationship with the state or the community than in the case of taxation or even charity. As Mahmood (2005: 120) notes, '[t]he specific gestures, styles, and formal expressions that characterise one's relationship to a moral code are not contingent but a necessary means to understand the kind of relationship that is

<sup>36</sup> Of course, this does not reflect reality everywhere. In other cases, for example, as in Somalia and pre-2021 Afghanistan, non-state groups coercively enforce zakat payments (Bandula-Irwin, Gallien, Jackson, van den Boogaard and Weigand 2021; Hiraal Institute 2018; Jackson 2018).

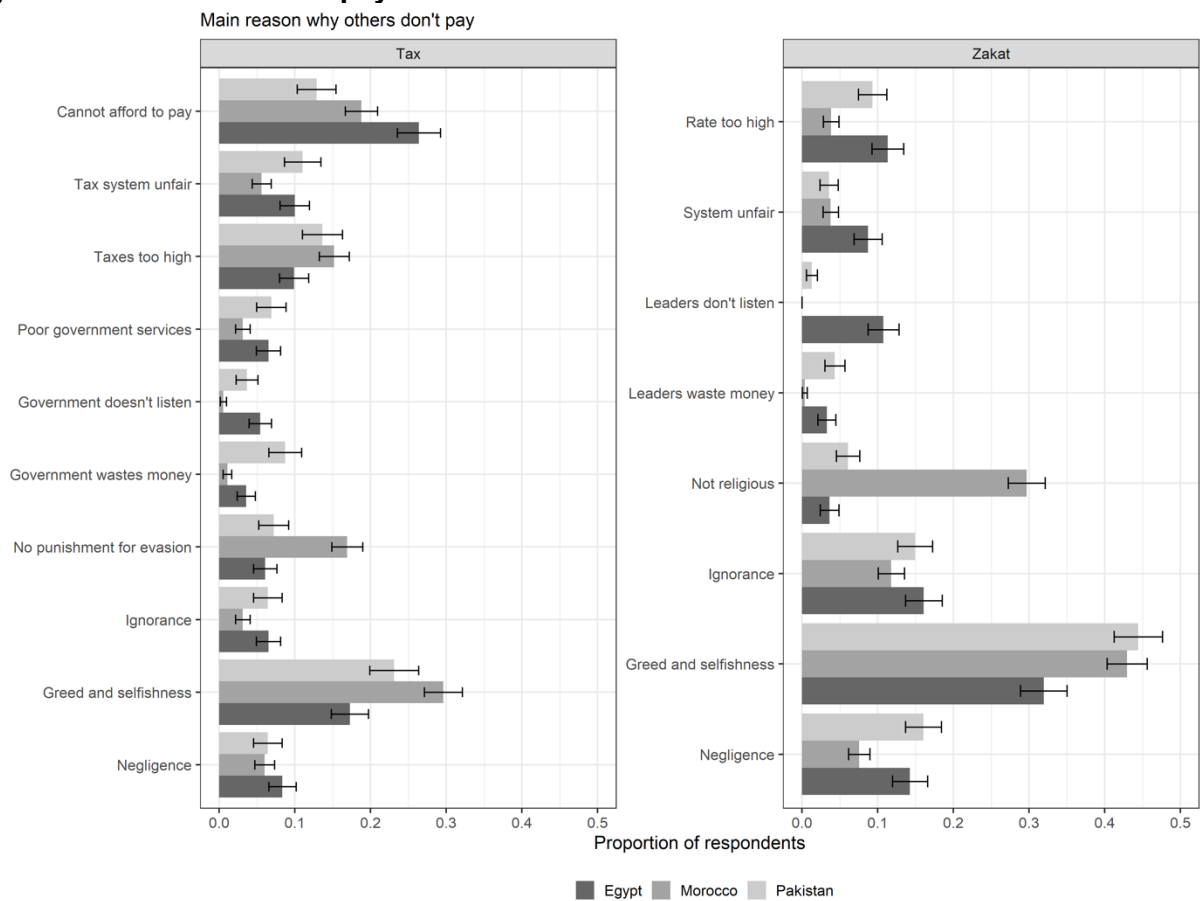
<sup>37</sup> As noted by Saad *et al.* 2014 (509–10), 'paying zakat purifies and cleanses something from dirt or filth', with individuals having paid zakat said to be 'free from... bad habits such as greed, selfishness, and arrogance', clearing one's account (hisab), or obligation to God and humankind.



established between the self and structures of authority.’ Here, the structure of authority explicitly goes beyond the state.

Supporting this, when asked why respondents think that others evade zakat, the most common answer across all three countries was ‘greed’, followed by ‘ignorance’ and ‘negligence’ (Figure 21), indicating that non-payment is seen as a personal or moral failing, rather than a failure of authorities, whether state or religious, to enforce payment. In comparison, while ‘greed’ was mentioned as a common response to explain tax evasion, affordability, the unfairness of the tax system, and rates of taxation, rather than ignorance and negligence, were also cited as important factors. This further suggests that the relationship to zakat evokes notions of obligation, which are not necessarily rooted in state enforcement or performance. In our case studies, citizens clearly make the distinction between state and religious authority, reflecting a ‘differentiation of secular and sacred’, of ‘state and religious institutions in Islamic societies’, with the ‘the realm of Islamic authenticity [lying] within the soul of the individual’ (Lapidus 1996: 4, 26).

**Figure 21 Reasons for non-payment**



Notes: Bars correspond to mean proportions of respondents selecting a particular category as the main reason for others' non-compliance with taxes and zakat, excluding missing values and 'don't knows'. The survey question asked those respondents who said less than 100% in their community pay zakat/taxes: 'What do you think is the main reason that some people don't pay the taxes/zakat that they should pay?' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Here we use the representative sample of all respondents, excluding the additional boost samples but without restricting to zakat-eligible respondents.

## 7 Conclusions

Given that the estimated size of annual zakat payments across the world rivals total development spending and plays a substantial role in social spending and redistribution in Muslim-majority countries, especially during times of urgent need (Gallien *et al.*, forthcoming), it is surprising how little coverage it has received in political science and development studies. This article has sought to address this gap by providing the first comparative empirical analysis of how citizens perceive and practice zakat across three Muslim-majority countries. It has captured the empirical realities and praxis of zakat and, importantly, centred citizen perceptions of the role of zakat and its relationship to the state. While we expected that the role of the state in zakat administration would shape citizen perceptions of and engagement with zakat – that it would mirror a tax where states treat it as such, and an informal tax or a form of charity where they don't – we instead find that citizen perceptions of zakat are independent of the role of the state in its administration, and that citizens largely engage with the practice independent of state preferences, choosing to prioritise social relations. These perceptions and practice indicate, perhaps unsurprisingly, that zakat in practice represents an informal tax, rooted in social pressures and sanctions in the afterlife, and existing beyond the limits of state authority. While zakat may technically fulfil the formal criteria of being a tax or a charitable payment in some contexts, neither of those are a sufficient description of zakat, as they ignore the particular nature of obligation that it carries, and the particular preferences that citizens have about the actors involved in its mediation and distribution.

Our findings build on the literatures on taxation and informal public finance and speak to a critical limitation in how we analyse and categorise redistributive payments. The discussion of whether zakat mirrors taxation or charity is not only a common Islamic jurisprudential debate but also represents the two main ways in which economics and political science categorise redistributive payments. From this perspective, zakat *is* a tax in Pakistan, and *is* a charitable payment in Morocco. However, as we have shown here, these categorisations are incomplete and do not adequately capture what zakat actually represents. We believe that this points to a wider inadequacy in how we categorise redistributive payments – namely, that they are categorised primarily in relationship to the role of the state. We thus argue for an approach that moves away from state-centrism, focusing instead on the lived experiences and everyday realities of citizens. Our evidence highlights the importance of citizen perceptions to defining praxis, in particular with respect to whether payments should be accumulated or distributed personally or by a state mediator.

Our findings on zakat perceptions and practice also have critical implications for the potential of states' attempts to control zakat through state-run zakat funds or legal enforcement. As described above, there has been an increasing interest in recent years in how states can 'harness' the substantial sums of zakat payments made in Muslim-majority countries every year. This has expanded in the aftermath of the Covid-19 pandemic in particular, and has led to plans for new zakat funds, including in Morocco. While the incentive behind this for state actors is obvious, it is often harder for states to effectively capture zakat revenues than they may assume. While states may claim that state enforcement increases zakat compliance, better coordination, or trust in the zakat management process, we find little evidence to support this, as evasion is often easy and compulsion is primarily perceived as being independent of the role of the state. Beyond enforcement, we have also highlighted diversity in contributors' willingness to engage with the state in a role as distributor of zakat. While some contributors, particularly in Morocco, are open to a role for the state in zakat administration, others reject it on principle. Interestingly, however, this resistance to the state is not necessarily expressed alongside a desire for a more religiously legitimate non-state actor, which Islamist movements may seek to present themselves as (May 2013), but instead for maintaining individualised distribution.

This does not imply that there is no role for the state in zakat. However, two primary factors are relevant in considering how this role may be effective in practice. The first is citizens' wider perceptions of the appropriateness of state involvement in zakat distribution and the importance of knowing zakat recipients. These suggest that no matter how effective state funds are, some people will prefer to avoid them as a method of zakat distribution. Consequently, our findings suggest that states should accept that state-run zakat funds will exist as but one actor in a wider landscape of actors that collect and distribute zakat, rather than seeking to establish a monopoly over collection and distribution akin to taxation. Second, trust clearly plays a role in considerations of whether to engage with state funds. This suggests that the way a zakat fund is managed can change the way that citizens engage with it. Kuwait's zakat fund provides an interesting example in terms of both participation and transparency, as it allows people who contribute to the fund to choose the type of project and recipient to which their money is distributed (Zakat House n.d.).

This points to an interesting tension in the role of state funds: they can be conceived both as a distribution mechanism in line with the preferences of zakat payers, or alternatively as an institution that explicitly seeks to balance out inefficiencies in the preferences of zakat payers, by distributing to otherwise neglected or overlooked groups. It also speaks more deeply to what role zakat can play in social spending more widely. Through largely individualised giving, zakat represents a form of direct redistribution. It cannot easily be subsumed into state programmes or their funding, it cannot easily be earmarked or targeted, and, most crucially, it does not present an easy opportunity to subsidise state welfare budgets. In the context of a scramble for new opportunities to finance social spending in the aftermath of the Covid-19 pandemic, this appears to be an important lesson for both states and international development actors to keep in mind.

While this research has significant conceptual and practical implications, it also points to remaining questions and new avenues for future research. First, while we have selected our cases to reflect diversity in state involvement in zakat practice across Sunni-majority populations and both Maliki and Hanafi schools of Islamic jurisprudence, the geographic, cultural, and jurisprudential diversity of Muslim-majority countries implies that the practice and perceptions of zakat may differ in other contexts, particularly in majority Shi'a countries. Relatedly, there is a need to interrogate how these practices align with extant levels of religiosity across different Muslim-majority countries.<sup>38</sup> Second, given considerable diversity in the practice of state funds, more comparative research is needed. While we have focused on Pakistan and Egypt as examples of state funds, and while these are some of the most populous countries to have state funds, we cannot rule out that countries with higher state capacity or religious legitimacy may have higher compliance and acceptance of state involvement in zakat collection or distribution. Future research should thus include analyses of higher-income, higher-capacity states, such as the Gulf countries, and states with more decentralised state-run zakat funds, as exist in Indonesia. Third, and closely related to this, more remains to be said about the politics of enforcement and forbearance in state zakat enforcement. We have speculated that the poor performance of state funds, even in Pakistan, where state enforcement is mandated, might also be due to purposefully lax enforcement due to different resource allocations in revenue collection or political motivations. Comparative research about state enforcement practice, both cross-nationally and historically, could be instructive here. Finally, there are wider conceptual and methodological questions to explore. Reliable estimates of zakat payments are difficult to

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<sup>38</sup> Regarding the three cases under discussion, existing data is mixed on the extent of religiosity: when asked how much religion matters to them, 94 per cent of Pakistanis said religion is very important in their lives, compared to 89 per cent of Moroccans and 75 per cent of Egyptians who share this assessment. However, when asked about performing daily prayer, fewer people seem to pray daily in Pakistan: 50 per cent of respondents in Pakistan reported praying several times a day, significantly less than respondents in Egypt (60 per cent) and Morocco (69 per cent) (Pew Research Center 2013).

come by, and there is a substantial need for research that advances our capacity to make reliable estimates. Furthermore, there are questions on how zakat payments affect the overall progressivity or regressivity of zakat structures, and their relationship with tax, social protection, and wealth inequality more widely. This may be particularly important to come to a better understanding of the role of zakat in relation to contemporary state and society.

# Appendix

## Survey design and implementation

The survey was implemented in all three countries in August–November 2020, through two implementation partners: Gallup in Pakistan and ThinkONE and its affiliates in Egypt and Morocco. Sampling was conducted by implementation partners through a combination of random sampling and previously established inclusion/exclusion criteria. The surveys were conducted in Arabic in Morocco and Egypt, and in Urdu in Pakistan. Given the ubiquity of the respective concepts across the three countries, we do not expect substantial differences in understandings of these terms across different languages – one slight exception to this was Morocco, where enumerators were trained to provide additional explanations of the nisab in case there was some uncertainty around the concept. The surveys conducted in the three countries were almost identical, with minor differences across the countries, the most important of which we summarise below.

First, as discussed in the main body of the paper, the different national-level nisab thresholds and different currencies have caused some differences between the three surveys. For the nisab, we used the 2020 values that were widely reported at the time: Pakistan: PKR 46,000 (USD 284.30); Egypt: EGP 87,000 (USD 5,506.33); Morocco: MAD 41,000 (USD 4,315.79).

Second, in the question where we asked about whether people had given sadaqah above a certain threshold, we tied that threshold in each country to the respective nisab. We put the threshold at approximately 2.5 per cent of the nisab, to be equivalent to the smallest amount of zakat that may be payable in that country context. Comparisons of the levels of sadaqah payment in these countries should hence be interpreted in that context. These levels were: Pakistan: PKR 1,600 (USD 9.89); Egypt: EGP 1,500 (USD 94.94); Morocco: MAD 1,000 (USD 105.26).

Third, in order to generate a sufficient sample of zakat-paying respondents for separate analysis within that sample, we collected additional boost samples of 500 additional respondents in Egypt and Morocco (what we refer to as the ‘additional eligible’ samples in the text). For both of these samples, we used the question of whether respondents classified themselves as being above the previously established nisab threshold as a screening question, and ended the interview if they were not. Otherwise, the survey for the boost samples was exactly equivalent to the survey for the non-boost samples.

Fourth, as we discuss in the text, the existence/non-existence of state funds had some impact on the survey questions. We discuss these in the main text when they arise – for example, when respondents were asked who they paid zakat to (Figure 2), Moroccan respondents did not get the option ‘state fund’. Furthermore, given that Pakistan does collect some money directly from savings accounts, we distinguished for Pakistani respondents between those that had their money directly deducted and those who decided to give to state funds. Similarly, when respondents were asked about what would make them more likely to give to a state fund (Figure 4), the question was hypothetical for Moroccan respondents.

Fifth, aside from consent and, in the case of boost samples, the nisab, the question ‘What religion do you identify with’ was also used as a screening question in order to identify a Muslim sample. If respondents did not answer ‘Muslim’ to that question, the interview was ended at that point. In Pakistan, an additional question was added that asked respondents about the sect they identify with. If respondents identified as Shia, the interview was not ended at that point, however, Shia respondents were dropped from the sample before the analysis and are not considered in this paper.

**Table 3 Case selection**

	<b>Egypt</b>	<b>Morocco</b>	<b>Pakistan</b>
<b>GDP per capita</b> (World Bank 2020a)	3,569.2 USD	3,009.2 USD	1,188.9 USD
<b>Population</b> (World Bank 2020b)	102,334,403	36,910,558	220,892,331
<b>% of population that is rural</b> (World Bank 2020c)	57.21%	36.46%	62.83%
<b>Tax to GDP</b> (UNU WIDER – GRD Dataset – total taxes 2019)	13.38%	21.45%	11.4% <sup>39</sup>
<b>Polity score</b> (Center for Systemic Peace 2010)	-4 Closed anocracy	-4 Closed anocracy	7 Democracy
<b>V-dem score</b> (V-Dem Institute 2022)	Elected autocracy 0.12 Rank: 144	Closed autocracy 0.24 Rank: 115	Elected autocracy 0.23 Rank: 117

**Table 4 Descriptive statistics**

Sample overview and descriptive statistics

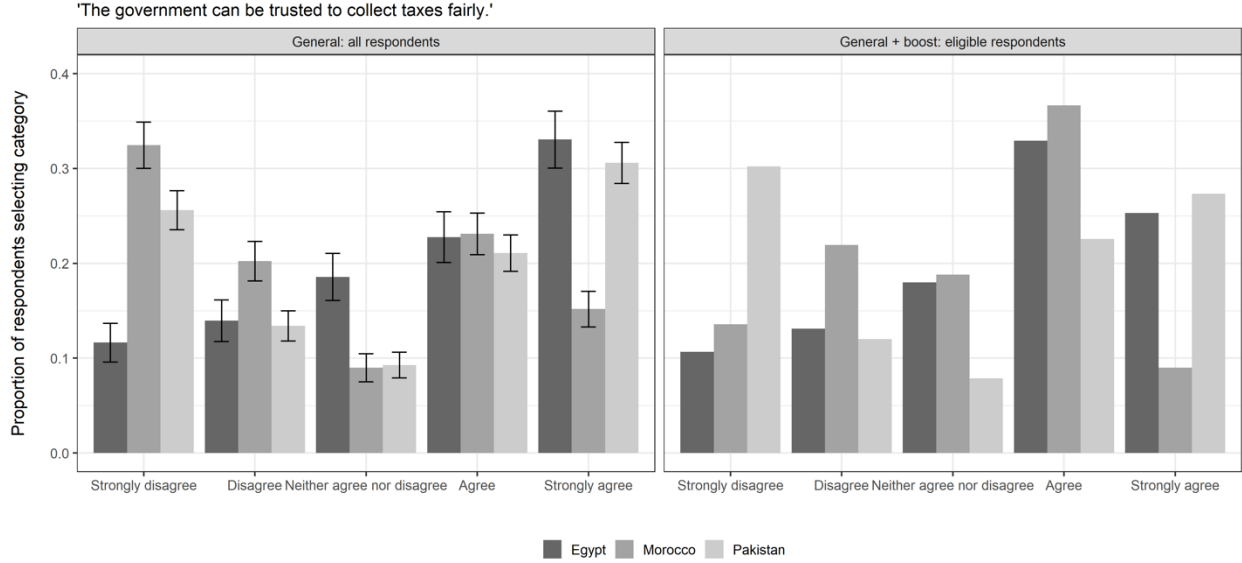
	<i>Gender</i>		<i>Income</i>			<i>Age</i>							<i>Education</i>					
	Women	Men	Low	Middle	High	18-24	25-34	35-44	45-54	55-64	65-74	75+	None	Primary	Secondary	College	Postsecondary	Graduate
<b>A. General: All</b>																		
Egypt	0.55	0.45	0.51	0.39	0.10	0.28	0.25	0.19	0.12	0.09	0.05	0.02	0.00	0.01	0.33	0.00	0.16	0.50
Morocco	0.51	0.49	0.47	0.43	0.10	0.23	0.22	0.21	0.16	0.10	0.06	0.02	0.05	0.11	0.17	0.22	0.34	0.11
Pakistan	0.15	0.85	0.05	0.35	0.60	0.25	0.34	0.23	0.11	0.04	0.02	0.01	0.16	0.19	0.31	0.15	0.06	0.13
Total	0.36	0.64	0.36	0.40	0.24	0.25	0.28	0.21	0.13	0.07	0.04	0.01	0.09	0.12	0.27	0.14	0.18	0.20
<b>B. General + Boost: Eligible</b>																		
Egypt	0.60	0.40	0.34	0.42	0.24	0.20	0.30	0.16	0.14	0.12	0.05	0.03	0.00	0.00	0.31	0.00	0.16	0.53
Morocco	0.57	0.43	0.05	0.74	0.22	0.07	0.43	0.27	0.14	0.07	0.02	0.01	0.01	0.03	0.07	0.23	0.52	0.14
Pakistan	0.11	0.89	0.03	0.21	0.76	0.28	0.32	0.21	0.12	0.05	0.02	0.00	0.10	0.16	0.31	0.17	0.09	0.17
Total	0.45	0.55	0.17	0.51	0.32	0.18	0.35	0.21	0.14	0.08	0.03	0.02	0.03	0.06	0.23	0.13	0.27	0.29

Note: Numbers in cells are proportions of respondents in each country sample selecting each category, excluding 'don't knows' and missing responses.

<sup>39</sup>

While the tax to GDP ratios for Morocco and Egypt are from 2019, the data stops at 2015 for Pakistan.

**Figure 22 The government can be trusted to collect taxes fairly.**



Notes: Bars correspond to mean proportions of respondents selecting a given degree of agreement with the fairness of government tax collection, excluding missing values and 'don't knows'. The survey question asked: 'Please tell me if you agree or disagree with the following statement: The government can be trusted to collect taxes fairly.' 95% confidence intervals are based on standard errors for the respective proportion in each country sample. Panel 'General: all respondents' is the representative sample of respondents, excluding the additional boost samples. Panel 'General + boost: eligible respondents' is the combination of the representative and boost samples, restricting to those respondents who self-reported to be above the nisab in each country and therefore to be zakat-eligible.

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