



Problems of Rejection of Applications for Prospective Marriage Dispensation in Islamic Law

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Abstract

This article discusses the judge's decision in rejecting the application for marriage dispensation which had been submitted and registered at the Registrar's Office of the Painan Religious Court with Number: 68/Pdt.P/2021/PA.Pn, that the Petitioner intended to carry out the marriage of the Petitioner's 18-year-old biological child with a 46-year-old man. The researcher uses the Library Research (library) research method. The researcher describes a structured research procedure, namely the research approach. Because what is being studied is written text in the form of a corpus (data used as a source of research material). The research information that becomes primary data is the decision of the judge of the Painan religious court, while the secondary data is data obtained from written sources, library materials including statutory regulations, scientific literature, books and articles, and journals. The results of the research can be concluded that the judge's decision can be correct because the judge adheres firmly to educational, and psychological aspects, as well as the potential for disputes in the household that will be fostered for children. In Islamic law, it is permitted by fiqh law and the values aimed at implementing sharia.

INTRODUCTION

Age is one of the requirements that the bride and groom must meet for a marriage in Indonesia, material requirements are a condition related to the essence or principles of a marriage in general (Rachmat et al., 2019; Arif & Zamzami, 2022). The age limit for marriage in Muslim-populated countries is on average between 15-21 years (Asrori, 2015). Law No. 16 of 2019 states that men or women who wish to carry out a marriage are only permitted if the man and woman have reached the age of 19 years, minors must apply for dispensation of marriage. Marriage Dispensation is a relief from something (Rachmat et al., 2019). age limit in carrying out a bond between a man and a woman as husband and wife to form a happy and eternal family (household) based on the belief in the Almighty God. Applications for marriage dispensations tend to increase each year, the judge must consider all the reasons submitted along with the possible impacts if the dispensation is granted.

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Allowing child marriage through the effort of "marriage dispensation" according to national law is a legal breakthrough to give a clear legal status to children. Allowing marriage for children is regulated in Law No. 16 of 2019 Regarding Amendments to Article 7 of Law No. 1 of 1974 1) Marriage is only permitted when men and women have reached the age of nineteen years (Azmi & Anzaikhan, 2022). 2) In the event of a violation of the age requirement as referred to in paragraph (1), the male parent and/or the female parent can request a dispensation from the Court with very urgent reasons accompanied by sufficient supporting evidence. 3) The granting of dispensation by the Court as referred to in paragraph (2) is mandatory. 4) Listening to the opinions of both sides of the prospective bride and groom who will perform the marriage. 5) The provisions regarding the condition of one or both parents of the prospective bridegroom as referred to in Article 6 paragraph (3) and paragraph (4) also apply to the provision regarding dispensation requests as referred to in paragraph (2) without reducing the provisions as referred to in Article 6 paragraph (6).

The explanation of what is meant by "deviation" is that it can only be done by submitting a request for dispensation by the parents of one or both parties of the prospective bride and groom to the Religious Court for those who are Muslim and the District Court for others, if the male and female parties are aged under nineteen years old. What is meant by "very urgent reasons" is a situation where there is no other choice and the marriage must take place (Hadaiyatullah & Huda, 2020). What is meant by "sufficient supporting evidence" is a certificate proving that the age of the bride and groom is still below the provisions of the law and a certificate from a health worker supporting the parents' statement that the marriage must take place. Then, to ensure the implementation of this provision, the Government carries out outreach and guidance to the public regarding the prevention of early marriage, the dangers of free sex and unregistered marriages to create a superior generation of the nation.

What prompted the amendment to the Marriage Law was UNICEF research data in 2016 which stated that Indonesia was ranked 7th among countries in the world with the highest rate of early marriage and 2nd in ASEAN after Cambodia. Cases regarding applications for marriage dispensation are the absolute competence of religious courts (Novval et al., 2022). This is following the explanatory provisions of article 49 paragraph (2) number (3) of Law No. 7 of 1989 as amended by Law No. 3 of 2006 and Law No. 50 of 2009 as well as article 7 paragraph (2) of Law No. 1 of 1974 as amended by Law No. 16 of 2019. The Painan Religious Court is one of the religious justice institutions at the district level in Indonesia that carries out this task.

Application on September 2, 2021, the Painan Religious Court with Number 68/Pdt.P/2021/PA.Pn., will carry out the marriage of the applicant's biological child, YA Place Date of Birth, Jakarta, 06-02-2003 (18 years), will carry out the marriage with a man -man with initials, D Place, date of birth, Balai Tuesday, 01-01-1975 (46 years), The decision of the Painan Religious Court is interesting to review. One of the reasons the judge rejected the application was that the age difference was too large. The research question in this article is how the judge understands how to interpret Article 2 of Law Number 16 of 20219 regarding the Decision of the Painan Religious Court Number: 68/Pdt.P/2021/Pa.Pn.

METHODS

Research or "research" consists of the words re (repeat) and search (search, pursuit, tracing, investigation, or research), so research means repeating a search (Rivauzi, 2019; Owoyemi, 2020; Supriani et al., 2022; Weir et al., 2022). Research methodology means a set of scientific methods, knowledge of systematic and logical steps in searching for data relating to a particular problem to be processed, analyzed,

drawn conclusions and then found a solution. In this research, the author took a normative juridical approach, namely an approach that uses a legis-positivist conception (Isnaini, 2017; Murdifin & Setyawan, 2019). This concept views law as identical to written norms Diana et al., (2017) which are created and promulgated by authorized institutions or officials. This concept views law as a normative system that is independent, closed and detached from real social life (Copy of determination number 68/pdt.p/2021/pa.pn).

RESULT AND DISCUSSION

The Painan Religious Court made a decision based on legal considerations that adjusted the arguments of the applicant's petition with the provisions of Article 49 paragraphs (1) and (2) and their explanations, as well as Law Number 7 of 1989 which was amended by Law Number 3 of 2006 and the second amendment. with Law Number 50 of 2009. The panel of judges confirmed the authority of the Painan Religious Court in this case. During the trial, the judge listened to statements from the applicant's children who requested dispensation, the prospective husband, and the prospective husband's parents by the provisions of Article 13 Paragraph 1 of Supreme Court Regulation (PERMA) number 5 of 2019 concerning guidelines for adjudicating applications for marriage dispensation.

During the examination, the judge must pay attention to the best interests of the child, especially the age difference between the applicant's child who is 18 years and 3 months old and her future husband who is 46 years old, by Article 16 PERMA number 5 of 2019 point (b). The judge considers that extending the age too far has the potential to trigger domestic disputes which are contrary to the purpose of marriage. Therefore, the applicant's attorney submitted a special power of attorney on September 1, 2021, which is registered in the Painan District Court's special power of attorney register number 107/k.kh/2021 dated September 16, 2021. The applicant proves the arguments of his application through letters P. 1 to P.10 and two witnesses. This application was submitted so that the judge would give dispensation to the applicant's child, aged 18 years and 3 months, named YA bint YE, to marry a man named D bin J who was 46 years old. The reason for this application is that the applicant's child has not yet reached the age limit for marriage by law number 16 of 2019 concerning amendments to law number 1 of 1974 concerning marriage.

That the applicant's daughter, YA bint YE, has expressed her readiness to marry D bin J out of mutual love, without coercion from anyone. Even though he stopped going to school in 2021 because he wanted to get married, the applicants tried to persuade him to continue his education at Vocational School. On the appointed trial date, the judge advised the applicants to postpone the marriage of their children, considering educational, economic, social and psychological factors. Nevertheless, the applicants persisted in their application on the grounds of avoiding the negative impact of the close relationship between the child and her future husband, as well as stating their readiness to guide the child in living a domestic life.

The judge considered that marriage is a physical and spiritual bond to form a happy and eternal household based on the belief in the Almighty God, so it must fulfill legal requirements and have the dimensions of the purpose of marriage. During the examination, the judge is obliged to pay attention to the best interests of the child, especially given the significant age difference between the applicant's child (18 years 3 months) and her future husband (46 years). The judge considered that extending the age too far could potentially lead to disputes in the household which would be contrary to the purpose of marriage. The judge's decision was justified because it took into account the educational, and psychological aspects of the child, and the potential for domestic disputes, and referred to the rule of harm in the

context of fiqh as a legal benchmark and principle. Thus, the rejection of the application for marriage dispensation is assessed by relevant and contextual legal considerations (Idris & Anita, 2020).

Marriage dispensation is given by the Religious Court to avoid harm that is greater than the benefit. For example, in the decision to determine case Number: 68/pdt.p/2021/pA.pn, the Council of Judges at the Painan Religious Court has a legal basis that sees benefits in rejecting the request for marriage dispensation. Judges consider the dangers and risks of marriage of minors, recognizing the potential for domestic disputes that conflict with the purpose of marriage. Thus, the decision is based on relevant legal considerations and is responsive to the specific context of each case (Muzaiyanah & Arafah, 2021).

The purpose of Islamic law is to create benefits and avoid harm. If an act has the potential to cause damage, then things that lead to that act are prohibited. In the context of marriage dispensation, the judge rejects the application considering the dangers and risks of marriage of minors, which can trigger discord in the household. This consideration is by fiqhiyyah rules which state that avoiding damage has a higher priority than achieving benefits (Zamakhsari, 2019).

Even though there are no strict provisions regarding age limits in Islamic teachings, the polemic about early marriage has given rise to polarization between groups that support and prohibit this practice. The purpose of marriage in Islam is to establish a harmonious, prosperous and happy family in this world and the hereafter. Harmony includes the exercise of the rights and obligations of family members, while prosperity involves fulfilling life's physical and spiritual needs to create happiness, affection and romance in the family (Sudirman, 2016).

Marriage dispensation is given by considering the benefit and avoiding the potential for greater harm, referring to the *maslah murlah* method. Rejection of dispensation in cases of significant age differences, especially when the child has not yet reached sexual readiness and development of reproductive organs, is based on the security of the child's soul and the priority of education over early marriage. The judge prioritizes the safety of the child's soul and the development of the function of the mind, considering that early marriage is not in line with building a *sakinah, mawaddah and rahmah* family. The judge's decision must be based on careful considerations to avoid losses for the litigants (Umah, 2020; Marwa, 2021).

Court decisions have significant legal impacts, especially in the context of marriage in Indonesia. Law Number 16 of 2019 has regulated the age limit for marriage, namely a minimum of 19 years for prospective husbands and prospective wives. This provision is strengthened by Article 15 paragraph (1) in the Compilation of Islamic Law, which is based on considerations of the benefit of the family and marital household. This principle is in line with the Marriage Law, which emphasizes that prospective husbands and wives must be mature in body and soul to undergo marriage to achieve the goals of a good marriage, avoid divorce, and produce healthy offspring. Therefore, marriage between prospective husbands and wives who are still underage must be prevented (Prasetyo, 2017).

The court needs to be careful in deciding whether to reject a request for dispensation because this decision will determine the legal status of the marriage. An example of a case occurred at the Painan Religious Court, where the refusal of a marriage dispensation for the applicant's child occurred in decision Number: 68/Pdt.P/2021/Pa.Pn. The petitioners requested marriage dispensation for their children and presented evidence such as letters and witnesses at the trial. The judge stated that the letters were authentic deeds with strong evidentiary value by Article 285 R.Bg. However, regarding letters P.9 and P.10, the judge stated that this evidence was not a deed, but could be considered about Article 1875 of the Civil Code in conjunction with Articles 286-289 R.Bg because it was supported by witness

testimony that was relevant to the applicant's petition. Therefore, this evidence is recognized as valid evidence in this case.

The judge considered evidence of letters P.9 and P.10 as evidence of letters that were not deeds, so they had to be corroborated with other evidence by Article 285 R.Bg. The marriage rejection letter from the Rana Pesisir District Religious Affairs Office is proof that the applicant's child's marriage was proposed but rejected because it did not meet the requirements, namely that the applicant's child was not old enough. Because of this refusal, the applicants applied for a marriage dispensation to the Painan Religious Court. The applicant's child, named YA, and her future husband have had a close relationship for approximately 1 year, often going out together, but without slander in the community according to witness testimony. Witness statements are facts that are seen and heard directly, and are following one another, fulfilling the material requirements as regulated in Article 308 paragraph (1) R.Bg and Article 309 R.Bg. With the legal basis of PERMA 8 No. 5 of 2019, the judge advised all parties regarding the impact of marriage on children and decided to postpone marriage until the child reaches the age limit regulated by Law No. 16 of 2019 concerning amendments to Law No. 1 of 1974 (Makinara et al., 2020).

The judge believed that even though the marriage plan was without coercion, the applicant's child, who wanted to marry D bin J, deserved a dispensation because he was not yet mature enough to take responsibility as a wife. Physical and mental maturity is required in the household. The applicant's child wants to marry only based on compatibility and liking each other, and will not even continue their education because of the decision to marry, which according to the judge is contrary to important aspects in examining marriage dispensations, namely the potential for stopping education and the principle of the best interests of the child (Wahyudani, 2020). In justifying the legal consideration, the judges apply the rule of *fihiyyah* which states "rejecting *mafsadah* must come first by seeking benefits." Hakim put forward the concept of *maslahat mursalah*, consideration of goodness, and rejection of damage in society. The decision to reject the marriage age dispensation for underage children is considered beneficial for both prospective brides and their respective families, as well as avoiding *mafsadah* which is considered to be contrary to the meaning and purpose of sharia in building an intact household (Aisyah, 2017).

In Islamic law, there is no specific age limit for marriage, but Islam indicates signs, namely puberty, which is identified with menstruation for women and the release of semen for men. In cases of refusal of marriage dispensation with a significant age difference, the child's sexual health and reproductive readiness are important considerations. Children's age should be used more for the development of intellectual functions and education rather than for early marriage which can pose a risk to the child's soul and is not in line to form a *sakinah, mawaddah and rahmah* family. Therefore, judges as part of the law enforcement apparatus must consider the legal expediency in granting requests for marriage age dispensation, regardless of positive legal provisions. Judges have the authority to make legal discoveries, considering that laws are limited to certain events (Bastomi, 2016; Nur, 2016; Mesraini et al., 2020; Saputra et al., 2022)

Even though the Marriage Law does not explicitly prohibit underage marriage Imron, (2013), the regulated age limits are still flexible in practice. Marriage dispensation can be considered by a judge in an emergency or urgent situation to avoid negative impacts (*mafsadah*). It is important to maintain the benefits of marriage by complying with religious and state regulations, both in terms of jurisprudence and law. The Compilation of Islamic Law emphasizes the requirement for marriage to reach a certain age to maintain the benefit of the family and household, and judges have the authority to refuse marriage dispensations according to the conditions and exigencies that arise.

CONCLUSION

Reasons from the Council of Judges in Rejecting the Application for Dispensation of Marriage on the Ground of Age Difference Ruling Number: 68/Pdt.P/2021/PA.Pn that the judge's decision can be justified because the judge is firm in the educational, and psychological aspects of the child, as well as the possibility of domestic disputes the stairs that will be built for early childhood children, the writer also looks at the health aspect of the child's reproductive organs. The application of Fiqhiyyah rules by the judge's consideration in deciding whether a matter has a legal basis that is considered by the judge in deciding the matter of the marriage dispensation application and based on the arguments and evidence of the applicant, based on the facts, then according to Islamic law it is allowed by rules of jurisprudence. Review of Islamic Law In the context of the settlement of cases by the religious court judges, the panel of judges used the opinion supporting that underage marriage is in Islamic law. So, the panel of judges who determined this matter was impressed to believe that underage marriage is very risky in the household of children and the ijthad set by the panel of judges through a copy of its determination is very accurate from the values of the purpose of the application of Sharia.

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