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Tax Insight

Penundaan PPh Marketplace Beri Ruang Penyempurnaan Implementasi

Marketplace Income Tax Delay Creates Room to Refine Implementation

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Keputusan Kementerian Keuangan (Kemenkeu) menunda implementasi pemungutan pajak penghasilan (PPh) Pasal 22 atas transaksi melalui marketplace memberi kesempatan bagi banyak pelaku usaha digital untuk menyesuaikan diri sebelum aturan benar-benar diterapkan. Bagi pemerintah, penundaan dapat menjadi momentum untuk menyempurnakan desain kebijakan sekaligus memperkuat komunikasi kepada publik.

The Ministry of Finance's decision to postpone Article 22 income tax collection on online marketplace transactions gives many digital businesses more time to prepare before the policy takes effect. For the government, the delay also provides an opportunity to refine the policy and improve public communication.

Menteri Keuangan (Menkeu) Purbaya Yudhi Sadewa mengungkap keputusan penundaan tersebut diambil dengan pertimbangan menjaga daya beli masyarakat dan memberi ruang bagi pemulihan ekonomi yang masih berlangsung. Dengan penundaan itu, penerapan Peraturan Menteri Keuangan (PMK) Nomor 37 Tahun 2025 diundur hingga akhir Oktober 2026 dan mekanisme pemungutan pajak baru akan berlaku mulai 1 November 2026.

Minister of Finance Purbaya Yudhi Sadewa said the decision was made to safeguard public purchasing power and allow the ongoing economic recovery to continue. Under the revised timeline, enforcement of Minister of Finance Regulation Number 37 of 2025 has been postponed until the end of October 2026, with the new tax collection scheme scheduled to take effect on November 1, 2026.

Penunjukan Tokopedia, Shopee, Lazada, dan Blibli sebagai pemungut PPh Pasal 22 juga dibatalkan sementara. Pajak yang telanjur dipungut akan dikembalikan kepada pedagang.

The appointment of Tokopedia, Shopee, Lazada, and Blibli as Article 22 income tax collectors has also been temporarily revoked, while collected taxes will be refunded to merchants.

Keputusan penundaan ini menjadi ruang evaluasi yang penting agar implementasi kebijakan nantinya berjalan lebih mulus. Penundaan ini bisa menjadi kesempatan bagi pemerintah, marketplace, dan pelaku usaha untuk memastikan kesiapan implementasi dan komunikasi kebijakan berjalan lebih baik.

The delay provides a valuable opportunity to evaluate the policy and ensure a seamless rollout when it eventually takes effect. It gives the government, marketplaces, and businesses extra time to enhance their operational readiness and optimize policy communication.

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Kebijakan pajak marketplace pada dasarnya tidak menghadirkan jenis pajak baru. Yang berubah hanyalah mekanisme pemungutannya yang dilakukan lebih awal melalui marketplace. Selain pemungutannya dilakukan di awal, pajak ini juga tetap bisa dikreditkan.

The marketplace tax policy does not introduce a new type of tax. Rather, it changes when and how the tax is collected, with marketplaces collecting the tax earlier in the transaction process. The tax collected can also still be credited against the taxpayer's final tax liability.

Meski demikian, perubahan waktu pemungutan tersebut membuat arus kas (cash flow) pelaku usaha sedikit berkurang pada awal transaksi. Selain itu, pelaku usaha dan marketplace juga perlu menyesuaikan proses administrasi karena pemotongan pajak dilakukan sejak awal.

However, bringing forward the timing of tax collection means businesses may experience a temporary reduction in cash flow at the beginning of a transaction. Businesses and marketplaces will also need to adjust their administrative processes because the tax will be collected upfront.

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Hal itu yang mungkin dirasakan lebih memberatkan oleh pelaku usaha marketplace, karena selama ini pajak umumnya dibayarkan di belakang.

The change may feel more burdensome for marketplace businesses since taxes have generally been paid at a later stage.

Menata Ekosistem

Supporting the Digital Ecosystem

Penundaan implementasi kebijakan memberi ruang bagi ekosistem perdagangan digital untuk terus berkembang tanpa dibebani penyesuaian administrasi yang terlalu cepat. Langkah tersebut juga dapat mengurangi kekhawatiran pelaku usaha terhadap mekanisme pengawasan yang lebih ketat di platform online.

The delay gives the digital commerce ecosystem more time to grow without having to absorb new administrative requirements rapidly. It may also ease concerns among businesses about the introduction of tighter tax monitoring on online platforms.

Pasalnya, ekosistem digital saat ini masih terus berkembang. Dengan penundaan, pelaku usaha tidak langsung dibebani administrasi baru sehingga ruang untuk bertumbuh tetap terjaga.

The digital ecosystem is constantly evolving. By deferring the measure, businesses are not immediately required to take on additional administrative obligations, allowing them more room to grow.

Meski demikian, penundaan ini membuat upaya Direktorat Jenderal Pajak (DJP) untuk memperoleh data transaksi dari merchant yang lebih valid sebagai dasar pengawasan kepatuhan pajak pelaku usaha digital juga tertunda.

At the same time, the delay also means that the Directorate General of Taxes' efforts to obtain more reliable transaction data from merchants for monitoring tax compliance among digital businesses will be put on hold.

Level Playing Field

A Level Playing Field

Diketahui, alasan pemerintah mengubah mekanisme pemungutan pajak marketplace untuk menciptakan level playing field antara pedagang online dan offline. Meski demikian, mekanisme yang dipilih sejatinya masih perlu dikaji agar benar-benar menghadirkan perlakuan yang setara bagi kedua jenis pelaku usaha. Pasalnya, perdagangan offline tidak terdapat mekanisme pemungutan PPh Pasal 22 seperti yang dirancang untuk transaksi melalui marketplace.

> *The government has said that the changes to marketplace tax collection are intended to create a level playing field between online and offline merchants. However, the proposed mechanism may still require further consideration to ensure that both groups receive genuinely equitable tax treatment. This is because offline transactions are not generally subject to the same Article 22 income tax collection proposed for marketplace transactions.*

Di offline, tidak semua transaksi dikenakan pemotongan/pemungutan PPh. Ada PPh Pasal 23 dan PPh 4(2) final, misalnya untuk jasa dan sewa, dan PPh Pasal 22 juga hanya berlaku untuk komoditas atau transaksi tertentu. Sementara di online, ketika transaksinya dilakukan melalui marketplace, pemungutan PPh Pasal 22 bisa berlaku lebih luas. Jadi, transaksi yang secara substansi sama bisa mendapatkan perlakuan pajak yang berbeda hanya karena dilakukan melalui marketplace.

> *For offline transactions, not every transaction is subject to tax withholding or collection. Article 23 income tax and Article 4(2) final income tax may apply to services and rental transactions, while Article 22 income tax applies only to specific commodities or transactions. Online transactions made through marketplaces, by contrast, may be subject to Article 22 income tax more broadly. As a result, substantively similar transactions could receive different tax treatment merely because one takes place through a marketplace.*

Kondisi tersebut berpotensi menambah beban administrasi bagi pelaku usaha digital. Meski pajak yang dipungut dapat dikreditkan, penjual tetap harus menyesuaikan proses administrasi dan menghadapi pengurangan arus kas (cash flow) sejak awal transaksi. Sementara pedagang offline tidak menghadapi mekanisme serupa.

> *The situation could create additional administrative requirements for digital businesses. Although the tax collected can be credited, sellers will still need to adjust their administrative processes and absorb the resulting cash flow impact from the outset. Offline merchants, meanwhile, do not face the same burden.*

Withholding Tax vs Information Sharing

Withholding Tax vs Information Sharing

Dalam ekonomi digital, terdapat dua mekanisme pelibatan pihak ketiga, yaitu sistem pemotongan pajak (withholding tax system) dan sistem pelaporan data (information sharing system). Dalam withholding tax system, pihak ketiga menghitung, memotong, dan menyetorkan pajak atas transaksi yang difasilitasinya. PMK 37/2025 menggunakan pendekatan ini dengan menugaskan marketplace memotong PPh sebesar 0,5% dari transaksi bruto.

> *In the digital economy, tax authorities generally engage with third-party platforms through two distinct methods, i.e., a withholding tax system and an information sharing system. Under a withholding tax system, third parties calculate, withhold, and remit taxes on facilitated transactions. For instance, Minister of Finance Regulation Number 37 of 2025 assigns e-commerce marketplaces to withhold a 0.5% income tax on gross merchant sales.*

Pemotongan di awal dapat mempercepat penerimaan negara. Namun, penggunaan omzet sebagai dasar pemotongan tidak memperhitungkan biaya dan laba bersih pedagang. Bagi pedagang dengan margin tipis, pemotongan dapat mengurangi modal kerja dan likuiditas. Kewajiban sebagai pemungut juga menambah beban administrasi marketplace, termasuk pengelolaan dana, penerbitan bukti potong, serta penanganan transaksi yang dibatalkan atau dikembalikan.

> *While upfront withholding accelerates state revenue, using gross revenue as the base ignores merchants' operational costs and net profit margins. It potentially drains working capital and liquidity for low-margin sellers. It also imposes heavy compliance burdens on marketplaces, including managing funds, issuing withholding tax slips, and processing canceled orders or refunds.*

Sebaliknya, information sharing system atau Third-Party Information Reporting (TPIR) tidak mewajibkan pihak ketiga memotong dana wajib pajak. Platform memverifikasi identitas pengguna dan melaporkan data transaksi kepada otoritas pajak secara berkala.

> *Conversely, an information sharing system or third-party information reporting (TPIR) does not require platforms to withhold funds. Platforms verify user identities and regularly report transaction data to the tax authority.*

Pembayaran pajak tetap menjadi tanggung jawab wajib pajak melalui mekanisme self-assessment. Otoritas pajak menggunakan data pihak ketiga untuk mencocokkan informasi dan mendeteksi ketidakpatuhan. Dengan demikian, negara memperoleh informasi transaksi tanpa langsung mengintervensi arus kas wajib pajak.

> *Taxpayers are responsible for paying taxes under a self-assessment model. Tax authorities use this third-party data to match records and detect non-compliance without directly disrupting taxpayers' cash flows.*

Meningkatkan Kepatuhan
Enhancing Compliance

Pelaporan pihak ketiga memiliki dasar empiris dalam peningkatan kepatuhan. Data Internal Revenue Service (IRS) Amerika Serikat menunjukkan tingkat salah lapor pajak (misreporting rate) mencapai 63% pada jenis penghasilan yang tidak disertai pelaporan pihak ketiga. Ketika penghasilan dilaporkan penuh oleh pihak ketiga, tingkat salah lapor turun menjadi 7%.

> *Third-party reporting offers an empirical approach to improving tax compliance. Data from the U.S. Internal Revenue Service (IRS) reveals a 63% misreporting rate for income lacking third-party reporting, which drops dramatically to 7% when third parties fully report income.*

Pelaporan tersebut mengurangi asimetri informasi antara wajib pajak dan otoritas pajak. Ketika otoritas memiliki data transaksi, peluang penyembunyian penghasilan menjadi lebih kecil.

> *Such reporting reduces information asymmetry between taxpayers and tax authorities. When tax authorities receive external transaction feeds, opportunities for underreporting income shrink.*

Sebaliknya, penunjukan marketplace sebagai pemungut pajak menambah tanggung jawab hukum dan administratif platform. Pemungutan yang membebani pedagang juga berpotensi mendorong sebagian pelaku usaha berpindah ke saluran informal yang lebih sulit dilacak.

> *On the other hand, designating marketplaces as tax collectors increases legal and administrative risks for platforms. Imposing collection duties that burden sellers also risks driving some businesses into harder-to-track informal channels.*

Model OECD dan DAC7
OECD and DAC7

OECD menerbitkan Model Rules for Reporting by Platform Operators pada 2020. Kerangka ini menekankan transparansi dan pelaporan data platform kepada otoritas pajak. Cakupannya antara lain penyewaan properti, jasa personal, serta penjualan barang.

> *In 2020, the OECD laid out Model Rules for Reporting by Platform Operators. The system emphasizes platform transparency and data reporting to the tax authority. It comprises property rentals, personal services, and goods sales.*

Platform diwajibkan melakukan due diligence untuk memverifikasi identitas penjual dan melaporkan data seperti identitas penjual, nilai transaksi bruto, pajak atau komisi yang dipotong, serta rekening tempat dana dicairkan. OECD juga mengecualikan sejumlah penjual dari kewajiban pelaporan, termasuk jaringan hotel dengan lebih dari 2.000 transaksi per tahun, entitas pemerintah, dan perusahaan terbuka.

> *Platforms conduct due diligence to verify seller identities and report other data, such as sellers' identities, gross transaction values, deducted fees, and financial account details. OECD exempts several sellers from reporting obligations, including large hotel chains with over 2,000 annual transactions, government entities, and publicly traded companies.*

Pendekatan tersebut diterapkan Uni Eropa melalui Council Directive (EU) 2021/514 atau DAC7 yang berlaku sejak 1 Januari 2023. DAC7 mewajibkan platform mengumpulkan dan melaporkan data penjual kepada otoritas pajak setiap tahun.

The European Union has also been applying the approach since January 1, 2023, through Council Directive (EU) 2021/514, also known as DAC7. DAC7 mandates annual seller data gathering and reporting to the tax authority.

DAC7 tidak menciptakan jenis pajak baru dan tidak mengubah ketentuan pengenaan pajak atas penghasilan. Regulasi tersebut mengatur transparansi dan kerja sama administratif. Penjual barang juga dikecualikan dari pelaporan jika melakukan kurang dari 30 transaksi dan memiliki total nilai transaksi di bawah EUR 2.000 dalam satu tahun.

DAC7 does not create new taxes or alter income tax liabilities. Instead, the directive governs transparency and administrative cooperation. Additionally, sellers performing under 30 transactions in a year with a total annual sales of EUR 2,000 are exempt from reporting.

Implementasinya disesuaikan dengan sistem masing-masing negara. Prancis menggunakan data untuk menguji kepatuhan, Belanda menilai apakah transaksi merupakan sumber penghasilan atau kegiatan hobi, sedangkan Estonia menggunakan data DAC7 untuk pre-filled tax returns. Dalam ketiga pendekatan tersebut, platform tidak berfungsi sebagai pemungut pajak.

Its implementation varies by system across countries. France uses platform data for compliance auditing, the Netherlands evaluates whether transactions constitute taxable income or merely a hobby, and Estonia uses DAC7 feeds to populate pre-filled tax returns. All without turning platforms into tax collectors.

Coretax sebagai Infrastruktur Data

Coretax as Data Infrastructure

Implementasi Core Tax Administration System (Coretax) oleh DJP dapat mendukung marketplace sebagai sumber data bagi otoritas pajak. Coretax menggunakan NIK sebagai NPWP dan mengintegrasikan profil wajib pajak melalui Taxpayer Account Management (TAM), termasuk data pelaporan, pembayaran, serta informasi dari Instansi, Lembaga, Asosiasi, dan Pihak Lain (ILAP).

The DGT's Coretax administration system provides the technical architecture necessary to utilize marketplaces as reporting intermediaries for the tax authority. Coretax uses national identification number (nomor induk kependudukan/NIK) as the primary taxpayer identification number (nomor pokok wajib pajak/NPWP) and unifies taxpayer data through Taxpayer Account Management (TAM), including reporting data, payment history, and information from government agencies, institutions, associations, and other third parties.

Data transaksi marketplace dapat melengkapi profil tersebut. DJP kemudian dapat menggunakan Compliance Risk Management (CRM) untuk mencocokkan data transaksi dengan omzet yang dilaporkan dalam SPT Tahunan. Ketidaksesuaian dapat menjadi dasar penerbitan SP2DK.

Marketplace transaction data further enrich these profiles. The DGT can cross-match the transaction data against annual revenue reported in tax returns using Compliance Risk Management (CRM). Any discrepancies will trigger a request for an explanation of data and/or information (surat permintaan penjelasan data dan/atau keterangan/SP2DK).

Data tersebut juga dapat digunakan untuk pre-populated SPT. Dalam skema ini, pedagang memverifikasi omzet yang tercatat di Coretax, menambahkan biaya operasional bagi wajib pajak yang menggunakan pembukuan, kemudian menghitung dan membayar pajak sesuai ketentuan.

The data can also power pre-populated tax returns. Under this scheme, merchants verify the revenue recorded in Coretax, factor in operational expenses if using standard bookkeeping, and subsequently compute and pay their taxes accordingly.

Pengembalian Pajak

Tax Refunds

Setelah kebijakan ini ditunda hingga 1 November 2026, Menkeu Purbaya juga menyebut pajak yang telah dipungut akan dilakukan pengembalian. Proses tersebut sejatinya dapat dilakukan dengan relatif lancar karena transaksi di marketplace sudah tercatat secara digital.

Following the postponement of the policy until November 1, 2026, Minister of Finance Purbaya also stated that they will refund taxes already collected. The process should be relatively straightforward as marketplace transactions are digitally recorded.

Mengingat seluruh transaksi terdokumentasi secara digital, proses pengembaliannya seharusnya dapat dikelola dengan baik oleh marketplace. Data penjual yang telah dipotong pajaknya dapat diidentifikasi dengan mudah sehingga pengembalian dana tidak memerlukan proses yang terlalu kompleks. Apalagi masa pelaporan SPT belum berlangsung sehingga penyesuaian administrasi masih lebih sederhana.

> *Since the transactions are digitally documented, marketplaces should be able to manage the refund process efficiently. Sellers whose transactions were subject to tax collection can be readily identified, meaning refunds would not require an overly complex process. The fact that the tax filing return period has not yet begun should also make the necessary administrative adjustments rather simple.*

Hingga keputusan ini benar-benar diterapkan, pemerintah sejatinya memanfaatkan kemampuan analisis data digital yang telah dimiliki otoritas pajak. Pertukaran data dengan marketplace, pemanfaatan data analytics, dan penguatan pengawasan berbasis teknologi dinilai dapat menjadi pelengkap kebijakan pemungutan pajak.

> *Until the revised policy takes effect, the government could make greater use of the tax authority's existing digital data capabilities. Data exchanges with marketplaces, data analytics, and technology-based compliance monitoring could complement the marketplace tax collection policy.*

Penundaan kewajiban pemungutan PPh Pasal 22 marketplace hingga 31 Oktober 2026 memberi kesempatan untuk mengevaluasi kembali desain administrasi perpajakan ekonomi digital. Berdasarkan konsep TPIR, rekomendasi OECD, penerapan DAC7, dan kemampuan Coretax, marketplace tidak harus ditempatkan sebagai withholding agent. Perannya dapat difokuskan sebagai reporting intermediary.

> *The postponement of the marketplace Article 22 income tax until October 31, 2026, offers an opportunity to re-evaluate digital economy tax administration. Drawing on TPIR principles, OECD recommendations, DAC7, and Coretax capabilities, marketplaces need not act as withholding agents. Their role should be solely as reporting intermediaries.*

Dengan mengganti kewajiban pemotongan 0,5% dari omzet menjadi kewajiban pelaporan data transaksi secara berkala, pemerintah tetap memperoleh informasi untuk mengawasi kepatuhan. Pada saat yang sama, arus kas pedagang tidak langsung berkurang dan pengenaan pajak tetap dapat mempertimbangkan karakteristik penghasilan wajib pajak.

> *Transitioning from a 0.5% gross withholding obligation to periodic transaction reporting enables the government to access necessary information to monitor compliance. It also simultaneously protects merchant cash flow and allows taxation to consider taxpayers' income characteristics.*

Hal ini membuat ekosistem digital tetap bertumbuh tanpa banyak membebankan administrasi di depan untuk para pelaku usaha. Dengan pendekatan tersebut, pemerintah tetap dapat meningkatkan kepatuhan pajak sekaligus menjaga iklim usaha digital tetap kondusif.

> *The approach would enable the digital ecosystem to continue growing without placing excessive upfront administrative burdens on businesses. By combining data-driven tax administration with a measured implementation process, the government can continue to fortify tax compliance whilst maintaining a supportive environment for digital businesses.*

About Ideatax

Ideatax combine a long-running experience in tax consulting and tax authority to deliver thorough solutions to our clients. We also present integrated approaches with problem-solving capabilities imbued with a full commitment to the most polished quality of service to our clients. Since its establishment in 2020, Ideatax has been trusted to handle more than 465+ projects from 250+ clients and continues to grow. For more information, please contact:

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