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Tax Insight

Mengukur Tax Gap untuk Menentukan Target Pajak yang Tepat

Measuring the Tax Gap to Set Realistic Revenue Targets

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Measuring the Tax Gap to Set Realistic Revenue Targets

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Organisasi Kerja Sama dan Pembangunan Ekonomi (Organization for Economic Co-operation and Development/OECD) mendefinisikan tax gap sebagai selisih antara pajak yang secara teoritis seharusnya dipungut dan pajak yang benar-benar terkumpul. Kementerian Keuangan (Kemenkeu) menggunakan tax gap sebagai indikator untuk mengukur kepatuhan wajib pajak dan efektivitas administrasi perpajakan.

> *The Organization for Economic Co-operation and Development (OECD) defines the tax gap as the difference between the total tax theoretically owed and the amount actually collected. The Ministry of Finance uses this metric to gauge taxpayer compliance and assess administrative efficiency.*

International Monetary Fund (IMF) melalui metodologi Revenue Administration Gap Analysis Program (RA-GAP) membagi tax gap menjadi dua komponen. Pertama, compliance gap, yaitu kehilangan penerimaan akibat ketidakpatuhan, penghindaran pajak (tax avoidance), dan penggelapan pajak (tax evasion). Kedua, policy gap, yaitu kehilangan potensi penerimaan akibat kebijakan pemerintah berupa tarif preferensial, ambang batas, atau pengecualian pajak.

> *Using its Revenue Administration Gap Analysis Program (RA-GAP) method, the International Monetary Fund (IMF) breaks the tax gap down into two distinct components. First, the compliance gap, which refers to revenue losses stemming from non-compliance, tax avoidance, and tax evasion. Second, the policy gap, which refers to potential revenue forgone due to specific policies, such as preferential rates, statutory thresholds, or tax exemptions.*

Pengukuran tax gap penting untuk menentukan target penerimaan pajak berdasarkan potensi yang dapat dihimpun. Tax gap juga memberikan gambaran mengenai tingkat kepatuhan sukarela atau voluntary compliance rate (VCR).

> *Measuring the tax gap is essential for anchoring tax revenue targets to actionable economic potential. It also provides a baseline for evaluating an economy's voluntary compliance rate (VCR).*

Tanpa pengukuran tax gap, penetapan target penerimaan berisiko lebih berorientasi pada kebutuhan belanja daripada potensi penerimaan. Target yang ditentukan berdasarkan kebutuhan belanja tanpa memperhitungkan kapasitas wajib pajak dan celah penerimaan yang dapat ditutup dapat meningkatkan tekanan terhadap otoritas pajak.

> *Without tax gap estimates, budget targets risk being driven by spending needs rather than underlying collection capacity. Relying on revenue goals calculated purely from expenditure demands without evaluating actual taxpayer capacity or addressable revenue leaks creates operational pressure on tax authorities.*

Penetapan Target Penerimaan Pajak Indonesia

How Indonesia Sets Its Tax Target

Indonesia belum menggunakan penghitungan tax gap secara terstruktur sebagai basis dalam memetakan potensi penerimaan, menetapkan target APBN, serta merumuskan strategi peningkatan kepatuhan pajak. Target penerimaan dalam APBN disusun melalui dokumen Kerangka Ekonomi Makro dan Pokok-Pokok Kebijakan Fiskal (KEM-PPKF). Dokumen tersebut diformulasikan oleh Badan Kebijakan Fiskal (BKF) berdasarkan proyeksi makroekonomi, kinerja penerimaan historis, dan arah pembangunan nasional jangka menengah.

Indonesia has yet to systematically incorporate tax gap calculations into its revenue forecasting, state budget targeting, or tax compliance strategies. State budget targets are developed through the Macroeconomic Framework and Fiscal Policy Principles (Kerangka Ekonomi Makro dan Pokok-Pokok Kebijakan Fiskal/KEM-PPKF), a document produced by the Fiscal Policy Agency (Badan Kebijakan Fiskal/BKF) based on macroeconomic projections, historical collection performance, and medium-term national development goals.

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Salah satu indikator yang digunakan adalah tax buoyancy, yaitu perbandingan antara pertumbuhan penerimaan pajak dan pertumbuhan ekonomi nominal.

One metric utilized in this framework is tax buoyancy, which measures the tax revenue growth relative to nominal economic growth.

Dalam perumusan RAPBN 2027, pemerintah mengasumsikan pertumbuhan ekonomi riil sebesar 6% dan inflasi 2,5%. Dengan demikian, pertumbuhan ekonomi nominal (pertumbuhan ekonomi riil ditambah inflasi) diperkirakan sebesar 8,5%. Sementara itu, pemerintah menargetkan penerimaan pajak pada RAPBN 2027 sebesar Rp 2.591,4 triliun, tumbuh 12,1% dari outlook 2026.

In formulating the 2027 state budget bill, the government projects real economic growth of 6% and inflation of 2.5%, yielding an estimated nominal economic growth rate (real economic growth plus inflation) of 8.5%. Against this backdrop, the government targets tax revenue at IDR 2,591.4 trillion in the 2027 state budget bill, a 12.1% increase over the 2026 outlook.

Adapun penghitungan tax buoyancy didapat dari pertumbuhan pajak dibagi pertumbuhan ekonomi nominal. Dengan demikian tax buoyancy pada 2027 ditargetkan sebesar 1,42%. Artinya, setiap pertumbuhan ekonomi nominal sebesar 1% diharapkan menghasilkan pertumbuhan penerimaan pajak sekitar 1,42%.

Tax buoyancy is calculated by dividing tax revenue growth by nominal economic growth. On this basis, the implied tax buoyancy for 2027 is 1.42%. In other words, every 1% increase in nominal economic growth is expected to generate approximately 1.42% growth in tax revenue.

Pendekatan tersebut belum menjelaskan secara spesifik sumber tambahan penerimaan yang diperlukan untuk mencapai target tersebut, terutama bagian compliance gap yang akan ditutup.

However, this approach fails to specify where the necessary additional revenue will come from, particularly the portion expected to be generated by closing the compliance gap.

Tax buoyancy Indonesia mencapai lebih dari 2 pada 2021 dan 2022, antara lain karena kenaikan harga komoditas global dan pelaksanaan program pengungkapan sukarela (PPS) atau yang dikenal sebagai tax amnesty jilid II. Namun, tax buoyancy turun menjadi 0,88 pada 2023 dan 0,60 pada 2024, bahkan menjadi-0,12 pada 2025.

Indonesia's tax buoyancy surged past 2 in 2021 and 2022, primarily driven by a global commodity boom and the voluntary disclosure program (program pengungkapan sukarela/PPS), also known as tax amnesty volume II. Yet tax buoyancy fell to 0.88 in 2023, dropped to 0.60 in 2024, and contracted to -0.12 in 2025.

Perubahan tersebut menunjukkan pertumbuhan penerimaan pajak tidak selalu mengikuti pola pertumbuhan ekonomi secara konsisten. Karena itu, penetapan target berdasarkan tax buoyancy perlu dilengkapi dengan pemetaan tax gap dan identifikasi sumber penerimaan yang dapat ditingkatkan.

These sharp swings show that tax revenue growth does not always mirror economic expansion. Consequently, tax buoyancy-based targets must be augmented by tax gap mapping to pinpoint addressable revenue streams.

Tax Gap Indonesia

Indonesia's Tax Gap

Direktorat Jenderal Pajak (DJP) belum secara rutin mempublikasikan pengukuran tax gap. Karena itu, estimasi tax gap masih banyak mengacu pada penelitian independen dan lembaga multilateral.

> *As the Directorate General of Taxes (DGT) does not regularly publish official tax gap figures, estimates rely largely on independent academic research and multilateral institutions.*

Laporan Bank Dunia bertajuk Estimating VAT and CIT Gaps in Indonesia (2025), mencatat selama periode 2016-2021, rata-rata tax gap gabungan pajak pertambahan nilai (PPN) dan pajak penghasilan (PPh) badan mencapai 6,4% dari PDB. Secara nominal, angka tersebut setara dengan potensi penerimaan sekitar Rp 944 triliun per tahun.

> *According to a World Bank report, Estimating VAT and CIT Gaps in Indonesia (2025), the combined value-added tax (VAT) and corporate income tax (CIT) gap averaged 6.4% of GDP between 2016 and 2021. The figure was equivalent to an estimated IDR 944 trillion in annual potential revenue.*

Tax gap tersebut terdiri atas:

1. Compliance gap sebesar 3,7% PDB, atau sekitar Rp 548 triliun. Kesenjangan ini berasal dari ketidakpatuhan, termasuk penghindaran dan penggelapan pajak.
2. Policy gap sebesar 2,7% PDB, atau sekitar Rp 396 triliun. Kesenjangan ini berasal dari kebijakan pemerintah yang mengurangi potensi penerimaan, terutama melalui insentif fiskal, pembebasan pajak, dan fasilitas perpajakan lainnya.

> *The tax gap breaks down into:*
>
> 1. *Compliance gap at 3.7% of GDP, or equal to around IDR 548 trillion, driven by non-compliance, including tax avoidance and evasion.*
> 2. *Policy gap at 2.7% of GDP, or equal to IDR 396 trillion, arising from government policies that reduce potential revenue, particularly fiscal incentives, tax exemptions, and other tax incentives.*

Besarnya compliance gap menunjukkan adanya potensi penerimaan yang belum masuk dalam sistem perpajakan. Salah satu faktor yang berkontribusi adalah aktivitas ekonomi yang belum sepenuhnya tercakup dalam administrasi perpajakan.

> *The sizeable compliance gap indicates some potential revenue remains outside the tax net. One contributing factor is economic activity that tax administrations have yet to fully capture.*

Sementara itu, mengutip laporan OECD bertajuk Tax Administration 2024: Comparative Information on OECD and Other Advanced and Emerging Economies, policy gap mengukur kehilangan penerimaan pajak yang disebabkan oleh berbagai kebijakan perpajakan. Kesenjangan tersebut dapat mencakup belanja perpajakan yang disengaja, seperti kredit pajak yang diberikan untuk mencapai tujuan kebijakan tertentu, maupun belanja perpajakan yang tidak disengaja.

> *Meanwhile, as noted in the OECD's Tax Administration 2024: Comparative Information on OECD and Other Advanced and Emerging Economies report, the policy gap tracks tax revenue forgone through tax legislative design. The gap may include deliberate tax expenditures, such as tax credits introduced to achieve specific policy objectives, as well as unintended tax expenditures.*

Perkembangan policy gap dapat dilihat dari Laporan Belanja Perpajakan Kementerian Keuangan. Belanja perpajakan mencakup berbagai insentif dan fasilitas yang mengurangi penerimaan negara.

> *Indonesia's growing policy gap is visible in official Ministry of Finance Tax Expenditure Reports. Tax expenditures encompass various incentives that reduce state revenue.*

Fiscal Year	Tax Expenditure	Percentage of GDP	Dominant Categories
2023	IDR 360 trillion	1.71%	VAT and Luxury-Goods Sales Tax Incentives (IDR 208.2 T), Income Tax Incentives (IDR 129.2 T).
2024	IDR 400.1 trillion	1.81%	VAT and Luxury-Goods Sales Tax Incentives (IDR 227.8 T), Income Tax Incentives (IDR 140.7 T).
2025	IDR 530.3 trillion (Estimate)	> 2.00%	VAT and Luxury-Goods Sales Tax Incentives (IDR 343.3 T), Income Tax Incentives (IDR 150.3 T).

Source: Ministry of Finance Tax Expenditure Report.

Sementara itu, efisiensi pemungutan PPN Indonesia juga masih rendah. Bank Dunia dalam laporannya bertajuk Estimating VAT and CIT Gaps in Indonesia (2025) mencatat C-efficiency PPN Indonesia pada 2021 sebesar 52,8%, yang berarti penerimaan aktual PPN baru mencapai sekitar setengah dari potensi teoritisnya. Sebagai perbandingan, Thailand pada tahun yang sama mencatat C-efficiency sebesar 76,7%.

> *Indonesia also struggles with low VAT collection efficiency. The World Bank's Estimating VAT and CIT Gaps in Indonesia (2025) report found that Indonesia's VAT C-efficiency stood at 52.8% in 2021, meaning actual VAT receipts reached only about half of their theoretical potential. By comparison, Thailand achieved a C-efficiency of 76.7% in the same year.*

Rendahnya efisiensi tersebut antara lain berkaitan dengan pembebasan PPN atas sejumlah barang dan jasa, termasuk kebutuhan pokok, pendidikan, dan kesehatan, serta batas omzet pengusaha untuk dikukuhkan sebagai pengusaha kena pajak (PKP).

> *This relatively low efficiency is partly due to VAT exemptions on goods and services, including necessities, education, and healthcare, as well as the turnover threshold for businesses required to register as taxable entrepreneurs (pengusaha kena pajak/PKP).*

Kondisi tersebut tercermin dalam tax ratio Indonesia. Mengutip Laporan Tahunan DJP, rasio pajak turun dari 10,38% pada 2022 menjadi 10,31% pada 2023 dan 10,08% pada 2024. Untuk 2025, tax ratio Indonesia kembali turun menjadi 9,31%.

> *The issue is also reflected in Indonesia's tax ratio. According to the DGT annual report, the tax ratio slid from 10.38% in 2022 to 10.31% in 2023 and 10.08% in 2024, before falling further to 9.31% in 2025.*

Target Penerimaan APBN 2027

The 2027 State Budget Revenue Target

Dalam KEM-PPKF 2027, pemerintah menargetkan pendapatan negara sebesar 12,01% hingga 12,4% dari PDB dan menetapkan batas defisit APBN sebesar 2,4% atau Rp 671,2 triliun.

> *Under the 2027 KEM-PPKF, the government targets state revenue between 12.01% and 12.4% of GDP while capping the state budget deficit at 2.4% of GDP, equivalent to IDR 671.2 trillion.*

Dalam RAPBN 2027, penerimaan perpajakan ditargetkan mencapai Rp 2.908 triliun, meningkat 10,5% dibandingkan outlook 2026 sebesar Rp 2.631,4 triliun. Sementara itu, penerimaan pajak ditargetkan mencapai Rp 2.591,4 triliun, atau meningkat 12,1% dari proyeksi 2026.

> *Total tax receipts are projected to reach IDR 2,908 trillion in the 2027 state budget bill, up 10.5% from the 2026 outlook of IDR 2,631.4 trillion. Meanwhile, tax revenue is targeted at IDR 2,591.4 trillion, representing a 12.1% increase from the 2026 projection.*

Peningkatan target tersebut perlu disertai pemetaan tax gap berdasarkan sektor dan jenis pajak. Tanpa pemetaan tersebut, peningkatan penerimaan berisiko lebih banyak berasal dari wajib pajak yang sudah terdaftar dan patuh daripada dari perluasan basis pajak.

> *Achieving these aggressive targets requires tax gap mapping by sector and tax type. Without a mapping, additional revenue may be extracted disproportionately from registered and compliant taxpayers rather than through a tax base expansion.*

Ketergantungan pada wajib pajak existing juga dapat meningkatkan tekanan melalui pemeriksaan, penagihan, dan koreksi pajak. Jika tidak diimbangi dengan perluasan basis pajak, strategi tersebut dapat memengaruhi arus kas perusahaan dan keputusan investasi.

> *Continued reliance on existing taxpayers may also intensify audits, collection measures, and tax adjustments. Without corresponding efforts to broaden the tax base, this approach could affect corporate cash flows and investment decisions.*

Tekanan terhadap wajib pajak juga dapat memengaruhi belanja modal (capital expenditure/CAPEX), perekrutan tenaga kerja, dan modal kerja, terutama jika restitusi pajak berjalan lebih lambat.

> *Pressure on taxpayers could also affect capital expenditure (CAPEX), hiring, and working capital, especially if tax refund processing delays persist.*

Karena itu, penetapan target penerimaan 2027 perlu disertai identifikasi yang jelas mengenai sumber tambahan penerimaan, termasuk besaran compliance gap dan policy gap yang dapat ditutup. Pendekatan tersebut akan membuat target penerimaan lebih terukur dan mengurangi ketergantungan pada intensifikasi terhadap wajib pajak yang sudah berada dalam sistem.

> *To prevent these distortions, the 2027 revenue targets must explicitly define where additional revenue will be generated, including how much of the compliance and policy gaps might be closed. Therefore, the target will be more measurable while reducing reliance on intensified enforcement against existing taxpayers.*

Metodologi Pengukuran Tax Gap di Beberapa Negara

How Other Jurisdictions Measure the Tax Gap

Pengukuran tax gap di berbagai negara menjadi dasar dalam menentukan strategi penerimaan dan mengelola kepatuhan wajib pajak. Berdasarkan laporan OECD bertajuk Tax Administration 2024: Comparative Information on OECD and Other Advanced and Emerging Economies, sebanyak 89% otoritas pajak menggunakan metodologi top-down, yaitu analisis berbasis data makroekonomi. Sebanyak 57% juga menggunakan metodologi bottom-up, yaitu estimasi berdasarkan data mikro dan hasil audit.

> *Countries worldwide rely on tax gap analyses to shape revenue strategies and manage taxpayer compliance. According to the OECD's Tax Administration 2024: Comparative Information on OECD and Other Advanced and Emerging Economies, 89% of tax authorities employ top-down macroeconomic modeling, while 57% use bottom-up approaches based on micro-data and audit findings.*

Amerika Serikat

United States

Amerika Serikat melalui Internal Revenue Service (IRS) secara berkala menghitung gross tax gap, net tax gap, dan voluntary compliance rate. Untuk Tahun Pajak 2022, IRS memperkirakan gross tax gap sebesar US$ 696 miliar. Tingkat kepatuhan sukarela berada di sekitar 85% selama tiga dekade terakhir.

> *The United States regularly estimates gross tax gaps, net tax gaps, and VCR through the Internal Revenue Service (IRS). For fiscal year 2022, the IRS estimated a gross tax gap of USD 696 billion, with the VCR holding steady at around 85% over the past three decades.*

Gross tax gap terdiri atas underreporting gap sebesar US$ 539 miliar, underpayment gap US$ 94 miliar, dan non-filing gap US$ 63 miliar. Untuk menghitung underreporting gap, IRS menggunakan national research program (NRP), yaitu audit terhadap sampel wajib pajak yang dipilih secara acak.

> *The gross tax gap consisted of an underreporting gap of USD 539 billion, an underpayment gap of USD 94 billion, and a non-filing gap of USD 63 billion. The IRS calculates the underreporting component using the National Research Program (NRP), a random taxpayer sample audit.*

IRS juga menggunakan detection controlled estimation (DCE), yaitu model ekonometrik berbasis regresi menggunakan hasil audit acak untuk memperkirakan pendapatan yang tidak terdeteksi dalam proses audit. Metodologi tersebut membantu IRS memperkirakan penerimaan yang hilang dan mengevaluasi efektivitas penegakan hukum perpajakan.

> *The IRS also applies detection-controlled estimation (DCE), an econometric regression-based model that uses random audit results to estimate income that may remain undetected during audits. These methodologies help the IRS estimate lost revenue and evaluate the effectiveness of tax enforcement.*

Australia

Australia

Australian Taxation Office (ATO) menyusun laporan tax gap berdasarkan 15 jenis pajak. Pengukuran tersebut mencakup pajak berbasis transaksi, seperti goods and services tax (GST), cukai bahan bakar, dan cukai tembakau, serta pajak berbasis pendapatan, seperti PPh badan, PPh orang pribadi, dan fringe benefits tax.

> *The Australian Taxation Office (ATO) establishes a tax gap report across 15 tax categories, covering transaction taxes, such as goods and services tax (GST), fuel and tobacco excises, and income taxes, including corporate, individual, and fringe benefits.*

Pada 2022–2023, ATO memperkirakan net tax gap sebesar A$ 58,2 miliar atau 9,1% dari total kewajiban pajak secara teori sebesar A$ 640,5 miliar. Tax gap terbesar berasal dari PPh usaha kecil sebesar 17,4%, diikuti tax gap orang pribadi sebesar 6,2% dan GST sebesar 9,1%.

> *For 2022–2023, the ATO estimated a net tax gap of AUD 58.2 billion, equivalent to 9.1% of the estimated AUD 640.5 billion in theoretical tax liabilities. Small business income tax accounted for the largest gap at 17.4%, followed by individual income tax at 6.2% and GST at 9.1%.*

Pengukuran berdasarkan jenis pajak dan kelompok wajib pajak memungkinkan ATO menentukan prioritas kepatuhan dan mengevaluasi keberhasilan kebijakan berdasarkan penurunan tax gap.

> *Measuring the gap by tax type and taxpayer segment enables the ATO to target compliance and evaluate policy effectiveness based on reductions in the tax gap.*

Singapura dan Malaysia

Singapore and Malaysia

Singapura melalui Inland Revenue Authority of Singapore (IRAS) menerapkan risk-based compliance management. Pendekatan ini mengarahkan sumber daya pengawasan kepada wajib pajak berdasarkan tingkat risikonya.

> *Singapore applies risk-based compliance management through the Inland Revenue Authority of Singapore (IRAS) and directs enforcement resources toward taxpayers based on their risk profiles.*

IRAS juga menerapkan Tax Governance Framework (TGF) dan Tax Risk Management and Control Framework for Corporate Income Tax (CTRM). Perusahaan yang memenuhi persyaratan pengendalian internal perpajakan dapat memperoleh pengurangan frekuensi pemeriksaan dan fasilitas terkait voluntary disclosure.

> *IRAS also operates the Tax Governance Framework (TGF) and Tax Risk Management and Control Framework for Corporate Income Tax (CTRM). Companies eligible for internal tax controls may benefit from fewer audits and related to voluntary disclosure.*

Malaysia melalui Lembaga Hasil Dalam Negeri (LHDN) juga menggunakan analisis risiko dalam menentukan prioritas audit dan pengenaan penalti. Meskipun belum menerbitkan laporan tax gap seluas Australia, pendekatan LHDN menitikberatkan pada pengelolaan risiko dan kepatuhan jangka panjang.

> *Malaysia's Inland Revenue Board (Lembaga Hasil Dalam Negeri/LHDN) similarly uses risk analysis to determine audit priorities and penalties. Although LHDN does not publish a tax gap report as extensively as Australia, its approach emphasizes risk management and long-term compliance.*

Kebijakan Indonesia Mengurangi Tax Gap

Indonesia's Effort to Reduce the Tax Gap

Indonesia telah melakukan sejumlah langkah untuk mengurangi tax gap, terutama melalui modernisasi administrasi dan pengelolaan risiko kepatuhan. DJP menerapkan Core Tax Administration System (CTAS) atau Coretax untuk mengintegrasikan data dan proses administrasi perpajakan secara digital.

> *Indonesia has taken important steps to address its tax gap through administrative modernization and compliance risk management. The DGT introduced the Core Tax Administration System, commonly known as Coretax, to unify tax data and enable end-to-end digital processing.*

Coretax menyediakan antara lain fitur pre-filled return, yaitu pengisian SPT berdasarkan data pihak ketiga, serta mendukung proses restitusi. Integrasi data diharapkan mengurangi kesalahan pelaporan dan meningkatkan kemampuan DJP dalam mendeteksi ketidakpatuhan.

> *Coretax features pre-filled tax returns driven by third-party data matching and streamlined refund processing. The data integration is expected to reduce reporting errors and enhance the DGT's ability to identify non-compliance.*

DJP juga menerapkan compliance risk management (CRM) untuk mengelompokkan wajib pajak berdasarkan tingkat risiko kepatuhan. Wajib pajak berisiko rendah dapat memperoleh perlakuan yang lebih sederhana, sedangkan wajib pajak berisiko tinggi menjadi prioritas pemeriksaan dan penagihan.

> *In tandem, the DGT deploys compliance risk management (CRM) to segment taxpayers by risk level, offering simplified services to low-risk taxpayers while directing audit and collection resources toward high-risk taxpayers.*

Integrasi NIK sebagai NPWP juga memperluas basis data perpajakan dan membantu mengidentifikasi wajib pajak yang belum masuk dalam sistem.

> *Additionally, integrating the national identification number (nomor induk kependudukan/NIK) as the taxpayer identification number (nomor pokok wajib pajak/NPWP) expands the tax database to help identify unregistered taxpayers.*

Masalah Ambang Batas

Threshold Issues

Salah satu persoalan kebijakan terdapat pada ambang batas pengusaha yang wajib dikukuhkan sebagai pengusaha kena pajak (PKP). Peraturan Pemerintah Nomor 55 Tahun 2022 menetapkan batas omzet Rp 4,8 miliar per tahun untuk kewajiban pengukuhan sebagai PKP. Ambang batas ini enam kali lebih tinggi dibandingkan rata-rata negara OECD. Pengusaha di bawah batas tersebut tidak wajib memungut PPN dan dapat menggunakan tarif PPh Final 0,5% sesuai ketentuan yang berlaku.

> *One policy issue concerns the turnover threshold for mandatory PKP registration. Under Government Regulation Number 55 of 2022, businesses are exempt from registering as PKP if their annual turnover remains below IDR 4.8 billion. This threshold is six times higher than the OECD countries' average. Businesses below the threshold are exempt from collecting VAT and can opt for the 0.5% final income tax under applicable regulations.*

Ambang batas yang tinggi dapat menimbulkan bunching effect, yaitu kecenderungan pelaku usaha mempertahankan omzet di bawah batas untuk menghindari perubahan kewajiban perpajakan. Risiko lainnya adalah firm splitting, yaitu pemisahan kegiatan usaha menjadi beberapa entitas untuk menjaga omzet masing-masing tetap di bawah ambang batas.

> *This high ceiling could create a bunching effect, where businesses deliberately cap reported revenue to avoid VAT obligations, or engage in firm splitting, where they divide operations across multiple entities to stay under the threshold.*

Pemerintah telah menerbitkan PP 20/2026 yang membatasi durasi penggunaan tarif final. Namun, persoalan ambang batas PKP tetap perlu dievaluasi karena berkaitan dengan basis pemajakan PPN dan integrasi usaha kecil ke dalam sistem perpajakan formal.

> *Although the Government Regulation Number 20 of 2026 places time limits on using final tax rates, the fundamental PKP registration threshold requires evaluation as it relates to the VAT base and integrates small businesses into the formal tax system.*

Sengketa Perpajakan

Dispute Backlog

Tidak adanya indikator tax gap yang digunakan secara konsisten dalam penetapan target penerimaan juga dapat meningkatkan tekanan pada proses pemeriksaan dan koreksi pajak. Laporan Kinerja DJP 2025 mencatat backlog sengketa sebanyak 64.625 perkara dengan nilai Rp 176,16 triliun.

> *Lacking a consistent tax gap metric to justify revenue targets can over-pressurize field audits and tax adjustments. According to the DGT's 2025 Performance Report, tax dispute backlogs reached 64,625 cases involving IDR 176.16 trillion in contested assessments.*

Pada 2025, Pengadilan Pajak menerima 12.238 berkas tambahan, meningkat 3,4% dibandingkan tahun sebelumnya. Tingkat kemenangan DJP dalam sengketa pajak pada 2025 tercatat 37,50%, di bawah target 46% dan capaian 2024 sebesar 44,14%.

> *The Tax Court received 12,238 new cases in 2025, a 3.4% year-over-year increase. Meanwhile, the DGT's dispute win rate dropped to 37.50% in 2025, falling below its 46% target and down from 44.14% in 2024.*

Data tersebut menunjukkan perlunya evaluasi terhadap kualitas pemeriksaan dan koreksi pajak. Koreksi yang tidak didukung dasar hukum dan bukti yang kuat dapat meningkatkan sengketa serta menambah biaya administrasi bagi negara dan wajib pajak.

> *These data point to the need to improve the quality of tax audits and adjustments. Adjustments lacking a solid legal basis or evidence drive up disputes and impose administrative costs on both the state and taxpayers.*

Reformasi Formulasi Target APBN

Rethinking How State Budget Targets Are Set

Penetapan target penerimaan pajak perlu menggabungkan proyeksi makroekonomi dengan pengukuran tax gap. Tax buoyancy tetap dapat digunakan sebagai indikator, tetapi perlu dilengkapi dengan informasi mengenai sumber tambahan penerimaan.

> *Tax revenue targets should combine macroeconomic projections with tax gap measurement. Tax buoyancy can remain an indicator, but it should be complemented by an assessment of where additional revenue is expected to come from.*

Pertama, pemerintah perlu mengganti target penerimaan nominal dengan voluntary compliance rate sebagai indikator kinerja utama (IKU) DJP. Kinerja DJP tidak lagi semata-mata diukur dari pencapaian penerimaan dalam rupiah pada akhir tahun, tetapi dari persentase pajak yang dibayar secara sukarela dibandingkan dengan true tax liability.

> *First, the government should consider using the VCR as a key performance indicator (KPI) for the DGT rather than relying on nominal revenue targets. Their performance would then be measured not solely by the amount of revenue collected by year-end, but by the percentage of tax paid voluntarily compared to the true tax liability.*

Pendekatan ini mengacu pada praktik IRS yang mencatat VCR sekitar 85%. Dengan demikian, orientasi penegakan dapat bergeser dari pendekatan cops and robbers menuju peningkatan kepatuhan, sekaligus mengurangi pemeriksaan yang tidak berbasis risiko dan potensi sengketa di Pengadilan Pajak.

> *This approach draws on the IRS model, under which the VCR has remained at around 85%. It could shift enforcement away from a cops-and-robbers approach and toward improving voluntary compliance, while reducing non-risk-based audits and the potential for disputes before the Tax Court.*

Kedua, pemerintah perlu mengadopsi metodologi pengukuran tax gap melalui pendekatan top-down dan bottom-up. Pendekatan top-down dapat menggunakan metodologi IMF RA-GAP dengan memanfaatkan data konsumsi rumah tangga untuk mengestimasi tax gap PPN.

Second, the government should adopt both top-down and bottom-up methodologies for measuring the tax gap. A top-down approach could apply the IMF's RA-GAP methodology, using household consumption data to estimate the VAT gap.

Sementara itu, pendekatan bottom-up dapat dikembangkan melalui detection controlled estimation. Integrasi kedua pendekatan ke dalam Coretax akan membantu pemerintah mengukur net tax gap dan menentukan tambahan penerimaan yang realistis setiap tahun.

Meanwhile, a bottom-up approach could incorporate DCE. Integrating both approaches with Coretax could help the government estimate the net tax gap and determine a realistic amount of annual collectible additional revenue.

Ketiga, alokasi sumber daya penegakan perlu diarahkan pada shadow economy. Hasil DCE dapat digunakan untuk mengestimasi non-filing gap dan mengidentifikasi indikasi aktivitas ekonomi yang belum masuk dalam sistem perpajakan. Dengan menjadikan data indikatif tersebut sebagai peta risiko, pengawasan tidak berulang kali menyasar wajib pajak formal yang sudah patuh, tetapi diarahkan pada potensi tax gap yang lebih besar. Pendekatan ini juga dapat mengurangi tekanan terhadap arus kas dan belanja modal perusahaan serta memperluas basis pajak.

Third, enforcement resources should be directed toward the shadow economy. DCE results could be used to estimate the non-filing gap and identify economic activity that remains outside the tax system. By using these indicators as a risk map, enforcement efforts could focus on larger potential tax gaps rather than repeatedly targeting compliant taxpayers. Such an approach could also reduce pressure on corporate cash flow and capital expenditure while expanding the tax base.

Target penerimaan pajak sebesar Rp 2.591,4 triliun pada APBN 2027 perlu diuraikan berdasarkan sumbernya. Pemerintah perlu memisahkan tambahan penerimaan yang berasal dari pertumbuhan ekonomi, pengurangan policy gap, dan penutupan compliance gap.

Targeting IDR 2,591.4 trillion in tax revenue for the 2027 state budget requires a granular breakdown of source revenues. The government must separate yields expected from baseline economic growth, policy gap reductions, and compliance gap closure.

Pengurangan policy gap dapat dilakukan melalui evaluasi belanja perpajakan yang diperkirakan mencapai Rp 530,3 triliun. Sementara itu, penutupan compliance gap perlu didasarkan pada pemetaan sektor, jenis pajak, dan kelompok wajib pajak yang memiliki tingkat risiko ketidakpatuhan tinggi.

Reducing the policy gap could involve evaluating tax expenditures, estimated at IDR 530.3 trillion. Meanwhile, efforts to close the compliance gap should be based on detailed mapping by sector, tax type, and taxpayer segment with high non-compliance risk.

Pendekatan tersebut membuat target penerimaan lebih terukur dan memungkinkan kinerja DJP dievaluasi berdasarkan kemampuan memperkecil tax gap, bukan hanya berdasarkan pencapaian nominal penerimaan. Dengan data tersebut, pemerintah dapat menyusun target penerimaan berdasarkan potensi yang tersedia sekaligus menentukan strategi penutupan celah pajak secara lebih tepat.

This kind of approach would make revenue targets more measurable and allow the DGT's performance to be assessed by its ability to narrow the tax gap rather than merely by whether it achieves a nominal collection target. With these data, the government could set revenue targets based on available potential and adopt a more effective strategy to close the tax gap.

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