Unravelling the Alteration of the Rural and Urban Sector Property Tax Base in Indonesia: Impact of the HKPD Act

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Abstract. This study aims to explore the underlying concept of taxable value, its history, and the background of its revival in the HKPD Act of 2022. This study is based on a qualitative approach and involves in-depth interviews with scholars and stakeholders from government institutions conducted between September and October 2023. After conducting literature studies to create the interview framework, the data validation process involved triangulating data sources from academics, local governments, and central government. Content analysis is employed as a tool to achieve the research objectives. The research revealed that the NJKP concept was put into practice in the land and building taxes (PBB) provision under the PBB Act 1985 to prevent taxpayers from overburdening when the assessed value (Nilai Jual Objek Pajak - NJOP) is hiking excessively. The PDRD Act 2009 then omitted the NJKP concept from the land and building taxes for urban and rural sector (PBB-P2) regulation as the central government believed that local governments could considerably improve their revenues through regular updates of the NJOP after the Law gave local governments the authority to manage PBB-P2.

Keywords: land and building tax, property tax

1 Introduction

In many countries, particularly those in development, taxes are one of the primary sources of state revenue that dominate contributions to financing state expenditures. In Indonesia, there are various taxes, including the Land and Building Tax for the Rural and Urban Sector (PBB-P2), generally referred to as property tax. Property tax imposition has a general tendency to be regressive, unlike Income Tax (PPh), which is progressive [1].

The handover of PBB-P2 management from the central government to local governments is a means of implementing fiscal decentralization and striving to enhance regional economic independence [2]. Property tax revenue is a significant contributor to local government revenues, not only in Indonesia [3] but also in the United States [4], China [5], and Latin America [6]. Nonetheless, this does not imply that the potential of PBB-P2 has been thoroughly explored.

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One of the ways property taxes are levied is based on the value of the property itself as the tax object. The more valuable a property is, the more benefits it will bring to the owner. As a result, the tax contribution that the state is entitled to should be higher as well. Tax calculation accuracy and fairness toward taxpayers are reflected in assessed property values that are closely aligned with market prices [7]. PBB-P2 refers to this value as the Assessed Value (Nilai Jual Objek Pajak - NJOP). When the NJOP is far below the market value, the amount of PBB-P2 revenue that can be collected will be subpar. According to the applicable law, NJOP is subject to renewal for a maximum of three years. However, due to the time-consuming and costly process, as well as the lack of published transaction data [8], regular updates are not feasible for most local governments. In addition, the NJOP rise can lead to an increase in PBB-P2 levied, which may cause taxpayer resistance and objections. The possible public resistance to increased taxes is believed to be a factor that contributes to the local government's reluctance to update NJOP. However, at some point, an increase in NJOP is inevitable.

In 2022, a new provision was developed as a result of an evaluation of central and local government financial relations, particularly in local taxes, which altered the business process of imposing PBB-P2. It is regulated by Act 1 of 2022, commonly known as the HKPD Act. According to Article 40, paragraph (5), the NJOP used to calculate PBB-P2 must be determined using a range from 20% to 100% of the initial NJOP after deducting non-taxable value. Government Regulation No. 35 of 2023 (PP KUPD) ascertains that this could be an alternative to lessen the significant tax increase caused by the NJOP update. An increase in the maximum tax rate for PBB-P2 from 0.3% to 0.5% was also included in this policy. Local governments have the option to designate a percentage of the PBB-P2 imposition base that can be gradually modified. A similar concept has been applied under Act 12 of 1994, known as Taxable Value (Nilai Jual Kena Pajak - NJKP). The term NJKP will be used in this article for ease and simplicity.

This study aims to uncover the background of using specific percentages of NJOP to calculate PBB-P2 in the regulation. Researchers conduct qualitative research using both primary and secondary data. The primary data comes from in-depth interviews with scholars, employees of the Directorate General of Tax (DGT) who managed PBB-P2 before decentralization, and employees of the Directorate General of Fiscal Balance (DGFB). Secondary data is derived from regulatory documentation and academic manuscripts created in the process of enacting the HKPD Act. Despite extensive research on PBB-P2, the subjects discussed mostly focused on the calculation mechanism of PBB-P2 [9] the NJOP determination [10], the accuracy or fairness of NJOP [11], the use of information systems [12] or the evaluation of PBB-P2 governance [13]. Through a qualitative approach, this research presents a new perspective on the history of NJKP and the background of its use in the HKPD Act.

Literature Review

Land and Building Tax for Rural and Urban Sector (PBB-P2)

PBB-P2 is a type of property tax enforced in Indonesia and levied on property such as land and buildings in rural and urban sectors. Land taxation in Indonesia has existed since prehistoric times [14]. According to [15], the practice of land rent and tenement tax remained in use in the British colonial period, and it continued in the Dutch colonial era with the name ‘landrente’.

Following independence, the term ‘landrente’ was replaced by “pajak pendapatan”, and later it was renamed ‘PBB’ by Act 12/1985 (PBB Act). Unlike income tax, which is a subjective tax, PBB is categorized as an objective tax. It means that the amount of tax due is not contingent on the taxpayer’s condition but rather on the tax object’s condition [16]. The amount of tax payable is based on the value of the tax object. In other words, the tax burden will be proportional to the value of the tax object.

In 2009, the PDRD Act was passed, which marked the transfer of responsibility for managing PBB-P2 from central government to city or district governments, with only DKI Jakarta being administered by the Provincial Government. The PDRD Act transforms the way PBB-P2 is enforced by eliminating the NJKP provision and allowing local governments to set the tax with a maximum rate of 0.3%. In 2022, the HKPD Act replaced the PDRD Act and restructured the imposition of PBB-P2 by re-implementing the NJKP provision, which ranges from 20% to 100%. In addition, the Act raises the maximum rate limit for PBB-P2 from 0.3% to 0.5%.

In conformity with the PBB-P2 principle stipulated in the HKPD Act, the land and building elements in a property are segregated in the tax imposition. This concept demands that the value of the land be assessed separately from the value of the building. Building value should be extracted from real estate property to determine land values. Lin 2010 states that such extraction processes can lead to spatial injustice in tax imposition.

The assessment process for PBB-P2 purposes requires the expertise of an appraiser. An appraiser is responsible for assessd value (NJOP) in compliance with regulations. The tax will be charged to taxpayers based on the NJOP. Inaccurate assessment results can quickly spark public reactions and lead to decreased compliance and erosion of the principle of justice. The public commonly criticizes the PBB-P2 imposition due to NJOP assessments that are considered too high. This often occurs because of the disparities in perceptions about the value of taxation base between the tax officer and the community [17].

Public Interest Theory

Public interest theory is commonly discussed in microeconomics literature. This theory has two acceptable concepts. Regulations are established to ensure the safety and well-being of society [18]. Second, if market mechanisms fail, economic regulation must be put in place to maximize social welfare. According to [19], this second concept was developed by scholars after [20] and [18].

As stated by [21], public interest theory holds that regulations are designed to meet the community's needs and are made solely by considering what is best for the community. Several studies have been conducted using the perspective of public interest theory to explain a regulation, including [22], [23], [24], [25], and [26].

Indonesia's Law dictates how taxes are collected in the country. Despite the need for taxes to finance the state, it is imperative to pay attention to the condition of the taxpayer as well as the community and not to collect the taxes arbitrarily. Community welfare is a primary factor to consider. However, the legislation processes often involve political lobbies from the parties whom the regulations will impact. This lobby aims to influence the regulator to accommodate the interests of certain groups, which may not prioritize the welfare of the community. According to, this view is known as interest group or special interest theory. He argued that certain industries or groups could use the state's coercive power to facilitate and sustain rising prices or wages, which would ultimately increase the wealth of a particular industry or group at the expense of customers or society.

2. Method

This study employed content analysis methods to address the research question. Content analysis can be used to interpret various data types, such as interviews, observations, written sources, websites, and other data sources [27]. Texts originating from in-depth interviews are rich in meaning, and researchers have flexibility in interpreting them, depending on the research objectives, the quality of the data, as well as the researcher's experience and knowledge [28]. Figure 1 provides an overview of the analysis steps.

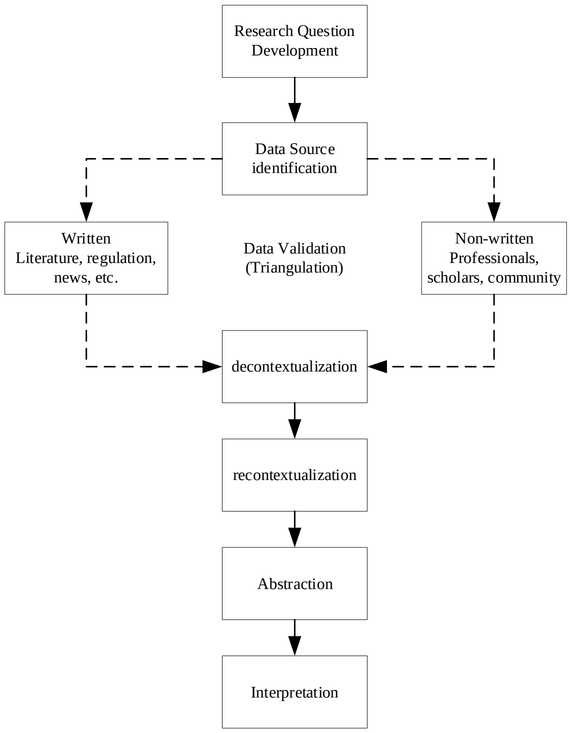

Fig.1. Content Analysis Steps

Source: Lindgren et al. (2020)

This study relied on both primary and secondary data. Primary data was collected using semi-structured, in-depth interviews. This approach aimed to obtain insights from each resource person and avoid any bias that could arise during a focused group discussion (FGD). Face-to-face interviews were conducted online or offline following the agreement between researchers and resource persons. Each informant's interview took approximately 60 minutes to complete. In every interview, the researcher communicates the purpose of the interview to the resource persons and obtains their consent. Interviews were recorded to help with the transcription process. The resource persons are selected from government officials involved in the legislation and implementation of PBB-P2 regulation and scholars with research interests in PBB-P2. Table 1 provides a list of resource persons.

Table 1. List of Resource Person

No	Resource Person	Afiliation	Role
1.	Central and Regional Fiscal Analyst	Directorate General of Fiscal Balance (DGFB), Ministry of Finance	Government officials involved in PDRD and HKPD Act legislation and implementation
2.	Head of Ende Tax Office	Directorate General of Tax (DGT), Ministry of Finance	Government officials involved in PBB Act legislation and implementation
3.	Icuk Rangga Bawono	Jenderal Soedirman University	Scholars
4.	Adhipradana Prabu Swasito	The University of Western Australia	Scholars

Secondary data is gathered from public documents such as reports, journal articles, regulations, and academic manuscripts related to the research topic. Researchers read and extract relevant information from reading sources and then incorporate them into the data analysis process.

3. Results and Discussion

3.1 The Background of NJKP Provision in the Land and Building Taxes Regulation

Taxable Value (Nilai Jual Kena Pajak or NJKP) was introduced in the PBB Act of 1985. The PBB Act of 1985 was a law that encompassed the administration of land and building taxes in every sector, including rural and urban areas. The PBB Act regulated NJKP as one of the tax calculation mechanisms, which was defined as the basis for calculating the land and building taxes. The NJKP represents a fraction of the assessed value (NJOP), which ranges from 20% to 100%. The amount of NJKP is further regulated under the Government Regulation by considering economic conditions.

Some scholars, institutions, or practitioners in Indonesia refer to NJKP as NJOPKP (Nilai Jual Objek Pajak Kena Pajak). In some countries, the term NJKP is known as a taxable value, which refers to the value used to calculate property taxes [29]. The term taxable value is a prevalent term in the literature that discusses property taxes in the United States [30] Netherlands [31] or Italy [32]. The taxable value is derived from the assessed value after deducting exemptions. In the Indonesian context, the exemptions are known as the Selling Value of Non-Taxable Tax Objects (NJOPTKP).

From the interview, it is revealed that the NJKP concept introduced in the PBB Act is incorporated in the preparation of the HKPD Act. According to the NJKP provision implemented in 1994 to 2000, NJKP is used as a means of adjusting the effective land and building tax rates for tax objects owned by civil servants, members of the Indonesian Army (ABRI/TNI), including pensioners and their widows/widowers who earn solely from salaries or pensions. This provision indicates that the implementation of NJKP during that period was a policy tool that considered the tax subject or bearer's status. Nevertheless, the provision was discontinued. This is partly due to the regressive nature of property taxes, which do not consider who owns the property [1] The implementation of the Sales Tax on Luxury Goods (PPnBM) uses a similar approach to reduce the regressivity of consumption taxes, such as Value Added Tax (PPN).

The Academic Paper on HKPD Act provides a brief overview of the background of the re-implementation of the NJKP provision. Basically, the HKPD Act does not differ from the PDRD Act regarding the basis for imposing PBB-P2. However, the HKPD Act specified additional provisions to calculate the tax due, ranging from 20% to 100% of the NJOP. Despite the absence of NJKP terminology in the HKPD Act, a resource person from DGFB confirmed that the provision is a concept associated with NJKP. The reason for bringing this concept back into the PBB-P2 regulation is no longer caused by the regressivity of PBB-P2. Instead, it is triggered by the fact that many local governments did not regularly perform the NJOP updates. The lack of regular NJOP updates caused a significant disparity between the NJOP and property market values. Consequently, when the NJOP is updated after a prolonged period, it will increase substantially, automatically raising the taxes owed by the taxpayer. A sudden rise in taxes can often cause social turmoil in society. The phenomenon of the abolition of the NJKP provision in the PDRD Act, which was eventually re-implemented in the HKPD Act, depicted a dynamic of government regulations that were adjusted according to the needs of society at that time.

3.2 The history of the NJKP rate applied in Indonesia.

The NJKP provision has been subject to several changes since it was first introduced in the PBB Act. The issuance of Government Regulation Number 46 of 1985 (PP-46/1985) marked the establishment of the NJKP rate for the first time following the enforcement of the PBB Act. PP-46/1985 was issued as a mandate from Article 6 paragraph (2) of the PBB Act. The rate of NJKP is stated as 20% of NJOP. The provision became effective on January 1, 1986.

In 1994, the government altered the NJKP regulation following a review of economic conditions. It is stipulated in the Government Regulation Number 12 of 1994 (PP-12/1994). The government divided the tax objects into two main groups and determined the NJKP rate based on the groups. They are: [1] An NJKP rate of 40% is imposed on housing tax objects owned by individuals with an NJOP equal to or greater than IDR1,000,000,000, and [2] An NJKP rate of 20% is imposed on other tax objects. The Directorate General of Taxes (DGT), which possessed the PBB administration authority at that time, issued a Circular Letter confirming the effective rate of NJKP along with exemptions from the implementation of group NJKP [1]. The exemptions applied to every housing tax object owned, controlled, or utilized by civil servants and members of the Indonesian Army, including pensioners and widows/widowers who earn solely from salaries or pensions. These exemption provisions implied that the NJKP rate used for tax calculation of property that meets the exemption requirement is 20%.

From 1997 through 1998, there were some adjustments to the NJKP provisions. For the first time, the plantation and forestry sectors are specifically stated and included in the group of tax objects with an NJKP rate of 40%, along with the housing tax objects owned by individuals with NJOP equal to or greater than IDR1,000,000.000. Meanwhile, other groups of tax objects are set to have an NJKP rate of 20%. The regulations for this are set forth by Government Regulation Number 48 of 1997 (PP-48/1997).

In 1998, the government enacted Government Regulation Number 74 of 1998 (PP-74/1998). The regulation is, in essence, to affirm that when the tax object is owned by civil servants and members of the Indonesian Army, including pensioners and widows/widowers who earn solely from salaries or pensions, they are subject to an NJKP rate of 20%.

Major changes were made by the Directorate General of Taxes in 2000, including the launch of the Tax Object Information System (SISMIOP), which strengthened the information system of the PBB administration. The government also amended the NJKP provision by enacting Government Regulation Number 46 of 2000 (PP-46/2000). The mining sector was added to the list of PBB objects under PP-46/2000. In addition, the NJKP rate and categorization of tax objects was extended into 4 groups, consisting of [1] the plantation sector with an NJKP rate of 40%, [2] the forestry sector with an NJKP rate of 40%, [3] the mining sector with an NJKP rate of 20%, and [4] other tax objects. The last group is split into two categories based on the property's assessed value (NJOP). Objects having an NJOP equal to or greater than IDR1,000,000,000 are imposed with a 40% NJKP rate, while those below IDR1,000,000,000 are imposed with a 20% NJKP rate.

PP-46/2000 also eliminates the exemption provision for property having NJOP equal to or above IDR1,000,000,000 and owned by civil servants, and members of the Indonesian Army, including pensioners and widows/widowers who earn solely from salaries or pensions. The most recent revision to NJKP before the PDRD Act era, was marked with the issuance of Government Regulation number 25 of 2002 (PP-25/2002). Under PP-25/2002, the government has increased the rate of NJKP imposed on the plantation sector. Furthermore, the provision of the NJKP rate was slightly adjusted where plantation, forestry, and mining tax objects are imposed with an NJKP rate of 40%. NJKP rate for other objects with NJOP equal to or greater than IDR1,000,000,000 is 40%. Meanwhile, for other objects with NJOP below IDR1,000,000,000, the NJKP is set at 20%.

Table 2. The NJKP Rate from Time to Time

No	**Sector**	**Year**				
		1985	**1994**	**1997**	**2000**	**2002**
1.	Plantation			40%	40%	40%
2.	Forestry			40%	40%	40%
3.	Mining				20%	40%
4.	Urban dan Rural Sector (including Other Sector)					
	a. NJOP ≥ IDR1 billion	20%	40%	40%	40%*	40%*
	b. NJOP < IDR 1 billion		20%	20%	20%*	20%*
	c. NJOP ≥ IDR 1 billion (Civil Servant/Member of Indonesian Army and their family)		20%	20%	-	-

*) is categorized as other objects group, which includes objects in rural and urban sectors or other sectors that have not been categorized as plantations, forestry, or mining

3.3 Future Use of NJKP: Lessons learned from the past

A previously removed concept in the imposition of PBB-P2 has reappeared in the HKPD Act, as stated in Article 4 paragraph (5). Government Regulation 35 of 2023 (PP 35/2023) regarding KUPD provides further guidance on this provision. Additional explanations are given in the regulation regarding some factors that can be considered by local governments when determining the NJKP rate. The determination of NJKP may involve three crucial factors. They are [1] an increase in NJOP resulting from the assessment, [2] the utilization of tax objects, and/or [3] NJOP clustering within a region.

Although using a slightly different narrative from the PBB Act, the use of the NJKP concept in the HKPD Act still contains some efforts to reduce the nature of PBB regressivity. The increase in NJOP can be implemented by redesigning the policy to be acceptable to the community and reducing the risk of resistance. This shows that the government must prioritize the public interest in a regulatory setting. This condition aligns with public interest theory, which suggests that the public's interests should be considered when drafting a regulation. Although in PBB-P2 legislation, it is undeniable that the government is also interested in maximizing revenue at some points. Local governments need to develop various scenarios that can be used to keep NJOP up-to-date using NJKP instruments and tax rate. This requires simulations to predict and analyze the potential impact, mainly on tax revenue.

To date, the imposition of the PBB administered by the central government (P5L sectors) still maintains the use of the NJKP rate of 20% and 40%. It depends on the type of object utilization and the size of the NJOP. All sectors except other sectors will be imposed using NJKP rate of 40% NJKP regardless of the size of NJOP. Objects in other sectors are divided into two main groups. Objects with an NJOP below IDR1,000,000,000 have a 20% NJKP rate. On the other hand, objects with an NJOP equal to or greater than IDR1,000,000,000 have a 40% NJKP rate.

Generally, PBB objects in the P5L sectors are property used to generate income and have a relatively high NJOP. In this sector, the government impose the tax with a maximum NJKP rate of 40%, not even close to 100%. Taking the NJKP rate and multiplying it with the PBB (tax) rate in the PBB-P5L sector will result in two effective tax rates, 0.1% and 0.2%. Can those be considered a good choice of policy? The impact of a policy can varies depending on the characteristics of each location/condition. It may result in the most optimal outcome for some objects or locations. However, other objects or locations may have an opposite impact. One size does not fit all.

4. Conclusion

Change in PBB regulations is part of the dynamic of public administration, which is intended to meet public needs at various times. NJKP, a certain percentage of NJOP as the basis for calculation in the HKPD Act, has previously been applied in the imposition of PBB-P2 under the PBB Act of 1985. The arrangement is created to prevent a potential social cost associated with increased tax due. The PDRD Act 2009 removed NJKP as the basis for calculating the PBB. Meanwhile, the PBB-P5L imposition managed by the central government still retains a similar provision. The PDRD Act 2009 marked the history of transferring the PBB-P2 administration to local governments. The central government believed local governments could maximize the potential revenue through decentralization of the PBB-P2 sector by regularly updating the NJOPs. However, local government encounters many obstacles to performing the NJOP update regularly, which caused the gap between property market value and NJOP to widen. A significant tax increase may occur when local governments reassess the tax object and update the NJOP after a long absence. The lack of proper management can lead to turmoil in society. To address this issue, the government passed the HKPD Act of 2022. The HKPD Act re-implements the NJKP provision as a PBB tax base ranging from 20% to 100%. The use of this percentage is expected to be one of the drivers for local governments to update their NJOP, as well as minimize potential social costs and revenue losses.

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