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August 2026 marks a notable period for Indonesia's fiscal and tax landscape. The government's FY2025 State Budget accountability report reaffirms continued fiscal discipline, while the FY2027 State Budget Plan signals the fiscal policy direction ahead. During the same month, a series of tax and customs regulations took effect, alongside continuing developments in asset forfeiture legislation and other regulatory reform. Businesses should use this period to identify which developments affect their operations, confirm the relevant implementing regulations, and review their compliance position accordingly.

1. ECONOMIC GROWTH AND FISCAL OUTLOOK

1.1 FY2025 State Budget (APBN) Accountability

The House of Representatives (DPR RI) approved the Bill on the Accountability for the Implementation of the State Budget (APBN) for Fiscal Year 2025 for enactment into law. The approval follows an unqualified (Wajar Tanpa Pengecualian / WTP) opinion issued once again by the Audit Board of Indonesia (BPK) on the Central Government Financial Statements (LKPP) for 2025 — the highest audit opinion, achieved by the government for ten consecutive years since the 2016 LKPP.

FY2025 budget realization shows the Indonesian economy remained relatively resilient against global pressures, including trade fragmentation and geopolitical tensions. Economic growth was recorded at 5.11%, inflation was maintained at 2.92%, and the budget deficit stood at 2.81% of GDP. This was accompanied by improved social indicators: the unemployment rate fell to 4.85% in August 2025 from 4.91% a year earlier, while the poverty rate declined to 8.25% in September 2025 from 8.57% in the same period in 2024.

For businesses, the consistent unqualified audit opinion and controlled deficit serve as indicators of the credibility of state financial management a factor relevant to assessing medium-term fiscal risk, including the sustainability of tax incentives and government spending that affect the business sector. Taxpayers and investors should also monitor how these results influence the direction of fiscal and tax policy in the coming years, particularly regarding fiscal space for financing national priority programs.

Overall, the FY2025 APBN accountability report shows that government fiscal discipline has remained intact amid global challenges, reflected in the consistently favorable audit opinion and improved macroeconomic and social indicators.

1.2 FY2027 State Budget Plan (RAPBN) Outlook

The government has submitted the State Budget Plan (RAPBN) for Fiscal Year 2027, proposing state expenditure of Rp4,097.2 trillion against targeted state revenue of Rp3,426.0 trillion. The budget deficit is proposed at 2.4% of GDP — lower than the FY2025 realized deficit — as an effort to balance accelerated growth with fiscal sustainability

The RAPBN 2027 posture is built on several macroeconomic assumptions: economic growth of 6%, inflation of 2.5%, a rupiah exchange rate of Rp17,500 per US dollar, and an average 10-year government bond (SBN) yield of 6.9%. State expenditure will focus on 8 national priority program clusters plus 1 supporting program, covering 60 work programs spanning education, health, social protection, infrastructure, regional fiscal autonomy, and revenue optimization — including plans to strengthen tax capacity through data integration, enhancement of the Coretax and Simbara systems, and diversification of Non-Tax State Revenue (PNBP).

The planned strengthening of tax capacity and data integration could increase the intensity of tax oversight and compliance requirements for corporate taxpayers, so readiness of data and internal reporting systems should be an early priority. The exchange rate and bond yield assumptions are also relevant for companies with foreign-currency exposure or debt instruments in planning 2027 cash flow and financing.

RAPBN 2027 remains a draft and may change during deliberation with the DPR before being enacted as the FY2027 State Budget Law

1.3 Tax Revenue Performance to August 2026

- Tax revenue realization to the end of August 2026 grew 24.1% year-on-year, as reported by Director General of Taxes Bimo Wijayanto before the House of Representatives (DPR) on 1 September 2026; the nominal realization figure was not disclosed.
- Applying the stated growth rate to the Rp1,135.4 trillion realized in January–August 2025 implies realization of approximately Rp1,409.1 trillion for January–August 2026 — equivalent to about 59.8% of the FY2026 State Budget (APBN) tax revenue target
- A gap of roughly Rp948.6 trillion remains to be collected against the FY2026 APBN tax revenue target over the remaining months of the year
- The government's full-year 2026 tax revenue outlook, per the RAPBN 2027 Nota Keuangan, is Rp2,257.9 trillion — below the FY2026 APBN target of Rp2,357.7 trillion
- The outlook is composed of income tax (PPh) of Rp1,162.9 trillion, value-added tax and luxury goods sales tax (PPN and PPnBM) of Rp993.3 trillion, land and building tax (PBB) of Rp27.6 trillion, and other taxes of Rp126.9 trillion
- The government attributes 2026 tax revenue performance to strengthening national economic activity, household consumption, trade and imports as the principal tax-base drivers, continuing tax reform, more effective supervision and enforcement, strengthened taxpayer compliance, and increasingly optimal implementation of Coretax

2. REGULATIONS IN FORCE DURING AUGUST 2026

Regulation	Effective/Issued Date	Key Provisions
Tax consultant licensing reform (PMK 55/2026)	24 August 2026	Tax consultants, Tax Consulting Firms (KKP), and other parties acting as Taxpayer Representatives
Government-borne income tax on foreign-currency SBN interest (PMK 59/2026)	24 August 2026	Institutional investors, corporates, and natural-resource exporters holding foreign-currency government securities
Discontinuation of e-Objection, Info KSWP, and Portal Ex-1 (Peng-51/PJ.09/2026)	26 August 2026	Taxpayers filing objections or requesting KSWP confirmation; government agencies, SOEs, and ILAP
DJP email reminder to newly-registered corporate taxpayers on unfiled FY2025 returns (Peng-52/PJ.09/2026)	26 August 2026	Corporate taxpayers first registered in 2025 that have not filed their FY2025 Annual CIT Return
<i>Financial-institution self-certification obligations (Peng-4/PJ/2026)</i>	10 August 2026	<i>Financial institutions and other reporting entities under CRS/PMK 108/2025</i>
Excise tape (pita cukai) specification revision (PMK 57/2026)	10 August 2026	Excisable-goods (BKC) producers and importers; excise tape design and security-feature compliance
DJBC vertical agency organizational restructuring (PMK 58/2026)	10 August 2026	Businesses interacting with DJBC Regional Offices (Kanwil) and other vertical units
Jewellery classification criteria under HS code 71.13 (PER-9/BC/2026)	14 August 2026	Importers/exporters of jewellery goods; customs classification and tariff certainty

(a) Tax Consultant Licensing Reform

PMK 55/2026 took effect on 24 August 2026, replacing the prior tax consultant licensing framework under PMK 175/PMK.01/2022. The regulation broadens the Ministry of Finance's oversight beyond licensed tax consultants to cover all other parties acting as a taxpayer's proxy (Kuasa Wajib Pajak), while tightening several entry and ongoing compliance requirements for the profession

Key provisions

- Entry requirements for individual tax consultants are tightened, covering education qualifications, measurable work experience, an extended waiting period, and a new kinship-disclosure requirement at the licensing stage.
- Under Article 5 paragraph (2), 14 requirements now apply to an individual applying for a tax consultant license, including holding a Surat Keterangan Kompetensi (SKK) and a certificate of having passed the tax consultant professional examination — meaning applicants must now pass two separate assessments: a competency test (uji kompetensi) to obtain the SKK, and a professional examination (ujian profesi).
- The regulation also introduces Surat Keterangan Terdaftar (SKT) and Surat Keterangan Kompetensi (SKK) requirements specifically for “other parties” (pihak lain) acting as Kuasa Wajib Pajak, alongside rules on their competency, registration, supervision, and sanctions.
- Kantor Konsultan Pajak (KKP) is recognized as a licensed business entity for the first time, including the option to operate as a Perseroan Terbatas (PT) — this entity-level licensing concept does not appear to have existed under either PMK 111/2014 or PMK 175/2022.
- Ministry of Finance oversight is expanded from licensed tax consultants alone to all parties acting as Kuasa Wajib Pajak
- Annual reporting obligations are more detailed, requiring fuller disclosure of client data and service fees.
- Membership in the Asosiasi Konsultan Pajak (Tax Consultants Association) becomes mandatory within a set period after a license is issued.
- SKP PPL (continuing professional education credit) targets are revised — notably reduced for level B and C license holders compared to the prior rule.
- A kinship / conflict-of-interest disclosure requirement applies to individual consultants (Pasal 5 ayat 2 huruf k) and to KKP's (Pasal 5 ayat 3 huruf j).
- Under Article 43, a tax consultant's license is automatically frozen while under suspect or defendant status in a tax-crime investigation or prosecution, regardless of the eventual court decision — this continues and extends the tiered sanctions structure already present in the prior regulation.

(b) Government-Borne Income Tax on Foreign-Currency Government Securities Interest

PMK 59/2026 provides that income tax (PPh) on interest or yield — including discount — from Government Bonds (SUN) and Government Sharia Securities (SBSN) denominated in foreign currency and issued by the government in the domestic primary market is borne by the government (Ditanggung Pemerintah / DTP), for Tax Periods June 2026 through December 2026. Its coverage therefore applies retroactively to a period before the regulation's promulgation date. The regulation follows shortly after the government, under PP 21/2026, expanded the range of instruments eligible for placement of natural-resource Export Proceeds (DHE SDA) to include foreign-currency SBN.

Key provisions

- Income tax on interest/yield (including discount) from foreign-currency SUN and SBSN issued in the domestic primary market is borne by the government rather than the securities holder.
- The facility is structured as government-borne tax (PPh DTP), not a tax exemption — holders remain conceptually liable for the tax, but the payment obligation is assumed by the government, which is relevant for SPT reporting and reconciliation.
- Coverage applies to Tax Periods June–December 2026, applying retroactively before the regulation's 24 August 2026 promulgation date.
- The regulation contains only four articles and does not itself set out detailed technical mechanisms (forms, reporting procedures) beyond referring to PMK 92/2023 as the general PPh DTP framework.

(c) Discontinuation of Legacy DJP Applications (e-Objection, Info KSWP, Portal Ex-1)

The Directorate General of Taxes (DJP) issued Announcement No. PENG-51/PJ.09/2026 on the discontinuation of the e-Objection, Info KSWP, and Portal Ex-1 applications, as part of the continued rollout of Coretax DJP.

Key provisions

- Objection (keberatan) filings and taxpayer Tax Status Confirmation (KSWP) requests, previously handled via e-Objection and Info KSWP, now migrate to Coretax DJP.
- KSWP access for government agencies, state-owned enterprises, associations, and other parties (ILAP), previously via Portal Ex-1, migrates to the new Portal KSWP.
- The announcement confirms e-Objection, Info KSWP, and Portal Ex-1 will be discontinued, but does not specify an exact shutdown date.

(d) DJP Email Reminder on Unfiled FY2025 Corporate Tax Returns

The Directorate General of Taxes (DJP) issued Announcement No. PENG-52/PJ.09/2026 confirming that it has sent email reminders (email blast) to corporate taxpayers first registered in 2025 that have not yet filed their FY2025 Annual Corporate Income Tax Return (SPT Tahunan PPh Badan).

Key provisions

- The reminder targets corporate taxpayers newly registered in 2025 that have not filed their SPT Tahunan PPh Badan for Tax Year 2025.
- Affected taxpayers are urged to file their return through the Coretax portal in accordance with applicable provisions.
- DJP frames the email reminder as part of its broader effort to help taxpayers meet their filing obligations.

(e) Financial-Institution Self-Certification Obligations

DJP Announcement No. PENG-4/PJ/2026 requires financial institutions and other reporting entities to request, obtain, and maintain valid self-certifications from account holders, and to clarify the reasonableness of those self-certifications, in support of financial-account identification under PMK 108/2025 and the Common Reporting Standard (CRS).

Key provisions

- The reminder targets corporate taxpayers newly registered in 2025 that have not filed their SPT Tahunan PPh Badan for Tax Year 2025. Affected taxpayers are urged to file their return through the Coretax portal in accordance with applicable provisions.
- DJP frames the email reminder as part of its broader effort to help taxpayers meet their filing obligations.

2.2 Customs Regulations

(a) Tax Consultant Licensing Reform

Minister of Finance Purbaya Yudhi Sadewa issued PMK 57/2026, revising the physical form, specifications, and design of excise tape (pita cukai) used on excisable goods (Barang Kena Cukai/BKC), with the stated aim of optimizing the oversight and security of excise tapes.

Key provisions

- The hologram is no longer listed as a mandatory minimum specification for excise tape, unlike under the prior regulation (PMK 52/2020).
- The change is intended to give flexibility in excise tape design and security technology, so that security features can be updated in line with technological developments — it does not eliminate the hologram outright.

(b) DJBC Vertical Agency Organizational Restructuring

PMK 58/2026 restructures the organization of the Directorate General of Customs and Excise's (DJBC) vertical agencies, with the stated aim of optimizing DJBC's role and improving organizational effectiveness and performance.

Key provisions

- The regulation revokes and replaces PMK 188/2016 as amended by PMK 183/2020.
- The restructuring includes changes to the organizational structure of DJBC's Regional Offices (Kantor Wilayah/Kanwil)

(c) Classification Criteria for Jewellery under HS Code 71.13

DJBC issued PER-9/BC/2026, setting out six criteria used to identify jewellery goods falling under tariff/Harmonized System (HS) code 71.13, intended as a classification guide to support legal certainty, uniform service, and consistency in classifying jewellery goods.

Key provisions

- Objection (keberatan) filings and taxpayer Tax Status Confirmation (KSWP) requests, previously handled via e-Objection and Info KSWP, now migrate to Coretax DJP.
- KSWP access for government agencies, state-owned enterprises, associations, and other parties (ILAP), previously via Portal Ex-1, migrates to the new Portal KSWP.
- The announcement confirms e-Objection, Info KSWP, and Portal Ex-1 will be discontinued, but does not specify an exact shutdown date.

3. GOVERNMENT REGULATION NO. 33 OF 2026 (PP NO. 33/2026)

PP 33/2026 is the long-awaited implementing regulation for Indonesia's Personal Data Protection Law (Law No. 27 of 2022). Running to 225 articles across twelve chapters, it elaborates ten specific matters the PDP Law mandated for further regulation — including objections to automated processing, compensation for personal-data-processing violations, data portability, personal data protection impact assessment (DPIA), the Data Protection Officer function (PPDP), notification obligations on corporate changes, cross-border data transfer, and the procedure for imposing administrative sanctions. Under Pasal 225, the regulation takes effect six months after its promulgation date — i.e., around 16 January 2027.

Key provisions

- The regulation's substantive scope covers nine areas: personal data; personal data processing; rights and obligations; cross-border transfer of personal data; international cooperation; public participation; compliance oversight of data controllers; administrative sanctions; and dispute resolution.
- Data controllers and processors must appoint a PPDP (Pejabat/Petugas Pelindungan Data Pribadi, akin to a Data Protection Officer) where processing serves public-service purposes, involves regular and systematic large-scale monitoring, or involves large-scale processing of specific-category personal data or data related to criminal offenses (Pasal 142).
- In the event of a personal data protection failure (data breach), the data controller must give written notice to affected data subjects and to the Personal Data Protection Authority (Lembaga) no later than 3×24 hours (72 hours) from becoming aware of the failure, covering what data was exposed, when and how, and the remediation steps taken (Pasal 114–115).
- Cross-border transfers of personal data require the controller to assess whether the receiving country offers a data protection standard equivalent to or higher than Indonesia's; if not, the controller must ensure adequate, binding safeguards are in place; if that cannot be met either, the data subject's consent is required before transfer (Pasal 165).
- Administrative sanctions range from written warnings, to temporary suspension of processing, to deletion or destruction of personal data, to administrative fines of up to 2% of the controller's or processor's annual revenue or income relative to the violation — multiple sanctions can be imposed simultaneously, and a written warning is not always a prerequisite (Pasal 184–185).
- Under the transitional and closing provisions, existing personal-data-protection-related regulations remain in force to the extent they do not conflict with PP 33/2026, and several operational details (e.g., PPDP competency standards, dispute mediator qualifications, technical procedures for transfer and sanctions) are left to further regulations to be issued by the Personal Data Protection Authority (Peraturan Lembaga) (Pasal 223–224).

4. ASSET FORFEITURE BILL — STRUCTURE, SCOPE, AND LEGISLATIVE TIMELINE

Bill Structure and Categories of Forfeitable Assets

The draft Asset Forfeiture Bill (RUU Asset Forfeiture) consists of 8 chapters and 62 articles, covering general provisions, the scope of criminal offences that can be forfeited, the procedural law of asset forfeiture, asset management, international cooperation, funding and closing provisions. At least sixteen core regulatory points are covered, spanning principles, methods of forfeiture, types of predicate offence and the procedure for filing a forfeiture application in court.

Key provisions:

- The bill's 8 chapters cover: (1) general provisions, (2) scope, (3) forfeitable criminal-offense assets, (4) forfeiture procedural law, (5) asset management, (6) international cooperation, (7) funding, and (8) closing provisions, across 62 articles and at least 16 core regulatory points.
- Under Chapter 3, forfeitable assets fall into three main categories: assets known or reasonably suspected to have been used as a tool or means to commit a criminal offense or to obstruct the judicial process; assets that are the direct proceeds of a criminal offense; and other legitimately-owned assets of the offender, which can be forfeited to cover state losses equal to the value of assets already declared forfeited

13 Predicate Offenses, Including Tax Crimes

The Asset Forfeiture Bill covers 13 criminal offences in total. The criminal offenses covered are: corruption; narcotics and psychotropic crimes; terrorism; people smuggling; smuggling of weapons, ammunition, and hazardous materials; forestry crimes; environmental crimes; tax crimes; banking crimes; insurance crimes; mining crimes; marine and fisheries crimes; and human trafficking.

Legislative Timeline

- As of 25 August 2026, Commission III had held 35 public hearings (Rapat Dengar Pendapat Umum) and 3 regional working visits; remaining steps before enactment include further public hearings, harmonization, working meetings with the government, discussion of the list of problem inventory (DIM), and first- and second-level approvals, with final (second-level) approval targeted at the December 2026 plenary.
- At the 27 August 2026 plenary session, Commission III Chair Habiburokhman stated that enacting the bill by no later than 15 December 2026 is “no longer a target” but a near-certainty, based on the Commission's planned session calendar.

5. TAX ALERT: GLOBE TAXPAYER REGISTRATION DEADLINE

Constituent entities or joint venture group members domiciled in Indonesia that are part of a Multinational Enterprise (MNE) Group meeting the GloBE threshold — consolidated global gross turnover of at least EUR 750 million in at least 2 of the last 4 fiscal years before the first GloBE-imposition year — must apply to add GloBE Taxpayer status under PER-6/PJ/2026.

Key provisions

- For MNE groups first covered by GloBE in fiscal year 2025 (January–December 2025), the registration application must be submitted no later than 9 months after that year-end — i.e., by 30 September 2026. Groups with a different first-covered GloBE year should calculate their own 9-month deadline from their respective year-end.
- Registration is submitted electronically through the Portal Wajib Pajak/Coretax, using the form set out in Lampiran A of PER-6/PJ/2026 — covering taxpayer name and NPWP, confirmation of ultimate parent entity status, ultimate parent entity identity, MNE group identity, the first GloBE-imposition year, correspondence address, and the responsible person's ID/NPWP, name, email, and phone number.
- DJP applies a self-assessment mechanism: taxpayers determine for themselves whether they meet the GloBE Taxpayer criteria. If a taxpayer does not register by the deadline, the Head of the relevant Tax Office (KPP) may assign GloBE Taxpayer status ex officio (secara jabatan), based on its own administrative research.

Please contact the Andersen Indonesia Tax Advisory team for support in implementing your tax and regulatory compliance procedures

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