RDJ ADVISORY
Tax and Advocate

TAX AND LEGAL INSIGHT
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INDONESIA / TAX GOVERNANCE / TAXPAYER RIGHTS

Tax Penalty Relief Is Not Automatic

Understanding Compliance, Taxpayer Rights & Administrative Remedies

THE CENTRAL DISTINCTION

Administrative relief concerns qualifying penalties and procedures. It does not automatically extinguish the underlying tax liability.

PMK 71/2026 + KEP-239/PJ/2026

Information for tax governance - not a tax amnesty or an individual legal opinion.

GENERAL INFORMATION ONLY. NOT LEGAL, TAX OR OTHER PROFESSIONAL ADVICE.

FOUR REGULATORY DISTINCTIONS

Relief has conditions. Rights have procedures.

Two instruments - different functions. PMK 71/2026 adjusts the administrative framework; KEP-239/PJ/2026 sets a specific conditional relief policy.

01 PRINCIPAL VS PENALTY

Under PMK 71/2026, payments are generally allocated to outstanding tax principal first when assessing qualifying relief. Penalty reduction is a separate matter.

02 SCOPE & ELIGIBILITY

Eligibility varies by sanction type, assessment, and statutory requirements. Some penalties are expressly excluded from reduction.

03 PROCEDURE & TIMING

Filing, payment and application deadlines are not interchangeable. KEP-239/PJ/2026 defines specific pathways for relief.

04 TAXPAYER REMEDIES

Required declarations and outstanding objections or other remedies can affect eligibility. The legal position is case-specific.

IMPORTANT LEGAL DISTINCTION

Relief is conditional. It is not cancellation of the tax principal or a general tax amnesty.

PRIMARY SOURCES PMK 71/2026 (effective 2 October); KEP-239/PJ/2026 (effective 8 October); DJP official guidance.

GENERAL INFORMATION ONLY. Specific rules and exceptions depend on the facts.

RDJ ADVISORY PERSPECTIVE

Beyond relief. Toward certainty.

Tax administration sits at the intersection of compliance obligations, taxpayer rights and procedural choices.

FOUR GOVERNANCE QUESTIONS

01 **ELIGIBILITY**

Which sanctions fall within the applicable scope and exclusions?

02 **PAYMENTS**

Is the underlying tax principal identified and reconciled?

03 **TIMING**

Are the relevant filing, payment and application periods distinct?

04 **RIGHTS**

Do existing legal remedies affect the available procedure?

KEY TAKEAWAY

Taxpayer rights and compliance obligations belong in the same conversation.

SOURCES: JDIH Kemenkeu (PMK 71/2026); DJP official KEP-239/2026 guidance and public statements.

DISCLAIMER: For general information only, not legal, tax or other professional advice. Rules depend on specific facts; readers should obtain appropriate professional advice.