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A Conceptual Study of Tax Refunds through the Direct Tax Deposit Mechanism Based on PMK 81/2024

Leo Krisna Iswahyudi [1*], Dr. I Wayan Novy Purwanto SH MKN [2]
[1-2] Faculty of Law, Udayana University, Denpasar, Indonesia

* Corresponding Author: **Leo Krisna Iswahyudi**

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Abstract
This study aims to analyze the tax refund mechanism through the direct tax deposit under Minister of Finance Regulation (PMK) 81/2024, and to identify the obstacles to implementing this mechanism among taxpayers and the tax authority. A complex and convoluted tax refund mechanism is one of the factors behind low taxpayer compliance in paying taxes. The government has therefore taken a strategic step by digitalizing tax administration processes and, at the same time, establishing a new mechanism for tax refunds through the direct tax deposit. As a breakthrough, this mechanism offers a range of benefits. However, the challenges in its implementation must also be taken into account. This study uses a normative legal research method with statute and conceptual approaches. The results show that PMK 81/2024 introduces a number of new provisions: an expansion of refund types to include regular, expedited, and automatic refunds; refund subjects who are assessed through risk profiles; and the newest refund option, the direct tax deposit. These provisions bring benefits to both taxpayers and the tax authority. However, challenges concerning law enforcement and the facilities needed for implementation must be addressed in order to build trust and foster compliance with tax obligations among taxpayers.

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Introduction

State revenue can come from several sectors, and one of the largest is taxation. [1] As the biggest pillar, taxes are used to support various government programs, from education, health, infrastructure and development, and tourism to many others. [2] The stability of state revenue therefore depends heavily on taxpayers' compliance in paying taxes.

A tax mechanism that is complicated, uncertain, and non-transparent actually contributes to greater taxpayer non-compliance.[3] This is reflected in Indonesia's tax-to-GDP ratio, which remains low compared with the Asia-Pacific average of 19% and the average of 34% among member countries of the Organisation for Economic Co-operation and Development (OECD).[4] Indonesia's tax ratio was recorded at 10.1% in 2022 and 10.31% in 2023, and fell again to 10.07% in 2024.[5]

[1] Séna Kimm Gnangnon, "Tax Revenue Instability and Tax Revenue in Developed and Developing Countries," Applied Economic Analysis 30, no. 88 (2022): 19, https://doi.org/10.1108/AEA-09-2020-0133.
[2] Chevri Korat and Agus Munandar, "Penerapan Core Tax Administration System (CTAS) Langkah Meningkatkan Kepatuhan Perpajakan Di Indonesia," Jurnal Riset Akuntansi Politala 8, no. 1 (2025): 17.
[3] Ade Kurniawan Wahyu Hidayat and Inayati, "Implementation of the Core Tax System: Impacts and Challenges on Tax Revenue in Indonesia," Journal Transnational Universal Studies 3, no. 7 (2024): 2.
[4] I Nyoman Darmayasa and Nyoman Sentosa Hardika, "Core Tax Administration System: The Power and Trust Dimensions of Slippery Slope Framework Tax Compliance Model," Cogent Business & Management 11, no. 1 (2024): 1, https://doi.org/10.1080/23311975.2024.2337358.
[5] Ikatan Konsultan Pajak Indonesia (IKPI), "Penerimaan Pajak Indonesia Terus Menurun, Tax Ratio 2024 Capai 10,07% PDB," Ikpi.or.Id, 2024, https://ikpi.or.id/penerimaan-pajak-indonesia-terus-menurun-tax-ratio-2024-capai-1007-pdb/.

Under Article 1 paragraph (2) letter d of Law of the Republic of Indonesia Number 7 of 2021 on the Harmonization of Tax Regulations ("HPP Law"), one of the purposes of this law is to carry out administrative reform, consolidated tax policy, and the broadening of the tax base. Responding to the phenomenon of low tax compliance and to this purpose of the HPP Law, the Government established an inclusive and adaptive tax system through Coretax [6]—a system that uses technology to digitalize tax administration. [7]

One form of tax administration reform through Coretax is the tax refund mechanism. Previously, the tax refund process often took a long time—months or even more than a year—because of the complex stages from application to verification by the Directorate General of Taxes ("DGT"). This situation not only hindered taxpayers' cash flow but also added to the administrative workload of the tax authority. Through Coretax, all stages of the tax refund are recorded digitally, which promotes efficiency and transparency in fiscal administration. [8] In addition, the government has also introduced a new approach to tax refunds, namely the direct tax deposit system. The direct tax deposit gives taxpayers the flexibility to place overpaid tax as a balance that can be used in subsequent tax periods.

With the introduction of this system, the government seeks to shift the paradigm of tax services from reactive to proactive. The tax authority is now required to provide data- and technology-based services in which every process, from payment and reporting to refunds, can be monitored in real time. This innovation is an important step in creating tax governance that is modern and responsive to taxpayers' needs, while also supporting the target of a more sustainable increase in the national tax ratio.

As a follow-up to this innovative step, the Government issued Minister of Finance Regulation of the Republic of Indonesia Number 81 of 2024 on Tax Provisions for the Implementation of the Core Tax Administration System ("PMK 81/2024") on 14 October 2024, which took effect on 1 January 2025.[9] This regulation harmonizes 42 other Minister of Finance Regulations on technical tax matters, from document formats to examples of tax calculation, collection, and reporting. [10] With a holistic approach that combines technological aspects and policy certainty, the new system is expected to increase taxpayers' trust in tax institutions, which in turn can encourage tax compliance and, with it, state revenue from taxes. [11]

In practice, the implementation of Coretax through PMK 81/2024 is not yet optimal. This is due to taxpayers' uneven understanding of the direct tax deposit procedure, limited information technology infrastructure in some regions, and insufficient data integration between the tax administration system and taxpayers' financial reporting systems. [12] In addition, some business actors' doubts about the accountability and security of the deposit process present a challenge of their own, so intensive outreach and the strengthening of implementing regulations are needed to ensure that this policy is effective overall.

Challenges also arise from the human resources side of the tax authority. Implementing the Coretax system requires high digital competence in operating the system, analyzing data, and delivering technology-based services. If the readiness of tax officials does not keep pace with the complexity of the new system, the goals of efficiency and transparency will be difficult to achieve. Integrated training and human resource capacity building are therefore an inseparable part of the successful implementation of this policy.

Aware of these problems, several academics have conducted research on similar topics: (i) the article "Discourse on the Coretax System in Indonesia: A Study of Legal Certainty and Guarantees for Taxpayers," [13] describes the advantages of the Coretax system in increasing the number of compliant taxpayers and also analyzes legal certainty in terms of participant data protection through encryption technology, international security standards, and periodic security audits; (ii) the article "Penerapan Core Tax Administration System (CTAS) Langkah Meningkatkan Kepatuhan Perpajakan di Indonesia" (The Implementation of the Core Tax Administration System (CTAS) as a Step to Improve Tax Compliance in Indonesia), [14] describes the potential of implementing the Coretax system to create a tax system that is fair, accountable, and sustainable; and (iii) the article "Chaotic Tax Regulations in Indonesia," [15] describes the potential conflict between PMK 18/2024 and the VAT Law, which could hinder the goals of simplifying administration and increasing tax compliance. These three studies believe that the Coretax system is an innovation that can increase tax payment compliance among taxpayers. However, none has specifically addressed the implementation of the tax refund mechanism through the direct tax deposit as the newest product of PMK 81/2024.

This gap in the literature shows the urgency of examining more deeply how the direct tax deposit system is implemented. Analysis of the legal provisions, the procedural mechanism, and the obstacles in implementation is crucial to ensure that the problems of the earlier tax administration are truly addressed by the reform through the Coretax system. Accordingly, this study is expected to make a scholarly contribution to the development of digital fiscal policy in Indonesia and to enrich academic discourse in the field of modern tax law.

Based on this background, this paper is written to analyze the

[6] Irham Abdillah, Nuramalia Hasanah, and Dwi Handarini, "Analysis of Coretax Use on the Efficiency and Effectiveness of Tax Reporting at PT Jawara Mitra Consulting," International Journal of Current Economics & Business Ventures 5, no. 2 (2025): 530.
[7] Tekalign Negash Kabede, Dereje Daniel Tona, and Tamirat Ludego Fitamo, "Practice, Opportunities, and Challenges of Electronic Tax System from Taxpayer's Perspective: Evidence from Ethiopia," Journal of Tax Reform 11, no. 1 (2025): 7.
[8] Gevan Naufal Wala and Retha Tesalonika, "Transformasi Administrasi Perpajakan Melalui Coretax: Analisis Hukum Dan Akuntansi," Jurnal Komunikasi Dan Ilmu Sosial 4, no. 2 (2024): 150.
[9] Jay Pil Choi, Taiji Furusawa, and Jota Ishikawa, "Transfer Pricing Regulation and Tax Competition," Journal of International Economics 127 (2020): 2.
[10] Yohanes Hartanto and Hidayatullah, "Chaotic Tax Regulations in Indonesia," Advances in Social Humanities Research 3, no. 7 (2025): 541.
[11] Fitria Arianty, "Implementation Challenges and Opportunities Coretax Administration System on the Efficiency of Tax Administration," Jurnal Vokasi Indonesia 12, no. 2 (2024): 99, https://doi.org/10.7454/jvi.v12i2.1227.
[12] Korat and Munandar, "Penerapan Core Tax Administration System (CTAS) Langkah Meningkatkan Kepatuhan Perpajakan Di Indonesia," 23.
[13] Dharmawan Arifin, Aris Prio Agus Santoso, and Poniman, "Discourse on the Coretax System in Indonesia: A Study of Legal Certainty and Guarantees for Taxpayers," The Easta Journal Law and Human Rights 3, no. 2 (2025): 126–27, https://doi.org/10.58812/eslhr.v3i02.
[14] Korat and Munandar, "Penerapan Core Tax Administration System (CTAS) Langkah Meningkatkan Kepatuhan Perpajakan Di Indonesia," 27.
[15] Hartanto and Hidayatullah, "Chaotic Tax Regulations in Indonesia," 544.

concept and implementation of the tax refund mechanism through the Direct Tax Deposit system, set out in a journal article entitled "A Conceptual Study of Tax Refunds through the Direct Tax Deposit Mechanism Based on PMK 81/2024."

Method

This study uses a normative legal research method with a statute approach and a conceptual approach, [16] which aims to examine the legal provisions on the tax refund mechanism through the direct tax deposit as regulated in PMK 81/2024. The data used in this study come from primary legal materials, [17] such as statutes and regulations and official government documents, as well as secondary legal materials [18] in the form of literature, scholarly journals, and the opinions of tax law experts. The analysis is carried out qualitatively through legal interpretation and the systematics of regulations in order to understand their implementation and legal implications.

Results and Discussion

Legal Provisions on the Tax Refund Mechanism through the Direct Tax Deposit under PMK 81/2024

Under Article 1 number 1 of Law of the Republic of Indonesia Number 28 of 2007 on the Third Amendment to Law Number 6 of 1983 on General Provisions and Tax Procedures ("Law 28/2007"), tax is defined as a compulsory and coercive contribution, for which no direct compensation is received, used for state purposes for the greatest prosperity of the people. Alongside this obligation, taxpayers also have several rights, one of which is the right to obtain a refund of overpaid tax. As stated above, the tax refund mechanism was previously complex and time-consuming. With the Coretax system, however, the process is now fully digital, with several options for using the overpaid tax.

The comparison of the provisions of the refund mechanism before and after the issuance of PMK 81/2024 is set out in detail in Table 1.

Table 1: Comparison of Refund Mechanism Provisions Before and After the Issuance of PMK 81/2024

Aspect	Before PMK 81/2024	After PMK 81/2024
Types of Refund	Refunds were divided into 2 (two) types: (1) regular refund; and (2) expedited refund (preliminary refund), which was granted only to certain taxpayers, including Compliant Taxpayers, low-risk Taxable Entrepreneurs, and Individual Taxpayers with income below a certain threshold, provided they met the stipulated administrative requirements.	Refunds are divided into 3 (three) types: (1) regular refund; (2) expedited refund (preliminary refund); and (3) automatic refund (auto refund) for certain conditions based on the risk assessment by the Coretax system.
Eligible Subjects	The parties entitled to apply for a refund were limited to Compliant Taxpayers, low-risk Taxable Entrepreneurs, and certain other Taxpayers who met administrative requirements, such as having no tax arrears, filing the Annual Tax Return on time for three consecutive years, and not being under investigation for a tax crime.	All Taxpayers may apply for a refund of overpaid tax, provided they meet the risk classification and compliance level determined by the Coretax system. The assessment is carried out digitally based on risk profile, compliance track record, and the Taxpayer's administrative status, without restriction to particular categories.
Refund Options	A Taxpayer with an overpayment could submit an application for a refund of the overpaid tax.	Taxpayers are given two options for overpaid tax: (1) submit an application for a refund of the overpaid tax; and (2) keep the overpayment in the form of a direct tax deposit, which can be used to settle tax obligations in subsequent tax periods.
Examination Mechanism	Every refund application was processed through a full examination for regular refunds and a simple examination for expedited refunds. Examination by the tax officials was a mandatory stage that every refund application had to pass before a Decision Letter on Preliminary Refund of Tax Overpayment or a Tax Assessment Letter of Overpayment was issued.	A risk-based approach is applied, which emphasizes examining taxpayers with a high level of risk. For low-risk taxpayers, or those who meet the refund criteria, a refund of overpaid tax can be obtained automatically without going through a manual examination process.
Regulatory Orientation	More manual and selective, with a focus on direct supervision by tax officials of certain taxpayers. Implementation was dominated by physical verification and face-to-face interaction between taxpayers and tax officers.	Automatic, digital, and data-based, thereby increasing efficiency, transparency, and legal certainty, and widening access and convenience for all taxpayers through the application of the digitally integrated Coretax system.

Source: Author's compilation, 2025.

Based on this comparison, it can be concluded that several provisions on refunds of overpaid tax under PMK 81/2024 are oriented toward simplicity and process efficiency. This reform reflects the government's commitment to building a tax administration system capable of meeting the challenges of fiscal modernization. Through the digital system integrated into Coretax, the processes of application, verification, and refund become more systematic, require minimal direct contact, and reduce the potential for administrative disputes between taxpayers and the tax authority. [19]

One of the newest products in tax refunds under PMK 81/2024 is the direct tax deposit. By definition, Article 1 number 112 of PMK 81/2024 provides that: "A tax deposit is a tax payment that does not yet refer to a specific tax obligation." Because a tax deposit does not yet refer to a specific tax obligation, taxpayers can later allocate it to the payment of particular taxes in the future, [20] including

[16] Derita Prapti Rahayu and Sulaiman, Metode Penelitian Hukum (Yogyakarta: Thafa Media, 2020), 30.
[17] David Tan, "Metode Penelitian Hukum: Mengupas Dan Mengulas Metodologi Dalam Menyelenggarakan Penelitian Hukum," Nusantara: Jurnal Ilmu Pengetahuan Sosial 8, no. 8 (2021): 2427.
[18] Zainuddin Ali, Metode Penelitian Hukum (Jakarta: Sinar Grafika, 2016), 23.
[19] Arifin, Santoso, and Poniman, "Discourse on the Coretax System in Indonesia: A Study of Legal Certainty and Guarantees for Taxpayers," 124–125.
[20] Ni Kadek Indah Kristanti, "Analisis Urgensi Implementasi Fitur Deposit Pajak Pada Coretax Sebagai Metode Pembayaran Pajak" (Thesis, Politeknik Negeri Bali, 2025), 4.

Income Tax (PPh) Articles 21, 22, 23, 25, and 29, Value Added Tax (PPN), Luxury Goods Sales Tax (PPnBM), and late-payment penalties. [21]

Furthermore, under Article 103 paragraph (3) of PMK 81/2024, a tax deposit can be funded through: (1) payment via the electronic state revenue system; (2) an application for transfer (pemindahbukuan); and (3) an application concerning the remaining overpaid tax or remaining interest compensation after it has been offset against Tax Debt. To use the tax deposit mechanism, taxpayers must still go through the process of applying for a refund of overpaid tax, attaching several documents as provided in Article 127 paragraphs (3) and (4) of PMK 81/2024, namely: (1) a written refund application in Indonesian; (2) proof of tax payment, a tariff and/or customs value determination letter, or an import cancellation document approved by an authorized official; (3) a copy of the objection, appeal, or judicial review decision (if any); (4) a calculation of the tax that should not have been payable; and (5) the reasons for the application for a refund of the overpaid tax.

For such an application, the DGT will verify the correctness of the relevant tax payment. If the review shows an overpayment of tax that should not have been payable, the DGT will issue a Tax Assessment Letter of Overpayment and refund the overpayment to the taxpayer. The refund can be made through two options: (1) a direct refund to a bank account in the taxpayer's name registered in the tax database; and (2) a transfer of the funds to the relevant taxpayer's deposit account. Beforehand, the DGT will send the taxpayer a notification to obtain consent to the option offered. If the taxpayer does not give consent within the specified period, the overpaid tax will be refunded to the taxpayer. This procedure ensures transparency and the protection of taxpayers' rights.

Beyond the direct tax deposit mechanism itself, PMK 81/2024 also reflects a paradigm shift in fiscal policy from a control-oriented system to one based on trust and a risk-based approach. The Government seeks to build trust by simplifying processes while enforcing compliance discipline through digital data-based supervision. This innovation is expected to increase the level of voluntary compliance and reduce the administrative burden on both taxpayers and the tax authority. With the flexibility to use the tax deposit balance, taxpayers can more easily manage their tax cash flow, while the tax authority obtains more accurate data to support a responsive fiscal policy.

Implementation of the Tax Refund Mechanism through the Direct Tax Deposit among Taxpayers and the Tax Authority

Using the direct tax deposit as one mechanism for refunding overpaid tax is a simpler and more transparent innovation. Through this mechanism, the process of refunding overpaid tax becomes faster, more accurate, and more integrated. Its benefits are therefore felt not only by taxpayers but also by the tax authority.

For taxpayers, a tax refund through the direct tax deposit that can be processed online via Coretax makes it easier to analyze data more quickly and accurately. This increases transparency and reduces the potential for tax fraud. [22] In addition, taxpayers are given the flexibility either to receive the refund of overpaid tax directly or to transfer it to a tax deposit account. When overpaid tax is transferred to a tax deposit account, taxpayers can also use that balance to pay their tax obligations without having to create a separate billing, as long as the balance is sufficient. [23] This reduces the potential for penalties if a taxpayer happens to miss paying tax by the deadline.

For the tax authority, examinations can be focused on more substantive matters, because deposits and tax refunds are monitored in real time in the system. Tax services can also be delivered more optimally through a risk-based approach, since refunds of overpaid tax can be made promptly, without a convoluted examination process, by examining only the taxpayer's risk profile. When a taxpayer uses the tax deposit balance to pay tax obligations, the tax authority likewise does not need to issue a new payment billing.

Furthermore, the application of the direct tax deposit mechanism also drives digital transformation in the national tax administration system. The use of the Coretax system centralizes all transaction and payment data, so that the tax authority can monitor tax cash flows comprehensively and in a consolidated manner. This not only strengthens the supervisory function but also improves the quality of the tax database that underpins macro-level fiscal decision-making. [24] The policy therefore provides not only practical but also strategic benefits for strengthening national tax governance.

As a relatively new policy, this mechanism is of course not free from implementation challenges. To ensure that implementation is on target, both taxpayers and the tax authority need to pay attention to the challenges of implementing the refund mechanism for overpaid tax through the direct tax deposit.

For taxpayers, a lack of training or understanding in using this mechanism can increase the likelihood of errors in operating the system and filling in data. Taxpayers must remain vigilant about recording balances, the potential for double payments, idle funds, and even financial losses caused by delays in the refund process or by a tax deposit balance that cannot be used in the next tax period. [25]

For the tax authority, the lack of technical guidelines often leaves officers in the field without a uniform reference for carrying out the refund mechanism through the direct tax deposit. In addition, heavy server load often causes bugs in the system during peak usage periods, [26] which ultimately hinders services. Uneven technical infrastructure across Indonesia also impedes implementation of this mechanism, particularly in remote and outlying areas. [27] As a result, some tax offices still use conventional methods.

The regulatory aspect also needs to be strengthened to ensure

[21] Moh Yudi Mahadianto and Sri Yani, "Interpretation of Tax Payment Mechanism in Coretax System on Compliance (Case of KPP Pratama Cirebon)," Journal of Management 7, no. 1 (2025): 4

[22] Hidayat and Inayati, "Implementation of the Core Tax System: Impacts and Challenges on Tax Revenue in Indonesia," 4.

[23] Kristanti, "Analisis Urgensi Implementasi Fitur Deposit Pajak Pada Coretax Sebagai Metode Pembayaran Pajak," 52.

[24] Arianty, "Implementation Challenges and Opportunities Coretax Administration System on the Efficiency of Tax Administration," 103.

[25] Kristanti, "Analisis Urgensi Implementasi Fitur Deposit Pajak Pada Coretax Sebagai Metode Pembayaran Pajak," 53.

[26] Notika Rahmi and Damith Gangodawilage, "SWOT Analysis of Indonesian Tax Administration Innovation in the Digitalization Era," Ilomata International Journal of Tax and Accounting 3, no. 1 (2022): 29.

[27] Gabrella Dimetheo, Athirah Salsabila, and Nikita Ceysha Amabel Izaak, "Implementasi Core Tax Administration System Sebagai Upaya Mendorong Kepatuhan Pajak Di Indonesia," Prosiding Seminar Nasional Ekonomi Dan Perpajakan 3, no. 1 (2023): 18.

the continuity of this policy's implementation. PMK 81/2024 must be synchronized with its implementing regulations so as to avoid overlapping norms and confusion at the operational level. Likewise, monitoring and evaluation mechanisms need to be designed on a periodic basis so that the government can assess the policy's effectiveness and make adjustments when recurring obstacles are found. This evaluation-based approach is important to ensure that digital innovation does not stop at the administrative level but genuinely adds value to the national tax system.

Overall, the tax refund mechanism through the direct tax deposit regulated in PMK 81/2024 is an innovative step in Indonesia's tax administration reform. By providing a more efficient and transparent option for taxpayers [28] to manage overpaid tax, it is hoped that tax compliance will increase and that relations between taxpayers and the tax authority will become more harmonious. Nevertheless, implementing this mechanism requires effective outreach and adequate information technology support. The DGT needs to ensure that the tax information system can properly accommodate the direct tax deposit mechanism, and to provide clear guidance for taxpayers in using this facility.

In essence, three elements can realize the objectives behind the issuance of PMK 81/2024: law enforcement, facilities, and trust. [29] Law enforcement can be ensured by strengthening the supervision and performance of the tax authority, accompanied by the preparation of technical guidelines to accommodate the transition from the conventional tax reporting mechanism to a system integrated through Coretax. Facilities are provided by offering convenience and simplification for taxpayers. The availability of means and infrastructure such as the internet and devices, as well as outreach activities, also accelerates the benefits of implementing the facilities that have been launched. [30] With law enforcement and facilities guaranteed, trust can be built.

The tax refund mechanism through the direct tax deposit is not merely an administrative innovation but also a representation of a transformation of the paradigm in the relationship between the government and taxpayers. This approach, which emphasizes digitalization, transparency, and accountability, marks a new era of tax governance that is more modern and responsive to society's needs. If implemented consistently and accompanied by adaptive supervision, this policy has the potential to become an important foundation for a tax system that is fair, efficient, and sustainable. PMK 81/2024 thus becomes not merely a legal instrument but also a catalyst for realizing the vision of fiscal reform toward voluntary compliance and shared prosperity.

Conclusion

The direct tax deposit mechanism, as a product of PMK 81/2024, is a policy innovation intended to provide convenience, certainty, and efficiency in refunding overpaid tax to taxpayers. This mechanism allows taxpayers to keep overpaid tax in a deposit account managed by the Directorate General of Taxes, which can be used to settle tax obligations in the future or be refunded directly upon application. This provision strengthens a digitally based tax administration system and speeds up the refund process without having to go through a time-consuming examination.

In implementation, however, there are a number of obstacles on the part of both taxpayers and the tax authority. At the taxpayer level, the challenges lie in technical understanding of this new mechanism and the potential for data-entry errors. On the tax authority's side, the constraints include the readiness of technical guidelines and the evenness of technical infrastructure, while system bugs make tax services less than optimal.

To optimize the implementation of PMK 81/2024, the Government needs to prepare detailed technical instructions that are easy for all taxpayers to understand, accompanied by massive outreach and integrated training for tax officials so that understanding of this mechanism is evenly distributed. Capacity building for the tax authority through regular training on the refund mechanism and the direct tax deposit is also very important. In addition, the DGT is advised to provide consultation and complaint channels that respond to technical and substantive problems in the field. In this way, services can be delivered accurately and professionally—in line with the effective and accountable running of the policy.

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