Analysis of Implementation of The Obligation Using Transfer Pricing Documentation on Domestic Transactions in Indonesia

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Abstract- *Indonesia has adopted BEPS Action Number 13 into Regulation of the Minister of Finance Number 213/PMK.03/2016 which has been in effect since December 30, 2016. This regulation regulates the types of documents and/or additional information that must be kept by Taxpayers conducting related party transactions, and the procedures for managing them. The application of the TP Doc obligation in Indonesia has advantages and disadvantages, especially for taxpayers who only have domestic related party transactions. The advantages of making a TP Doc can help Taxpayers as argumentation material in the context of proof and to maintain fairness and/or business practice (Arm's Length Principle) during the research, examination and/or tax litigation process. Meanwhile, the implementation of making TP Doc has several shortcomings. First, the creation of a TP Doc will increase taxpayer compliance costs. Second, the corresponding adjustment mechanism, which has not been fully implemented in tax audits, can lead to double taxation economically, thus harming taxpayers who only have domestic transactions.*

Index Terms- Transfer Pricing, Transfer Pricing Documentation, Domestic Transactions

I. Introduction

Along with the development of a company that forms a business group, it will generally be followed by an increasing number of intragroup transactions or transactions between parties that have a special relationship (hereinafter referred to as related party transactions). The type of related party transactions referred to may be in the form of sale or purchase of tangible goods, provision of intragroup services, payment of interest, sale or purchase of shares, as well as transfer and utilization of both tangible and intangible assets. Problems that often arise in related party transactions are called transfer pricing.

Transfer pricing practices in the context of tax avoidance do not only occur in multinational companies that carry out cross-border related party transactions. In practice, according to the Directorate General of Taxes (hereinafter referred to as the DGT), transfer pricing can also occur between domestic companies. The Director of International Taxation at the DGT said that several companies in Indonesia that are in the same group often do this practice. The purpose of transfer pricing in domestic companies is generally used to transfer profits from one company to other companies that have smaller tax obligations than other companies (Kontan, 2017).

The OECD has provided a guideline in the form of the OECD Transfer Pricing Guidelines (hereinafter referred to as the OECD TP Guidelines) for the parties that are doing transfer pricing. Through these guidelines, it is hoped that all parties will pay more attention to transfer pricing issues, including the arrangement of transfer pricing documentation (hereinafter referred to as TP Doc).

Indonesia is one of the countries that has adopted the recommendations of the OECD Guidelines in formulating tax regulation in Indonesia related to transfer pricing (Ernst and Young, 2016). One form of adoption of the OECD Guidelines in tax regulations can be seen in the Regulation of the Director General of Taxes Number PER-43/PJ/2010 (hereinafter referred to as PER-43/2010). PER-43/2010 regulates the application of the principle of fairness and business practice in transactions between Taxpayers and related parties. This regulation has been amended by Regulation of the Director General of Taxes Number PER-32/PJ/2011 (hereinafter referred to as PER-32/2011). PER-43/2010 as amended for the last time by PER-32/PJ/2011 stipulates that the making of TP Doc is not only related to cross-border transactions but also domestic transactions with the context of tariff differences.

At the end of 2016, Indonesia then adopted the Base Erosion and Profit Shifting Action (hereinafter referred to as BEPS) Number 13 into a tax regulation issued on December 30, 2016. The adoption refers to the Regulation of the Minister of Finance Number 213/PMK.03/2016 (hereinafter called PMK-213/2016). This regulation regulates the types of documents and/or additional information that must be kept by taxpayers who conduct transactions with related parties, and the procedures for their management.

With the enactment of PMK-213/2016, the TP Doc setting includes a new threshold that will be used as a reference in determining TP Doc obligations. Meanwhile, the regulation regarding the analysis of arm's length principle still uses PER-43/2010 as amended for the last time by PER-32/PJ/2011.

Different from PER-43/2010 as amended for the last time by PER-32/2011, PMK-213/2016 does not explicitly mention the scope of related party transactions that are required to make a TP Doc. Therefore, for a Taxpayer who only has domestic related party transactions and has met the threshold for TP Doc obligations, the Taxpayer is obliged to organize a TP Doc even though there is no difference in tax rates with the related parties.

Based on the foregoing, it is necessary to further study the implementation of the TP Doc on domestic transfer pricing in Indonesia. Therefore, it inspires and motivates researchers to raise the theme in the study which will be entitled "Analysis of Implementation of the Obligation Using Transfer Pricing Documentation on Domestic Transactions in Indonesia"

II. CONCEPTUAL FRAMEWORK

A. Special Relationship

A special relationship occurs when there is participation in management, control, or capital (Darussalam, 2013). Then, the concept of control is also included in the scope of technology control, accounts payable relationship, strong negotiating position, and so on. Furthermore, the special relationship has two categories, namely de facto control and de juro control. De facto control is generally more focused on a wider scope of management. As in a negotiation between parties who have a special relationship, it will be more dominant than a negotiation in general with parties who do not have a special relationship. De facto control can also be seen from the form of exclusivity of selling a product to a certain party, including control of technology and science, interest-free lending and borrowing transactions, and so on. Meanwhile, De juro control is a condition where there is an entity that has a majority equity participation from another entity, either directly or indirectly, so that the entity has the right to make important decisions in the entity owned. De juro control can also occur if there are managers or management (either Directors, Managers, or others) that are the same between one entity and another. (Rotondaro, 2000)

B. Related Party Transactions

The scope of related party transactions regulated by the OECD Transfer pricing Guidelines 2017 (OECD, 2017) is a transaction between two companies that are related to special relationship, where the company itself is referred to as an associated enterprise (affiliated company).

C. Transfer Pricing

According to the OECD (OECD, 2017) transfer pricing refers to the price at which a company transfers tangible or intangible goods or provides services to affiliated companies. The OECD definition implies that transfer pricing is a normal part of international trade. For multinational companies, transfer pricing is needed to ensure that transactions with their foreign affiliates are efficient and to track the performance of their divisions (Rugman & Eden, 2017).

Furthermore, Zain (2008) said that if transfer pricing is grouped there is a domestic transfer pricing, namely the price set for transactions of goods or services between companies within a group of companies and/or between divisions within a company within the jurisdiction of the same country, while multinational transfers pricing is related to transactions that occur between divisions within a legal unit or between legal units covering various jurisdictions from various country.

D. Tax Avoidance

For companies, taxes are expenses that are deducted from net income after deducting operating expenses. If the tax is high, it will have an impact on net income which will be distributed to the owners of the company. Therefore, managers are looking for ways to pay less tax. This is related to the fulfillment of the interests of the owner of the company. The owner's desire to increase performance and value by promising compensation requires managers to look for strategies to minimize expenses and maximize net income. Therefore, the strategy taken is the practice of tax avoidance (Sari, 2014). This strategy is carried out by management to plan the amount of tax that will be deposited into the state so that the value is smaller than it should be (Desai and Dharmapala, 2015)

E. Transfer Pricing Documentation.

According to Hejazi (2009), Transfer Pricing Documentation (hereinafter referred to as TP Doc) with the contemporaneous documentation scheme acts as a blueprint that presents the results of the fairness of pricing for sale and purchase transactions of tangible goods, services, and intangible goods with affiliated parties. There are two purposes of transfer pricing documentation, namely for external interests and internal interests.

Then, according to Hariom (2011) that TP Doc is a documentation activity carried out by companies for transactions that occur with parties who have special relationships with the company. The TP Doc also aims to explain to the tax authorities the application of the arm's length principles used in related party transactions. Every company that carries out related party cross border transactions is required to organize and keep a TP Doc.

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III. RESEARCH METHOD

The qualitative approach is applied in this research due to the consideration of the suitability of the data available. Then from the existing data and also its availability as material for conducting research, the qualitative approach was chosen by the researcher. Thus, it is necessary to conduct further and in-depth research including the collection of data needed in this research. To obtain a complete and valid picture in implementing policy of the obligation to prepare TP Doc on domestic transactions in Indonesia, the data collection is done qualitatively through literature study and in-depth interviews. According to Sale, Lohfeld, and Brazil (2002, p. 45), although in-depth interview research techniques do not represent a large population, key informants of in-depth interviews can provide important and useful information for research. Therefore, we also conducted in-depth interviews with five key informants including Astuti (2021), Irawan (2021), Boerman (2021), and Nuryanto (2021).

IV. RESULT AND DISCUSSION

In fact, transfer pricing is a term with a neutral meaning, but in practice it has a negative connotation and is closely related to the term of tax avoidance. The pejorative meaning of transfer pricing refers to the terms transfer mispricing, transfer manipulation and so on. Transfer pricing manipulation is used to avoid government supervision by taking advantage of differences in regulations between countries related to tax rates by setting transfer prices to be below or above the opportunity cost (Eden, 2003). Some of the motives commonly used by business groups in transfer pricing include repatriating capital, window dressing on financial statements, minimizing taxes, risking currency differences and other reasons. An example of tax avoidance is allocating profits to other place with low tax rates through transfer pricing (Rahayu and Santoso, 2013). On the other hand, the Director of International Taxation of the DGT has said that more than 60% of cross-border related party transactions are transactions that are mostly carried out by multinational companies (Bisnis, 2019).

Scheme of Transfer Pricing for Domestic Transactions

Head of Sub-Directorate for Prevention and Handling of International Tax Disputes, Directorate General of Taxes (DGT), explained in detail the practice of transfer pricing for domestic companies. There are two transfer pricing schemes that are generally carried out on domestic transactions in Indonesia. First, transfer pricing transactions are carried out if one company that is part of a business group has a tax holiday facility. Then, other affiliated companies will transfer the company's profits to the affiliated company that has the tax holiday facility. This practice is similar to transfer pricing that is carried out across borders, namely transferring profits from one company in Indonesia to companies located in other countries that have lower tax rates. The destination country is often referred to as a tax heaven country.

The second scheme of transfer pricing on domestic transactions is carried out by transferring part of the profits from one company to another company that is still in the same business group that recorded a net loss of the company. According to tax provisions in Indonesia, if the company loses then the company will be free of tax burden. Characteristics that are often encountered from loss-making companies that become places to accommodate profits from other companies are that the company's operations run as usual and do not appear to be experiencing financial difficulties. Furthermore, the Head of Sub-Directorate for Prevention and Handling of International Tax Disputes at the DGT gave an example, there is an ABC company that normally generates profits and has an affiliate, namely company XYZ, which always suffers losses. Next, the ABC company makes a transaction with company XYZ at a pre-arranged transfer price. It is intended that the profit on ABC company is reduced, but company XYZ still suffers a loss. Therefore, to overcome the modes of tax avoidance by this company, the government then issued PMK-213/2016. PMK-213/2016 is a refinement of the provisions of PER-32/2011 which regulates about transfer pricing. The obligation to produce a TP Doc in PMK-213/2016 is not only required for transactions with affiliates who are overseas. However, this obligation also applies to parties who only have domestic related party transactions (Kontan, 2017).

Background of Minister of Finance Regulation Number 213 Year of 2016 (PMK-213/2016)

Researchers conducted interviews related to the background of the formation of PMK-213/2016 with key informants including Irawan (2021 and Astuti (2021). The formation of PMK-213/2016 is one of the BEPS implementations designed by the BEPS Inclusive Framework whose majority members are OECD and G-21 member countries. Irawan (2021) explained that the historical background before the launching of PMK 213 and the establishment of BEPS was motivated by the meeting of the G-21 countries with the OECD. Government agencies that manage their state revenues meet in international forums. The parties exchanged their experiences about tax revenue in their respective countries. Overall, these countries experience a similar trend of declining tax revenues caused by tax avoidance through the Base Erosion and Profit Shifting scheme (hereinafter referred to as BEPS).

Astuti (2021) explained that members of the BEPS Inclusive Framework, including Indonesia, are required to implement the minimum standard BEPS recommendations. If Indonesia does not implement the minimum BEPS standard, then Indonesia will not pass the review and this will result in the exchange of CbCR data between countries. On October 5, 2015, the OECD issued BEPS Action No. 13. The objective of the issuance of BEPS Action No. 13 is to increase tax administration transparency and increase certainty for taxpayers through standardization of TP Doc with a three-tiered approach. The three-tiered approach includes Master File, Local File, and Country-by-Country Reporting (CbCR). At the end of 2016, Indonesia then adopted the BEPS Action Number 13 in PMK-213/2016 which was

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published on December 30, 2016. This PMK 213 also provides settings for the type of TP Doc, namely Master File and Local File. In addition, PMK 213 also provides clearer instructions regarding what documents or information must be submitted in the TP Doc Master File, Local File, and CbCR. In addition, with the enactment of PMK-213/2016, the new threshold in PMK-213/2016 will be used as a reference in determining TP Doc obligations. Prior to PMK 213, the threshold was already regulated in PER-43/PJ/2010 as amended for the last time by PER-32/PJ/2011. However, the threshold setting in PMK-213/2016 is different from the previous regulation.

Threshold of Transfer Pricing Documentation Obligations in Indonesia
The difference between the TP Doc mandatory threshold provisions in PMK-213/2016 with the previous regulation, namely PER-43/2010 as amended for the last time by PER-32/2011, are as follows:

PMK-213/2016	PER-43/2010 as amended for the last time by PER-32/2011
• Master File dan Local File The value of gross income in the previous Tax Year in one Tax Year of more than Rp50,000,000,000.00 (fifty billion rupiah); the value of Related party transaction in the previous Tax Year in one Tax Year: of more than Rp20,000,000,000.00 (twenty billion rupiah) for tangible goods transaction; or of more than Rp5,000,000,000.00 (five billion rupiah) for each service provision, interest payment, intangible goods utilization, or other Related party transactions; or An Affiliated Party in a country or jurisdiction with the rate of Income Tax lower than the rate of Income Tax as referred to in Article 17 of Law Number 7 Year 1983 regarding Income Tax as amended for several times with the most recent amendment by Law Number 36 Year 2008 regarding the Fourth Amendment to Law Number 7 Year 1983 regarding Income Tax. • CbCR A Taxpayer constituting a Parent Entity of a Business Group having consolidated gross income in the Tax Year concerned not less than Rp11,000,000,000,000.00 (eleven trillion rupiah).	Focus on cross-border related-party transactions. Domestic related-party transactions are outside the purview of transfer pricing rules, except when availing tax tariff difference occur arising out of: • Treatment of final or non-final income tax imposition in certain business sectors; • Imposition of luxury goods sales tax (LGST); or • Transactions with contractor of cooperation contract in oil and gas industry.

The Executive Director of the Center for Indonesia Taxation Analysis (CITA) said that there is still a need for clarity between regulations and procedures in PMK-213/2016 because they still overlap. PMK-213/2016 also does not explicitly revoke PER-43/2010 as amended for the last time by PER-32/2011 and related regulations that are contrary. In addition, there are other things that still need to be addressed further from PMK-213/2016, namely the scope of domestic transactions. On the other hand, PMK-213/2016 does not confirm transactions for cross-border. Thus, the increase in tax compliance costs charged to taxpayers needs to be anticipated (Tempo, 2017).

Tax Avoidance Risk for Taxpayers who only have Domestic Related Party Transactions

The enactment of PMK-213/2016 actually makes the implementation of the obligation to prepare TP Doc on domestic transactions in Indonesia different from PER-43/2010 as amended for the last time by PER-32/2011. Taxpayers who carry out domestic related party transactions with no difference in tax rates should be included in the category of low risk Taxpayers. What is meant by no difference in tax rates is when the Taxpayer has a transaction with other domestic Taxpayers under the same conditions, where the financial statements experience profit and use the general rate.

Furthermore, if a Taxpayer is subjected to a tax audit, then the tax officer makes corrections to the related party transaction of one of the Taxpayers, a correction should also appear on the Taxpayer of the opposite transaction. That term called "move right to left pocket". This means that the state will receive tax revenue for positive corrections from taxpayers, but on the other hand, the state will also return the excess tax to other taxpayers for negative corrections. Thus, the correction does not increase state revenue but instead reduces revenue because the cost of collecting taxes is greater than tax revenue. Therefore, the implementation of the objectives of Article 18 paragraph (3) of the Income Tax Law will not be achieved. The government should focus on taxpayers with cross-border related party transactions or domestic related party transactions but meet the requirements for tax rate differences. The taxpayer is included in the high risks category in tax avoidance.

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However, Taxpayers who only have domestic related party transactions still have a risk for tax correction. According to Boerman and Nuryanto (2021) that in practice there has not been a corresponding adjustment mechanism for domestic transactions. Even though the corresponding adjustment mechanism has already been regulated in the provisions of PER-43/2010 as amended for the last time by PER-32/2011. Corresponding adjustments are corrections made to the primary and secondary corrections. The difference between the price or profit of related party transactions with the price or fair profit is a primary adjustment. If the primary correction is made at the profit level, Tax Auditor must attribute the profit correction to related party transactions that have a high risk of tax avoidance. Primary corrections made by the Tax Auditor may result in secondary corrections. Secondary correction is a follow-up correction that may occur due to a primary correction in related party transactions.

For example, when the Tax Auditor makes a positive correction on a Taxpayer related party transaction. As a result of this correction, there is an overpayment to the affiliate. For the overpayment, the Tax Auditor may make secondary corrections based on the applicable tax provisions. Back then in the context of the corresponding adjustment, if it is not implemented by the tax officer, there will be double taxation economically. Regarding to this, the corresponding adjustment should be applied to domestic taxpayers, so that the taxation practice environment becomes healthy and creates justice for taxpayers.

Boerman (2021) added that as long as PMK-213/2016 still valid, taxpayers who only carry out domestic related party transactions, which have met the PMK-213/2016 threshold, must keep making TP Doc. The advantages of making a TP Doc is it can help taxpayers as argumentation material in the context of proof and to maintain fairness and/or business practice (Arm's Length Principle) during the research, examination and/or tax litigation process.

If the taxpayer makes a TP Doc, the tax officer has the obligation to review the TP Doc. However, if the Taxpayer does not make a TP Doc, the right to prove the fairness and prevalence of the Taxpayer's related party transaction business will be lost. The tax officer will conduct the test using a method that is believed by the tax officer and may not consider the evidence made by the taxpayer. If the tax audit will proceed to the tax court, the taxpayer's chance to win will be very low. This is considered by the judge of the tax court, where the taxpayer has been given the right of proof through making a TP Doc, but it is not utilized.

Resetting PMK-213/2016 Threshold for Taxpayers who only have Domestic Related party transactions

Researches conducted interviews related to key informants' opinions on the implementation of PMK-213/2016 for Taxpayers who only have Domestic Related party transactions with key informants including Nuryanto (2021) and Boerman (2021). Nuryanto (2021) stated that it is necessary to reset the threshold in PMK-213/2016. The regulation does not have to follow the previous regulation, in this case is PER-43/2010 as amended for the last time by PER-32/2011, but it is necessary to re-stipulate the criteria for Taxpayers who are exempted or excluded from the obligation to prepare TP Doc.

In line with Nuryanto, Irawan (2021) stated that PMK-213/2016 needs to be reviewed by the Government. The regulations made should not be burdensome for taxpayers in terms of cost of compliance. The regulations made actually have to support taxpayers to develop their business by not distorting tax regulations. Therefore, we could get a balance from policies that are made not only based on "suspicion".

Nuryanto (2021) added that if PMK-213/2016 is revised, taxpayers who have a high risk are still required to make a comprehensive TP Doc as regulated in PMK-213/2016 and refers to the OECD Guidelines and BEPS Action 13. Meanwhile, taxpayers with low risk may be required to make a TP Doc with a simpler presentation compared to high risk taxpayers. The simplification aims to make taxpayers more obedient by not burdening them.

In implementing simplification into domestic regulations, Indonesia could follow the new Practical Toolkit from The Platform for Collaboration on Tax (PCT). PCT is a joint initiative of the International Monetary Fund (IMF), the Organization for Economic Co-operation and Development (OECD), the United Nations (UN) and the World Bank Group (WBG). The New Practical Toolkit will support the successful implementation of effective TP Doc requirements for developing countries.

V. CONCLUSION

The implementation of the TP Doc obligation in Indonesia has advantages and disadvantages, especially for taxpayers who only have domestic transactions. The advantages of making a TP Doc can help Taxpayers as argumentation material in the context of proof and to maintain fairness and/or business practice (Arm's Length Principle) during the research, examination and/or tax litigation process. Meanwhile, the implementation of making TP Doc has several shortcomings. First, the creation of a TP Doc will increase taxpayer compliance costs. Second, the corresponding adjustment mechanism that has not been fully implemented can lead to double taxation economically, thus harming taxpayers who only have domestic transactions.

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APPENDIX

Appendixes, if needed, appear before the acknowledgment

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The preferred spelling of the word "acknowledgment" in American English is without an "e" after the "g." Use the singular heading even if you have many acknowledgments

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