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CONTROLLING LOCAL CHARGES: THE TAX AND FEE BOUNDARY AFTER THE COLLAPSE OF EXECUTIVE REVIEW

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ABSTRACT

Local governments levy charges as well as taxes, and the line between the two determines which legal guarantees apply to a citizen who must pay. This study examines how that line is drawn and how the proliferation of local charges is controlled, in a system where the principal control mechanism was removed by constitutional ruling and later replaced by a different one. The method combines doctrinal analysis with a structured review of research published between 2017 and 2024 and comparative material from Poland, Serbia, South Africa and the United States. Three findings follow. The control architecture has been rebuilt rather than repaired: a 2017 constitutional ruling invalidated executive review of subnational regulations, holding that review belongs to the courts, and the 2022 fiscal relations statute then substituted ex ante restriction of what may be charged for the ex post annulment that had been removed. The forum that inherited the function reviews subnational law poorly, with decisions found seriously flawed and politically sensitive cases avoided. And the doctrinal question of when a charge is in substance a tax is largely unaddressed in recent scholarship; Polish administrative-court jurisprudence on whether general tax law applies to enumerated local charges is the closest available treatment. The study argues that ex ante closure and ex post review answer different questions, and specifies four criteria a charge should satisfy.

ABSTRAK

Pemerintah daerah memungut retribusi selain pajak, dan garis pemisah keduanya menentukan jaminan hukum apa yang berlaku bagi warga yang harus membayar. Penelitian ini menelaah bagaimana garis itu ditarik dan bagaimana pertumbuhan pungutan daerah dikendalikan, dalam sistem yang mekanisme pengendalian utamanya dibatalkan oleh putusan konstitusional dan kemudian digantikan mekanisme lain. Metodenya memadukan analisis doktrinal dengan telaah terstruktur riset terbitan 2017 hingga 2024 serta bahan pembanding dari Polandia, Serbia, Afrika Selatan, dan Amerika Serikat. Tiga temuan mengikutinya. Arsitektur pengendaliannya dibangun ulang, bukan diperbaiki: putusan konstitusional 2017 membatalkan pengawasan eksekutif atas peraturan daerah dengan menyatakan bahwa pengujian merupakan ranah pengadilan, dan undang-undang hubungan keuangan 2022 kemudian menggantikan pembatalan ex post yang hilang itu dengan pembatasan ex ante atas apa yang boleh dipungut. Forum yang mewarisi fungsi tersebut menguji peraturan daerah secara buruk, dengan putusan yang ditemukan cacat serius dan perkara peka politik yang dihindari. Sementara itu pertanyaan doktrinal tentang kapan sebuah pungutan pada hakikatnya adalah pajak nyaris tidak dibahas dalam literatur mutakhir; yurisprudensi peradilan administrasi Polandia mengenai berlaku atau tidaknya hukum pajak umum atas pungutan daerah yang dienumerasi merupakan pembahasan terdekat yang tersedia. Penelitian ini berargumen bahwa penutupan ex

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	ante dan pengujian ex post menjawab pertanyaan yang berbeda, dan merinci empat kriteria yang seharusnya dipenuhi sebuah pungutan. Kata kunci: retribusi daerah; pembedaan pajak dan retribusi; pengujian peraturan; peraturan daerah; desentralisasi fiskal

1. INTRODUCTION

A citizen asked to pay money to a local authority is entitled to know what kind of payment it is. If it is a tax, a body of general law attaches: rules on assessment, objection, limitation periods, evidence, and the protections that accompany compulsory exaction. If it is a charge for a service, a different and usually thinner set of rules applies, and the payment is justified by the service received rather than by capacity to pay. The classification is not a taxonomic convenience. It determines what the payer can argue and where.

This makes the boundary between the two a question of constitutional consequence, and it makes the proliferation of local charges a constitutional problem rather than merely an administrative irritation. A charge that is in substance a tax, imposed without the authority required for a tax, extracts money under a legal characterisation that withholds the protections the substance would attract.

Indonesia has controlled this problem twice, by different means, within a decade. Until 2017 central government and governors conducted executive review of subnational regulations and annulled those found unlawful; Butt (2019a) records that before the Constitutional Court invalidated that mechanism the Ministry of Home Affairs had revoked several thousand such regulations, mostly illegal taxes and fees, and that the problematic instruments included user charges imposed for no identifiable government service and taxes duplicating those of another tier. In 2017 the Constitutional Court held that review of subnational regulations belongs to the Supreme Court rather than to executive officials.

The control function did not disappear; it moved and changed form. The 2022 law on fiscal relations between central and regional government restricts in advance what regional governments may levy, which is an ex ante substitute for an ex post mechanism. Ambarwati et al. (2023) assess the resulting control and evaluation arrangements and conclude that they do not comply with the concept of regional autonomy, while accepting that such mechanisms are necessary in a unitary state, since no system of autonomy works in the absence of control.

Three questions organise the analysis. First, what does recent scholarship establish about the doctrinal boundary between a tax and a charge, and what does it leave unresolved? Second, what happened to the control architecture between 2017 and 2022, and does the forum that inherited the review function perform it adequately? Third, what criteria should a charge satisfy, and what does ex ante closure fail to answer that ex post review would?

2. LITERATURE REVIEW AND CONCEPTUAL FRAMEWORK

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The legal nature of a local charge

The doctrinal question of when a charge is in substance a tax is, on the evidence of this review, substantially unaddressed in recent peer-reviewed scholarship. No article published between 2017 and 2024 was located that treats the tax-versus-charge distinction — the benefit principle, the cost-recovery ceiling, the requirement of a quid pro quo — as its subject in a major law journal. That absence is reported as a finding rather than worked around.

What exists, and is directly useful, is Polish public-finance-law scholarship on a structurally identical problem: charges enumerated by statute whose classification against general tax law is contested. Miernik (2019) traces how administrative courts classified the planning fee before and after a 2009 statutory change, finding earlier rulings treating it as a non-tax liability outside the tax ordinance and later judgments treating it as a non-tax budget liability, with the dispute persisting precisely because such fees are not enumerated in the statutory catalogue of public-law budget liabilities. The mechanism is instructive: enumeration determines classification, and what is not enumerated is litigated.

Mańczyk (2021) analyses parking fees in designated zones and, critically for the present argument, the application and non-application of the general tax ordinance to those local fees. Wantoch-Rekowski and Kwaśniewski (2019) examine market charges and find that the governing statute neither differentiates rates nor states criteria that would justify differentiation, then work through which differentiation criteria are legally permissible, the prohibition on differentiating by person rather than by location, and the limits administrative courts have set on determining public charges. Mańczyk (2022) examines what happens when a charge becomes optional, tracing across two regions whether municipalities continued to levy the market fee after 2016, when the decision became discretionary.

Review of subnational regulation

Butt (2019a) analyses the 2017 Constitutional Court decision invalidating executive review of subnational regulations and holding that the Supreme Court must conduct such review. He argues the decision reversed a centralising trend and produced confusion because of flawed reasoning and a problematic decision process. The account of what was being annulled before the ruling is directly relevant here: user charges imposed for no identifiable government-provided service, and taxes duplicating those of another tier.

Butt (2019b) then examines what the inheriting forum does. Analysing Supreme Court reviews of subnational law between 2011 and 2017, he finds most decisions seriously flawed, with minimal or absent reasoning and inconsistency with prior rulings, and the Court avoiding politically sensitive cases despite clear jurisdiction, partly because its own review jurisdiction remains unclear and it has not sought to clarify it. He concludes that the Court functions ineffectively as a restraint on

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government power. The two studies together describe a function transferred to a body that had not been performing the analogous function well.

Astariyani et al. (2023) examine Indonesia's preventive and evaluative regulatory control mechanisms comparatively, identifying obstructing factors and arguing the mechanisms require amendment to raise regulatory quality. They report that Indonesia had 57,735 regulations as of 14 November 2023, of which 55,374 remained in force — a figure that describes the scale of the corpus any review mechanism must address, though it does not disaggregate regional instruments.

The 2022 statute and its control architecture

Ambarwati et al. (2023) address the control and evaluation of regional regulations on taxes and charges under the 2022 law directly. Their conclusion is two-sided and worth stating fully: the mechanisms do not comply with the concept of regional autonomy, yet such mechanisms are necessary in a unitary state since no system of autonomy works without control; and the supervisory authority granted to central government, both preventive and repressive, tends to cause excessive interference in shaping regional tax and charge policy, so the authors call for specific provisions preventing intervention beyond what is required.

Lewis (2023) provides the fiscal-policy assessment of the same statute, arguing that its broader implicit intent is to facilitate greater central control over regions, operationalised through performance incentives, revenue earmarks and spending mandates; that the design of many reforms is flawed; and that the law cannot address the underlying problems of corruption and clientelism, so it is unlikely to improve the distributional equity of transfers or to enhance subnational tax mobilisation, spending efficiency or service delivery. Lewis (2018), examining local government form, finds that directly elected local executives do not raise more local tax revenue though they spend less and more efficiently, which indicates that local revenue behaviour is not strongly responsive to electoral incentive.

Saptono et al. (2023) identify a boundary problem in its vertical form. Examining hotel, restaurant and entertainment taxes as service delivery shifts to digital platforms, they find competing taxing claims between national and regional government, with local government's traditional base eroded and the centre holding an administrative advantage where the transaction sits within a broader value-added tax chain, and inadequate regulatory frameworks producing both revenue gaps and double non-taxation.

Charge-financed local government and its incidence

Two studies establish that reliance on charges and fines has a distributional character that a purely doctrinal analysis would miss. Su (2020) examines whether local governments raise traffic fines in response to revenue pressure using Californian county data from 2004 to 2015. Le and Young (2023), using panel data on Californian municipalities from 2002 to 2016 with fixed-effects estimation, find that the proportion of Latinx or Hispanic residents in a city's population is

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positively and significantly associated with increased reliance on fines, fees and forfeitures, that such reliance accelerated during the Great Recession, and that it falls disproportionately on low-income households and racial minorities.

These concern fines and forfeitures rather than service charges, and the categories are adjacent rather than identical; they are used here only for the general proposition that non-tax revenue reliance has distributional consequences that its legal characterisation does not disclose. Yurdadoğ et al. (2022), analysing European Union data from 1995 to 2018, find significant effects of government expenditure, tax revenue and gross domestic product on non-tax revenue with causality running from those variables to it, supporting the proposition that fiscal pressure drives recourse to charging.

Comparative control of subnational charging

Cvetković-Ivetić and Baturan (2024) examine public utility fees as own revenues of local self-government units in a Serbian province, noting that fiscal decentralisation increases the need for own revenues whose rates local authorities set either independently or within statutory limits, and examining the yield of these fees and the factors affecting their rates and abundance. The structural parallel is close: a unitary state in which local charges carry local autonomy and the centre caps rates by statute.

Fuo (2023) analyses a South African appellate decision on whether municipalities may impose penalty rates on unlawfully used property without first recategorising it, with the majority holding that they may because the penalty targets the owner's conduct rather than the property, and the minority holding that the governing statute does not authorise unlawful use as a rateable category because it is conduct rather than a property category. The case concerns property rates and a penalty rather than a user charge; it is used here as an example of judicial reasoning about the outer limits of a municipal charging power conferred by statute.

What drives charges to proliferate

Charge proliferation is usually treated as an administrative failing, but the comparative evidence identifies it as a predictable response to constraint on the tax side. Zhang and Hou (2020), using a difference-in-differences design, find that state-imposed limitations on local taxation and expenditure caused municipalities to shift toward user fees and charges. Where the tax instrument is capped, in other words, the charge instrument expands, and the expansion is a consequence of the cap rather than an independent lapse of discipline.

Bedzieszak (2019), analysing twenty-six economies over two decades, finds user charges correlating positively with expenditure volume and negatively with tax burden, which is the substitution relationship in cross-national form. Notably, decentralisation was significant for charges in the whole public sector but not in the decentralised-only specification, indicating that the

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substitution operates at the level of the fiscal system rather than being a property of local government as such.

Diversification, fiscal illusion and its costs

Whether charge-heavy financing is benign depends on what diversification does to the total burden. Shi and Tao (2018), examining major cities across an economic cycle, find that more diversified cities impose higher tax burdens rather than lower ones, particularly where general-fund surpluses are large, and that the relationship strengthens in downturns. The finding supports the fiscal illusion argument: a burden spread across many small instruments is less visible and therefore easier to raise.

Shon and Kim (2019), across one hundred and fifty fiscally standardised cities, find greater revenue diversification lowering short-term debt while raising long-term debt, so that stabilisation and fiscal illusion operate simultaneously on different margins. Groenendijk's (2023) typology of instruments in multi-level systems, built on ownership and decision-making authority rather than on statutory label, offers the classificatory tool this literature has otherwise lacked, and applies as readily to charges as to shared taxes.

The accountability case for taxes over charges

A separate literature suggests that the choice between taxing and charging has consequences for the relationship between citizen and government. Weigel (2020), evaluating a randomised property tax campaign across three hundred and fifty-six neighbourhoods, finds compliance rising from 0.1 to 11.6 per cent and political participation rising by approximately five percentage points, with citizens bearing participation costs worth about a day's household income. He describes this as a participation dividend of taxation.

Nupia (2024) qualifies the mechanism, showing formally that higher taxes always raise citizens' political demands but that this does not automatically improve public goods provision or reduce capture, and that causation also runs from better accountability to higher equilibrium tax rates. Van Rompuy (2021) adds that subnational tax autonomy contributes to regional convergence while the contribution of transfers diminishes and eventually reverses with dependence. The three together indicate that a broad, visible tax base is preferable to an array of small charges on grounds that have nothing to do with revenue yield.

Research gap

Four gaps are documented. No located study within the review window treats the doctrinal tax-versus-fee boundary as its subject. No located study analyses a case in which a court reclassified a local fee as an unauthorised tax and invalidated it on that basis, so any assertion of a judicial reclassification doctrine currently lacks secondary support. No verified empirical study estimates the compliance cost or investment-climate effect of Indonesian local charges. And no verified

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secondary source establishes the number of charge types permitted under the 2022 statute, which must be taken from the statutory text itself.

3. METHOD

The study employs doctrinal analysis supported by a structured review and comparative material. It generates no primary data, examines no individual regional regulation, and offers no estimate of the number, yield or compliance cost of local charges.

Legal materials

Primary materials comprise the 2022 law on fiscal relations between central and regional government and its implementing regulation, the constitutional decision on review of subnational regulations, and the statutory framework governing regional taxes and charges. All are public documents. No individual regional regulation, permit file or taxpayer record was examined, and no local government is identified.

Literature identification and verification

Peer-reviewed studies published between 2017 and 2024 on local charges and non-tax revenue, review of subnational regulation, fiscal decentralisation and the classification of public levies were identified and retained only where bibliographic details could be verified against a publisher page, a digital object identifier record, an indexing database record or the journal's own site. For Indonesian journals indexing status was checked and outlets without demonstrable indexing were excluded; several outlets returning on-topic results were excluded on that basis. Works published in 2025 or later were excluded even where directly on point, and this excluded several recent Indonesian studies of the same statute.

Treatment of quantities and of comparative material

Quantities are reported as published from a single identified source, with the status of each stated: where a source itself cites a figure from a third party, that is recorded rather than concealed. No figure whose primary source could not be identified is reported. Comparative material from Poland, Serbia, South Africa and the United States is used for the specific doctrinal or empirical point each supports and not as evidence about Indonesian practice; where a comparative case concerns a different instrument than a service charge, the difference is stated at the point of use.

4. RESULTS AND DISCUSSION

What was being annulled, and by whom

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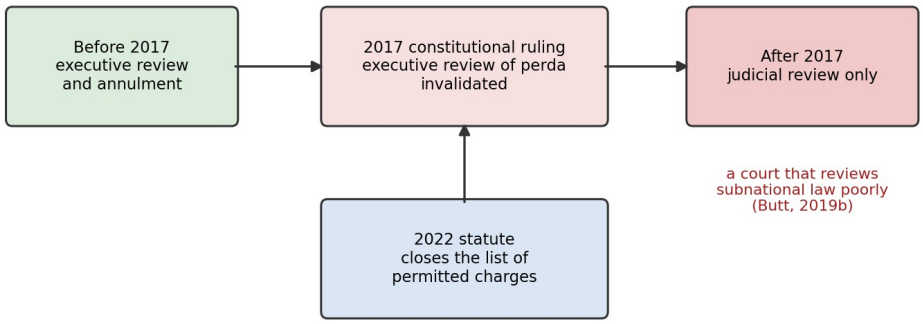


Figure 1. Rebuilding of the control architecture for local charges (authors' construction)

Figure 1 sets out the sequence. Before 2017 the control on unlawful local charges was ex post and administrative: executive officials reviewed subnational regulations and annulled them. Butt (2019a) records that this mechanism had revoked several thousand regulations, mostly illegal taxes and fees, and characterises what was problematic about them in terms that name the doctrinal issue precisely — user charges imposed for no identifiable government-provided service, and taxes duplicating those imposed by another tier.

The first category is the tax-fee boundary in operational form. A charge for which no identifiable service is provided cannot be justified on the benefit principle, and what remains is a compulsory exaction for general revenue, which is a tax. That the executive review mechanism was catching such instruments in quantity indicates both that the problem was real and that the mechanism was doing something.

The 2017 decision transferred review to the Supreme Court. Butt (2019b) then finds that Court's reviews of subnational law between 2011 and 2017 seriously flawed, with minimal or absent reasoning, inconsistency with prior rulings, avoidance of politically sensitive cases despite clear jurisdiction, and unclear review jurisdiction that the Court has not sought to clarify. The transfer therefore moved a function from a body that was performing it in volume to a body with a documented record of performing the analogous function poorly.

Ex ante closure as a substitute

Table 1. Two control mechanisms compared

Attribute	Executive review (to 2017)	Statutory closure of the list (from 2022)
Timing	Ex post, after enactment	Ex ante, before enactment is possible
Question answered	Is this instrument unlawful?	Is this type of charge permitted at all?
Reaches a charge with no identifiable service	Yes, on the instrument's own terms	Only if the type is excluded from the list
Reaches a permitted charge misapplied in	Yes	No

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practice		
Effect on regional autonomy	Intervention after a local decision	Restriction of the decision space itself
Forum	Executive officials	The legislature, once, in advance

Source: authors' analysis of the mechanisms described by Butt (2019a) and Ambarwati et al. (2023).

The fourth row is the study's central observation about the substitution. A closed list answers a categorical question: may a regional government levy a charge of this type. It does not answer the question executive review was answering in the cases Butt describes, which is whether a particular instrument, nominally of a permitted type, is being applied in a way that provides no identifiable service. A charge for a market service is permitted; a charge labelled as one but collected where no market service is rendered is the abuse, and closure does not reach it.

Ambarwati et al. (2023) reach the tension from the other direction, finding the new arrangements non-compliant with regional autonomy while conceding that control is necessary in a unitary state, and warning that preventive and repressive supervision together tend to produce excessive interference. Read with Table 1, the difficulty is not that control is excessive in the abstract but that the two mechanisms are not substitutes: the ex ante one constrains autonomy heavily while leaving the specific abuse it replaced unaddressed.

Lewis's (2023) assessment that the statute's implicit intent is greater central control, that many reform designs are flawed, and that it cannot address underlying corruption and clientelism, is consistent with this reading without requiring it. A restriction on the decision space achieves central control by construction; whether it achieves the purpose the removed mechanism served is a separate question that the design does not answer.

Criteria for a charge

If the categorical question is settled ex ante and the application question is left to a forum that performs review poorly, then criteria stated in advance become more rather than less important, since they are what an administrator applies without prompting and what a court would apply if asked. The comparative material supports four.

Table 2. Criteria a local charge should satisfy

Criterion	Content	Comparative support
Identifiable service	A specific service must be rendered to the payer	The category Butt (2019a) records as annulled
Cost relationship	The rate must bear a stated relationship to the cost of provision	Wantoch-Rekowski & Kwasniewski (2019) on rate criteria
Objective differentiation	Rates may differ by location or service characteristic, not by the identity of the payer	Wantoch-Rekowski & Kwasniewski (2019)
Declared procedural regime	The instrument must state which general procedural law applies to assessment and objection	Manczyk (2021) on application and non-application of the tax ordinance

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Source: authors' derivation from the cited comparative studies. The criteria are proposed, not drawn from any single legal system's settled doctrine.

The fourth criterion is the one most easily overlooked and the cheapest to satisfy. Mańczyk's (2021) treatment of when the general tax ordinance applies to a local fee identifies a question every charging instrument implicitly answers and few answer expressly: what procedure governs assessment, what grounds of objection exist, and within what period. A payer who cannot determine which body of procedural law applies to a demand cannot effectively contest it, whatever the substantive merits.

Miernik's (2019) finding that classification disputes persist precisely because certain fees are not enumerated in the statutory catalogue carries a corollary for a system that has just closed its list. Enumeration resolves classification for what is enumerated, and displaces the dispute to the margins: to instruments that resemble a listed type without falling squarely within it. A closed list therefore converts a proliferation problem into a characterisation problem, which is progress only if some forum can decide characterisation reliably.

Charges, fiscal pressure and incidence

Yurdadoğ et al. (2022) find causality running from expenditure, tax revenue and output to non-tax revenue, which supports treating recourse to charging as a response to fiscal pressure rather than as an independent policy choice. Cvetković-Ivetić and Baturan (2024) show the same instruments carrying local financial autonomy in a comparable unitary system with statutory rate limits, which indicates that capping rates centrally and relying on charges locally are not alternatives but a combination many systems adopt.

Le and Young's (2023) finding that reliance on fines, fees and forfeitures is positively associated with the share of a particular ethnic group in a city's population, accelerated during recession and falls disproportionately on low-income households, matters here as a warning about what legal classification conceals. A charge is presented as payment for a service received and therefore as fair by construction. Its incidence is an empirical question that its characterisation does not answer, and it is not asked in the Indonesian literature: no verified study of the compliance cost or distributional incidence of Indonesian local charges was located.

Saptono et al. (2023) identify the direction from which the base is now eroding. As hospitality, food service and entertainment transactions move onto platforms, the local base contracts while the centre holds an administrative advantage, producing both revenue gaps and double non-taxation under inadequate frameworks. A regional government losing base through this channel, and simultaneously restricted ex ante in what it may charge, faces pressure toward exactly the practices the earlier annulment mechanism was catching.

Closure without a substitute instrument

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The analysis above identified ex ante closure of the permitted list as answering a different question from the ex post review it replaced. The proliferation literature identifies a second difficulty with closure taken alone. If charges expand because the tax side is constrained, as Zhang and Hou (2020) find and Bedzieszak (2019) corroborate cross-nationally, then restricting which charges may be levied without addressing the constraint that produced them leaves the underlying pressure intact and redirects it. Yurdadog et al.'s (2022) finding that causality runs from expenditure and revenue to non-tax revenue describes the same pressure from the aggregate side.

Two Indonesian findings indicate where that pressure would be redirected. Irwan et al. (2022), examining ten local tax categories and eight charge types in one district, find realised revenue well below potential, with terminal, market and waste charges the most under-optimised — that is, the room for increase lies in collecting existing charges more intensively rather than in creating new ones. Chalil (2020) finds fiscal spillovers among Indonesian municipalities operating without electoral feedback on neighbourhood performance, so intensified collection would not be disciplined by the comparison between jurisdictions that decentralisation theory assumes.

Mahdavi and Westerlund's (2018) finding that subnational tax capacity and effort do not converge completes the picture. A closed list applied uniformly across jurisdictions of unequal capacity constrains all of them identically while leaving their differing ability to use what remains untouched, which is a strong argument for pairing closure with the capacity measures the reviewed literature indicates are otherwise absent.

Limitations

Five limitations qualify this study. First, the central doctrinal question — when a charge is in substance a tax — could not be supported from recent scholarship, and the criteria proposed are derived from comparative material rather than from settled doctrine in any system. Second, no located study analyses a judicial reclassification of a fee as an unauthorised tax, so that mechanism is discussed as a possibility rather than as an established practice. Third, the Polish material comes from a specialised national public-finance-law journal and concerns a civil-law system whose instruments are not identical to Indonesian ones. Fourth, the incidence evidence concerns fines and forfeitures in the United States and is used only for a general proposition. Fifth, several directly relevant Indonesian studies of the 2022 statute were published after the review window and are therefore absent, so the domestic literature described here is the literature as at the end of 2024 rather than as it now stands.

5. CONCLUSION

The distinction between a tax and a charge decides what protections attach to a compulsory payment, and it is therefore a constitutional question rather than a classificatory one. In Indonesia the mechanism that policed it was executive review, which had annulled several thousand subnational regulations, mostly illegal taxes and fees, including user charges imposed where no

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identifiable government service was provided. A 2017 constitutional ruling invalidated that mechanism and assigned review to the Supreme Court, a forum whose reviews of subnational law in the preceding years have been found seriously flawed, poorly reasoned, inconsistent, and avoidant of politically sensitive cases.

The 2022 fiscal relations statute then supplied a different instrument: ex ante restriction of what may be levied. This study's central argument is that the two mechanisms answer different questions. Closure of the list determines which types of charge are permitted; it does not determine whether a permitted type is being applied where no service is rendered, which was the abuse the removed mechanism was catching. The result is a control architecture that constrains regional autonomy substantially — as one assessment finds, in a manner not compliant with the autonomy concept though necessary in some form in a unitary state — while leaving the specific practice it replaced without a functioning remedy.

Four criteria follow for any charging instrument, and none requires new institutional machinery: an identifiable service rendered to the payer; a rate bearing a stated relationship to the cost of provision; differentiation by location or service characteristic rather than by the identity of the payer; and an express statement of which general procedural law governs assessment and objection. The fourth is the cheapest and the most neglected, and it is the one that determines whether a payer who believes a demand unlawful can do anything about it. Finally, two absences should be recorded rather than papered over: recent scholarship does not treat the tax-charge boundary as a subject, and no verified study examines the compliance cost or distributional incidence of Indonesian local charges. A boundary this consequential is currently being administered without a literature.

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DECLARATIONS

Author contributions (CRediT)

CRediT). [To be completed by the authors.]

Conflict of interest

The authors declare that they have no financial or non-financial conflict of interest in relation to the subject matter of this article. No author holds a position in, or receives support from, any organisation examined or evaluated in this study.

Data availability

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This study generated no primary data. It draws exclusively on published peer-reviewed literature, publicly available legal instruments and publicly available official statistics, all of which are identified in the text and listed in the references. No confidential administrative record, individual taxpayer record, permit file or personal datum was accessed, and no individual person or business is identified. Every quantity reported was traced to a single identified public source and can be verified by any reader from that source.

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Declaration on the use of artificial intelligence

An initial draft of this manuscript was prepared with generative-AI assistance (Claude, Anthropic) by Research Center Progresif from publicly available data; the author(s) revised it and take full responsibility for the final content.

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