

# Optimizing the Use of Electronic Stamps as Tax Revenue in E-Commerce Businesses Linked to the Stamp Duty Law in Indonesia

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## ABSTRACT

*The COVID-19 pandemic in Indonesia caused an economic crisis that had an impact on the state revenue sector of stamp duty to decline. This decrease occurred due to a policy from the Government in implementing PPKM in accordance with the Instruction of the Minister of Home Affairs Number 15 of 2021 concerning the Enforcement of Restrictions on Emergency Community Activities for Corona Virus Disease 2019 in the Java and Bali Regions. During the implementation of this PPKM, all transactions turn into electronic transactions. With the transition from direct transactions to electronic transactions, the Government is trying to implement electronic stamp duty. Electronic stamp duty is a stamp used for documents in electronic form. The purpose of the imposition of this electronic stamp duty is as a tax on electronic documents. In addition, the purpose of the imposition of electronic stamp duty can be used as legal evidence in proving civil cases. However, in reality, the imposition of electronic stamp duty on electronic transactions carried out in e-commerce has not been effectively carried out.*

**Keywords:** Covid-19, Functions, Electronic Documents, E- Commerce, Electronic Seals, Taxes. Progressive Calculation, Perum Peruri.

## INTRODUCTION

State Revenue is the right of the Central Government which is recognized as an addition to net assets consisting of Tax Revenue, Non-Tax State Revenue, and Grant Revenue[1]. The complete definition of state revenue is state income used as a source of funding for state activities and needs in the context of state development. What is meant by state revenue or state revenue or government revenue, which includes taxes, levies, profits of state enterprises, fines, public donations, etc. In this case, state income comes from tax and non-tax. Tax is a mandatory contribution to the state that is imposed by an individual or entity that is coercive in nature based on the law,

with no direct compensation and is used for the needs of the state for the greatest prosperity of the people[2]. Payment of taxes is a manifestation of state obligations and the participation of taxpayers to directly and jointly carry out tax obligations for state financing and national development. In accordance with the philosophy of tax law, paying taxes is not only an obligation, but is the right of every citizen to participate in the form of participation in state financing and national development. Judging from the tax function itself[3], the tax function is divided into 4(four), namely:

### **1. Budget function**

The budget function is a tax function as tax is a source of state revenue and has a function to finance expenses related to the state. Taxes can be used by the state for routine financing such as personnel expenditures, goods expenditures, maintenance, and so on. The costs required by the state can be obtained through tax receipts paid by citizens who are registered as taxpayers to the state. For matters relating to development financing, the costs used can come from government savings, namely from revenue domestically reduced by routine expenditures.

### **2. Setting function**

The regulatory function is that taxes function as a means of driving the community to comply with tax obligations. In addition, through tax policy, it can assist the government in regulating economic growth, so that it is expected to achieve the goal of achieving community welfare. In carrying out the function of regulating, it is generally used in two ways, namely the general way and the special way. The general way is usually done with tax rates that are intended to make changes to general rates. Specific ways are divided into positive and negative ways. Specific ways are divided into positive and negative ways. Community activities that are seen as positive by the government will receive support, including in the field of taxation, which is carried out by providing tax incentives through tax facilities such as tax holidays and tax reductions. A negative way is the use of taxes that are intended to prevent or hinder development or direct people's lives towards certain goals, for example, high excise rates on liquor.

### **3. Stability Function**

The function of stability is that taxes function in assisting the government with regard to the ownership of funds that can be used to carry out policies related to price stability so that matters relating to inflation can be controlled properly. To be able to maintain the stability of the country's economy, this can be done by regulating the circulation of money in the community, collecting taxes, and using effective and efficient taxes.

### **4. Income Redistribution Function**

Taxes that have been entered into the state treasury will then be used for the public interest. The public interest in question is to finance development so that it can open up job opportunities that can be utilized by its citizens, which can lead to an increase in people's income[4].

So, if it is concluded from the notion of tax to the function of the tax itself, the characteristics inherent in the notion of tax are:

1. Taxes are collected based on the strength of the Act and its implementing regulations;
2. In the event that the tax payment cannot be demonstrated by the Government

asan individual counter-achievement;

3. Taxes are levied by the state, both by the central and regional governments;
4. Taxes are intended for government expenditures, which if there is a surplus from their income, it can be used to finance public investment;
5. Taxes can also finance budgetary purposes, namely regulating [5].

The Directorate General of Taxes classifies the taxes collected into 2 groups, namely direct taxes and indirect taxes. Direct tax is a tax imposed on the income and wealth of a person or business entity accompanied by a tax assessment letter. For example income tax, corporate tax / corporate tax, wealth tax and so on [6]. Indirect taxes are taxes collected from certain parties whose collection is delegated by the government to other parties/people. For example sales tax, export tax, import tax, stamp duty, tax on bank interest, dividends, and so on. In this study further will be discussed about the stamp duty. Stamp duty is a label or strip in the form of a sticky, electronic, or other form that has the characteristic of containing a security element issued by the Government of the Republic of Indonesia, which is used to pay taxes on documents [7]. We often encounter the use of stamps in Indonesia. The history of the birth of the seal began in the Netherlands in 1624 as a tax on sealed paper [8]. In Indonesia the seal was used in 1817 during the Dutch colonial era. The type of seal that was issued the first time was a patch seal. In Law Number 13 of 1985 concerning Stamp Duty, there are two types of stamp duty, namely stamp duty with a nominal value of 1000 to be imposed on documents worth more than Rp. 1,000,000 2178 / 5000 and a stamp with a nominal value of 500 which is intended for documents with a value of Rp. 100,000 up to Rp. 1,000,000 [9]. Then there are changes that are regulated by Government Regulation Number 24 of 2000 concerning Changes in Stamp Duty Rates and the Limits for Imposition of Nominal Prices Subject to Stamp Duty. The government issues a stamp with a nominal value of 3000 which is intended for objects with a value of Rp. 250,000 – Rp. 1,000,000, while for objects that are worth more than Rp. 1,000,000 is subject to a stamp duty with a nominal value of 6000 [10]. In Law Number 10 of 2020 (hereinafter referred to as the Stamp Duty Law) concerning Stamp Duty, replacing the previous Law, a 10,000 stamp duty is issued which is intended for objects with a value greater than Rp. 5,000,000 [11]. Although it has been ratified, the Law is effective January 1, 2021. Therefore, the use of the previous stamps with a nominal value of 3000 and 6,000 can still be used until December 31, 2021.

Stamps are usually used in making letters of agreement, statements, receipts and others that aim as a means of proof of a civil nature. Stamp duty is also intended for payment of document tax or proof of tax payment to the state for making documents and others. Stamp duty is a type of tax that has a budgetary function, meaning that stamp duty is one of the instruments for forming recipients for state administration. As an instrument for forming state revenues, Stamp Duty is expected to be able to follow the level of state revenue needs in line with developments in the fields of social and state life. To contain the spread of COVID-19, the Government has enacted regulations regarding the Enforcement of Restrictions on Community Activities (PPKM).

During the implementation of this PPKM, all transactions directly turn into electronic transactions. The rapid pace of technological development that eventually formed an electronic trading system or commonly referred to as e-commerce [12]. E-commerce is a business process using electronic technology that connects companies, consumers and society in the form of e-commerce electronic transactions and the sale of goods, services and information electronically [13].

The unique characteristics of the internet and the worldwide reach of its users make e-commerce grow more rapidly. When compared with ordinary trading, the nature of the internet can be said to be unique because it has succeeded in breaking through world boundaries, cutting distribution chains, and being available for 24 hours. With these advantages, more and more people are starting businesses using

the internet as a medium, the largest portion of which is for sales advertising[14]. The effectiveness of the use of e-commerce can be seen in 2017 the number of electronic transactions was recorded at Rp. 42.2 trillion. Meanwhile, in 2018 it increased to Rp. 105.5 trillion. In 2019, when COVID-19 first appeared, electronic transactions almost doubled to 205.5 trillion, and in 2020 electronic transactions grew 29.6% to Rp. 266.3 trillion[15]. Electronic transactions result in state revenues in 2020 not reaching the target set by the government. In 2021 the development of e-commerce in Indonesia is progressing very rapidly, e-commerce transactions grew 63.4 percent to Rp. 186.7 trillion. Bank Indonesia (BI) estimates that by the end of 2021 e-commerce transactions could increase by 48.4 percent throughout 2021 to IDR 395 trillion. The United Nations Conference on Trade and Development ("UNCTAD") has observed the dynamics of e-Commerce in ASEAN which is growing so rapidly, where it is stated that Indonesia is a country with the highest number of electronic transactions[16]. With this number, Indonesia's digital economy transactions are ranked first for the ASEAN region with a contribution of 49%.

Seeing the increase in the percentage increase in the number of e-commerce that is soaring up, then every transaction in e-commerce is naturally subject to tax payments by applying electronic stamp duty.[17] That the imposition of taxes in transactions carried out in e-commerce can provide many benefits and have great potential to increase state tax revenues. Based on the background thinking above, it is necessary to research, regarding optimizing the use of electronic stamp duty in electronic transactions conducted in e-commerce.

### **Research methods**

The approach method used in this study is a normative juridical approach. The normative juridical research method is carried out by examining library materials, such as legislation, books, scientific journals, and others [18]. Normative legal research focuses on a scientific research procedure to find the truth based on the scientific logic of law from the normative side[19].

### **Discussion**

Electronic stamp duty is a stamp used for documents in electronic form [20]. The regulation on stamp duty is regulated in Law Number 13 of 1985 concerning Stamp Duty, which was then updated with the Stamp Duty Law Number 10 of 2020 concerning Stamp Duty. The renewal of the Stamp Duty Law is based on the development of information technology which continues to grow rapidly[21]. Information technology has led to a reduction in the use of paper. In line with that, electronic transactions are also growing so that contracts can be done electronically via the internet network. The 2020 Stamp Duty Law emphasizes that electronic documents are objects of stamp duty that can be used as evidence or information. The Stamp Duty Act 2020 provides a legal umbrella for the development of forms of seals, which are currently not only in the form of sticky stamps, but also electronic seals, as well as seals in other forms as determined by the Minister[22]. So that the addition of documents in electronic forms as stamp objects in the 2020 Stamp Duty Law can be said to be in line with the addition of the Stamp Duty payment method using Electronic Seals.

The electronic seal itself has a unique code in the form of a serial number and certain information consisting of an image, the national symbol of Garuda Pancasila, the words "ELECTRONIC SEALS" as well as numbers and writing indicating the

stamp duty rate, which is Rp. 10,000, - (ten thousand rupiah). The affixing of the electronic seal can be done through the e-Meterai Portal at the link with following the steps as follows:

1. Open pos e-meterai.co.id page
2. Click the "BUY E-METERAI" menu;
3. Log in by entering your email and password, if it's the first time, then click "Register here". Continue with filling in personal data and uploading documents;
4. Enter the OTP code sent via SMS for the validation process;
5. After validation, you can purchase e-seal as you wish;
6. After logging in, you will be faced with two menu options, Purchase and Affix. If you don't have an electronic seal yet, select purchase;
7. After that, you can continue the affixing stage, entering detailed document information such as date, document number, and document type;
8. Upload documents in PDF format;
9. Position the seal in accordance with applicable regulations;
10. Click "Apply the Seal", click "Yes";
11. Next, a menu for entering the PIN appears, fill in the registered PIN, the process is complete;
12. You can directly download PDF files from documents that have been affixed with an electronic seal or send them to a registered email.

In the event of a failure in the electronic seal system, payment can be made using a Tax Deposit Letter (SSP). The affixing of Electronic Stamps must pay attention to the instructions for use which are an integral part of the Electronic Stamp System. The security element is carried out through the application of a unique code and certain information, a unique code in the form of a 22 (twenty two) digit Electronic Seal serial number generated by the Electronic Stamp System.

The objectives of the enactment of the 2000 Stamp Duty law are :

Provide equality between documents and electronics;

Taking sides with the wider community and MSME actors with relatively low and affordable rates, as well as an increase in the nominal limit for the value of money in documents from more than Rp. 1.000.000, to Rp. 5.000.000,-; and

Increase simplicity and effectiveness through single tariffs and the application of electronic seals.

The establishment of the renewal of the Stamp Duty Law also aims to: increasing the role of the community as a manifestation of the implementation of citizenship obligations in a fair manner and to optimize state revenues and carry out national development. What is meant by national development is development that takes place continuously and sustainably and evenly throughout the country with the aim of educating the life of the nation and for the welfare of the Indonesian people in a just and equitable manner. In order to achieve this goal, very large funds are needed to finance the continuity of development. The State Budget of the Republic of Indonesia does not rely enough on the production of oil, natural gas, and other non-tax income. Because taxes are one of the most potential sources of financing, taxes are the main source of state revenue used to finance government spending and development

This is stated in the State Revenue and Expenditure Budget (APBN) where tax revenue is the largest domestic revenue. Even with the enactment of the Regional Autonomy Law, state revenues, especially revenues from the tax sector, have a

very large role in increasing the amount of national [23] development funds and routine financing. After the economic crisis caused by the COVID-19 pandemic that occurred in various countries in the world (including Indonesia) caused the state revenue sector to decline and the need for a policy review. Of the total state revenue, tax revenue in 2020 was the hardest hit post due to the Covid-19 pandemic, with the realization of tax revenues only reaching 89.3 percent of the target set in Presidential Regulation No. 72 of 2020 of IDR 1,198.9 trillion [24]. The Ministry of Finance Sri Mulyani noted that the realization of tax revenue until the end of August 2021 was Rp. 741.3 trillion, or a 9.5% growth compared to August 2020. This means that tax revenues have reached 60% of the 2021 target of Rp. 1,142.5 trillion or 92.9% of the 2021 State Budget. For example, domestic Value Added Tax (VAT) revenue from January to August 2021 grew 12.6% compared to the same period January-August 2020 which experienced a contraction of 6.2% [25].

His decline is in contrast to the increase in economic activity in the form of buying and selling transactions in electronic commerce (e-commerce), which almost doubled in the midst of the COVID-19 pandemic, the number of which jumped from 80 million transactions in 2019 to 140 million transactions as of August 2020. (2121 data) The PMO Blue Print for the Payment System of Bank Indonesia said this condition occurred due to a shift in people's transaction and payment patterns in meeting their needs in the midst of a pandemic. This is because people are currently unable to move in the midst of the government's restrictive policies to suppress the spread of the virus, so many business transactions and buying and selling are done digitally [26].

Following up on the development of the shift in the pattern of people's economic transactions as well as preventing a deeper contraction of state revenues, the Government and the public need to make various efforts, especially in the fiscal sector, as currently several countries in the world have also launched fiscal policies during the pandemic, especially in the field of taxation [27]. This is because the role of taxes in Indonesia is not only a source of revenue in the State Revenue and Expenditure Budget (APBN), but at this time during the pandemic, it also plays an important role in efforts to maintain and recover the economy, because it can be part of the overall stimulus push for the economy. National Economic Recovery. Therefore, it is necessary to establish further policies regarding the application of electronic stamp duty in buying and selling transactions carried out in e-commerce [28], so that it can be the key to success in increasing state revenue through taxes, especially with the soaring increase in digital transactions as a result of the Covid-19 pandemic. Indonesia can emulate the application of electronic stamp duty in every transaction made in e-commerce, these countries include:

### ***Perspectives on the Imposition of Electronic Stamp Duty in Australia***

Stamp duty is a source of income that is very impactful for the country. Even according to a study conducted by the Director of the Household Finance Program The Grattan Institute, Brendan Coates, stamp duty has a much more reliable position in Australia than in any other country [29]. This is because in each Australian state has its own tariff. But as a general rule, the calculation of the stamp duty is calculated based on the value of the property price. The more expensive the property, the more

stamp duty you have to pay. For comparison, several Australian states have different stamp duty rates, including:

### ***New South Wales***

In New South Wales, the stamp duty for the purchase of property can be divided into several types, namely property for residence, property for investment, property for vacation or ranching, property for commercial or industrial, and property for business. In addition to the stamp duty for property purchases, there is also a stamp duty for non-property purchases. Examples of stamp duties on non-purchase of property are declarations of trusts and grants<sup>[30]</sup>. Declaration of trust is a legal document that can state the percentage of ownership for a person, as well as authority which is in it. For example, a declaration of trust can set out who is to pay for installments, insurance, bills, repairs, etc. While a grant is the transfer of a property from the old owner to the new owner. In New South Wales, property values range from \$300,000 to \$1,000,000. If the property price is above \$300,000, the fixed rate of the stamp duty is \$8,990 plus 4.5% of the property's value. If the value of the property is above \$3,000,000, the fixed rate of the stamp duty is \$150,490 plus 7% of the value of the property.

### ***Queensland***

In Queensland, there is no stamp duty on any property valued at \$5,000 or less. However, if the property is worth \$5,000-\$75,000, a stamp duty rate of 1.5% of the property's value will apply. If the property is worth \$450,000, a stamp duty rate of 3.5% of the property's value will apply. As an example of calculating the stamp duty, if the price of the land is \$450,000, then the stamp duty that needs to be issued is 3.5% of the \$450,000 property.

Although there are differences in the rules for imposing stamp duties in New South Wales and Queensland, as a general rule Australia sets a progressive rate on its tax calculations. The calculation of the stamp duty is calculated based on the value of the property price. The more expensive the property, the more stamp duty you have to pay. According to a study by experts on the imposition of stamp duty in Australia, the imposition of the stamp duty indicates inefficient tax revenue. This is because the income stream is dependent on turnover in the property market, with charges that can amount to more than 5% of the cost of a home in some states and territories. In this case, the stamp duty in Australia also acts as a disincentive to buying or changing property. The prolonged impact of the policy of applying the stamp duty is to become an obstacle for Australians in conducting trade transactions, especially in the property sector with high tariffs, especially during the COVID-19.

### ***Perspectives on the Imposition of Electronic Stamp Duty in the UK***

The UK also imposes a stamp duty in the case of buying property rights, new or existing leases, transfer of land, at a rate that follows the property price or also known as a progressive rate, i.e. the more expensive the property, the higher the percentage of the stamp duty. Furthermore, the more property a person owns, the higher the percentage of stamp duty rates. The rate to be paid to purchase stamp duty varies, according to the value of the property price. If the property is valued at £1,000,000, then the calculation results from the Stamp Duty calculator are required to pay

4.38% of the value of the property price of £1,000,000 which is £43,750. The method of paying stamp duty in the UK is also quite sophisticated, because payments can be made online or using phone banking facilities. If payment is not made online or using phone banking facilities, there are alternative payments using debit cards, cash checks at the bank, and cash checks at the post office. The policy of reducing the stamp duty was introduced in 2017, removing the stamp duty on first-time home purchases in an effort to address the UK's looming housing affordability crisis. In fact, a policy of temporarily removing the seals was also put in place ("sealing holiday") by the UK for one year to help property buyers enter the market.

Besides property, the UK also imposes stamp duties on buying and selling shares, both manually and electronically. For manual trading of shares, namely transactions using physical documents, stamp duty is imposed through Stamp Duty on shares. Stamp duty payments must be made within the period from the signing of the share purchase document. If they are not paid within the specified time, they will be penalized in the form of a fine. After making the payment, it is required to notify the UK Revenue and Customs Service[31]. As has been explained that there is a manual sale and purchase of shares or electronically, then for buying and selling shares electronically, stamp duty is imposed through the Stamp Duty Reserve Tax (SDRT). The agency authorized as the center for storing securities, namely CREST, and automatically deducts costs for SDRT from every electronic share purchase transaction. However, if the sale and purchase of shares is carried out outside the CREST service, then both the seller and the buyer are required to notify the details of their transaction to HMRC, namely the UK revenue and customs service[32].

### ***Perspectives on the Imposition of Electronic Stamp Duty in New Zealand***

Unlike other countries, New Zealand has a policy of not imposing stamp duties. New Zealand, which does not impose stamp duty, generates state revenues through GST and income tax, with income tax rates that are not too different from Australia, while the GST rate is 5% higher than the rate in Australia with a fixed rate. Canada is also a country that does not impose state revenues through stamp duty, but state revenues are carried out through taxes on property occupation. While other policies can be seen in Sweden, which continues to impose stamp duties but with fixed rates on property transactions, namely 1.5% for individuals and 4.25% for 'legal entities' such as corporations[33].

In New Zealand, the stamp duty is not valid based on the Stamp Duty Abolition Act 1999[34]. The law in principle withdraws all provisions in the Stamp and Check Duties Act 1971, which regulates the stamp duty. Several things are regulated in the Stamp and Check Duties Act 1971, including the definition of stamp duty and other matters related to it, obligation to pay stamp duty, property valuation which is used as the basis for payment of stamp duty, inspection and collection of stamp duty, and rejection of duty inspection. seal[35] By looking at the countries above, it shows that there is no regulation on the imposition of stamp duty using e-commerce. However, there are interesting things that can be followed by the imposition of stamp duty on e-commerce in Indonesia. In fact, the State of Australia and the United Kingdom apply a progressive tax calculation to purchase property. Progressive calculation is a tax collection rate with a percentage based on the amount or quantity of the tax object and also based on the price or value of the tax object. Tax collection uses this progressive calculation, making tax collection rates increase if the number of tax objects increases and if the value of



tax objects increases. In Indonesia, this progressive tax calculation applies to motorized vehicles, in which the provisions for imposing progressive tax rates are regulated in Article 6 of Law Number 28 of 2009, as follows:

- Ownership of the first motorized vehicle is subject to a minimum fee of 1%, while the maximum is 2%.
- Ownership of a second, third, and so on motorized vehicle is subject to a minimum tariff of 2% and a maximum of 10%.
- Similarly, the imposition of Taxable Income (PKP) which determines progressive rates as follows:
  - PKP less than Rp. 50,000,000 – Rp. 50,000,000, subject to a tax rate of 5%.
  - PKP more than Rp. 50,000,000 – Rp. 250,000,000, subject to a tax rate of 15%.
  - PKP more than Rp. 250,000,000 – Rp. 500,000,000, subject to a tax rate of 25%.
  - PKP above Rp. 500,000,000, subject to a tax rate of 30%

Based on the Circular Letter of the Directorate General of Taxes Number: SE-62/PJ/2013, the Government has determined the imposition of taxes on electronic transactions in e-commerce. These taxes include income tax, value added tax, and sales tax on luxury goods. The application of electronic stamp duty on e-commerce has not been further regulated in the legislation, because at that time the development of the internet in Indonesia was still limited and e-commerce companies in Indonesia were still relatively few. The absence of a policy that regulates the imposition of stamp duty is what causes e-commerce business actors to be able to escape the imposition of taxes. Whereas, the imposition of electronic stamp duty is to provide equality between conventional transactions and electronic transactions. This problem will not be resolved when the government does not continue to make improvements and does not contribute to providing education about the imposition of electronic stamp duty on transactions carried out in e-commerce. According to Stamp Duty Law, the Stamp Duty Law has not been able to answer the challenges and take advantage of the progress of electronic transactions, so it is necessary to make improvements into Stamp Duty Law, to regulate policies regarding the imposition of electronic stamp duty in every transaction. The application of electronic stamp duty on e-commerce has great potential in terms of increasing state treasury revenues.

In this increasingly internet age, it is often used by irresponsible people. One of them is fraud in electronic transactions. As a company known a high security products, Perum Peruri can cooperate with e-commerce companies to distribute electronic stamp duty. The imposition of electronic stamp duty aims to:

1. Confidentiality

Ensure that information can only be accessed by authorized and interested persons.

2. Data Integrity

Ensure that information is not changed/modified during storage or at the time of transmission.

3. Authentication

Ensure that information is sent and received by the correct party (authentic sender/receiver of information).

4. Undeniable

That the owner of the information cannot deny that the information belongs to him or has been authorized by him.

Both Perum Peruri and e-commerce companies need to understand the importance of imposing this electronic stamp duty. If in the future there is a problem involving buying and selling transactions in e-commerce, electronic stamp duty can be used as evidence in civil cases. In addition, the imposition of electronic stamp duty is expected to eradicate fraud in electronic transactions. Thus, transaction activities has safe guarantee for the community.

First thing is, Perum Peruri, the Taxation Authority, and e-commerce companies need to collaborate in terms of imposing stamp duties with progressive rates on electronic transactions. Both Perum Peruri and E-commerce Companies are equally to take a role in terms of realizing the application of electronic stamp duty on electronic transactions conducted in e-commerce. To realize the imposition of electronic stamp duty on electronic transactions, Perum Peruri and e-commerce companies can imitate the steps of the AHU PNBP voucher payment system, namely:

1. Open the AHU website;
2. Complete the required data to order a voucher number
3. If all the data is complete and has been inputted, a voucher number booking proof will be issued which contains a voucher code;
4. Proceed to the payment stage by transferring to Bank BNI by entering the billing number in the form of a 15-digit voucher code;
5. If the data and billing figures match, you can make payments immediately;
6. If the payment is successful, the NTPN code will appear on the BNI Bank ATM transaction receipt.

The way the electronic seal works requires technology support, the electronic seal is used like a pulse voucher which will be made a kind of code generator by the system. This generator code will be distributed through distributions. This code generator will be filled with a kind of digital wallet. This electronic seal digital wallet contains the total value of the stamp that has been paid [36]. There are four channels that have been implemented, namely [37]:

1. Host to Host (H2H) Electronic Channel The imposition of an electronic seal will be directly affixed to a document that has been connected to an electronic system that has collaborated with the government;
2. Channels connected to e-wallet Documents to be used will be directly affixed through an electronic channel that is connected to the user's digital wallet. So that users can directly pay taxes imposed on this electronic stamp duty by paying directly through a digital wallet.
3. Via Merchant The imposition of electronic stamp duty on certain electronic documents can be obtained through certain merchants who have been appointed and cooperate with the Government, and these merchants are equipped with adequate equipment and equipment to provide electronic seals to users.
4. Through Point Of Sales (POS) system channels Every document that is connected to the POS system and has met the specified criteria, the POS system will be automatically stamped with an electronic seal.

The imposition of electronic stamp duty can also be applied if Perum Peruri appoints or cooperates with an E-commerce Company in Indonesia to distribute adequate equipment and supplies for the imposition of electronic stamp duty. Then the role of the E-commerce Company in terms of the imposition of electronic stamp duty can be determined by the POS system, where every payment made from an electronic transaction is automatically stamped with an electronic stamp duty.

The cost of imposing electronic stamp duty is applied by a progressive calculation, where the higher the value of an item, the higher the value of the

electronic stamp duty that must be borne. As an illustrative example of the imposition of electronic stamp duty with progressive calculation, it can be calculated as follows:

Items worth less than Rp. 50,000 – less than Rp. 1.000.0000, subject to an electronic stamp duty rate of Rp. 3,000,-;

Items worth from Rp. 1,000,000 – less than Rp. 5,000,0000, subject to an electronic stamp duty rate of Rp. 6.000,-;

Items worth from Rp. 5,000,000 – less than Rp. 10. 0000000, subject to an electronic stamp duty rate of Rp. 10,000,-;

Items valued above Rp. 10,000,000, subject to an electronic stamp duty rate of Rp.15.000,-.

In order to carry out the imposition of electronic stamp duty with progressive calculations, it is necessary to have basic rules that regulate it first. Therefore, it is hoped that the government will immediately prepare rules regarding electronic stamp duty in electronic transactions. With the imposition of electronic stamp duty with progressive calculations, it is hoped that it can help support the Government in improving the welfare of the people affected by the Covid-19 Pandemic, so that economic growth will increase. Besides that, to strengthen fiscal resilience, and support national and equitable development.

### **Conclusion**

With the transition from direct transactions to electronic transactions, it is only natural that every electronic transaction must be subject to tax. However, the imposition of electronic stamp duty in electronic transactions is hampered. This is because the 2020 Stamp Duty Law has not regulated the rules regarding the imposition of electronic stamp duty on electronic transactions conducted by e-commerce. The absence of rules regarding the imposition of electronic stamp duty in electronic transactions in e-commerce is deemed unable to achieve the goal of increasing state opinion and helping to realize national development. Therefore, the Government is expected to accelerate the making of regulations related to the use of electronic stamp duty for electronic transactions carried out in e-commerce.

In comparison to other countries, New Zealand does not apply electronic stamp duty. However, there are New Zealand regulations that can be adopted by the Government of Indonesia. The Indonesian government may impose a goods and services tax on electronic services. To determine the determination of tax costs, we look at the system of imposition of stamp duties in force in the UK. In the UK, the determination of the value of the imposition of stamp duty is carried out on a progressive basis. Where the higher the value of the asset, the higher the percentage of the imposition of stamp duty. In the case of buying and selling conducted electronically, the imposition of electronic stamp duty is imposed through the Stamp Duty Reserve Tax (SDRT). The agency authorized as the center for storing securities, namely CREST, and automatically deducts costs for SDRT from every electronic buying and selling transaction. Therefore, the Government of Indonesia can also imitate the system applied in the UK. By collaborating first between the Tax Authorities, Perum Peruri, and e-commerce companies. Each has its own role to realize the imposition of electronic stamp duty in electronic transactions. As the party authorized to set the stamp duty fee, the Tax Authority may determine the progressive calculation in the imposition of electronic stamp duty. As the party authorized to distribute electronic stamp duty, Perum Peruri can cooperate with E-commerce Companies in Indonesia to distribute equipment and supplies for the imposition of electronic stamp duty. The role of e-commerce companies in terms of the imposition of electronic stamp duty can be determined by the POS system, which every person does Payments from electronic transactions are automatically

calibrated/deducted with electronic stamp duty fees. The purpose of the imposition of electronic stamp duty is also to carry out the function of the tax, namely the regulatory function. With the function of regulating, taxes can be used as a tool to achieve goals. The intended purpose can be seen from the imposition of liquor and cigarette customs. The imposition of taxes on liquor and cigarettes is very high, this is due to achieve the goal of reducing consumption of liquor and cigarettes. Regulatory functions can also be found in the imposition of tax holidays. The imposition of the tax holiday aims to attract investors to invest. Thus, it can bring good benefits to the community such as new jobs, improving the quality of human resources, and accelerating the economic growth of the region. Therefore, the imposition of electronic stamp duty can also carry out the regulatory function. With the function of regulating, the imposition of electronic stamp duty, either in electronic documents or in electronic transactions, can be used as a valid civil proof. The imposition of electronic stamp duty in electronic transactions is expected to help increase the role of the community as a manifestation of the implementation of citizenship obligations in a fair manner, and can optimize state revenues after the Covid-19 pandemic, and can carry out national development.

The next step, mapping is needed as a step to provide socialization to the public regarding the electronic seal system, this is so that the community and economic actors are able to avoid the threat of security disturbances or failures in the electronic seal system.

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