

# Tax Disputes Arising from Value Added Tax Treatment of Foreclosed Collateral Transactions

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## ABSTRACT

This study aims to examine the underlying causes of value-added tax (VAT) disputes related to foreclosed collateral (AYDA). A case study approach was employed, utilizing a triangulation method that combined content and literature analysis with interviews conducted with tax consultants, auditors, and Tax Court judges. The findings indicate a rising trend in VAT disputes concerning AYDA, primarily driven by differences in interpretation between tax authorities and taxpayers. Additionally, inconsistencies between applicable regulations and the nature of taxpayers' business operations contribute to these disputes. This research provides valuable insights into the factors leading to VAT disputes on AYDA and offers practical implications for reducing such conflicts. By identifying key areas of regulatory misalignment and interpretational discrepancies, the study contributes to the development of more effective tax policies and compliance strategies, ultimately helping to mitigate future disputes.

Keywords: Tax Dispute; VAT; AYDA; Court Decision

*Analisis Sengketa Pajak Atas Perlakuan Pajak Pertambahan Nilai Terkait Transaksi Agunan yang Disita (Ayda)*

## ABSTRAK

Penelitian ini bertujuan untuk menganalisis penyebab terjadinya sengketa PPN atas AYDA. Metode penelitian yang digunakan adalah pendekatan studi kasus. Analisis dilakukan dengan menggunakan metode triangulasi dengan melakukan analisis isi dan kepustakaan serta wawancara dengan Konsultan, Pemeriksa Pajak dan Hakim Pengadilan Pajak. Hasil penelitian menunjukkan bahwa terjadi peningkatan jumlah sengketa dan penyebab terjadinya sengketa terkait PPN atas AYDA. Hasil analisis menunjukkan bahwa penyebab terjadinya sengketa PPN atas AYDA adalah karena adanya perbedaan penafsiran antara fiskus dengan wajib pajak serta peraturan yang diterapkan tidak sesuai dengan sifat dan kondisi usaha Wajib Pajak. Kontribusi penelitian ini adalah membantu mencegah terjadinya sengketa pajak.

Keywords: Tax Dispute, VAT, AYDA, Court Decision

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## INTRODUCTION

The banking sector plays a crucial role in the financial system. Waworuntu et al. (2017) emphasized that banks are essential to economic development, particularly for businesses that require credit for growth. In their operations, banks collect funds from the public but often face challenges in optimizing fund allocation while balancing public interest with the financial interests of fund providers. In addition to banks, non-bank financial institutions also play a similar role in providing alternative funding sources for individuals and businesses, thereby supporting economic growth. According to Kairupan (2017), the increasing demand for capital has led to the establishment of specialized financing institutions classified as non-bank financial institutions, with the primary objective of providing funding to individuals and companies for business development.

In extending credit, banks and other lending institutions are exposed to credit risk, which arises when borrowers face difficulties in meeting their repayment obligations. In practice, not all credit disbursements proceed as expected, as some borrowers encounter financial obstacles that hinder their ability to repay their debts. When borrowers default, the impact extends to both banks and financing institutions, necessitating measures to recover the outstanding amounts. Consequently, banks and financial institutions must adhere to prudent lending principles when assessing creditworthiness.

When a borrower is unable to fulfill repayment obligations, banks and financing institutions may take various measures to recover the loan, including acquiring collateral pledged by the borrower. This process, commonly known as Collateral Taken Over (AYDA), involves the transfer of collateralized assets to the lender. AYDA is generally regarded as a secured asset in accordance with banking regulations. Banks have the right to acquire collateral, either in part or in full, through an auction or direct negotiation process.

A tax dispute arises when AYDA is sold to settle the debtor's outstanding debt, involving the creditor—whether a bank or a consumer financing institution—and the Tax Office. The Tax Office considers the sale of AYDA as the delivery of Taxable Goods (BKP) under Article 4, paragraph (1), letter (a) of the Value Added Tax (VAT) Law, arguing that the assets fall within the BKP category and that their transfer occurs within a taxable jurisdiction. As a broad-based tax, VAT presents several challenges, particularly in the interpretation of tax laws and their implementation. The three main areas of contention include discrepancies regarding tax subjects, tax objects, and tax invoice regulations.

The Directorate General of Taxes (DGT), through Circular Letter Number SE-121/PJ/2010 on VAT Treatment in Banking Activities, permits banks to engage in activities beyond service provision, such as the sale of AYDA. While AYDA sales are not the primary focus of banking operations, they are an integral part of credit risk management and recovery strategies. However, taxpayers argue that such transactions should not be subject to VAT. Banks contend that AYDA sales do not constitute the delivery of Taxable Goods (BKP) because ownership of the asset remains with the debtor, and the bank merely facilitates the sale process.

Tax disputes related to the sale of foreclosed collateral due to borrower defaults continue to be a contentious issue, driven by differing interpretations of tax regulations between taxpayers and tax authorities (Fiskus/DGT). Despite

ongoing discussions, a definitive resolution has yet to be reached. Sutedi (2011) defines tax disputes as interpretational differences between taxpayers – whether individuals or corporate entities – and government tax authorities. One legal recourse available to taxpayers in such disputes is filing an appeal with the Tax Court. However, before reaching the appeal stage, taxpayers must undergo a series of administrative procedures, including an initial tax audit, filing an objection, and subsequently submitting an appeal. The dispute resolution process involves several stages, including the submission of an appeal petition by the taxpayer, a response from the DGT, and a rebuttal statement from the taxpayer.

Data obtained from the Secretariat of the Tax Court indicate a significant and increasing number of tax disputes each year, underscoring the persistent challenges in interpreting and applying VAT regulations on AYDA transactions.

**Table 1. Data on Receipt of Tax Court Appeal/Lawsuit Application Files for the 2018-2022 Period**

Defendant/ Appellee	Number of Incoming Files					Total	Percentage
	2018	2019	2020	2021	2022		
Directorate General of Taxes (DGT)	7,814	12,884	14,672	12,317	11,602	59,289	81.19%
Directorate General of Customs & Excise (DJBC)	3,573	2,141	1,830	2,804	2,889	11,407	15.62%
Regional Government (Pemda)	49	24	144	67	218	502	0.69%
Total Files Incoming	11,436	15,049	16,646	15,188	14,709	73,028	100%

Source : Research Data, 2023

As shown in Table 1, tax disputes involving the Directorate General of Taxes (DGT) as the respondent account for the highest number of cases compared to other respondents, such as the Directorate General of Customs and Excise (DJBC) and regional governments. The disputes recorded between 2018 and 2022 were further analyzed based on their respective decisions, as detailed below.

**Table 2. Dispute Profiling Results for the 2018-2022 Period**

Types of Disputes	Number of Disputes
Value Added Tax (VAT)	29,278
Tax Lawsuit	8,451
Import Duty Tariff	9,171
Income Tax Article 25/29 Corporate	6,296
Import Duty/Customs Value	5,018
Other Disputes	14,814

Source : Research Data, 2023

As shown in Table 2, Value Added Tax (VAT) disputes represent the majority of tax disputes. The dispute profiling results are further categorized based on the type of correction applied, as outlined below.

**Table 3. Types of VAT Dispute Profiling Corrections for the 2018-2022 Period**

Types of Disputes	Number of Disputes
Tax Base for Value Added Tax	17.121
Input Tax	9,682
Rates	2.138
Etc	393

Source : Research Data, 2023

Statistical data from 2018 to 2022 indicate that 96 disputes arose concerning the submission of foreclosed collateral (AYDA), with 90 decisions resulting in the annulment of corrections. These disputes have persisted from previous years and have been consistently ruled in favor of taxpayers at the appeal level by the Tax Court. Despite this, the Tax Office continues to impose corrections on similar cases, leading to recurring disputes. According to data from the Tax Court Secretariat, most appeal decisions in AYDA-related cases have favored taxpayers. The detailed outcomes of Tax Court decisions for the 2018–2022 tax years are presented in the following table.

**Table 4. Decisions on VAT Disputes on AYDA for the 2018-2022 Period**

Taxpayer	Dispute	Verdict	
		Reject	Granting All
Bank	60	4	56
Financing Institution	36	2	34
Amount	96	6	90

Source : Research Data, 2023

Tax disputes related to the sale of foreclosed collateral (AYDA) due to borrower defaults continue to generate ongoing disagreements. These disputes arise primarily from differences in the interpretation of tax regulations between taxpayers (WP) and tax authorities (Fiskus/DGT) and remain unresolved. According to Sutedi (2011), tax disputes occur when individuals or entities disagree with government tax authorities over tax assessments or obligations. One possible resolution for such disputes is filing an appeal with the Tax Court. However, before reaching this stage, taxpayers must first undergo an audit, file an objection, and proceed through the appeals process.

The imposition of Value Added Tax (VAT) on AYDA transactions remains an area of concern that requires further research. A comprehensive examination of this issue is necessary to understand the implementation of VAT regulations from both the taxpayer's and tax authority's perspectives, with the objective of minimizing recurring disputes. The primary aim of this study is to analyze the factors contributing to VAT disputes on foreclosed collateral.

Collateral Taken Over (AYDA), also known as foreclosed collateral, is one of the strategies banks employ to resolve non-performing loans. Bank Indonesia Regulation Number 6/25/PBI/2004 defines AYDA as assets voluntarily surrendered to banks as loan collateral. Additionally, the Indonesian Accounting and Banking Guidelines (PAPI) define AYDA as assets acquired by banks through auctions or other means, either through voluntary surrender by the debtor or authorized parties permitted to sell the collateral outside of an auction. This situation typically arises when debtors are unable to meet their repayment obligations. Hills (2019) stated that collateral is closely related to declining debt repayment capacity and that eliminating taxes on foreclosed assets could help reduce disputes.

The General Tax Provisions and Procedures (KUP) Law does not explicitly define tax disputes. Instead, Article 1, Paragraph 5 of Law Number 14 of 2002 on the Tax Court defines a tax dispute as a disagreement between taxpayers and tax authorities regarding tax obligations, resulting from decisions that can be appealed or challenged in court. The legal basis for these disputes lies in tax laws and regulations, including disputes over tax collection procedures enforced through official tax collection letters.

Tax disputes arise due to violations of tax regulations or differences in tax calculations between taxpayers and tax authorities during the tax determination process, depending on the interpretation of applicable legislation. Mayanja et al. (2020) identified several factors contributing to tax disputes, including perceived injustices in tax collection (e.g., unfair assessments or unsubstantiated tax liabilities), ambiguity in tax laws, misinterpretation of tax regulations by tax authorities, and procedural errors in tax administration.

According to Evelyn (2014), tax disputes can be categorized into formal and material disputes. Formal disputes occur when either the taxpayer or the tax authorities fail to comply with legally established procedures and methods. Tax authorities are required to follow strict guidelines under the KUP Law regarding tax audits, tax assessments, and the issuance of objection decisions. If these procedures are violated, disputes may arise from the tax authorities' actions. Conversely, taxpayers may also initiate formal disputes if they fail to adhere to the procedural requirements outlined in the KUP Law and Tax Court Law Number 14 of 2002.

Material disputes, on the other hand, arise from differences in the amount of tax owed or overpaid (in cases of tax refunds), based on discrepancies between tax authorities' calculations and those of the taxpayer. These differences may stem from varying interpretations of the applicable legal basis, differing perceptions of tax provisions, or disputes over specific transactions. As a result, the tax liability determined by tax authorities may differ from that calculated by the taxpayer, leading to a material dispute.

Previous research on VAT disputes related to AYDA has been limited. Studies conducted by Ulum (2023), Tambunan (2020), Dhani (2022), Prabandari et al. (2021), and Nuraini (2016) have primarily examined this issue from a legal perspective. Ulum (2023) highlighted legal uncertainties surrounding the implementation of AYDA regulations. Research by Tambunan (2020) and Dhani (2022) analyzed banks' efforts in utilizing AYDA as a strategy for managing non-

performing loans and found that VAT obligations pose challenges for banks in collateral takeovers. Prabandari et al. (2021) examined the tax consequences of AYDA implementation, specifically the obligation to pay VAT. However, discussions on the tax implications of AYDA remain underexplored. Nuraini (2016) argued that no taxable delivery occurs in AYDA transactions, and therefore VAT should not be imposed. However, this analysis only considers the legal perspective and does not address the broader implications of tax disputes that require resolution in the Tax Court.

Further research into tax disputes has been conducted by Puspitasari (2017), who stated that the government's imposition of VAT on AYDA takeovers is based on the principle that tax objects under the VAT Law are determined not solely by legal definitions but also by the nature of the taxable object. However, this research was limited to literature reviews and document analysis, highlighting the need for further studies incorporating insights from key stakeholders, such as tax consultants, auditors, and court officials.

Based on the literature review and the issues outlined above, the conceptual framework for this study is presented in Figure 1.

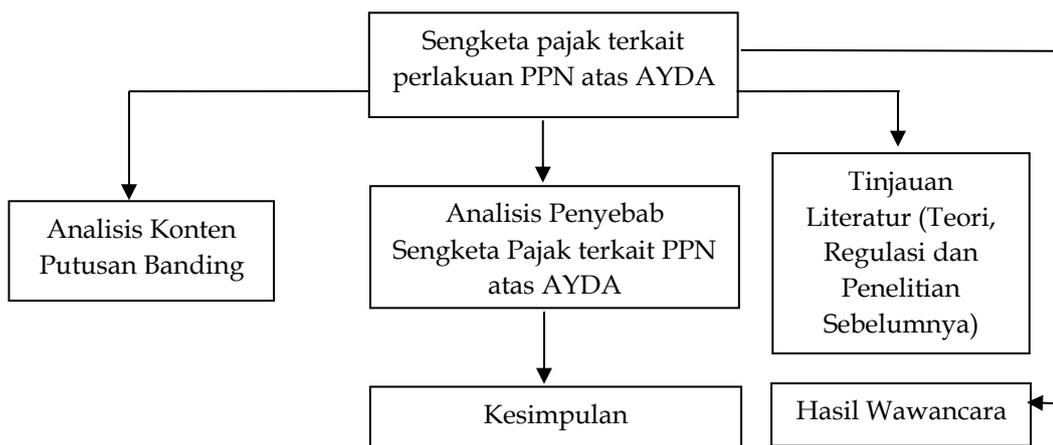
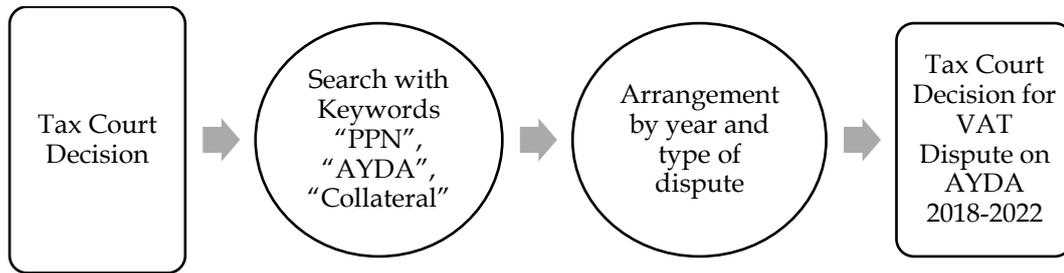


Figure 1. Conceptual Framework

Source : Research Data, 2023

## RESEARCH METHODS

The primary data for this study were obtained through interviews with respondents, capturing their perspectives on the issue. Additionally, secondary data were collected from Tax Court decisions related to the treatment of Value Added Tax (VAT) in AYDA transactions during the 2018–2022 period. The data collection techniques employed in this study are outlined as follows:



**Figure 2. Framework Conceptual**

Source : Research Data , 2023

Interviews were conducted with key informants who possess expertise, experience, and insights related to tax disputes concerning VAT treatment in AYDA transactions, both directly and indirectly. The study involved three categories of respondents: disputing parties (tax authorities and tax consultants representing taxpayers), and Tax Court judges.

A purposive sampling method was employed to select respondents based on specific criteria. Participants were required to have a minimum of five years of technical expertise in their respective fields and at least five consecutive years of practical experience handling VAT disputes related to AYDA.

The selected interviewees were professionals with direct competence in VAT disputes on AYDA, as detailed in Table 5 below.

**Table 5 List of Interview Sources**

No.	Position	Code
1.	1 ( one ) judge	R1
2.	1 ( one ) functional person Examiner Regional Office of the Directorate General of Taxes Mandatory Tax Big	R2
3.	1 ( one ) consultant Tax	R3

Source : Research Data , 2024

## RESULTS AND DISCUSSION

### Descriptive Statistical Analysis of Tax Court Decisions related to AYDA

Statistical data from 2018 to 2022 indicate that 96 disputes arose concerning the submission of foreclosed collateral (AYDA), with 90 decisions resulting in the annulment of tax corrections. These disputes have persisted from previous years and have consistently been ruled in favor of taxpayers at the appeal level by the Tax Court. Despite these rulings, the Tax Office continues to issue corrections on similar cases, leading to recurring disputes.

**Table 6. VAT Disputes on AYDA Period 2018-2022**

Type of business	Amount		Correction Maintained		Correction Canceled	
	Applicant	Dispute	Number of Applicants	Number of Verdicts	Number of Applicants	Number of Verdicts
Bank	17	60	4	4	13	56

Financing Institution	13	36	2	2	11	34
Amount	30	96	6	6	24	90

Source : Research Data, 2024

### Analysis Reason The occurrence Dispute

This study categorizes VAT disputes related to AYDA into two types: formal disputes and material disputes. Formal disputes arise from procedural violations or non-compliance with VAT regulations on AYDA by either the respondent or the appellant. In contrast, material disputes focus on discrepancies in tax liabilities resulting from differences in legal interpretations, regulatory application, and substantive disagreements over the imposition of VAT on AYDA transactions.

As shown in Table 7, all VAT rulings on AYDA analyzed in this study fall under the category of material disputes.

**Table 7. Number of Decisions Based on Type of Dispute**

Type Dispute	Amount Decision Based on Year Tax					Total
	2018	2019	2020	2021	2022	
Formal Dispute	0	0	0	0	0	0
Material Dispute	10	13	19	24	30	96

Source : Research Data, 2024

### Analysis Content

Table 8 shows amount decision based on identification disputes related to VAT disputes on AYDA obtained based on information from Tax Court decisions.

**Table 8. Number of Decisions Based on the Cause of VAT Disputes on AYDA**

Identification Dispute	Number of Decisions by Tax Year					Total
	2018	2019	2020	2021	2022	
<b>AYDA Sales Services Performed</b>						
Sales of AYDA are not including service finances that are not subject to VAT	8	5	9	12	4	38
AYDA sales are carried out in frame fulfil activity business or his job	4	2	5	3	12	26
<b>Submission Goods Got it Tax</b>						
Sales of AYDA are subject to VAT based on Article 4 in conjunction with Article 1A (1) C of the VAT Law.	4	4	3	2	5	18
Sales of AYDA are subject to VAT based on Article 16D of the VAT Law	1	3	5	2	3	14
Total	17	14	22	19	24	96

Source : Research Data, 2024

## **Analysis of the Causes of VAT Disputes on AYDA**

### **The Sale of AYDA Does Not Constitute a Taxable Financial Service**

Collateral Taken Over (AYDA) serves as a form of loan security, initially pledged by the debtor to the bank as part of a credit facility (financial service). The bank (appellant) sells AYDA to minimize potential losses resulting from non-performing loans. If the proceeds from the sale of AYDA exceed the debtor's outstanding obligations, the remaining balance is returned to the debtor. Therefore, the formation and liquidation of AYDA do not generate added value for the bank. As a financial intermediary, the bank's core function is credit intermediation rather than engaging in trade or profit-driven AYDA transactions.

Banks do not collect VAT on the transfer and sale of collateral, as these assets are additional security provided by the debtor when obtaining a loan. AYDA assets are considered non-performing assets with potential losses, requiring banks to establish loss reserves, as mandated by Bank Indonesia Regulation Number 7/2/PBI/2005. Article 37, paragraphs (1) and (2), and Article 36 of this regulation emphasize the necessity for banks to promptly resolve and document AYDA settlements. Prabandari et al. (2021) state that this regulation aims to improve credit restructuring efforts, mitigate risks associated with deteriorating loan quality, and ensure banks can recover from losses caused by non-performing loans. The policy also seeks to restore the debtor's financial health while enhancing the bank's overall performance.

Expert interviews further support this position:

#### **Tax Consultant's Opinion:**

*"... The implementation of VAT on services in Indonesia remains inconsistent with existing regulations. Although the VAT Law stipulates VAT on services, its practical application often deviates from the prescribed rules." (R3, 2024)*

#### **Tax Court Judge's Opinion:**

*"... Although Article 4 of the VAT Law applies generally, AYDA transactions within the banking industry are subject to distinct provisions. Unlike general VAT rules, financial services in banking are exempt from VAT." (R1, 2024)*

Additionally, Article 12 of Law Number 10 of 1998 on Banking states that banks may acquire collateral—through auction or voluntary transfer—if the debtor fails to meet repayment obligations. However, the regulation also mandates that such collateral must be liquidated as soon as possible. Research by Tambunan (2020) confirms that banks and financing institutions sell AYDA assets as part of credit risk management, which aligns with their financial service activities. Therefore, credit provisioning falls under financial services that are exempt from VAT.

Despite this, the Directorate General of Taxes (DGT) distinguishes between VAT-exempt financial services and taxable financial activities. According to Articles 6 and 7 of the Banking Law, certain financial services are excluded from

VAT. However, AYDA sales by creditors to buyers do not fall within the scope of exempt financial services, leading to disputes regarding VAT applicability.

Therefore, it can be concluded that Banks and financing institutions conduct AYDA transfers and sales as part of financial services, which are categorized as VAT-exempt activities.

### **AYDA Sales as Part of Banking and Financial Institution Operations**

When banks or financial institutions sell AYDA, the primary objective is to generate cash flow to cover the debtor's outstanding debt. Therefore, AYDA sales are integral to daily banking and financing operations, making them part of the creditor's economic activities.

An examiner's statement supports this argument:

*"When a company classifies an asset as inventory, the intention is to sell it. If either intent or factual conditions are met, the transaction qualifies as a business activity." (R2, 2024)*

Similarly, Salim (2012) explains that creditors hold legal authority over collateral, allowing them to sell the asset upon debtor default. However, this authority does not extend to physical possession or direct use of the collateral; instead, it grants the right to liquidate the asset to recover outstanding debts. Thus, the intention and factual conditions surrounding AYDA transactions suggest that these sales are conducted as part of the creditor's business activities.

A Tax Court judge reinforces this interpretation:

*"Bank Indonesia Regulation Number 7/2/PBI/2005 mandates banks to promptly liquidate AYDA." (R1, 2024)*

Despite this perspective, VAT laws in Indonesia lack a clear definition of "business activities" in the context of VAT applicability. VAT is typically imposed when a taxable transfer occurs as part of a business operation. Since AYDA transactions are undertaken to recover non-performing loans rather than generate profits, they may not align with the VAT Law's definition of a taxable transfer.

### **AYDA Sales Are Subject to VAT Under Article 4 and Article 1A(1)(c) of the VAT Law**

Under the VAT Law, VAT is imposed on the transfer of taxable goods (BKP) within Indonesia when conducted by a taxable entrepreneur. One condition for VAT imposition is that the transfer must occur as part of the seller's business activities. Rosdiana et al. (2011) argue that VAT applies to transactions that are integral to an entrepreneur's economic activities.

Banks, in addition to offering VAT-exempt financial services, may also provide taxable services, such as custodial services and factoring. Therefore, banks qualify as taxable entrepreneurs (PKP) and must comply with VAT obligations. However, financial institutions that exclusively provide VAT-exempt services are not required to register as PKP.

An examiner supports this view:

*"In the context of AYDA sales, VAT treatment depends on specific transaction conditions and applicable VAT regulations. However, based on available information, AYDA sales qualify as taxable transactions and are subject to VAT." (R2, 2024)*

It can be concluded that the absence of an explicit transfer of taxable goods does not necessarily exempt a transaction from VAT. Under Indonesian VAT law, both physical and legal transfers may trigger VAT obligations.

### **AYDA Sales Are Subject to VAT Under Article 16D of the VAT Law**

VAT is also imposed on the transfer of fixed assets by taxable entrepreneurs if the assets were not initially acquired for resale. Under Article 16D of the VAT Law, VAT applies to asset transfers unless the input VAT on the acquisition was non-creditable.

In the case of AYDA, these assets are not classified as inventory but must be liquidated promptly to recover outstanding debts. Article 12A of the Banking Law mandates that collateral acquired through auction must be sold as soon as possible. The explanatory notes further clarify that banks cannot permanently hold such assets and must use the proceeds for operational recovery.

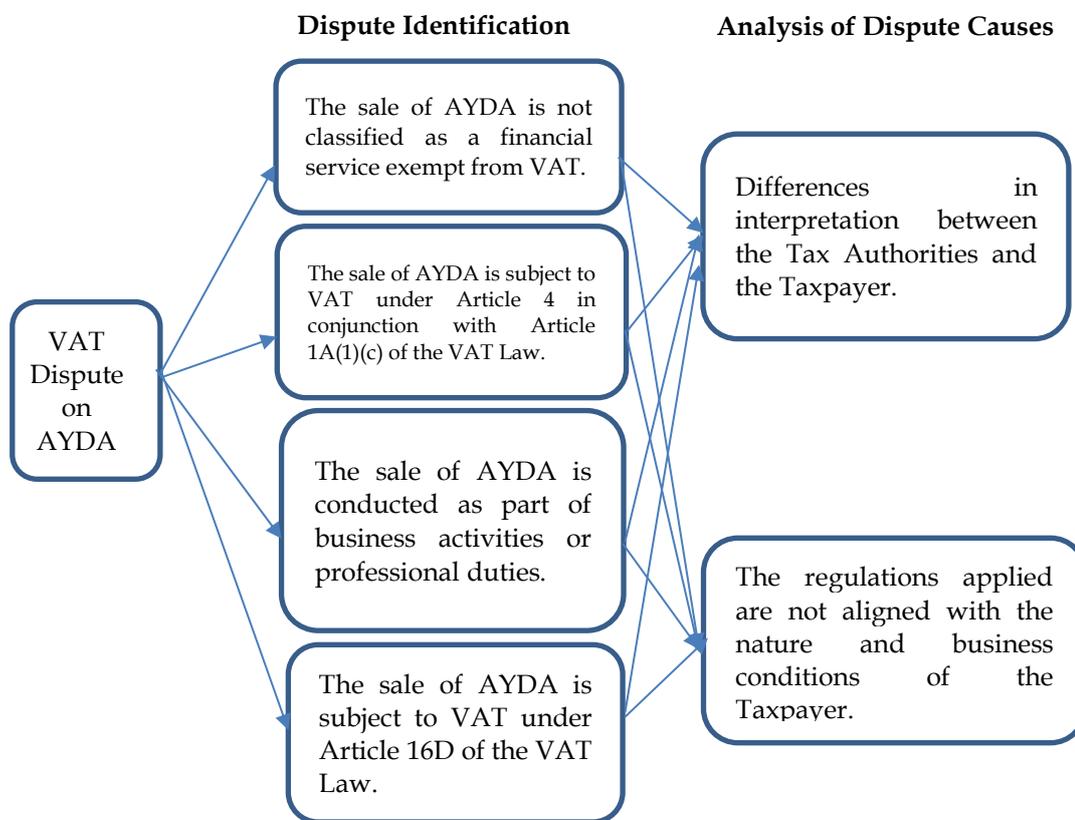
Additionally, the VAT Law states that VAT is not due when taxable goods are transferred as loan collateral. Since creditors acquire AYDA as collateral rather than as a taxable good, no VAT is due at the point of acquisition. Gunadi (2012) argues that VAT treatment for AYDA transactions should fall under Article 16D, as banks do not engage in asset trading. However, following the issuance of Circular Letter SE-121/PJ/2010, VAT treatment on AYDA sales became unclear. This circular categorizes bank-held collateral as taxable goods, making AYDA sales subject to VAT.

Puspitasari (2017) states that if VAT is imposed on AYDA sales under Article 4, paragraph (1)(a) of the VAT Law, the transaction must occur as part of a business activity, which is not the case for banks. However, if VAT is imposed under Article 16D, the input VAT is non-creditable, making the transfer VAT-exempt.

The application of VAT regulations on AYDA transactions is inconsistent with the nature and operational conditions of financial institutions. Differing interpretations of VAT applicability create legal uncertainty, prompting taxpayers to adopt positions that best serve their financial interests. The ongoing lack of clarity results in inconsistent tax enforcement, leading to recurring disputes.

### **Summary Analysis Reason VAT dispute on AYDA**

The summary of the VAT dispute analysis is presented in Figure 3, illustrating the dispute identification process and underlying reasons. This summary consolidates findings from content analysis and interviews with key informants, providing a comprehensive overview of the VAT dispute on AYDA transactions.



**Figure 3. Summary Analysis Reason AYDA Dispute**

Source : Research Data , 2024

## CONCLUSION

This study aims to analyze the causes of VAT disputes related to AYDA and explore efforts to minimize such disputes. Between 2018 and 2022, Tax Court decisions concerning VAT on AYDA exhibited an increasing trend. The identification of VAT disputes on AYDA includes the following key issues: (1) the sale of AYDA is not classified as a financial service exempt from VAT, (2) AYDA sales are subject to VAT under Article 4 in conjunction with Article 1A(1)(c) of the VAT Law, (3) AYDA sales are conducted as part of business activities or professional duties, and (4) AYDA sales are subject to VAT under Article 16D of the VAT Law.

Based on research findings that integrate content analysis and interviews, the primary causes of VAT disputes on AYDA are: (1) differences in interpretation between the Tax Office and taxpayers and (2) the misalignment of applicable regulations with the nature and business conditions of taxpayers.

This study is subject to limitations in accessing Tax Court decision data, as some decisions may not have been uploaded to the official database (<https://setpp.kemenkeu.go.id/risalah/IndexPutusan>). Additionally, challenges

in obtaining complete decision profiling data arise due to missing or inaccurately recorded information in the archives of the Tax Court Secretariat.

The analysis in this study is based on Tax Court decisions issued between 2018 and 2022. Future research is recommended to incorporate the latest tax regulations and relevant legal frameworks to provide a more up-to-date and comprehensive analysis.

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