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ANALYSIS OF TAX AMNESTY IMPLEMENTATION IN TAX REVENUE IN ASIAN REGION COUNTRIES

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ABSTRACT

Tax revenue has an unlimited useful life because taxes are collected from citizens as obligatory, and they can be forced to collect them. Taxes can support the development of a country. Tax amnesty is one of the fiscal policies to get tax revenue quickly. Several countries have implemented tax amnesty policies, but there have been successes and failures in their implementation. Information technology factors, as well as easy access to information and confidentiality guarantees, support the success of a tax amnesty. After implementing the (long-term) tax amnesty, tax revenues sometimes increase. It reflects that taxpayer compliance in reporting assets and depositing tax obligations is only sometimes obedient after implementing the tax amnesty program.

Keywords: Tax amnesty, tax revenue, tax implementation.

INTRODUCTION

A country's macroeconomic growth and development are greatly influenced by its financial system and taxation, especially in areas such as public debt, inflation, fiscal deficit, income distribution, and economic stability (Luitel & Tosun, 2014). Fiscal policy is an economic policy that aims to improve the economy and make the country better and more productive. The primary fiscal policy instruments are revenue from taxes and spending on state spending (Sukirno, 2016). Taxes are levies made by the state to its citizens from laws in which the state does not provide direct counter-achievement to the

public (Mardiasmo, 2016). Tax revenue from citizens is mandatory and coercive (Aritonang & Rustam, 2016). Problems arise because there are still many taxpayers who have not fulfilled their obligations in reporting and paying taxes, and there are assets that are outside the territory of Indonesia that taxpayers have not reported in their tax return reports (Aseng, 2017; Inasius et al., 2020). In addition, data from the 2016 Panama Papers and 2021 Pandora Papers reveal that many Indonesian citizens hide their assets in tax-free countries or countries with low tax rates (Aritonang & Rustam, 2016). So the government must establish policies to overcome existing problems.

One of the policies implemented by the government to increase the number of registered taxpayers and increase the state tax ratio is the tax amnesty program (Aritonang & Rustam, 2016). Tax amnesty is a government decision whereby several taxpayers who have not paid their taxes partially or wholly are exempt from fines and tax obligations. The primary purpose is to encourage taxpayers to disclose income in exchange for an amnesty penalty voluntarily. Tax amnesty is a modern practice that plays an essential role in the tax policy of developing countries. Because tax amnesty can increase the collection of state tax revenues in the short term, reduce government administration costs, improve law enforcement, and reduce tax rates according to the law (Abdurrahmani & Doğan, 2019). Tax amnesty is a program to withdraw "money" from citizens who are indicated to have owned assets and investments in tax-free countries such as Panama or other countries. The results expected by the government by implementing a tax amnesty program with very low ransoms will make citizens interested in diverting their savings and investing domestically (Ispriyarso, 2019). Based on the Tax Amnesty Law Number 11 of 2016, the tax amnesty aims to (first) accelerate economic growth and restructuring, primarily through the transfer of assets affecting domestic liquidity, improving the rupiah exchange rate and reducing interest rates and increasing investment; (second) encouraging tax reform towards a fairer tax system and developing a tax database that is more valid, comprehensive and integrated; (three) increasing tax revenues which among other things are used to finance development.

Tax amnesty is a familiar thing for the Indonesian state. The policy was first implemented in 1964, then in 1984, 2008, 2016, and finally in 2022, known as the Voluntary Disclosure Program. The tax amnesty program in 1964, 1984, and 2008 failed due to low legal issues (Mauluddi et al., 2022). In 1984, the government's motive for implementing a tax amnesty was implementing a new taxation system that could increase public participation in state financing and national development and for the need for openness and honesty from taxpayers (Ragimun, 2011). In 2008, the tax amnesty collected IDR 7.46 trillion from 5,635,128 people, but the amount collected was lower than the amount targeted by the tax office (Mauluddi et al., 2022).

Meanwhile, from 2016 to 2017, only declaration receipts exceeded the revenue target, while repatriation and redemption payments did not exceed the state revenue target. In fact, repatriation was only 14.7% of the set target. The significant addition of taxpayers is also not visible, indicating that the number of taxpayers participating in the tax amnesty still needs to be higher, namely from the mandatory tax return reporting. Which reaches 20.1 million taxpayers, but only 891,577 participate (Ispriyarso, 2019). As for the voluntary disclosure program, completed at the end of June 2022, the realization of collected income tax reached IDR 61 trillion. Suryo Utomo (Directorate General of Taxes) said that the volunteer disclosure program is a success because the

realization is higher than expected, and it is optimistic that tax revenue for 2022 will reach the target (DDTC News, 2022).

Several countries have also implemented a tax amnesty program. Based on data from Hermansyah (2016), 38 countries have implemented a tax amnesty program in their country's fiscal policy, 10 of which are in Asia. The results of successful implementation in these countries have varied. The success of tax amnesty is closely related to taxpayer compliance (Juanda et al., 2022). This research will explain the policies and results of tax amnesties in 10 Asian countries: Indonesia, India, Malaysia, Bangladesh, Pakistan, the Philippines, Sri Lanka, Thailand, Kazakhstan, and South Korea. The reason why researchers chose to conduct research in countries in Asia is that until now, there are still many developing countries in Asian countries with a tax ratio below 13%. A tax ratio above 13% is needed to fund various programs mandated in the Sustainable Development Goals (SDGs) while accelerating economic growth. This study aims to systematically review the literature that discusses the implementation of tax amnesty in various countries and how the ratio of tax revenues is after the program's implementation. Taxpayer compliance in reporting their assets and tax obligations will increase state tax revenues to support state development.

RESEARCH METHODS

This study uses a qualitative descriptive analysis through a literature search related to research results, history, organizational guidelines, policies and opinions of organizational management experts. Problems in qualitative research are temporary, tentative and will develop or change after the researcher is in the field. The qualitative descriptive analysis approach describes the conditions to be observed in the field in a more precise, transparent and detailed manner. This approach aims to describe, explain, and answer the questions studied more dept by examining as many individuals, groups, or events as possible (Pandiangan et al., 2021).

The data used in this study is secondary data resulting from the collection and systematic analysis of literature, journals, articles, news, and other supporting data related to the implementation of tax amnesty in Asian countries. In this study the authors chose Indonesia, India, Malaysia, Bangladesh, Pakistan, Philippines, Sri Lanka, Thailand, Kazakhstan, and South Korea as the focus of research.

RESULTS AND DISCUSSION

The following explained by the results that has been conducted related to:

Tax Amnesty

Tax Amnesty is an action to disclose undisclosed treasure wealth and pay the appropriate ransom with Constitution based on Constitution Forgiveness Tax Number 11 in the Year 2016, without being affected by penalty administration taxation or punishment criminal in field taxation of the tax which should. There are several considerations before carrying out a tax amnesty, including shadow economy, is an economic activity that is deliberately kept secret to avoid taxes; capital flight, namely in the form of illegal capital

flight abroad; the existence of financial instruments that affect the potential loss of tax revenue; and political budgeting to deal with the contraction in the state budget that has occurred.

Tax amnesties in the world have several categories, namely tax amnesty which only forgives tax criminal sanctions, but still requires the payment of taxes, including interest and fines; tax amnesty which only requires the payment of the tax principal and interest, but is exempt from sanctions, both fines and tax sanctions; tax amnesty where only the principal is obligated to pay, interest, fines and tax sanctions are waived; and a tax amnesty that waives all past tax obligations, interest, fines and penalties.

Tax Amnesty in Several Countries

This study aims to analyze the implementation of Tax Amnesty in several countries in Asia, including Indonesia.

Table 1. Implementation of Tax Amnesty

Country Name	Period	Implementation of Tax Amnesty	Implementation of Tax Amnesty
Indonesia	1984 - 2016	5 times	The percentage of tax revenue to Gross Domestic Product (GDP) per quarter has fluctuated, but from January 2022 to April 2022, it has increased significantly. Voluntary Disclosure Program with the help of the ease of reporting application systems.
India	1951 - 2016	11 times	The percentage of tax revenue to GDP per quarter has fluctuated, but from January 2022 to April 2022, it has increased significantly. The revival of India's GDP from the pandemic can be seen in July 2020. Tax revenues began to increase even though they continued to fluctuate afterward. However, this is a positive sign that many citizens are still aware of taxes and carry out their tax obligations.
Malaysia	2016	1 time	Based on quarterly data from the World Bank for July 2019 to January 2022, the graph shows a sharp decline and a sharp increase from January 2020 to January 2022. There is insufficient information regarding the application of Tax Amnesty, so it is not easy to assess whether the implementation has effectively increased revenues.
Bangladesh	1971 - 2014	18 times	Bangladesh's tax revenue tends to decrease. It also shows reduced taxpayer reporting in Bangladesh. Tax amnesty carried out too often will make taxpayers too 'relaxed' in dealing with tax amnesty (Aseng, 2017).

Table 1. (continuation)

Country name	Period	Implementation of Tax Amnesty	Implementation of Tax Amnesty
Pakistan	1958 - 2016	9 times	The percentage of tax revenue to Pakistan's GDP shows a fluctuating graph, but from 2020 to 2021, it tends to increase. It can be used as a positive signal because it can be used as an indicator that more and more citizens are aware and obedient in carrying out their tax obligations.
Philippines	1972 - 2008	12 times	Tax revenue to the Philippines' GDP rapidly increased from January 2022 to April 2022. It also happened in the previous year but decreased gradually at the end of the year. The government should consider why it rose rapidly initially but gradually decreased drastically at the end of the year.
Sri Lanka	1964 - 2009	12 times	Tax revenue to Sri Lanka's GDP in 2019 tends to fall dramatically. Trends are still fluctuating from April 2020 to April 2022. The Sri Lankan government needs to adopt policies to increase tax revenue and compliance with the submission of state tax reports.
Thailand	2016 - 2019	2 times	Tax revenue after the tax amnesty in Thailand in 2019 tends to decrease until 2021. The reason is likely the impact of the Covid-19 pandemic. Compliance in reporting and paying taxes must be boosted again after the post-pandemic economic recovery in 2022.
Kazakhstan	2001- 2007	3 times	Based on Kazakthan tax revenue data obtained, quarterly data from October 2019 to April 2022 shows that tax revenue from January 2022 tends to increase. It also shows that many taxpayers have deposited their tax obligations.
South Korea	2016 - 2017	1 time	Revenues in South Korea from October 2019 to April 2022 showed a decline. The government should be concerned about how to increase state tax revenues.

Source: Data Processed

Tax Amnesty in Indonesia

Indonesia first implemented a tax amnesty in 1964 during President Soekarno's tenure. The policy is intended to collect funds from the community in question, potentially but has yet to be taxed. The subjects of the tax amnesty are Individual Taxpayers and Corporate Taxpayers. At the same time, the objects are wealth tax, income tax, corporate tax, and capital stamp duty (on company capital placements that have yet to be reported). The 1964 Tax Amnesty applies for one year from the effective date until August 17, 1965. The facilities obtained by participants who distribute capital for productive businesses are free from tax demands, and there is no problem with the origin of the source of income.

During the reign of President Soeharto, namely in 1984, a second tax amnesty was carried out. Tax amnesty applies to all the tax amnesty are Individual Taxpayers and corporate taxpayers who have or have not registered themselves as taxpayers. At the same

time, the Forgiveness Tax covers, as a whole, taxes that have never been collected or collected under the tax laws in effect at the time. The redemption rate is 1% for taxpayers who filed in 1983 and 1984. Tax payable notifications are at a maximum of April 18, 1984, or 10% for taxpayers who submitted tax returns for 1983 and 1984. The tax rate is multiplied by the total net worth of the taxpayer. The facilities obtained by taxpayers who report taxes are exempted from all investigations and examinations regarding the reported assets or income source and cannot be prosecuted criminally. Amnesty lasted from April 18, 1984, to June 30, 1985, and extended until December 31, 1984.

In 2008, the government launched the Sunset Policy program, which can be said as a policy program to initiate the modernization of taxation in Indonesia. The Sunset Policy abolishes administrative fines while continuing to pay the tax principal in full according to the general rates that apply under the law but does not stipulate a policy regarding exemption from criminal tax charges. When it was implemented, IDR 7.46 trillion was collected from 5,635,128 people, but the amount collected was still far from the amount targeted by the tax office. The implementation of the tax amnesty in 1964, 1984, and 2008 can be said to have failed due to weak legal issues (Mauluddi et al., 2022).

In 2016, Indonesia again implemented the tax amnesty policy after the excitement of the Panama Papers scandal and the sluggish Indonesian economy at that time. Tax Amnesty 2016 for the first period, June 28, 2016, to September 30, 2016. The second period is from October 1, 2016, to December 31, 2016, and the last is from January 1, 2017, up to March 31, 2017. Every period has a ransom policy, different and the ransom amount for each period.

Tax amnesty rates for disclosure of domestic assets was 2% in the first period, 3% in the second period, and 5% in the third period. Amnesty rates for disclosing assets abroad (if not transferred domestically) was 4% in the first period, 6% in the second period, and 10% in the third period. Amnesty rates for disclosure of transferred overseas assets into the country (repatriation) was 2% in the first period, 3% in the second period, and 5% in the third period.

The tax amnesty rate for MSMEs (Micro, Small, and Medium Enterprises) whose business circulation does not exceed 4.8 billion (since promulgation until March 31, 2017) is 0.5% if the assets reported are not more than 10 billion and 2% if the assets reported are reported to exceed 1 M.

Not all targets and realization of tax revenue from the 2016 tax amnesty program exceeded the target. The stated revenue target is a declaration of IDR 4,000 trillion, repatriation of IDR 1,000 trillion, and a ransom of IDR 165 trillion, along with the achievements of the 2016 tax amnesty program:

Table 2. Tax Amnesty Targets and Realization (in trillions)

Information	Target	Realization	Percentage
Declaration	IDR 4,000	IDR 4,707	117.67%
Repatriation	IDR 1,000	IDR 147	14.70%
Ransom	IDR 165	IDR 135	81.81%

Source: Ministry of Finance of the Republic of Indonesia, 2022

According to the table above, it can be seen that the repatriation and redemption of money were within the state revenue target. Repatriation was only 14.70% of the target that had been set. The 2016 tax amnesty in Indonesia, seen from the revenue/return aspect, was quite successful, especially from the declaration aspect, but it was still unsuccessful from the repatriation aspect. Several things can be used to explain the low realization of repatriation funds, for example, the link between repatriation and the level of trust and credibility of investment competitiveness in Indonesia. It is possible because Indonesian citizens with assets abroad feel safer if they keep them abroad. In addition, the number of participants who took part in the tax amnesty was not as expected, so the tax amnesty in Indonesia in 2016 was not fully optimized.

Tax Amnesty volume 2 was completed. A voluntary disclosure program allows taxpayers to disclose unpaid tax obligations voluntarily. The fulfillment of these tax obligations can be managed with two policies. The first policy is to pay income tax or income tax based on assets not fully reported by participants in the tax amnesty program. In contrast, the second policy is to pay income tax following the disclosure of assets not disclosed in the taxpayer's annual tax returns. The voluntary disclosure program has been completed, and the realization income tax collected from the voluntary disclosure program is IDR 61 trillion until the end of June 2022. This voluntary disclosure program is considered successful because the realization is higher than expected, and it is optimistic that tax revenue for 2022 will reach the target (DDTC News, 2022).

Even though the realization of the voluntary disclosure program was higher than the target set cannot guarantee that the 2022 state tax revenue target will reach the target because 2022 has not yet ended. Taxpayers still need to submit tax returns in Indonesia. The problem of low annual notice submission is still an obstacle Indonesia faces. It shows that the awareness and compliance of taxpayers in Indonesia still need to be improved. The following is the submission of annual notice data for the last ten years:

Table 3. Percentage of Taxpayer Annual Notice Reporting

Year	Registered Taxpayer	Taxpayers who are obliged to report annual notice	Taxpayers who Report annual notice	Percentage (%)
2012	22,030,583	17,659,278	9,482,480	53.70
2013	24,347,763	17,731,736	9,416,457	53.11
2014	27,945,570	18,357,833	10,828,808	58.99
2015	30,044,103	18,159,840	10,945,173	60.27
2016	32,769,255	20,165,718	12,269,290	60.84
2017	36,510,000	16,598,887	12,047,967	72.58
2018	39,150,000	17,653,046	12,551,444	71.10
2019	42,510,000	18,334,683	13,394,502	73.06
2020	46,380,000	19,006,794	14,755,255	77.63
2021	49,821,000	19,000,000	15,971,000	84.00

Source: Ministry of Finance of the Republic of Indonesia

Table 3 shows that after the 2016 tax amnesty, there was an increase in the number of registered taxpayers and reporting tax returns. The percentage of reporting also increased from 2016 even though they had not met the annual notice report submission target. It shows that compliance with the annual notice reporting for Indonesian taxpayers has increased yearly, especially after the tax amnesty was held in 2016.

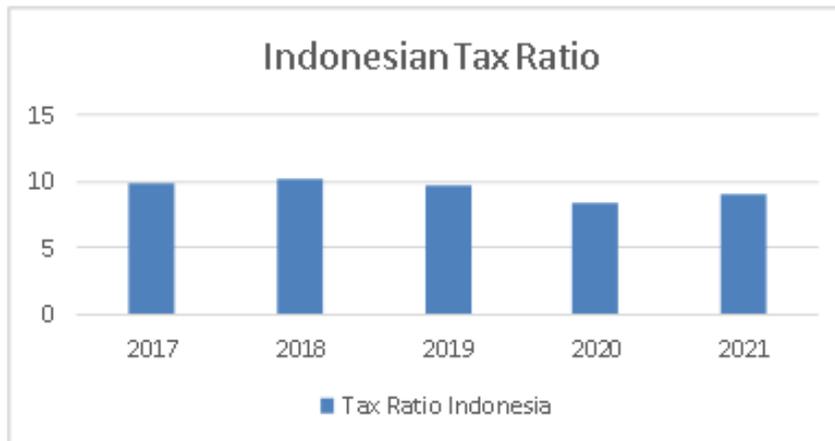


Figure 1. Indonesian Tax Ratio

Source: Ministry of Finance of the Republic of Indonesia, 2022

Based on the picture above, the tax ratio in 2017 was 9.89% of GDP, which increased to 10.24%. In 2018, it decreased to 9.77% and 8.33% in 2019 and 2020 and finally increased again to 9.11% in 2021. The decline in 2019 and 2020 was due to the

The covid-19 pandemic caused the Indonesian economy to experience a downturn, but it rose again in 2021. It is evidenced by the increase in the tax ratio in 2021 and the Voluntary Disclosure Program from January to June 2022, achieving good results and exceeding expectations, so it is hoped that in 2022 Indonesia's tax ratio will increase.

Based on World Bank data from October 2019 to April 2022, the percentage of tax revenue to GDP per quarter fluctuated, but from January 2022 to April 2022, it experienced a significant increase. It is positive because tax revenue has increased, and the 2022 revenue target will likely be achieved. It can also be said that more and more Taxpayers are reporting their annual notice and paying taxes according to their obligations, supported by the Voluntary Disclosure Program with the help of an easy reporting application system.

Tax Amnesty in India

India carried out a recurring tax amnesty program in 1951, 1965, 1975, 1975, 1980, 1985, 1986, 1991, 1997, 2013, and finally, in 2016 (Ibrahim et al., 2017). In 1997, India implemented a tax amnesty called the Voluntary Income Disclosure Scheme (VIDS) program and raised Rs. 100 billion, with disclosed income of around Rs. 330 billion (Vikraman, 2015). This program is intended for companies and individuals who set a 35% rate and 30% tax rate to be legitimized each of their assets without retrospective penalties (Banerji, 2016). The 1997 tax amnesty program increased gross domestic product from 3% or less to 3.6% (Beniwal & Shrivastava, 2016).

The most recent tax amnesty introduced in June-September 2016 managed to attract 64,275 declarations which generated Rs 294 billion in government revenue (Mundy, 2016). Taxpayers must only pay 31% against the 45% tax stipulated in the 2016 Income Declaration Scheme. The Government of India then launched a final tax amnesty from December 2016 to March 2017. Taxpayers who declare their income undeclared must pay taxes, surcharges, and penalties, with a total of 49.90% (Adhia, 2017). Taxpayers will

also be free from prosecution, and this is an attractive offer for delinquent taxpayers, such as changes to declare their assets and pay their obligations.

Based on data from the World Bank for October 2019 and April 2022, the percentage of tax revenue to GDP per quarter has fluctuated. However, from January 2022 to April 2022, there has been a significant increase. The revival of India's GDP from the pandemic can be seen in July 2020. Tax revenues began to increase even though they continued to fluctuate afterward. However, this is a positive sign that many citizens are still aware of taxes and carry out their tax obligations.

Tax Amnesty in Malaysia

Malaysia implemented a tax amnesty from March 1 to December 15, 2016, but there needs to be more information regarding implementing the tax amnesty. The tax amnesty program aims to increase voluntary disclosure and settlement of tax debts among taxpayers. While most countries that implement tax amnesty worldwide include offshore property repatriation and black money laundering, the tax amnesty in Malaysia does not cover both. It is due to the problems of Anti-Money Laundering, Anti-Terrorism Funding, and the Results of Unlawful Activities of the 2001 Law. The tax amnesty penalty rate is reduced by 15% for complete payment and payment in 6 installments 20% compared to failure to submit a stamp tool within the stipulated period from March 1, 2016, to June 30, 2016, is 5% while from July 1, 2016, to December 15, 2016, it is 10% (Hamid & Hilmi, 2018).

Hamid & Hilmi (2018) found that tax non-compliance and tax evasion exist in every country, including Malaysia. In 2013, the Inland Revenue Board of Malaysia (IRBM) reported that additional taxes and fines in 2013 amounted to RM4,300.79 million compared to 2012, which amounted to RM2,647.55 million representing an increase of 62.44%. Of the 62,717 cases audited in 2013, the non-compliance rate on PCBs increased from 17% (2012) to 20% (2013). Meanwhile, under-collected taxes in 2013 decreased by 11.29% from RM66.98 million to RM59.42 million, while compounds charged increased by 12.20% from RM7.13 million to RM8 million. Data regarding the realization of Malaysia's 2016 tax amnesty receipts has limited information, so it cannot be said that it has succeeded or failed.

Based on quarterly data from the World Bank from July 2019 to January 2022 shows a graph that has decreased sharply and increased dramatically from January 2020 to January 2022. The past two years were during the Covid-19 pandemic, so each country experienced an uncertain economic period. The ratio of tax revenues still needed to be more consistent. There had to be improvements in the taxation system so that the country's tax revenue tended to increase.

Tax Amnesty in Bangladesh

Bangladesh launched 18 tax amnesties between 1971 and 2013 (Ahmed et al., 2016). The government protects taxpayers who joined the tax amnesty program even though they only report 1% of their black money because they get a license to whitewash some black money (Waris & Latif, 2014).

Table 4. Amnesty Tax Collection in Bangladesh

Year	Total Disclosure	Collection from Tax Amnesty (in millions)	Tax Amnesty Percentage of Income Tax
1976-1977	11,464	100	8,72
1987-1988	6,642,900	400	6.02
1988-1989	70,593	250	3.54
1989-1990	7,822,400	400	5,11
2000-2001	350,082	1,000	2.85
2002-2005	1,452,000	No taxes	0.00
2005-2006	716,201	3,450	4.81
2006-2007	872124	6,874	7.88
2007-2008	1,174,466	8,000	6,81
2008-2009	1,385,774	1,000	0.72
2009-2010	1,704,228	1210	0.70

Source: NRB Bangladesh in Ahmed et al. (2016)

Data from the World Bank on tax revenues to Bangladesh's GDP show that the percentage of tax amnesty from income taxes from 1976 to 2010 fluctuated, but from 2008 to 2010, the success rate tended to be very low. The 2013-2014 tax amnesty only collected 180 million out of 205 people (Ibrahim et al., 2017).

Tax amnesty carried out too often will make taxpayers too 'relaxed' in dealing with tax amnesty (Aseng, 2017). Bangladesh's tax revenue after implementing the tax amnesty in 2013-2014 tends to decrease, which also shows reduced taxpayer reporting in Bangladesh. It is likely to occur because the tax amnesty program in Bangladesh has had a detrimental impact on the country's economy (Ibrahim et al., 2017).

Tax Amnesty in Pakistan

Pakistan has implemented a Tax Amnesty program since the 1950s with mixed results. The following is tax amnesty data that has been carried out in Pakistan:

Table 5. Tax Amnesty in Pakistan

Year	Results
1958	71,289 declarations were filed
1969	19,600 declaration targets
1976	Tax Amnesty
1997	Collected Rs151 M
2000	79,411 declaration targets
2008	Collected Rs2,800 M at a 2% tax rate
2012	Only for funds invested in the Stock Exchange
2013	Only for non-official cars, with only 50,000 cars participating For traders in the green field industry

Source: Pakistan's income data Aseng (2017)

Pakistan's most recent tax amnesty was conducted between December 7 and December 26, 2016). The tax amnesty was targeted only at the property sector, but this tax amnesty failed as only 1,919 transactions were made, and only Rs 50 million was realized under the program (Ibrahim et al., 2017).

The failure to collect the 2016 tax led to the Pakistan Federal Revenue Service offering a more general tax amnesty covering all sectors for both residents and non-residents of Pakistan. Tax amnesty for real estate investors is given the privilege of only a 3% rate to increase property prices due to the repatriation of black money in the property sector. On the other hand, individual taxpayers must pay a maximum of 35% tax on income and a 100% penalty for lateness. It creates injustice for taxpayers honestly reporting their tax obligations (Ibrahim et al., 2017).

World Bank data regarding Pakistan's tax revenue to GDP from 2010 to 2021 after the last tax amnesty in 2016 shows that tax revenue to GDP fluctuates, but from 2020 to 2021, tax revenue tends to increase. It is a positive thing because the increase in tax revenue shows that more and more citizens are aware and obedient in carrying out their tax obligations.

Tax Amnesty in the Philippines

During Marcos' leadership, the Philippines implemented the tax amnesty program ten times, from 1972 to 1981. The first tax amnesty was carried out in 1972 for people who were not subject to tax on income, motorized vehicles, and goods and receivables (Aspa, 2016). The first tax amnesty was considered successful, but afterward, too many tax amnesties were carried out so that its effectiveness was reduced. During the leadership of Corazon Q. Aquino, the tax amnesty was carried out three times, and the total amount collected was PhP.1,366.50. During Estrada's administration, a tax amnesty was introduced in 1999. The tax amnesty was able to collect PhP.3,531 in tax revenue. The program was also launched during the reign of Aroyo. There were 21 regulations launched during the 2001-2008 tax amnesty period (Aspa, 2016). The 2008 tax amnesty covers income tax, property and donors tax, capital gains tax, introduction tax fee, other percentage tax, excise duty, and documentary stamp tax. Under one of Aroyo's regulations, the government could tax PhP5.90 billion in revenue from 20,629 taxpayers (Aspa, 2016).

World Bank data regarding tax revenues to the Philippine GDP shows a rapid increase in the Philippines for tax ratio in the Philippines from January 2022 to April 2022. It is a positive thing, but looking back at January 2021, it also experienced a drastic increase and decline gradually at the end of 2021. It should become the government's concern regarding the reason for the rapid rise at the beginning of the year but a gradual decline at the end of the year.

Tax Amnesty in Sri Lanka

Sri Lanka has also undertaken periodic tax amnesties to increase tax revenues. Sri Lanka has implemented tax amnesty 11 times (Waidyasekara, 2016). Some experts conclude that the tax amnesty in Sri Lanka was a failure. The first tax amnesty in Sri Lanka, launched in 1964, was unsuccessful due to time constraints. The second tax amnesty in 1965 continued the first tax amnesty. However, it succeeded in raising Rs 138 million, compared to the first tax amnesty, which could only collect Rs 20 million in undisclosed income. The third tax amnesty held in 1970 collected Rs 61 million in undisclosed income. In the fourth tax amnesty, taxpayers must pay their undisclosed income as a cash deposit.

In comparison, 30% of the deposit is allocated for taxes. The company can invest the remaining 70% in certain areas. In 1978, the Sri Lankan taxation committee did not recommend that the government restart the program as it would incentivize taxpayers to

wait until the tax amnesty program was re-launched in the future rather than pay the existing tax debts. The fifth tax amnesty in 1979 also used a similar scheme. The difference lies only in the reduced tax percentage of 20%.

Based on data from the World Bank regarding tax revenues to Sri Lanka's GDP in 2019, Sri Lanka's tax revenues tend to fall dramatically and have not achieved the results they used to. Trends are still fluctuating from April 2020 to April 2022. The Sri Lankan government must make a breakthrough to boost tax revenue and compliance with the submission of tax reports for the country's taxpayers so that tax revenues can return to 2019.

Tax Amnesty in Thailand

At the end of 2015, Thailand announced two tax amnesty laws to encourage taxpayers to comply with tax regulations. The tax amnesty is classified as very short, from January 1, 2016, to March 15, 2016 (Richter, 2016). This program is awarded to Thai partnership companies or legal experts with revenue of not more than 500 million Bath before December 31, 2015. As a result, around 40,000 companies decided to join the program (Praktikantin, 2016). However, no actual results have been found from the tax revenue collected by the government through this program.

Furthermore, additional tax exemption for small and medium enterprises in Thailand will be granted for one year and a 10% reduction for the following year, subject to terms and conditions. Moreover, suppose companies fail to register this tax exemption from January 1, 2016, to December 31, 2019. In that case, they "will not be able to apply for a loan from a commercial bank because the bank will then ask for tax records before considering a loan" (Aseng, 2017).

Based on data from the World Bank, tax revenue after tax amnesty in Thailand in 2019 tends to decrease until 2021. It is possible due to the impact of the covid-19 pandemic. Compliance in reporting and paying taxes must be boosted again after the post-pandemic economic recovery in 2022.

Tax Amnesty in Kazakhstan

Kazakhstan has approved the tax amnesty program with the legalization of assets three times. The first campaign was held in 2001, making \$480 million legal in just one month. The second legalization was undertaken in 2006-2007, generating \$6.8 billion in tax revenue from capital and property taxes. The three tax amnesty programs collected 5.7 trillion (about \$17 billion) from more than 140,000 taxpayers (Ibrahim et al., 2017).

Kazakhstan tax revenue data obtained is quarterly data from October 2019 to April 2022. Tax revenue from January 2022 tends to increase, showing that many taxpayers have deposited their tax obligations.

Tax Amnesty in South Korea

South Korea has implemented a tax amnesty program for individual and corporate taxpayers from October 1, 2015, to March 31, 2016. There is no penalty fee for those who will declare and pay overdue tax. There will be a daily fee for the overdue amount (0.03%) (Swire, 2015). The South Korean government will not take legal action against past tax evasion "unless the funds originate from criminal activity, such as embezzlement, breach of trust, or fraud." In addition, citizens must report income (domestic and foreign) while

"they are also required to report foreign financial accounts valued at more than 1 billion won (US\$848,540)" (Kim, 2015). Thus, through the efforts made for this program, the government hopes to collect revenue worth KRW500b or US\$424 million.

Based on tax revenue data from the World Bank for South Korea, the quarterly data obtained is from October 2019 to April 2022. The trend from April 2022 shows a decline. It should be a concern for the government to increase state tax revenues again with voluntary awareness (compliance) of the tax itself.

CONCLUSION

Asian countries have policies and regulations for implementing tax amnesty in their countries. Some have succeeded with their tax amnesty program, but many have failed. The offer to eliminate high fines only sometimes makes the tax amnesty program in that country successful. It needs support from various elements, especially information technology systems. Ease of reporting methods and guarantees of data confidentiality are also determining factors for a successful tax amnesty program. The government must guarantee their safety and good image by not leaking the data they use for their programs.

Tax revenue after the tax amnesty does not guarantee it will always increase. It can be seen from the tax ratios of several countries, which are only sometimes good and increasing. It means the government must continuously monitor taxpayer compliance in reporting and paying taxes.

There are several limitations to this study. First, this research is a literature review study that only collects and analyzes studies and data from other sources, so the data obtained is limited. Second, this research is limited to the number of times the country has implemented tax amnesty and its impact on state revenues being hit by the Covid-19 pandemic, so information related to state revenues can be biased. Therefore, suggestions for the direction of the following research agenda are to examine further whether the implementation of tax amnesty is. It is directly proportional to the increase in state revenue by expanding data and samples of countries that have carried out tax amnesty, as well as the implications and consistency of taxpayer tax reporting after amnesty tax.

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