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Community Empowerment and Tax Law Reform in Strengthening Consumer Protection: A Comparative Study of Indonesia, Nigeria, and India

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Abstract

The rapid expansion of the digital economy has intensified consumer protection challenges in developing countries, particularly in cross-border digital transactions where information asymmetry, price opacity, and limited regulatory capacity expose consumers to unfair commercial practices. While tax law has traditionally been regarded as an instrument for generating state revenue, its regulatory function offers significant potential to strengthen consumer protection in digital markets. This study examines the construction of tax law as a consumer protection instrument in Indonesia, India, and Nigeria, analyzes the role of community empowerment in supporting responsive tax reform, and formulates an integrated policy model based on a functional comparative approach. This research employs normative legal research using comparative, statutory, and conceptual approaches. The comparative analysis adopts the functional comparative method developed by Konrad Zweigert and Hein Kötz, while legal materials consist of legislation, judicial and policy documents, academic literature, and relevant institutional reports. The findings demonstrate that the three jurisdictions adopt different approaches to integrating tax law with consumer protection. Indonesia emphasizes market neutrality through digital value-added tax reform, India explicitly protects consumers through anti-profiteering provisions under the Central Goods and Services Tax Act 2017, whereas Nigeria primarily prioritizes fiscal revenue mobilization with limited consumer-oriented safeguards. The study further reveals that responsive regulation, co-regulation, fiscal literacy, and community participation significantly influence the effectiveness of tax law beyond formal legal norms. Accordingly, this study proposes an integrated model of responsive tax governance that combines substantive tax justice, co-regulatory institutional arrangements, community empowerment, and digital transparency mechanisms to strengthen consumer protection in digital commerce while accommodating the legal pluralism and institutional diversity of developing countries. This is in line with Sustainable Development Goals (SDGs) 12: Responsible Consumption and Production.

KEYWORDS *Community Empowerment, Tax Law, Consumer Protection, Comparative Law, Sustainable Development Goals (SDGs).*

Introduction

The development of the digital economy has fundamentally altered the patterns of transactions and the distribution of goods and services, thereby widening the information gap between business actors and consumers.[1] In many jurisdictions such as Indonesia, India, and Nigeria, the surge in trade transactions through electronic commerce systems is not always matched by supervisory capacity that is adaptable to cross-border practices. This inequality in access to information gives rise to new types of disputes, such as algorithm-based price manipulation and violations of consumer data protection, which have shifted from the traditional civil law domain to the realm of public regulation and fiscal policy.[2] The phenomenon reflects the widening digital information asymmetry between business actors and consumers, whereby consumers are structurally vulnerable to non-transparent business practices. This gap arises not only from the absence of regulation, but also from the divide between written legal norms and the State's capacity to implement them consistently in the digital sphere.

One public legal instrument with strategic potential to strengthen consumer protection is tax law. Tax law is predominantly understood as a means of state revenue collection,[3] however, its inherent regulatory dimension has the potential to serve as a consumer protection instrument through the realization of economic justice. Indirect taxes such as Value Added Tax (VAT) or Goods and Services Tax (GST) directly affect the

[1] Ibnu Sina Nur Ubay et al., "Legal Responsibility of Marketplaces in Online Buying and Selling Transactions in Indonesia," *Jurnal Legisci* 3, no. 4 (February 6, 2026): 340–68, https://doi.org/10.62885/legisci.v3i4.1058.

[2] Nurlaily Nurlaily et al., "Reassessing Consumer Protection in Digital Markets: Information Asymmetry as Epistemic Injustice in Indonesia and the Philippines," *Vifada Assumption Journal of Law* 3, no. 2 (December 25, 2025): 21–35, https://doi.org/10.70184/ggab5b91.

[3] Mohammed Saleh Al-Maghrebi and Mohd Rizal Palil, "The Role of Budget Transparency, Tax Knowledge and Tax Education in Tax Compliance: Evidence from Salaried and Self-Employed Taxpayers in Malaysia," *Journal of Accounting and Investment* 27, no. 1 (January 31, 2026): 314–40, https://doi.org/10.18196/jai.v27i1.28540.

position of consumers as the ultimate tax bearer,[4] so that tax policy design should take into account its impact on purchasing power and the legal position of consumers.

Indonesia, through Article 1 paragraph (2) letter c of Law Number 7 of 2021 concerning the Harmonization of Tax Regulations (Law HPP), affirms the objective of establishing a more equitable and legally certain tax system. This provision substantively demonstrates that the principle of fairness in tax law is not limited to the relationship between the state and taxpayers, but also opens the way for the expansion of the function of taxation beyond mere fiscal purposes towards consumer protection, particularly following the extension of VAT objects to Electronic Trade Transactions (ETT). The formulation of fairness in this provision remains general and does not explicitly refer to consumer protection, yet this principle provides a constitutional basis for tax policy reform oriented towards fairness for consumers as the ultimate tax bearer. At the same time, this addresses the limitations of Law Number 8 of 1999 concerning Consumer Protection (UUPK), which still relies on a reactive civil law approach one that has proven ineffective in detecting digital fiscal manipulation without empowering consumers with tax literacy.

Nigeria, under the Federal Competition and Consumer Protection Act (FCCPA) 2018, explicitly regulates the consumer right to price disclosure[5] in Section 115. This provision states that business actors must not display goods or services for sale without providing adequate price information to consumers. Violation of this provision is punishable by a fine of up to 100 million naira and imprisonment for company directors. Functionally, the right to price disclosure is closely linked to tax administration reform through the series of annual Finance Acts under the

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[4] Ezat Sabir Esmaeel, "The Impact of Direct-Indirect Taxation on Consumer," *IOSR Journal of Engineering* 03, no. 6 (June 2013): 08–13, https://doi.org/10.9790/3021-03620813.

[5] David Oluwadare Adetoro, "Highlights of Nigeria's Federal Competition and Consumer Protection Act 2018: An Overview," *Business Law Review* 42, no. 6 (December 1, 2021): 300–305, https://doi.org/10.54648/BULA2021041.

Federal Inland Revenue Service (FIRS),[6] however, their operational link has not yet been consolidated within a single macro policy framework. Consumer protection in Nigeria remains generally oriented towards price information without systematic integration with fiscal policy, so the potential of tax law as a protection instrument has not been fully utilized. This obstacle is further compounded by the federal structure that rigidly divides tax authority between the central government and State Boards of Internal Revenue,[7] so that the implementation of the FCCPA at the local level is also constrained by fiscal capacity and institutional imbalances among states.

India has developed a more progressive mechanism under the Central Goods and Services Tax (CGST) Act, 2017, which explicitly links tax policy with consumer protection.[8] Section 171 of the CGST Act provides for anti-profiteering measures, which require business actors to pass on the benefits of GST rate reductions or input tax credits to consumers through commensurate reductions in prices. This provision prohibits the practice of unjust enrichment, whereby corporations retain the benefits of tax incentives for themselves.[9] Section 57 of the CGST Act provides for the establishment of the Consumer Welfare Fund, which requires penalty funds from anti-profiteering violations to be allocated for consumer welfare.

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[6] Innocent Jooji et al., "The Federal Inland Revenue Service (FIRS), Tax Compliance and the Fight Against Corruption in Nigeria," *International Journal of Professional Business Review* 8, no. 9 (September 4, 2023): 1–12, https://doi.org/10.26668/businessreview/2023.v8i9.3359.

[7] Seun Bamidele, "Fiscal Federalism and Local Governments' Struggle for Autonomy in Nigeria," *Commonwealth Journal of Local Governance*, no. 30 (December 31, 2025): 111–27, https://doi.org/10.5130/zmfhr914.

[8] Ramesh K and Mahalakshmi N, "GST Awareness for Consumer Empowerment and Financial Literacy – An Exploratory Case Analysis," *International Journal For Multidisciplinary Research* 6, no. 5 (October 15, 2024): 1–12, https://doi.org/10.36948/ijfmr.2024.v06i05.28789.

[9] Jasmine V.M., "GST & Evolution of Tax System in India," *IRA-International Journal of Management & Social Sciences (ISSN 2455-2267)* 7, no. 1 (May 3, 2017): 65, https://doi.org/10.21013/jmss.v7.n1.p8.

India's normative framework demonstrates that tax law can function not only as a fiscal instrument but also as a redistributive mechanism that protects consumer interests. However, following the entry into force of the sunset clause in April 2025, the acceptance of new anti-profiteering complaints has been suspended[10] resulting in the shift of oversight responsibility from formal authorities to civil society. This transition demonstrates that without institutionalized community empowerment to monitor remaining disputes at the state level, digital consumer protection regulations will lose their enforcement power.

The effectiveness of tax law as a consumer protection instrument in the digital era cannot be explained solely by a rigid command-and-control approach; rather, it requires a framework of responsive regulation as developed by Ian Ayres and John Braithwaite. This theory proposes a graduated enforcement pyramid, where compliance by business actors is ensured through a combination of persuasion, fiscal transparency, incentives, and, at the top of the pyramid, severe criminal or tax penalties, tailored to the level of compliance of the actors.[11] The principle of co-regulation complements this framework by affirming that the oversight of large-scale digital transactions must not rely solely on formal fiscal authorities such as the Directorate General of Taxes in Indonesia, the Federal Inland Revenue Service in Nigeria, or the GST Council in India. Effective supervision absolutely requires the involvement of business associations and consumer communities as supervisory partners who have direct access to data on daily market practices.

Civic empowerment serves as an indispensable complementary element in tax law reform oriented towards consumer protection. The theory of civil empowerment explains that strengthening the capacity of citizens to understand, monitor, and utilize available legal instruments is an

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[10] Monika Yadav, "Sunset Clause for Anti-Profiteering under GST Regime," *The New Indian Express*, June 23, 2024, https://www.newindianexpress.com/business/2024/Jun/23/sunset-clause-for-anti-profiteering-under-gst-regime.

[11] Paulo De Sousa Mendes, "Responsive Regulation, Enforced Self-Regulation, and Corporate Liability," *Criminal Law Forum* 33, no. 4 (December 7, 2022): 285–321, https://doi.org/10.1007/s10609-022-09445-5.

essential prerequisite for ensuring that consumer protection,[12] not solely dependent on the initiatives of business actors or state bureaucratic intervention. In the digital ecosystem, civil society organizations and digital media play a vital role as advocacy channels that encourage business actors to be transparent in passing on the benefits of tax incentives or rate reductions to consumers.[13] An effective oversight system can only be achieved if the state and society are positioned as equal partners, rather than merely subjects and objects of regulation. Low fiscal literacy makes it extremely difficult for consumers themselves to detect irregularities such as the retention of incentive benefits or the manipulation of digital tax levies by business actors,[14] thus community empowerment is an absolute prerequisite for effective consumer protection through tax instruments. The integration of responsive regulation, co-regulation, and civil empowerment frameworks demonstrates that tax law reform and the strengthening of participatory oversight mechanisms are not separate agendas, but rather complementary elements within a distributed enforcement system.

Indonesia, Nigeria, and India share a common position as emerging economies with the largest digital consumer markets in their respective regions. All three countries are also undergoing extensive tax law reforms within a relatively close timeframe: Law Number 7 of 2021 concerning the Harmonization of Tax Regulations in Indonesia, the reform of the GST regime in India including anti-profiteering dynamics extending beyond 2025, and the series of Finance Acts in Nigeria. On the other hand, the three countries have distinct legal traditions and constitutional structures:

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[12] Sulistyowati Sulistyowati, Gusti Bintang Maharaja, and M. Rahman, "Legal Study on Mediation as an Alternative for Dispute Resolution in the State Administrative Court," *Journal of Law, Politic and Humanities* 6, no. 4 (June 1, 2026): 2542–52, https://doi.org/10.38035/jlph.v6i4.3345.

[13] Sam Hampton et al., "Multiple Roles of Business for Climate Action," *IScience* 28, no. 12 (December 2025): 1–18, https://doi.org/10.1016/j.isci.2025.114059.

[14] Harun Rashid, Hussein Warsame, and Shahid Khan, "Tax Collections and Democracy in Developing and Developed Countries," in *Global Encyclopedia of Public Administration, Public Policy, and Governance*, ed. Ali Farazmand (Cham: Springer International Publishing, 2022), 12593–97, https://doi.org/10.1007/978-3-030-66252-3_4097.

Indonesia is a unitary state with a civil law system, Nigeria operates under a federal government structure with a common law system, and India is governed by a quasi-federal structure with a common law system. These fundamental differences require a comparative approach that does not merely assume uniformity in legal systems. The use of the functional comparative method enables this study to identify patterns in the relationship between tax law reform and consumer protection that are both universal and context-specific, reflecting the socio-legal characteristics of each country.

The urgency of this study lies in the serious risk currently faced by fiscal policymakers in developing countries: the danger of adopting a pragmatic approach that treats tax law instruments merely as exploitative tools to achieve state revenue targets, without considering their impact on purchasing power and the legal position of consumers. This issue calls for in-depth analysis that takes into account internal legal pluralism and the socio-economic context of each country. If tax law reform in the digital era is not integrated with consumer protection and empowerment, then any form of fiscal incentive or tariff relief introduced by the state runs a high risk of evolving into hidden subsidies that foster unjust enrichment, while simultaneously leaving domestic consumers in a passive position bearing economic burdens without any guarantee of market fairness.

Research on consumer protection has developed from various perspectives, but few studies have linked it to the protective function of tax law in digital trade transactions. Rizaldy Alpiansyah et al. have shown that community empowerment through improving general legal literacy is an important instrument for addressing weaknesses in the consumer protection system; however, their study does not connect this to the importance of fiscal and tax literacy as a regulatory tool.[15] Akoh Ojonugwa, Joel, and Enejoh (2025) evaluated the effectiveness of consumer protection institutions in Kogi State, Nigeria, and found that limited institutional

[15] Rizaldy Alpiansyah, Irfan Alkhotiri, and Harsing, "Enhancing Community Legal Literacy As An Effort To Overcome The Weakness Of The Consumer Protection System In Goods Purchase Transactions," *Al Musa'adah : Journal of Community Service STAI Minhajul Haq* 1, no. 1 (February 27, 2026): 1–10, https://doi.org/10.66891/4r7z1x04.

capacity and low public awareness are the main obstacles to upholding consumer rights, although their study did not analyze the functional link between tax administration reform and digital consumer protection.[16] Meanwhile, Gupta and Singh (2024), through a comparative analysis of the Consumer Protection Act 2019 in India, emphasize the importance of harmonizing the consumer protection framework with the development of the digital economy. However, their discussion remains limited to the conventional consumer law regime and has not explored the role of tax law or the dynamics of fiscal pluralism in supporting consumer protection.[17]

This study is presented to fill the gaps in previous research by introducing a novel analytical framework that positions tax law and community empowerment as instruments for consumer protection within the digital trade ecosystem, employing a functional comparative legal approach. It integrates the theories of responsive regulation, co-regulation, community empowerment, and internal legal pluralism to explain the dialectical relationship between tax policy design, community empowerment, and the effectiveness of consumer protection in Indonesia, India, and Nigeria. Unlike previous studies that tend to examine consumer protection or tax law separately, this research analyzes the connection between the two within a comprehensive conceptual framework. Based on this framework, the study aims to analyze the construction of tax law as a consumer protection instrument in digital trade transactions, examine the role of tax literacy and the participation of civil society organizations in enhancing the effectiveness of tax law reform, and formulate a model for integrating responsive tax policy based on co-regulation and community

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[16] Akoh Ojonugwa, Joel Akowe, and Timothy Enejoh Omejeh, "An Assessment of the Effectiveness of Consumer Protection Agency in the Enforcement of Consumer Rights in Kogi State," *International Journal of Social Sciences and Management Research* 11, no. 1 (2025): 1–14, https://doi.org/10.56201/ijssmr.vol.11no1.2025.pg.1.14.

[17] Hariom Gupta and Amit Singh, "The Consumer Protection Act, 2019: A Comparative Analysis of Legislative Frameworks in India and Other Jurisdictions," *International Journal of Criminal, Common and Statutory Law* 4, no. 2 (July 1, 2024): 155–62, https://doi.org/10.22271/27899497.2024.v4.i2b.104.

empowerment through a functional comparative study of Indonesia, India, and Nigeria.

Methods

This is a normative legal study with an interdisciplinary approach, employing the comparative approach, statute approach, and conceptual approach. The normative legal study focuses on examining legal norms, legal principles, doctrines, and institutional frameworks that govern the relationship between tax law and consumer protection in digital trade transactions, while utilizing macroeconomic data as a sociological context. The comparative approach applies the functional comparative method developed by Konrad Zweigert and Hein Kötz—a method that compares how different legal systems resolve legal issues with the same function, regardless of similarities in legal tradition or institutional form. This approach is used to compare the regulation and implementation of tax law as a consumer protection instrument in Indonesia, India, and Nigeria, taking into account differences in legal systems, constitutional structures, and internal legal pluralism in each country. The statute approach is used to examine various regulations governing taxation and consumer protection, while the conceptual approach is employed to analyze the concepts of responsive regulation, co-regulation, community empowerment, tax fairness, and consumer protection as the basis for constructing legal arguments.

Legal materials are collected through literature study of primary legal materials, secondary legal materials, and non-legal materials relevant to the research focus. Primary legal materials include Law Number 8 of 1999 concerning Consumer Protection, Law Number 7 of 2021 concerning the Harmonization of Tax Regulations, as well as its implementing regulations relating to Value Added Tax on Electronic Trade Transactions (ETT); the Central Goods and Services Tax Act, 2017 (including transitional enforcement regulations following the 2025 sunset clause under the GST Appellate Tribunal); the Integrated Goods and Services Tax Act, 2017; the Federal Competition and Consumer Protection Act, 2018; the Companies

Income Tax Act; the Value Added Tax Act; and various Finance Acts in Nigeria related to digital tax reform and consumer protection. Secondary legal materials consist of books, national and international scientific articles, research findings, dissertations, reports of international organizations, and scholarly doctrines concerning tax law, consumer protection law, digital economy law, responsive regulation, and comparative law. Non-legal materials include digital trade transaction reports, reports from consumer protection institutions in Indonesia, India, and Nigeria, as well as other relevant non-legal documents.

One of the challenges in this study is the potential for bias arising from differences in legal language, limited access to judgments or local policy documents in India and Nigeria, and variations in terminology and tax institutional structures that may affect the interpretation of legal norms. To minimize this potential bias, the study utilizes official government documents, international organization publications, reputable academic journals, and employs source triangulation by comparing various academic references and legal documents of high authority. Legal materials are processed through the stages of inventory, classification, verification, and systematization in accordance with the research problem formulation. Inventory is conducted by collecting all statutory regulations, doctrines, judgments, policy documents, and academic literature relating to consumer protection and tax law reform in the three countries. Subsequently, all legal materials are classified according to their type, jurisdiction, and subject matter, then verified to ensure their validity, timeliness, and relevance before being systematically organized in accordance with the focus of discussion regarding the construction of the function of tax law, community empowerment, and the model for integrating tax policy.

The analysis of legal materials is carried out qualitatively using a descriptive-analytical method, through grammatical, systematic, and comparative interpretation of the legal norms applicable in each country. The comparative analysis is conducted based on the three functional stages outlined by Zweigert and Kötz: investigating the similarity of functions (tertium comparationis), mapping differences in regulatory mechanisms, and evaluating institutional factors that influence the effectiveness of tax law as an instrument for consumer protection in digital trade. Furthermore, the results of this analysis are integrated with a conceptual approach, drawing on the theories of responsive regulation, co-regulation, community empowerment, and legal pluralism, to formulate a model for integrating tax policy that is responsive, adaptive, and oriented toward strengthening digital consumer protection in Indonesia, India, and Nigeria.

Results and Discussion

I. Dimensions of Tax Regulation: Functional Construction of Tax Law as an Instrument of Consumer Protection in the Digital Economy

The development of the digital economy has transformed the way states exercise their taxation functions, particularly in dealing with electronic transactions involving cross-border business actors who have no physical presence in the market country. In this context, tax law is no longer understood solely as an instrument for state revenue collection (budgetary function), but also as a regulatory instrument that influences the economic behavior of society. Rochmat Soemitro explains that the regulatory function grants the state the authority to use taxation as a means to achieve specific objectives beyond fiscal interests, including establishing economic balance and protecting public interests.[18] This concept is highly relevant to digital trade, as the mechanism for levying Value Added Tax (VAT) or Goods and Services Tax (GST) directly affects the final price paid by consumers, who are the ultimate tax bearers. Therefore, the regulatory function of tax law needs to be repositioned as a preventive consumer protection instrument, particularly to ensure that digital tax policies not

[18] Batara Mulia Hasibuan, I Gusti Ayu Ketut Rahmi Handayani, and Waluyo Waluyo, "Legal System in Providing Income Tax Incentives in the Field of Investment Based on the Principle Of Nondiscrimination," in *International Conference On Law, Economic & Good Governance (IC-LAW 2023)* (Surakarta: Atlantis Press, 2024), 153–58, https://doi.org/10.2991/978-2-38476-218-7_24.

only increase state revenue but also create a fair, transparent, and accountable market mechanism.

This repositioning is theoretically grounded in the application of the principles of equality and certainty from Adam Smith's four canons of taxation, which serve as fundamental benchmarks for assessing whether the design of digital taxation treats consumers fairly.[19] The principle of equality requires that the fiscal burden be distributed proportionally to prevent price distortions between domestic products and cross-border goods,[20] while the principle of certainty demands absolute transparency regarding the amount and components of taxes charged to end consumers.[21] From the perspective of Gustav Radbruch's theory of the purpose of law, a sound tax system must be capable of balancing three fundamental values: justice, legal certainty, and expediency, without prioritizing any one value excessively. The principle of legal certainty is often given priority by fiscal authorities and global platform operators through administrative efficiency,[22] whereas the fulfillment of the principle of economic justice for end consumers can only be achieved if there is a design of public law that explicitly serves a protective function.

Indonesia has established the normative basis for taxation on digital transactions through Article 6 paragraph (13a) of Government Regulation in Lieu of Law Number 1 of 2020, which was subsequently enacted into Law Number 2 of 2020. This provision essentially grants the government the authority to levy Value Added Tax on the utilization of intangible taxable goods and/or taxable services from outside the Customs Territory

[19] Favourate Y. Mpofu and Tankiso Moloi, "Direct Digital Services Taxes in Africa and the Canons of Taxation," *Laws* 11, no. 4 (July 15, 2022): 57, https://doi.org/10.3390/laws11040057.

[20] Kimberly A. Clausing, "Lessons from Three Global Collective Action Problems," *SSRN Electronic Journal* 79, no. 1 (2026): 163–206, https://doi.org/10.2139/ssrn.6640698.

[21] J. Luzak et al., "ABC of Online Consumer Disclosure Duties: Improving Transparency and Legal Certainty in Europe," *Journal of Consumer Policy* 46, no. 3 (September 13, 2023): 307–33, https://doi.org/10.1007/s10603-023-09543-w.

[22] Kayode Akinsola, "Legal Frameworks for Corporate Tax Compliance: Navigating Local and Global Regulations" (Boston: SSRN, 2025), https://doi.org/10.2139/ssrn.5127003.

through Electronic Trade Transactions (ETT). It was implemented through Minister of Finance Regulation Number 48/PMK.03/2020, and further refined through Minister of Finance Regulation Number 60/PMK.03/2022 and Minister of Finance Regulation Number 81 of 2024 concerning digital-based tax administration, which integrates the Coretax System. In line with this, Article 1 paragraph (2) letter c of Law Number 7 of 2021 concerning the Harmonization of Tax Regulations affirms the objective of establishing a more equitable and legally certain tax system. This formulation demonstrates that the principle of justice is manifested through the creation of a level playing field between domestic and foreign digital business actors, thereby indirectly protecting consumers by eliminating price distortions caused by foreign tax avoidance.[23] Nevertheless, this fiscal norm has not been explicitly formulated as a consumer protection provision, meaning that the legal position of Indonesian consumers remains passive and dependent on free market mechanisms.

Indonesia's normative weakness lies in the fact that administrative legal certainty still tends to favor the interests of state tax collection administration and the designated global platforms, without being balanced by consumer transparency. The evolution of the ETT VAT regulatory framework from PMK 48/2020, PMK 60/2022, to PMK 81/2024—which integrates the Coretax System reflects Radbruch's orientation toward legal certainty that still prioritizes the efficiency of fiscal administration. The consolidation of monthly tax reporting under PMK 81/2024 is exclusively for internal data exchange between digital platforms and the Directorate General of Taxes, leaving end consumers without access to legal transparency mechanisms[24] to verify whether the 11% or 12% VAT component deducted from their digital wallets has actually been remitted to the state treasury. Consequently, consumers are unable to determine

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[23] Jonker Sihombing, "Legal Optimization of Digital Tax Administration in Indonesia: Case of Coretax," *Journal of Law, Politic and Humanities* 6, no. 2 (December 20, 2025): 1149–61, https://doi.org/10.38035/jlph.v6i2.2720.

[24] Naufal Rizqiyanto et al., "Tax Regulation Challenges in the Digital Economy Era: Legal Analysis and Implications in Indonesia," *Trunojoyo Law Review* 7, no. 1 (January 14, 2025): 65–102, https://doi.org/10.21107/tlr.v7i1.28540.

whether this levy is being unilaterally retained by the platform as hidden profit or remitted in accordance with regulations. Thus, the principle of legal certainty in Indonesia is only satisfied at the fiscal-administrative level, while still disregarding the fundamental right of consumers to price disclosure a key element of consumer protection in the digital era.

Unlike Indonesia, Nigeria's digital economy tax reform was primarily designed to expand the tax base and strengthen state revenue capacity. The Finance Act 2019 amended Section 13(2) of the Companies Income Tax Act (CITA) by introducing the principle of Significant Economic Presence (SEP), which was subsequently operationalized through the Companies Income Tax (Significant Economic Presence) Order 2020 to impose tax on the income of non-resident digital corporations that generate profits from the Nigerian domestic market without a physical presence. The Finance Act 2020 amended Section 10 of the Value Added Tax Act (VAT Act), requiring foreign digital service providers to register, collect, and remit VAT to the Federal Inland Revenue Service (FIRS), accompanied by an increase in the VAT rate from 5% to 7.5%[25] through the amendment of Section 4 of the VAT Act. This entire digital tax reform design was developed exclusively to expand and mobilize state revenue in order to address the fiscal crisis resulting from fluctuations in oil and gas sector revenues,[26] without incorporating a redistributive dimension that favors the bargaining power of consumers. Nigeria's digital tax reform is not designed to directly protect consumers, but rather to optimize state revenue from the rapidly growing digital economy.

The nature of consumer protection in Nigeria's legal framework differs fundamentally from India's approach, as Nigerian tax law does not develop equivalent anti-profiteering measures. The primary focus of regulation lies in the effectiveness of tax collection through administrative

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[25] Majebi Samuel Amune, "Legal Implications Of Value Added Tax On Electronic Commerce Transactions In Nigeria," *African Journal of Legal Research* 3, no. 3 (January 10, 2025): 174–99, https://doi.org/10.1787/3a2b78e8-en.

[26] Ewuga Anzule et al., "Moderating Effect of Digitalisation on the Relationship Between Petroleum Revenue and Budget Performance in Nigeria," *International Journal of Research and Innovation in Social Science* 10, no. 3 (2026): 2620–54, https://doi.org/10.47772/IJRISS.2026.100300190.

mechanisms, including the application of the reverse charge mechanism—which shifts the obligation to collect tax to a resident party under certain conditions as stipulated in Section 10 of the Value Added Tax Act, where foreign suppliers fail to fulfill their VAT collection duties.[27] Richard Bird and Eric Zolt, through their theory of tax administrative capacity, explain that countries with limited fiscal institutional capacity tend to adopt regulatory designs that are simple, easy to monitor, and entail low administrative costs, rather than establishing complex oversight systems.[28] Consumer protection in Nigerian fiscal law is only realized through the provision of exemption clauses from VAT for micro and small enterprises with a turnover below 25 million Naira, as stipulated in Section 15 of the VAT Act. Consequently, the legal position of consumers in Nigeria remains passive and entirely dependent on free market mechanisms and general business competition oversight.

India has developed its digital tax legal framework along two paths: the income-based approach and the consumption-based approach. Prior to its abolition on 1 April 2025, the income-based path was regulated under Section 165 and Section 165A of the Finance Act 2016, as amended by the Finance Act 2020. It introduced the Equalization Levy on digital transactions conducted by non-resident business actors, serving as an instrument to establish tax equity in the digital economy.[29] The termination of the income-based approach led India to shift its focus on consumer price protection entirely to the second path, the consumption-based approach: the GST regime applicable to Online Information Database Access and Retrieval (OIDAR) services, which requires foreign digital service providers

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[27] Awa Diouf and Hannelore Niesten, "Tracking and Taxing Cross-Border Digital Transactions: The Case of VAT in Senegal" (Senegal, August 2025), https://doi.org/10.19088/ICTD.2025.043.

[28] Richard M. Bird, "Fiscal Decentralization and Decentralizing Tax Administration: Different Questions, Different Answers," *SSRN Electronic Journal*, 2015, 1–17, https://doi.org/10.2139/ssrn.2694651.

[29] Martha Kanama, "Bridging the Digital Tax Gap: A Comparative Analysis of Online Business Taxation in Tanzania," *International Journal of Law and Society* 8, no. 4 (December 9, 2025): 320–27, https://doi.org/10.11648/j.ijls.20250804.15.

to register for GST in business-to-consumer (B2C) transactions.[30] This second path is directly reinforced by Section 171 of the Central Goods and Services Tax (CGST) Act, 2017, through the anti-profiteering mechanism, which requires business actors to pass on any benefits from GST rate reductions or input tax credits to consumers through commensurate reductions in prices.[31] The accumulated penalty funds from violations of this provision are allocated to the Consumer Welfare Fund under Section 57 of the CGST Act, 2017 , making India the only jurisdiction among the three that has successfully constructed the function of indirect tax law as an explicitly institutionalized consumer protection instrument through a transitional mechanism.

Redistributive justice forms the philosophical basis of India's tax law framework, where the Delhi High Court has consistently interpreted Section 171 of the CGST Act, 2017 as a protective provision aligned with constitutional objectives of economic justice, by prohibiting corporate unjust enrichment. This design reflects the application of John Rawls' difference principle in justice theory, which holds that economic benefits arising from fiscal policy reform should be explicitly directed toward strengthening the position of the structurally disadvantaged parties,[32] namely end consumers. Although the entry into force of the sunset clause on 1 April 2025 has suspended the acceptance of new anti-profiteering complaints, the protective rights of Indian consumers continue to be upheld through the resolution of existing pending disputes, which are now

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30 Kathryn James and Thomas Ecker, "Relevance of the OECD International VAT/GST Guidelines for Non-OECD Countries," *Australian Tax Forum* 32, no. 2 (2017): 317–76, https://doi.org/https://search.informit.org/doi/10.3316/informit.948826606169996.

31 Pallavi Rai and Chandra Shekhar, "From Tax Relief to Market Reality: Assessing the Government of India's Role in Ensuring Price Reductions Post-GST," *Mahat Research and Advisory*, 2025, 1–18, https://doi.org/https://doi.org/10.13140/RG.2.2.26721.57448.

32 Kweku Adams and Jay Cullen, "Distributive Justice and Tax Avoidance in Emerging Economies: A Rawlsian Analysis of Multinational Structures, Professional Complicity and Legal Reform," *Critical Perspectives on International Business*, April 14, 2026, 1–24, https://doi.org/10.1108/cpoib-11-2025-0252.

overseen by the Principal Bench of the GST Appellate Tribunal (GSTAT).[33] This transition demonstrates that consumer protection through tax instruments in India is not temporary, but has become an integral part of the institutionalized tax legal system. Consequently, Indian consumers have a strong public legal basis through the pursuit of compensation for ongoing disputes at the GSTAT level, as well as access to the Consumer Welfare Fund for market education in cases where digital corporations are found to have engaged in price manipulation.[34]

Table 1. Comparison of the Construction of the Function of Tax Law in Consumer Protection in Indonesia, Nigeria and India

Dimensions	Indonesia	Nigeria	India
Legal Basis for Digital Taxation	Article 6 paragraph (13a) of Perppu No. 1/2020 in conjunction with Law No. 2/2020; PMK 48/2020 in conjunction with PMK 60/2022 in conjunction with PMK 81/2024; Article 1 paragraph (2)	Section 13(2) CITA jo. SEP Orders 2020; Sections 4, 10, and 15 Value Added Tax Act jo. Finance Act 2019/2020.	Section 165 & 165A of the Finance Act, 2016 (Till April 2025); Section 171 & Section 57 of the CGST Act, 2017; GSTAT Transition Rules (2025-2026).

[33] Tejnarayan Thakur and Aribam Debala Devi, "GST Reforms 2025 and The New Tax Regime in India: Towards Simplified Taxation or Added Complexity," *Journal of Economics, Management and Trade* 31, no. 12 (December 15, 2025): 94–113, https://doi.org/10.9734/jemt/2025/v31i121375.

[34] Neelam Chawla and Basanta Kumar, "E-Commerce and Consumer Protection in India: The Emerging Trend," *Journal of Business Ethics* 180, no. 2 (October 9, 2022): 581–604, https://doi.org/10.1007/s10551-021-04884-3.

	letter c of Law No. 7/2021 (HPP Law).		
Function of Tax Law	*Regular:* Equal market treatment and prevention of price distortion.	*Budget Air:* Mobilization of state revenue and extension of the fiscal base.	*Regulerend*: Redistributive justice and protection of consumer surplus.
Consumer Protection Mechanism	Indirect (*Level Playing Field / Competitive* Price Neutrality).	Incidental (VAT exemption for micro/SME business partner consumers).	Direct (Anti-Profiteering Measure, GSTAT, and Consumer Welfare Fund)
Tax Justice	*Certainty & Equality Principle* (Adam Smith; Purpose of Radbruch's Law).	*Administrative Capacity Theory* (Richard Bird & Eric Zolt).	*Distributive Justice* (John Rawls; Constitutional Socio-Economic Justice).
Political Orientation of Law	Post-pandemic fiscal consolidation and system efficiency through integrated digitalization (Coretax).	Extending the digital tax base to reduce dependence on natural resources.	Social welfare, correction of market intervention, and prevention of *unjust enrichment*.

Source: Author

A comparative analysis of the normative characteristics across the three jurisdictions reveals distinct gradations in the construction of the function of digital indirect tax law. Indonesia, with its primary legal basis consisting of Article 6 paragraph (13a) of Government Regulation in Lieu of Law No. 1 of 2020 read together with Law No. 2 of 2020, Minister of Finance Regulations 48/2020 read together with 60/2022 read together with 81/2024, and Article 1 paragraph (2) letter c of Law No. 7 of 2021, emphasizes the regulatory function through equal market treatment and the prevention of price distortions, with consumer protection operating indirectly via a level playing field and competitive price neutrality. Nigeria, based on Section 13(2) of the Companies Income Tax Act read together with the SEP Order 2020, and Sections 4, 10, and 15 of the VAT Act read together with the Finance Acts 2019/2020, emphasizes the budgetary function through the mobilization of state revenue and the expansion of the fiscal base, with consumer protection being incidental, achieved through exemptions from VAT burdens for micro and small enterprise customers. India, through Sections 165 and 165A of the Finance Act 2016 until April 2025, Sections 171 and 57 of the CGST Act, 2017, and the transitional rules of GSTAT 2025–2026, emphasizes the regulatory function through redistributive justice and the protection of consumer surplus, with consumer protection being direct, achieved through anti-profiteering measures, the GSTAT, and the Consumer Welfare Fund. These differences reflect varying theoretical foundations of tax justice: the principles of certainty and equality from Adam Smith and Radbruch's theory of the purpose of law in Indonesia; Bird and Zolt's theory of administrative capacity in Nigeria; and John Rawls' distributive justice and constitutional socio-economic justice in India.

The legal policy behind these differences in fiscal design demonstrates that tax policy choices always reflect a country's national priorities at a given time and are never socio-politically neutral. Indonesia directs its digital tax reform toward post-pandemic national economic consolidation and strengthening data-based oversight systems through the Coretax System, which reflects an orientation toward administrative efficiency and legal certainty for fiscal authorities. Nigeria faces severe budget deficits resulting from volatility in the oil and gas commodity market, so its tax law reform is entirely geared toward expanding the tax base to ensure state fiscal resilience, rather than considering price fairness for digital consumers. Meanwhile, India positions consumer economic rights as part of a broader constitutional agenda concerning social welfare and distributive justice, which is reflected in the existence of anti-profiteering measures and the Consumer Welfare Fund as institutionalized consumer protection instruments. These differing orientations in legal policy show that tax law cannot be understood as a value-neutral instrument; rather, it always reflects the political choices and national development priorities of each country.

The construction of tax law as a consumer protection instrument in digital trade transactions in developing countries has proven to be gradual, layered, and highly contextual, thereby refuting any generalization that all developing countries treat tax law according to a uniform administrative-fiscal paradigm. The effectiveness of consumer protection through tax law depends heavily on the extent to which the principles of tax justice are elaborated and the direction of each jurisdiction's legal policy, which in turn is influenced by fiscal institutional capacity, constitutional structure, and fiscal pressures faced. From a functional comparative perspective, Indonesia and Nigeria have significant opportunities to adopt redistributive elements and price transparency similar to India's anti-profiteering model, in order to address the information asymmetry that has long disadvantaged consumers as the bearers of indirect tax burdens. Conversely, India could adopt Nigeria's withholding tax administrative efficiency and Indonesia's digital reporting consolidation through the Coretax System, to close compliance gaps for cross-border non-resident digital platforms that have long caused fiscal leakage. Accordingly, tax law reform oriented toward consumer protection requires an approach that is not only normative but also institutional, taking into account the administrative capacity and socio-economic context of each country, so that consumer protection can be effectively realized.

II. Distributed Law Enforcement Ecosystem: Community Empowerment, Co-Regulation, and the Dynamics of Legal Pluralism

The effectiveness of a legal norm is determined not only by its quality of formulation but also by the extent of its acceptance and implementation in society. This view aligns with the theory of living law put forward by Eugen Ehrlich, which explains that the law that actually governs social conduct is that which emerges from social consciousness, rather than merely the written law contained in state statutes.[35] In the context of utilizing tax law as a consumer protection instrument, this social consciousness is manifested in the form of fiscal literacy, which encompasses citizens' critical understanding of their economic rights as the ultimate bearers of indirect tax burdens.[36] Fiscal literacy is also manifested through the active participation of civil society organizations in monitoring the implementation of digital fiscal policies on the ground, ensuring that these policies do not remain as merely dormant regulatory texts. Without these two elements, tax law norms that are theoretically oriented toward protecting digital consumers risk becoming functionally ineffective and losing their influence in actual market practice.

Ian Ayres and John Braithwaite, in their theory of responsive regulation, formulated a model for monitoring legal compliance in the form of a graduated enforcement pyramid. This model places education, persuasion, and self-regulation at the base, while coercive and criminal sanctions are positioned at the top.[37] Within this framework, state coercive intervention increases gradually when the mechanisms at the lower levels

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[35] Marcos Augusto Maliska, "Ehrlich, Eugen," in *Encyclopedia of the Philosophy of Law and Social Philosophy* (Dordrecht: Springer Netherlands, 2023), 850–56, https://doi.org/10.1007/978-94-007-6519-1_602.

[36] Amalia Novoa-Hoyos, Lucie Depoo, and Enrique Jiménez-Rodríguez, "Role of Financial Literacy and Awareness of Tax Impacts in an Emerging Economy Facing Tax Reform," *Economics & Sociology* 15, no. 1 (2022): 222–40, https://doi.org/10.14254/2071-789X.2022/15-1/14.

[37] De Sousa Mendes, "Responsive Regulation, Enforced Self-Regulation, and Corporate Liability."

become ineffective, thereby placing *community empowerment* in a strategic position at the base of the pyramid. Strengthening fiscal literacy serves as an early preventive instrument that reduces information asymmetry without incurring high bureaucratic costs,[38] while the organized participation of civil society acts as an early detection mechanism to identify the retention of fiscal benefits by digital platforms. Consequently, community empowerment becomes a fundamental element that enables the state to avoid costly and counterproductive coercive sanctions, as compliance can be achieved through persuasion and legal awareness from the outset.

The concept of co-regulation, developed by Julia Black, asserts that regulatory governance in modern complex societies can no longer rely on a one-way hierarchical relationship between the state and citizens; rather, it requires a proportional distribution of oversight functions.[39] The effectiveness of law enforcement depends on the division of roles among state authorities, business associations, and civil society groups, each of which possesses different access to information regarding daily market realities. When applied to tax law as an instrument for digital consumer protection, the principle of co-regulation dictates that fiscal authorities cannot unilaterally ensure price compliance by global platforms without supervisory partners from business associations and consumer bodies. E-commerce business associations enforce internal compliance codes among their members, while consumer organizations serve as the primary channel for collecting public complaints when corporations retain tax benefits. Thus, co-regulation offers a partnership model that enables distributed and more efficient oversight compared to a single command approach by the state.

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[38] Ivana Katnic et al., "Understanding the Role of Financial Literacy in Enhancing Economic Stability and Resilience in Montenegro: A Data-Driven Approach," *Sustainability* 16, no. 24 (December 17, 2024): 11065, https://doi.org/10.3390/su162411065.

[39] Magdalena Stratmann et al., "Visualizing Regulatory Ecosystems: A New Approach to Mapping EU Regulations as Architectures–The Case of the AI Act," *Computer Law & Security Review* 61 (July 2026): 1–16, https://doi.org/10.1016/j.clsr.2026.106333.

The implementation of the co-regulation principle in Indonesia is evident through the establishment of the Volunteer Tax Program for the Nation, now known as Renjani, and coordinated by the Directorate General of Taxes. This program involves universities through their Tax Centers, the Indonesian Association of Tax Consultants, and deploys trained students as outreach agents at the level of Tax Service Offices.[40] Methodologically, Renjani reflects elements of co-regulation, as it has successfully distributed the burden of tax education previously a sole monopoly of the state to non-state actors with institutional capacity on the ground. However, the Renjani program is currently still limited to a formal orientation focused on improving administrative compliance, such as filing annual tax returns[41] and has not been functionally adapted to safeguard consumer protection rights against exploitation from digital VAT burdens in electronic trade transactions. This operational gap constitutes a significant barrier to mitigating practices of unjust enrichment that can structurally harm consumers.

Unlike conventional consumer protection frameworks, which already have formal complaint channels through the Indonesian Consumer Foundation and the National Consumer Protection Agency, Indonesia lacks an institutional integration that links digital fiscal compliance issues with substantive consumer rights. The current design of Indonesia's digital taxation system, including the implementation of the Coretax System under Minister of Finance Regulation Number 81 of 2024, is strictly structured around a taxpayer-centric approach that only establishes communication channels between taxpayers and tax authorities.[42] The

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[40] Nova Ayunda Pasha, "Peran Pendampingan Mahasiswa MBKM Dalam Program Renjani Terhadap Optimalisasi Pelayanan Wajib Pajak Di KPP Bangkalan," *Jurnal Pengabdian Kolaborasi Dan Inovasi IPTEKS* 3, no. 2 (April 30, 2025): 522–52, https://doi.org/10.59407/jpki2.v3i2.2290.

[41] Riswari Asri Rabbani, Irwan Harefa, and Yananto Mihadi Putra, "The Role of Tax Volunteers for the Nation in Enhancing Tax Compliance and Tax Literacy at KPP Pratama Jakarta Kembangan," *Pelita : Jurnal Penelitian, Terapan Dan Aplikatif* 2, no. 2 (June 26, 2025): 79–86, https://doi.org/10.70550/pelita.v2i2.226.

[42] Irwan Aribowo et al., "Assessing Tax Reform as a Journey to Tax Administration," *KnE Social Sciences*, March 15, 2022, 503–524, https://doi.org/10.18502/kss.v7i5.10574.

absence of an integrated complaint data system connecting the Directorate General of Taxes with national consumer bodies means that tax literacy and consumer protection literacy operate along two fragmented institutional pathways. This gap in legal infrastructure indicates that the co-regulation model in Indonesia has only been established at the level of pure taxpayer compliance, and has not yet expanded into an integrated mechanism for protecting digital consumers. Consequently, Indonesian consumers lack a specific channel to report alleged fiscal violations that are linked to their consumer protection rights in digital transactions.

In Nigeria, the vitality of the civil society movement is strongly represented by the Civil Society Legislative Advocacy Centre (CISLAC), which collaborates with the Tax Justice Network Africa (TJNA) to advocate for more progressive tax reform.[43] The civil society coalition actively conducts critical reviews of excessive tax incentives granted to digital corporations and advocates for addressing horizontal tax burden disparities among socio-economic groups in Nigeria,[44] thus demonstrating the strong role of public participation in influencing the direction of the federal government's macro fiscal policy. Nevertheless, the advocacy focus of CISLAC and TJNA remains entirely centered on the equitable distribution of tax burdens among different social groups, and has not yet addressed the strategic intersection between the function of indirect tax law, or Value Added Tax, and the enforcement of consumers' right to price transparency in digital transactions. On the other hand, Section 115 of the Federal Competition and Consumer Protection Act (FCCPA) 2018 explicitly provides for consumers' right to price disclosure, yet this provision has not been integrated with digital tax policy within the framework of civil society advocacy. This confirms that community empowerment in Nigeria remains confined to issues of macro fiscal justice

[43] Ma Josep Cascant-Sempere, "Grounding ActionAid's Tax Justice Campaigns in Nigeria," *Development and Change* 53, no. 3 (May 18, 2022): 525–50, https://doi.org/10.1111/dech.12709.

[44] Olatunde Julius Otusanya, Jia Liu, and Sarah George Lauwo, "Influence of Tax Dodging on Tax Justice in Developing Countries: Some Theory and Evidence from Sub-Saharan Africa," *Journal of Financial Crime* 30, no. 2 (February 2, 2023): 332–60, https://doi.org/10.1108/JFC-01-2022-0012.

and has not yet been translated into direct protective instruments for consumers within the digital trade ecosystem.

Nigeria's federal constitutional structure rigidly divides taxing authority between the Federal Inland Revenue Service (FIRS) at the central level and the State Boards of Internal Revenue at the state level[45] thereby widening the gap in market oversight capacity across regions. Areas with a highly developed digital economy, such as Lagos State, face a far higher volume of digital transaction tax disputes compared to inland regions,[46] yet this high level of economic exposure has not been matched by the availability of local consumer complaint channels that are functionally integrated with fiscal compliance issues. Without a unified formal mechanism comparable to India's National Consumer Helpline, Nigerian citizens' ability to ensure that tax incentives are passed on to consumers depends entirely on national-level civil society advocacy organizations, whose operational scope is highly limited. Civil society groups in Nigeria are unable to reach individual consumers at the grassroots level directly due to resource constraints and extensive geographical coverage. Consequently, consumers in regions with low fiscal institutional capacity lack adequate access to protection for their rights to price fairness in digital transactions.

India demonstrates a more integrated co-regulation model in responding to GST rate adjustments following recent price disputes, where the Central Board of Indirect Taxes and Customs (CBIC) acts as the macro-level supervisor of price movements for digital commodities.[47] CBIC is supported by regular sensitization of trade associations to pass on the benefits of input tax credit to the public,[48] while at the grassroots level,

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45 Udonna Ezeani, "Taxing Powers In Nigeria: Constitutional Framework" (Nigeria: Afe Babalola University, 2025), https://doi.org/10.2139/ssrn.5250333.

46 Uchenna Vivian Anioke, "Digital Tax Administration And Revenue Generation In Lagos State, 2008-2018," *European Journal of Political Science Studies* 7, no. 2 (September 18, 2024): 128–66, https://doi.org/10.46827/ejpss.v7i2.1816.

47 Saptarshi Datta, Himanshu Thakkar, and Siddharth Dabhade, "Combating GST Input Tax Credit Fraud In India: Forensic Accounting, Data Analytics, And Legal Enforcement Strategies," *International Journal of Management, Public Policy and Research* 5, no. 1 (March 31, 2026): 37–48, https://doi.org/10.55829/ykz3ea41.

48 Manika Gandhi and Shipra Gupta, "Harmonization of IBC and Tax Laws: Does India Need a Separate Tax Treatment Framework for MSMEs Under CIRP and

consumers are provided with extensive facilities to report suspected price discrepancies via the National Consumer Helpline (NCH) and the Integrated Grievance Redressal Mechanism (INGRAM) portal.[49] Given the application of the sunset clause in Section 171 of the Central Goods and Services Tax (CGST) Act, 2017, which has suspended the acceptance of new anti-profiteering complaints, the interconnection function between the NCH and CBIC has transformed into a mechanism for collecting community-based dispute evidence. Verified complaint data is systematically converted into case files for ongoing disputes, which are then reviewed at the GST Appellate Tribunal (GSTAT) level. This creates an effective cycle of participatory oversight involving the state, industry associations, and individual consumers. This model demonstrates that India has successfully converted public participation into a legal instrument with evidential weight in digital tax disputes.

The implementation of co-regulation in India faces structural challenges stemming from the dual nature of the GST system—administered by the central government through Central GST and by state governments through State GST which results in varying levels of law enforcement capacity across regions. Access to digital complaint infrastructure such as the INGRAM portal and the public's level of fiscal literacy remains highly uneven between urban economic centers and digitally isolated inland areas, meaning that consumer protection effectiveness is not uniform across the country. To address this gap, civil society organizations such as CUTS International actively advocate for market policies and provide consumer education at the local level, reaching communities that lack access to digital complaint channels.[50] However, the

Liquidation?," *IUP Law Review* 16, no. 1 (2026): 59–82, https://doi.org/10.71329/IUPLR/2026.16.1.59-82.

[49] Akash Gupta, Arushi Bajpai, and Janani Sivaraman, "Consumer ADR in India," in *Consumer Alternative Dispute Resolution in Emerging Economies*, ed. Eda Sahin-Sengül and Serkan Kaya (London: Routledge, 2025), 16, https://doi.org/10.4324/9781032689739.

[50] Vladyslav Teremetskyi et al., "Consumers Rights in the Field of Electronic Trade in Medicinal Products: Legal Challenges and Global Harmonization Trends," *Journal*

independent involvement of civil society organizations in specific issues of digital tax manipulation remains very limited and tends to depend on official partnership programs opened by the state, rather than being independent movements that emerge organically from the grassroots. This phenomenon shows that the co-regulation model in India is largely driven by top-down state initiatives that provide legal instruments, rather than being propelled by independent civil society movements.

Table 2. Comparison of Community Empowerment Levels in Indonesia, Nigeria and India

Dimensions	Indonesia	Nigeria	India
Community-Based Tax Literacy Program	Tax Volunteer Program for the Nation (Renjani) — Collaboration between the Directorate General of Taxes, IKPI, and university Tax Centers.	Macro fiscal policy advocacy by CISLAC and the Tax Justice Network Africa coalition.	CBIC's public campaign following the 2025 GST tariff reforms; development of interactive FAQs and cross-digital media outreach.
Consumer Participation Fiscal Issues Related Channels	Not yet available; YLKI and BPKN are handling the general consumer issue conventionally, separate from	There is no dedicated complaint channel yet; oversight relies heavily on policy advocacy at the national level.	*National Consumer Helpline (NCH)* and the INGRAM portal, linked to CBIC data as evidence base for disputes at

of Pioneering Medical Sciences 14, no. 04 (May 5, 2025): 113–19, https://doi.org/10.47310/jpms2025140415.

	the DGT digital tax database.		the GSTAT level.
Main Orientation of Civil Society Movement	Administrative compliance of domestic taxpayers (compliance-oriented).	Fairness of horizontal distribution of fiscal burden between socio-economic groups (equity-oriented).	Protection of consumer material rights regarding the continuation of tariff reduction benefits (consumer-protective).
The Impact of Internal Legal Pluralism	Variations in regional autonomy affect the reach, facilities, and educational effectiveness of local tax volunteer programs.	The federal structure influences acute fiscal institutional capacity gaps between states.	The dual GST structure (central-state) impacts equitable internet access and the reliability of digital complaint channels.
Maturity Level of Co-Regulatory Model	**Medium** — The co-regulatory structure is still limited to the pure taxpayer reporting compliance dimension.	**Low** — Civil movement participation has not been able to touch the protective function of taxes for micro consumers.	**Tall** — Co-regulation has encompassed the complete cycle of price monitoring and consumer protection.

Source: Author

A comparison of the level of maturity of community empowerment across the three jurisdictions reveals that Indonesia, with its Renjani program, is at an intermediate stage, as the co-regulation structure remains limited to the dimension of pure taxpayer reporting compliance. India is at a high level, as co-regulation has fully covered the cycle of price monitoring and consumer protection through the integration of the NCH and INGRAM portal with the CBIC, which serves as the evidence base for disputes at the GSTAT level. Nigeria is at a low level, since the participation of civil society movements represented by CISLAC and TJNA has not yet extended to the protective function of tax law for micro-consumers, and remains focused on general advocacy for macro fiscal policies. The impact of internal legal pluralism also varies: regional autonomy in Indonesia affects the reach and effectiveness of local tax volunteer education programs, while India's dual GST structure influences the equitable distribution of internet access and the reliability of digital complaint channels across states. In Nigeria, the federal structure consistently contributes to severe disparities in fiscal institutional capacity among states, thereby hindering the implementation of uniform consumer protection across the country..

The existence of a responsive regulatory framework and the principle of co-regulation does not automatically result in effective community empowerment on the ground unless supported by a concrete institutional architecture. The effectiveness of civil society movements depends heavily on the availability of an institutional structure that connects citizens and fiscal authorities in an interdisciplinary manner, as demonstrated by the integration of the National Consumer Helpline and the INGRAM portal with the CBIC in India. This success cannot be attributed solely to the presence of abstract protective norms such as Section 171 of the CGST Act, 2017; rather, it requires operational mechanisms that enable public participation to be converted into evidential weight in legal disputes. Indonesia and Nigeria, despite possessing abundant social capital in the form of student volunteer programs and the vitality of civil society coalitions, have not yet been able to translate this capital into participation channels specifically designed to safeguard consumer rights in digital tax law. This confirms that effective co-regulation demands deliberate institutional design, rather than emerging purely organically from social consciousness alone without the support of adequate legal infrastructure.

The three jurisdictions clearly demonstrate that the dimension of internal legal pluralism, manifested through regional autonomy in Indonesia, the dual GST structure in India, and the federal system in Nigeria, consistently acts as a limiting factor that affects the equitable effectiveness of civil society empowerment at the local level. Consequently, the success of co-regulation implementation in one developed region cannot be generalized as representative of systemic success across the entire nation, since each area has significantly different institutional capacity, access to technology, and levels of fiscal literacy. Strengthening tax law reform as an instrument for consumer protection in developing countries requires the design of fiscal policies that take into account variations in local capacity and institutional pluralism, rather than imposing a rigid, uniform, one size fits all approach. States should adopt an asymmetric strategy that provides room for adaptation in regions with limited capacity such as simplifying complaint procedures or strengthening the role of local civil society organizations as supervisory partners. In this way, consumer protection through tax law can be realized more equitably and fairly across all regions of developing countries with high internal socio-legal diversity.

III. Construction of a Responsive and Participatory Tax Model for Sovereign Consumer Protection

Roscoe Pound viewed law as a tool of social engineering, namely an instrument used by the state to direct social change towards the broader interests of society.[51] The concept affirms that law is not merely sufficient to maintain order, but must also be capable of shaping social conduct to reflect values of justice. Based on this epistemological premise, the proposed integration model is not merely the addition of cosmetic technical clauses, but a complete paradigm shift that views tax law as a public instrument. Digital tax policy in developing countries must be deliberately designed to

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[51] Hamdan Purnama and Iskandar Iskandar, "A Critical Analysis of Social Engineering Theory in the Context of Legal Development in Indonesia," *ULIL ALBAB : Jurnal Ilmiah Multidisiplin* 3, no. 12 (November 5, 2024): 54–67, https://doi.org/10.56799/jim.v3i12.5812.

serve market justice for consumers, rather than being subordinated to the short-term pragmatism of pursuing state revenue targets. This paradigm shift is a fundamental prerequisite to ensure that digital tax law does not lose its social relevance amid the increasingly complex and massive dynamics of the digital economy.

The first pillar of the proposed integration model is grounded in John Rawls' theory of justice, particularly the difference principle. Rawls explains that inequalities are justified only if they bring the greatest benefit to the least advantaged groups in society.[52] Every reduction in tax rates, grant of fiscal incentives, or provision of input tax credits must be legally designed to flow directly to end consumers, who are the ultimate tax bearers and are structurally burdened by indirect taxes without having adequate bargaining power. The success of this pillar is based on the legislative precedent of Section 171 of the Central Goods and Services Tax (CGST) Act, 2017 in India, which explicitly requires business operators to pass on the benefits of rate reductions or input tax credits to consumers through commensurate reductions in prices . Through the lens of Gustav Radbruch's theory of the purpose of law, this obligation to pass on benefits must be formulated explicitly, with legal certainty and predictability[53] so that the realization of substantive justice does not depend on the voluntary compliance of corporations. Thus, the pillar of substantive justice serves as the normative foundation ensuring that digital fiscal policies benefit not only the state and business operators but also provide tangible benefits to consumers as the ultimate bearers of tax burdens.

The second pillar of this model is co-regulation, which adopts Julia Black's concept as an adaptive institutional framework for overseeing the implementation of digital fiscal policies. This model places three main actors within a single, circularly interconnected digital tax-price monitoring cycle: fiscal authorities as macro-level regulators, e-commerce business

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[52] Ülker Yükselbaba, "Can Rawls' Theory of Distributive Justice Become a Cure for Poverty?," *Annales de La Faculté de Droit d'Istanbul*, no. 71 (January 16, 2023): 539–65, https://doi.org/10.26650/annales.2022.71.0010.

[53] Annie Myranika et al., "Effectiveness of Law in the Policy of Restricting the Operation of Goods Vehicles," *Istinbath: Jurnal Hukum* 22, no. 02 (December 18, 2025): 309–31, https://doi.org/10.32332/istinbath.v22i02.art04.

associations as enforcers of internal compliance codes, and consumer complaint networks as the primary mechanism for detecting violations at the grassroots level. This tripartite structure replicates the success of the integration between the Central Board of Indirect Taxes and Customs (CBIC), trade associations, and the INGRAM portal in India, enabling distributed and efficient oversight without imposing excessive bureaucratic costs. However, in the context of post-2025 transitional reforms, this model emphasizes that such interconnection is not aimed at imposing costly administrative sanctions, but rather serves as a basis for collecting dispute evidence that carries legal weight at the level of tax tribunals or courts. Consequently, co-regulation functions as a preventive and participatory oversight mechanism, rather than merely a punitive instrument that only activates after violations have occurred.

The third pillar of the model is responsive regulation, developed by Ian Ayres and John Braithwaite, which constitutes a dynamic and graduated mechanism for law enforcement. Enforcement begins at the base layer, focusing on persuasion and education through institutionalized fiscal literacy and student volunteer programs; it progresses to the middle layer, consisting of collaborative oversight based on data partnerships between business associations and civil society organizations; and finally, coercive measures are escalated at the top of the pyramid when all lower layers prove ineffective or when regulatory failure occurs. This pyramid structure prevents the state from falling into the trap of a punitive approach that incurs high costs from the outset of digital transactions, while also transforming the role of society from a mere symbolic complement into the first line of defense within the fiscal law enforcement system. With this clear pyramid structure, the state can allocate enforcement resources efficiently by prioritizing intervention only in cases that genuinely require coercive action. Responsive regulation also provides incentives for business operators to comply voluntarily, as they understand that sanctions will escalate in proportion to their level of non-compliance.[54] Thus, this graduated enforcement mechanism creates a balance between the

[54] De Sousa Mendes, "Responsive Regulation, Enforced Self-Regulation, and Corporate Liability."

effectiveness of law enforcement and the protection of the rights of compliant business operators.

The fourth pillar of this model is participatory legitimacy, which is based on Jürgen Habermas' theory of communicative action, serving as the sociological foundation for community empowerment.[55] The legitimacy of modern law no longer derives exclusively from the state's coercive authority; rather, it must emerge from inclusive, open, and equal discursive processes in the public sphere that enable all stakeholders to articulate their interests meaningfully.[56] Based on this, the participation of civil society movements in overseeing digital fiscal policies is no longer viewed as a voluntary policy option for the state, but as an absolute prerequisite for the democratic legitimacy of taxation itself. The involvement of civil society organizations—whether through enhanced education such as Indonesia's Tax Volunteer Program, monitoring of digital price deviations like India's complaint portal network, or advocacy for budget fairness such as the CISLAC and TJNA coalition in Nigeria acts as a cornerstone that transforms consumers from subjects of fiscal exploitation into legal entities with full participatory legitimacy. Thus, the pillar of participatory legitimacy ensures that digital fiscal policies are not only formally valid but also socially accepted by the communities they affect. Institutionalized public participation serves as an important corrective mechanism for the state in formulating policies that truly prioritize consumer interests.

The implementation of this model in Indonesia requires the explicit addition of a pass-through obligation clause into the substantive tax regulatory framework, either through an amendment to Law Number 7 of 2021 concerning Harmonization of Tax Regulations or through binding provisions in the implementing regulations on ETT VAT. This clause

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[55] Muklis Al'anam and Radian Salman, "THE RELEVANCE OF JÜRGEN HABERMAS'S THEORY OF COMMUNICATIVE ACTION AS THE PHILOSOPHICAL FOUNDATION OF HUMAN RIGHTS ENFORCEMENT IN INDONESIA," *Mimbar Hukum* 36, no. 1 (June 9, 2024): 61–82, https://doi.org/10.22146/mh.v36i1.11513.

[56] KAVI JOSEPH ABRAHAM, "Midcentury Modern: The Emergence of Stakeholders in Democratic Practice," *American Political Science Review* 116, no. 2 (May 29, 2022): 631–44, https://doi.org/10.1017/S0003055421001106.

could be incorporated into Minister of Finance Regulations as a mandatory requirement for global ETT platforms such as Shopee, TikTok Shop, or Tokopedia to retain their digital operating licenses in Indonesia, thereby making compliance with the obligation to pass on benefits a binding condition. In terms of institutional and technological aspects, the model recommends establishing an ETT VAT Transparency Dashboard based on open API technology, integrated directly into the architecture of the Coretax System under the framework of Minister of Finance Regulation Number 81 of 2024. This would enable real-time data interconnection between the Directorate General of Taxes' monthly reporting database and the complaint systems of the Indonesian Consumer Foundation (YLKI) and the National Consumer Protection Agency (BPKN). Through this integration, consumers can scan receipt numbers or digital invoices to verify that the tax they pay is actually remitted to the state treasury, thereby significantly reducing the information asymmetry that has long benefited digital platforms. The Tax Volunteer Program for the Nation (Renjani) could also be functionally repositioned from merely assisting with the filing of annual tax returns to acting as supervisors of digital fiscal price fairness for domestic consumers at the level of Tax Service Offices. In this way, this normative and technological reconstruction transforms the position of Indonesian consumers from passive burden-bearers into active supervisory subjects within the digital trade ecosystem.

The reconstruction of the model for Nigeria mandates the introduction of anti-fiscal price manipulation balancing clauses through joint regulations between the Federal Competition and Consumer Protection Commission (FCCPC) and the Federal Inland Revenue Service (FIRS), to be integrated into future amendments to the Finance Act and the implementing regulations of the Value Added Tax Act (VAT Act). The inclusion of this provision is essential to ensure that the expansion of the digital tax base through the Significant Economic Presence (SEP) principle and the designation of foreign collectors[57] Based on Section 10 of the VAT

[57] Joseph Mupokosera and Annet Wanyana Oguttu, "Income Taxation of the Digital Economy: The Advantages and Disadvantages of Digital Services Taxes from an African Perspective," *Intertax* 54, no. Issue 2 (February 1, 2026): 123–50, https://doi.org/10.54648/TAXI2026021.

Act, which requires foreign digital service providers to register, collect, and remit VAT, this should not become a tool to squeeze the purchasing power of domestic consumers amid a prolonged fiscal crisis. In line with the Administrative Capacity Theory of Richard Bird and Eric Zolt, which emphasizes the importance of simple collection mechanisms in countries with limited institutional capacity,[58] Nigeria is recommended not to emulate the complex and costly bureaucratic structure of the Indian tribunal. Instead, Nigeria should establish an automated tax withholding monitoring mechanism on payment gateways and the local digital wallet ecosystem with high penetration, such as Flutterwave, Interswitch, OPay, and Moniepoint,[59] which can serve as an early detection instrument for price violations automatically. If digital platforms raise prices beyond the official VAT rate of 7.5%, the FinTech nodes system will send an automated notification of unjust enrichment to the FCCPC, with the CISLAC coalition and the Tax Justice Network Africa acting as independent verifiers at the ground level to ensure data accuracy and proportional follow-up actions. Through this technology-based approach, Nigeria can establish an efficient oversight system without having to build an expensive and complex enforcement bureaucracy.

The proposed model for India requires restructuring in terms of equitable access to law enforcement. Internal legal pluralism and the dual structure of the GST system between the central government and the states continue to create significant disparities in enforcement capacity across regions, particularly between urban areas and digitally isolated rural regions. Following the principle of subsidiarity, which emphasizes that decisions

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[58] Anders D. Jensen and Jonathan L. Weigel, "No Taxation without Administration: Bringing the State Back into the Public Finance of Developing Countries," *Journal of Economic Literature* 64, no. 1 (March 1, 2026): 246–80, https://doi.org/10.1257/jel.20251760.

[59] Khadijah Iddrisu et al., "The Rise of FinTech in Africa: Empowering the Underserved and Unbanked," in *Banking on Inclusion*, ed. Ibrahim Nandom Yakubu (Cham: Palgrave Macmillan, 2025), 19–61, https://doi.org/10.1007/978-3-031-96716-0_2.

should be made as close as possible to the affected communities,[60] model this mandates the operational decentralization of the National Consumer Helpline or NCH and the INGRAM portal down to the level of local committees in each state or State-level Consumer Protection Committees under the direct supervision of the GST Council. The role of independent civil society organizations such as CUTS International should be formalized as permanent advisory board members within the decision-making structure of the GST Council, so that consumer voices are heard in the formulation of fiscal policies. Furthermore, funds held in the Consumer Welfare Fund under Section 57 must be mandatorily allocated to finance free legal assistance for civil society organizations to advocate for the resolution of outstanding legacy cases involving poor consumers in rural areas at the GST Appellate Tribunal or GSTAT. Thus, this institutional restructuring ensures that consumer protection through tax instruments is not only enjoyed by urban populations with access to technology, but also reaches consumers in remote regions who have long been marginalized.

The integration model formulated essentially marks a radical theoretical paradigm shift from the form of legal centralism toward accommodating the principle of participatory legal pluralism, as conceptualized by John Griffiths.[61] The conventional paradigm of legal centralism tends to view state bureaucratic institutions as the sole authority determining market order and the enforcement of fiscal law,[62] so it disregards the role of civil society in a system of governance that should be distributed. Conversely, this reconstructed integration model demonstrates that the effectiveness of digital indirect tax law as a consumer protection instrument is no longer measured narrowly by its ability to mobilize state

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[60] Michael Da Silva, "Subsidiarity and the Allocation of Governmental Powers," *Canadian Journal of Law & Jurisprudence* 36, no. 1 (February 8, 2023): 83–111, https://doi.org/10.1017/cjlj.2022.26.

[61] Ido Shahar and Karin Carmit Yefet, "Rethinking the Rethinking of Legal Pluralism: Toward a Manifesto for a Pluri-Legal Perspective," *Law and History Review* 42, no. 2 (May 9, 2024): 223–35, https://doi.org/10.1017/S0738248023000184.

[62] Hao Tu et al., "Judicial Independence and Corporate Government Subsidy: Evidence from Provincial Court Centralization," *Journal of Accounting Literature*, July 2, 2026, 1–38, https://doi.org/10.1108/JAL-11-2025-0602.

revenue through budgetary functions, but is determined by the harmonious dialectical interaction between the state's written norms or law in books, adaptive co-regulatory institutional architecture, and the level of legal awareness among civil society that possesses full participatory legitimacy. This paradigm shift recognizes that the state is not the only actor with the capacity and legitimacy to safeguard market justice, but rather requires partnership with civil society as an equal counterpart in a distributed governance system. Thus, this model offers a theoretical framework that is more suited to the complexity of digital economic governance, which transcends territorial boundaries and conventional bureaucratic hierarchies.

A functional comparison of the jurisdictions of Indonesia, India, and Nigeria confirms that there is no single universal policy model that can be rigidly applied across all developing jurisdictions, or a one-size-fits-all approach. Each country has significantly different characteristics in terms of public law systems, the degree of fiscal decentralization, institutional administrative capacity, and macroeconomic pressures; consequently, an approach that is successful in one country may not necessarily be effective if it is transplanted uncritically into another without contextual adaptation. Indonesia, with its unitary government system and civil law tradition, requires a different approach from Nigeria, which follows a federal system and common law, and from India, which has a quasi-federal structure with a complex dual GST system. Therefore, the success of strengthening digital tax law reform requires each country to reconstruct its normative elements, integrate technologies such as Coretax in Indonesia, GSTAT cells in India, or FinTech nodes in Nigeria, and develop channels for empowering its society either consciously or by design, all tailored to its specific socio-legal context. Through this contextual approach, digital tax law reform can become an effective instrument for realizing sovereign and inclusive market justice in the digital economy for all segments of society, rather than serving solely the interests of state revenue or the profits of global platform corporations.

Conclusion

Tax law has the potential to be reconstructed as an instrument of consumer protection in digital trade transactions, but its effectiveness is greatly influenced by the direction of legal policy, institutional design, the level of public empowerment, and the nature of internal legal pluralism in each country. Indonesia has established a foundation through digital tax reform and administrative modernization, yet its consumer protection function remains indirect. India presents the most progressive model, having successfully integrated tax rules, consumer protection, and participatory mechanisms into a relatively comprehensive oversight system, whereas Nigeria still prioritizes revenue-raising functions, meaning the consumer protection dimension has not yet developed optimally. This study proposes an integrated responsive tax policy model based on co-regulation, responsive regulation, substantive justice, and community empowerment, which positions the state, tax authorities, digital business operators, civil society organizations, and consumers as complementary actors in achieving transparency and justice in the digital market. As a practical implication, policymakers should consider establishing explicit provisions regarding the obligation to pass on the benefits of tax policies to consumers, developing institutional integration and data exchange between tax authorities and consumer protection agencies, and strengthening public fiscal literacy through participatory mechanisms supported by digital technology. For further research, it is recommended to conduct empirical studies on the effectiveness of this integrated model by analyzing its implementation across digital trade platforms, measuring the level of consumer fiscal literacy, and evaluating the impact of digital technology in supporting collaborative oversight among government, business, and society across various jurisdictions.

References

ABRAHAM, KAVI JOSEPH. "Midcentury Modern: The Emergence of Stakeholders in Democratic Practice." *American Political Science Review* 116, no. 2 (May 29, 2022): 631–44. https://doi.org/10.1017/S0003055421001106.

Adams, Kweku, and Jay Cullen. "Distributive Justice and Tax Avoidance in Emerging Economies: A Rawlsian Analysis of Multinational Structures, Professional Complicity and Legal Reform." *Critical Perspectives on International Business*, April 14, 2026, 1–24. https://doi.org/10.1108/cpoib-11-2025-0252.

Adetoro, David Oluwadare. "Highlights of Nigeria's Federal Competition and Consumer Protection Act 2018: An Overview." *Business Law Review* 42, no. 6 (December 1, 2021): 300–305. https://doi.org/10.54648/BULA2021041.

Akinsola, Kayode. "Legal Frameworks for Corporate Tax Compliance: Navigating Local and Global Regulations." Boston: SSRN, 2025. https://doi.org/10.2139/ssrn.5127003.

Al-Maghrebi, Mohammed Saleh, and Mohd Rizal Palil. "The Role of Budget Transparency, Tax Knowledge and Tax Education in Tax Compliance: Evidence from Salaried and Self-Employed Taxpayers in Malaysia." *Journal of Accounting and Investment* 27, no. 1 (January 31, 2026): 314–40. https://doi.org/10.18196/jai.v27i1.28540.

Alpiansyah, Rizaldy, Irfan Alkhotiri, and Harsing. "Enhancing Community Legal Literacy As An Effort To Overcome The Weakness Of The Consumer Protection System In Goods Purchase Transactions." *Al Musa'adah : Journal of Community Service STAI Minhajul Haq* 1, no. 1 (February 27, 2026): 1–10. https://doi.org/10.66891/4r7z1x04.

Amune, Majebi Samuel. "Legal Implications Of Value Added Tax On Electronic Commerce Transactions In Nigeria." *African Journal of Legal Research* 3, no. 3 (January 10, 2025): 174–99. https://doi.org/10.1787/3a2b78e8-en.

Anioke, Uchenna Vivian. "Digital Tax Administration And Revenue Generation In Lagos State, 2008-2018." *European Journal of Political*

Science Studies 7, no. 2 (September 18, 2024): 128–66. https://doi.org/10.46827/ejpss.v7i2.1816.

Annie Myranika, Dian Yulviani, Siti Humulhaer, and Dwi Nur Afrianto. "Effectiveness of Law in the Policy of Restricting the Operation of Goods Vehicles." *Istinbath: Jurnal Hukum* 22, no. 02 (December 18, 2025): 309–31. https://doi.org/10.32332/istinbath.v22i02.art04.

Anzule, Ewuga, Isah Shittu, Aliyu Baba Usman, and Salihu Ndagi. "Moderating Effect of Digitalisation on the Relationship Between Petroleum Revenue and Budget Performance in Nigeria." *International Journal of Research and Innovation in Social Science* 10, no. 3 (2026): 2620–54. https://doi.org/10.47772/IJRISS.2026.100300190.

Aribowo, Irwan, Niswatun Nurul Kamilah, Jai Kumar, and Laily Rofi'ah. "Assessing Tax Reform as a Journey to Tax Administration." *KnE Social Sciences*, March 15, 2022, 503–524. https://doi.org/10.18502/kss.v7i5.10574.

Bamidele, Seun. "Fiscal Federalism and Local Governments' Struggle for Autonomy in Nigeria." *Commonwealth Journal of Local Governance*, no. 30 (December 31, 2025): 111–27. https://doi.org/10.5130/zmfhr914.

Bird, Richard M. "Fiscal Decentralization and Decentralizing Tax Administration: Different Questions, Different Answers." *SSRN Electronic Journal*, 2015, 1–17. https://doi.org/10.2139/ssrn.2694651.

Cascant-Sempere, Ma Josep. "Grounding ActionAid's Tax Justice Campaigns in Nigeria." *Development and Change* 53, no. 3 (May 18, 2022): 525–50. https://doi.org/10.1111/dech.12709.

Chawla, Neelam, and Basanta Kumar. "E-Commerce and Consumer Protection in India: The Emerging Trend." *Journal of Business Ethics* 180, no. 2 (October 9, 2022): 581–604. https://doi.org/10.1007/s10551-021-04884-3.

Clausing, Kimberly A. "Lessons from Three Global Collective Action Problems." *SSRN Electronic Journal* 79, no. 1 (2026): 163–206. https://doi.org/10.2139/ssrn.6640698.

Datta, Saptarshi, Himanshu Thakkar, and Siddharth Dabhade.

"Combating GST Input Tax Credit Fraud In India: Forensic Accounting, Data Analytics, And Legal Enforcement Strategies." *International Journal of Management, Public Policy and Research* 5, no. 1 (March 31, 2026): 37–48. https://doi.org/10.55829/ykz3ea41.

Diouf, Awa, and Hannelore Niesten. "Tracking and Taxing Cross-Border Digital Transactions: The Case of VAT in Senegal." Senegal, August 2025. https://doi.org/10.19088/ICTD.2025.043.

Esmaeel, Ezat Sabir. "The Impact of Direct-Indirect Taxation on Consumer." *IOSR Journal of Engineering* 03, no. 6 (June 2013): 08–13. https://doi.org/10.9790/3021-03620813.

Ezeani, Udonna. "Taxing Powers In Nigeria: Constitutional Framework." Nigeria: Afe Babalola University, 2025. https://doi.org/10.2139/ssrn.5250333.

Gandhi, Manika, and Shipra Gupta. "Harmonization of IBC and Tax Laws: Does India Need a Separate Tax Treatment Framework for MSMEs Under CIRP and Liquidation?" *IUP Law Review* 16, no. 1 (2026): 59–82. https://doi.org/10.71329/IUPLR/2026.16.1.59-82.

Gupta, Akash, Arushi Bajpai, and Janani Sivaraman. "Consumer ADR in India." In *Consumer Alternative Dispute Resolution in Emerging Economies*, edited by Eda Sahin-Sengül and Serkan Kaya, 16. London: Routledge, 2025. https://doi.org/10.4324/9781032689739.

Gupta, Hariom, and Amit Singh. "The Consumer Protection Act, 2019: A Comparative Analysis of Legislative Frameworks in India and Other Jurisdictions." *International Journal of Criminal, Common and Statutory Law* 4, no. 2 (July 1, 2024): 155–62. https://doi.org/10.22271/27899497.2024.v4.i2b.104.

Hampton, Sam, Andrea Byfuglien, Will Eadson, Briony Latter, Ben Hardy-Jones, Katherine Sugar, Hannah Bamford, and Richard Blundel. "Multiple Roles of Business for Climate Action." *IScience* 28, no. 12 (December 2025): 1–18. https://doi.org/10.1016/j.isci.2025.114059.

Hasibuan, Batara Mulia, I Gusti Ayu Ketut Rahmi Handayani, and Waluyo Waluyo. "Legal System in Providing Income Tax Incentives in the Field of Investment Based on the Principle Of Nondiscrimination." In *International Conference On Law, Economic & Good Governance (IC-LAW 2023)*, 153–58. Surakarta: Atlantis

Press, 2024. https://doi.org/10.2991/978-2-38476-218-7_24.

Iddrisu, Khadijah, Farihan Alhassan, Stephanie Giamporcaro, and Joshua Yindenaba Abor. "The Rise of FinTech in Africa: Empowering the Underserved and Unbanked." In *Banking on Inclusion*, edited by Ibrahim Nandom Yakubu, 19–61. Cham: Palgrave Macmillan, 2025. https://doi.org/10.1007/978-3-031-96716-0_2.

James, Kathryn, and Thomas Ecker. "Relevance of the OECD International VAT/GST Guidelines for Non-OECD Countries." *Australian Tax Forum* 32, no. 2 (2017): 317–76. https://doi.org/https://search.informit.org/doi/10.3316/informit.948826606169996.

Jensen, Anders D., and Jonathan L. Weigel. "No Taxation without Administration: Bringing the State Back into the Public Finance of Developing Countries." *Journal of Economic Literature* 64, no. 1 (March 1, 2026): 246–80. https://doi.org/10.1257/jel.20251760.

Jooji, Innocent, Margaret Oyekan, Zekeri Momoh, and Samuel Onuh. "The Federal Inland Revenue Service (FIRS), Tax Compliance and the Fight Against Corruption in Nigeria." *International Journal of Professional Business Review* 8, no. 9 (September 4, 2023): 1–12. https://doi.org/10.26668/businessreview/2023.v8i9.3359.

K, Ramesh, and Mahalakshmi N. "GST Awareness for Consumer Empowerment and Financial Literacy – An Exploratory Case Analysis." *International Journal For Multidisciplinary Research* 6, no. 5 (October 15, 2024): 1–12. https://doi.org/10.36948/ijfmr.2024.v06i05.28789.

Kanama, Martha. "Bridging the Digital Tax Gap: A Comparative Analysis of Online Business Taxation in Tanzania." *International Journal of Law and Society* 8, no. 4 (December 9, 2025): 320–27. https://doi.org/10.11648/j.ijls.20250804.15.

Katnic, Ivana, Milorad Katnic, Marija Orlandic, Marija Radunovic, and Ilija Mugosa. "Understanding the Role of Financial Literacy in Enhancing Economic Stability and Resilience in Montenegro: A Data-Driven Approach." *Sustainability* 16, no. 24 (December 17, 2024): 11065. https://doi.org/10.3390/su162411065.

Luzak, J., A. J. Wulf, O. Seizov, M. B. M. Loos, and M. Junuzović. "ABC of Online Consumer Disclosure Duties: Improving Transparency and Legal Certainty in Europe." *Journal of Consumer Policy* 46, no. 3 (September 13, 2023): 307–33. https://doi.org/10.1007/s10603-023-09543-w.

Maliska, Marcos Augusto. "Ehrlich, Eugen." In *Encyclopedia of the Philosophy of Law and Social Philosophy*, 850–56. Dordrecht: Springer Netherlands, 2023. https://doi.org/10.1007/978-94-007-6519-1_602.

Mpofu, Favourate Y., and Tankiso Moloi. "Direct Digital Services Taxes in Africa and the Canons of Taxation." *Laws* 11, no. 4 (July 15, 2022): 57. https://doi.org/10.3390/laws11040057.

Muklis Al'anam, and Radian Salman. "THE RELEVANCE OF JÜRGEN HABERMAS'S THEORY OF COMMUNICATIVE ACTION AS THE PHILOSOPHICAL FOUNDATION OF HUMAN RIGHTS ENFORCEMENT IN INDONESIA." *Mimbar Hukum* 36, no. 1 (June 9, 2024): 61–82. https://doi.org/10.22146/mh.v36i1.11513.

Mupokosera, Joseph, and Annet Wanyana Oguttu. "Income Taxation of the Digital Economy: The Advantages and Disadvantages of Digital Services Taxes from an African Perspective." *Intertax* 54, no. Issue 2 (February 1, 2026): 123–50. https://doi.org/10.54648/TAXI2026021.

Nova Ayunda Pasha. "Peran Pendampingan Mahasiswa MBKM Dalam Program Renjani Terhadap Optimalisasi Pelayanan Wajib Pajak Di KPP Bangkalan." *Jurnal Pengabdian Kolaborasi Dan Inovasi IPTEKS* 3, no. 2 (April 30, 2025): 522–52. https://doi.org/10.59407/jpki2.v3i2.2290.

Novoa-Hoyos, Amalia, Lucie Depoo, and Enrique Jiménez-Rodríguez. "Role of Financial Literacy and Awareness of Tax Impacts in an Emerging Economy Facing Tax Reform." *Economics & Sociology* 15, no. 1 (2022): 222–40. https://doi.org/10.14254/2071-789X.2022/15-1/14.

Nur Ubay, Ibnu Sina, Reza Saputra, Harmono Harmono, and Jaenudin Umar. "Legal Responsibility of Marketplaces in Online Buying and Selling Transactions in Indonesia." *Jurnal Legisci* 3, no. 4 (February 6, 2026): 340–68. https://doi.org/10.62885/legisci.v3i4.1058.

Nurlaily, Nurlaily, David Tan, Febri Jaya, and Nur Fatihah. "Reassessing

Consumer Protection in Digital Markets: Information Asymmetry as Epistemic Injustice in Indonesia and the Philippines." *Vifada Assumption Journal of Law* 3, no. 2 (December 25, 2025): 21–35. https://doi.org/10.70184/ggab5b91.

Ojonugwa, Akoh, Joel Akowe, and Timothy Enejoh Omejeh. "An Assessment of the Effectiveness of Consumer Protection Agency in the Enforcement of Consumer Rights in Kogi State." *International Journal of Social Sciences and Management Research* 11, no. 1 (2025): 1–14. https://doi.org/10.56201/ijssmr.vol.11no1.2025.pg.1.14.

Otusanya, Olatunde Julius, Jia Liu, and Sarah George Lauwo. "Influence of Tax Dodging on Tax Justice in Developing Countries: Some Theory and Evidence from Sub-Saharan Africa." *Journal of Financial Crime* 30, no. 2 (February 2, 2023): 332–60. https://doi.org/10.1108/JFC-01-2022-0012.

Purnama, Hamdan, and Iskandar Iskandar. "A Critical Analysis of Social Engineering Theory in the Context of Legal Development in Indonesia." *ULIL ALBAB : Jurnal Ilmiah Multidisiplin* 3, no. 12 (November 5, 2024): 54–67. https://doi.org/10.56799/jim.v3i12.5812.

Rabbani, Riswari Asri, Irwan Harefa, and Yananto Mihadi Putra. "The Role of Tax Volunteers for the Nation in Enhancing Tax Compliance and Tax Literacy at KPP Pratama Jakarta Kembangan." *Pelita : Jurnal Penelitian, Terapan Dan Aplikatif* 2, no. 2 (June 26, 2025): 79–86. https://doi.org/10.70550/pelita.v2i2.226.

Rai, Pallavi, and Chandra Shekhar. "From Tax Relief to Market Reality: Assessing the Government of India's Role in Ensuring Price Reductions Post-GST." *Mahat Research and Advisory*, 2025, 1–18. https://doi.org/https://doi.org/10.13140/RG.2.2.26721.57448.

Rashid, Harun, Hussein Warsame, and Shahid Khan. "Tax Collections and Democracy in Developing and Developed Countries." In *Global Encyclopedia of Public Administration, Public Policy, and Governance*, edited by Ali Farazmand, 12593–97. Cham: Springer International Publishing, 2022. https://doi.org/10.1007/978-3-030-66252-3_4097.

Rizqiyanto, Naufal, M. Rizqi, Fahmil Alfian Rizkia Afsa, and Badreddine Berrahlia. "Tax Regulation Challenges in the Digital Economy Era:

Legal Analysis and Implications in Indonesia." *Trunojoyo Law Review* 7, no. 1 (January 14, 2025): 65–102. https://doi.org/10.21107/tlr.v7i1.28540.

Shahar, Ido, and Karin Carmit Yefet. "Rethinking the Rethinking of Legal Pluralism: Toward a Manifesto for a Pluri-Legal Perspective." *Law and History Review* 42, no. 2 (May 9, 2024): 223–35. https://doi.org/10.1017/S0738248023000184.

Sihombing, Jonker. "Legal Optimization of Digital Tax Administration in Indonesia: Case of Coretax." *Journal of Law, Politic and Humanities* 6, no. 2 (December 20, 2025): 1149–61. https://doi.org/10.38035/jlph.v6i2.2720.

Silva, Michael Da. "Subsidiarity and the Allocation of Governmental Powers." *Canadian Journal of Law & Jurisprudence* 36, no. 1 (February 8, 2023): 83–111. https://doi.org/10.1017/cjlj.2022.26.

Sousa Mendes, Paulo De. "Responsive Regulation, Enforced Self-Regulation, and Corporate Liability." *Criminal Law Forum* 33, no. 4 (December 7, 2022): 285–321. https://doi.org/10.1007/s10609-022-09445-5.

Stratmann, Magdalena, Tobias Mast, Josefine Spürkel, Fabian Burmeister, Christian Kurtz, and Eloïse Soulier. "Visualizing Regulatory Ecosystems: A New Approach to Mapping EU Regulations as Architectures–The Case of the AI Act." *Computer Law & Security Review* 61 (July 2026): 1–16. https://doi.org/10.1016/j.clsr.2026.106333.

Sulistyowati, Sulistyowati, Gusti Bintang Maharaja, and M. Rahman. "Legal Study on Mediation as an Alternative for Dispute Resolution in the State Administrative Court." *Journal of Law, Politic and Humanities* 6, no. 4 (June 1, 2026): 2542–52. https://doi.org/10.38035/jlph.v6i4.3345.

Teremetskyi, Vladyslav, Viacheslav Davydenko, Alla Kiryk, Iryna Tur, Ihor Diorditsa, and Andrii Varkhov. "Consumers Rights in the Field of Electronic Trade in Medicinal Products: Legal Challenges and Global Harmonization Trends." *Journal of Pioneering Medical Sciences* 14, no. 04 (May 5, 2025): 113–19. https://doi.org/10.47310/jpms2025140415.

Thakur, Tejnarayan, and Aribam Debala Devi. "GST Reforms 2025 and The New Tax Regime in India: Towards Simplified Taxation or Added Complexity." *Journal of Economics, Management and Trade* 31, no. 12 (December 15, 2025): 94–113. https://doi.org/10.9734/jemt/2025/v31i121375.

Tu, Hao, Shenggang Yang, Ao Shu, and Minyi Dong. "Judicial Independence and Corporate Government Subsidy: Evidence from Provincial Court Centralization." *Journal of Accounting Literature*, July 2, 2026, 1–38. https://doi.org/10.1108/JAL-11-2025-0602.

V.M., Jasmine. "GST & Evolution of Tax System in India." *IRA-International Journal of Management & Social Sciences (ISSN 2455-2267)* 7, no. 1 (May 3, 2017): 65. https://doi.org/10.21013/jmss.v7.n1.p8.

Yadav, Monika. "Sunset Clause for Anti-Profiteering under GST Regime." *The New Indian Express*. June 23, 2024. https://www.newindianexpress.com/business/2024/Jun/23/sunset-clause-for-anti-profiteering-under-gst-regime.

Yükselbaba, Ülker. "Can Rawls' Theory of Distributive Justice Become a Cure for Poverty?" *Annales de La Faculté de Droit d'Istanbul*, no. 71 (January 16, 2023): 539–65. https://doi.org/10.26650/annales.2022.71.0010.

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