Strata Law Review, 2026, Vol. 4, No. 2, 177–188
E-ISSN: 2986-8114 | P-ISSN: 2987-3185
doi: 10.59631/slr.v4i2.600
Advance Access publication September 30, 2026

STRATA LAW REVIEW
journals.stratapersada.com/index.php/slr

Synchronization of Tax and Zakat Regulations in Indonesia's Positive Law: A Legal Certainty Perspective

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Article History	Submitted	Revised	Accepted
	2026-08-29	2026-09-22 & 2026-09-25	2026-09-30

Abstract

This article examines the synchronization of tax and zakat regulations in Indonesia's positive legal system and its implications for legal certainty for Muslim taxpayers. It employs normative legal research with prescriptive and descriptive-analytical characteristics, using statutory and conceptual approaches. Primary legal materials include the 1945 Constitution, taxation legislation, the Zakat Management Law, and implementing regulations; the materials are qualitatively analyzed through legal reasoning. The study finds no direct vertical normative conflict: the recognition of zakat within the tax system is generally consistent from statutes to implementing regulations. Horizontally, the Zakat Management Law and the Tax Regulation Harmonization Law mutually recognize zakat, yet substantive integration remains incomplete because zakat functions as a deduction from income rather than a direct credit against tax payable. Consequently, the framework provides formal legal certainty but does not yet achieve optimal substantive certainty. Muslim taxpayers continue to bear zakat and tax obligations through separate mechanisms, while the fiscal benefit of zakat recognition remains limited. The article recommends stronger regulatory integration and a gradual, carefully limited tax-credit model at the statutory level, supported by improved administrative and data integration between authorized zakat institutions and tax authorities. This approach is intended to strengthen substantive legal certainty, justice, and utility without eliminating the distinct legal character of tax and zakat.

Keywords: Legal certainty, muslim taxpayers, regulatory synchronization, taxation, zakat.

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INTRODUCTION

Law No. 23 of 2011 on Zakat Management provides the principal statutory bridge between the two regimes. Article 22 recognizes zakat paid through BAZNAS or authorized Zakat Management Institutions (LAZ) in the income-tax framework, while tax legislation also recognizes qualifying zakat in calculating taxable income. The rules are therefore not wholly disharmonious.[1] The sharper problem is that mutual recognition has not produced a fully integrated legal relationship: taxpayers can identify the formal requirements for obtaining a deduction, but the legal effect of zakat remains indirect because it reduces the income base rather than the final tax liability.[2] This distinction is central to determining whether regulatory synchronization has generated only formal certainty or also substantive certainty.

Previous studies have examined zakat as a tax deduction, implementation of the deduction facility, comparative Indonesian-Malaysian models, and proposals for policy reconstruction.[3] Those studies establish the importance of the tax-zakat relationship, but they generally emphasize the fiscal instrument or implementation outcome. The present article addresses a narrower doctrinal gap by separating two questions that are often conflated: whether the norms are vertically and horizontally consistent, and whether that consistency has produced substantive integration. This distinction makes it possible to identify a legal system that is formally synchronized without incorrectly characterizing incomplete integration as a direct conflict of norms.[4]

The analytical functions of the theories used in this study are therefore differentiated. Hans Kelsen's hierarchy of norms is employed to test the validity and vertical consistency of implementing rules against higher norms, while Maria Farida Indrati's theory of legislation is used to examine the appropriateness and coherence of regulatory content at equivalent and implementing levels. Gustav Radbruch's values of legal certainty, justice, and utility are then used evaluatively to determine whether a formally valid and consistent construction produces a substantively fair, predictable, and useful legal relationship for Muslim taxpayers. Kelsen and Indrati thus operate primarily as synchronization tools, whereas Radbruch is used to assess the consequences of that synchronization.[5]

On that basis, this article examines the tax-zakat relationship at two connected levels. First, it tests vertical and horizontal synchronization among the Constitution, the Zakat Management Law, the HPP Law, and implementing regulations. Second, it evaluates whether the resulting construction provides substantive legal certainty, particularly in relation to the distinction between a tax-deductible mechanism and a tax-credit model. The analysis remains doctrinal:

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[1] Titin Ruliana, "Zakat in Employees Income Tax," *Research Journal of Accounting and Business Management* 1, no. 1 (2017): 109.

[2] Imam Yahya, "Zakat Management in Indonesia: A Legal Political Perspective," *Al-Ahkam* 30, no. 2 (2020): 197.

[3] Provita Wijayanti et al., "Modelling Zakat as Tax Deduction: A Comparison Study in Indonesia and Malaysia," *Journal of Islamic Accounting and Finance Research* 4, no. 1 (2022): 28.

[4] Hary Djatmiko, "Re-Formulation Zakat System as Tax Reduction in Indonesia," *Indonesian Journal of Islam and Muslim Societies* 9, no. 1 (2019): 139.

[5] Eha Nugraha, Veranda Aga Refmasari, and Alif Ilham Akbar Fatriansyah, "Critical Review Zakat as Tax Deduction (Indonesia-Malaysia Comparative Study," *Journal of Economics, Business, and Accountancy Ventura* 23, no. 3 (2021): 427.

references to double burden describe the legal and financial consequence or perception produced by the regulatory structure, not an empirical measurement of taxpayer behavior.

The objective of this study is to determine the degree of vertical and horizontal synchronization of tax and zakat regulations in Indonesia and to explain its implications for the legal certainty of Muslim taxpayers. Its theoretical benefit is to clarify the conceptual distinction between formal synchronization and substantive integration, as well as between formal and substantive legal certainty. Its practical benefit is to provide a normative basis for evaluating the existing deduction mechanism, improving administrative integration, and considering a more proportionate tax-credit construction without eliminating the distinct legal character of tax and zakat.

METHOD

This study is normative legal research and is fundamentally prescriptive in character. Its principal purpose is not merely to describe the existing tax-zakat framework, but to identify the legal construction produced by the applicable norms, evaluate its consistency and implications, and formulate normative prescriptions for improving regulatory integration. The descriptive-analytical element refers to the mode in which the legal materials are organized and explained, rather than to a separate empirical research character. The study employs statutory and conceptual approaches. Primary legal materials comprise the 1945 Constitution, income-tax legislation as amended through the HPP Law, Law No. 23 of 2011 on Zakat Management, Government Regulation No. 60 of 2010, Director General of Taxes Regulation PER-11/PJ/2017, Government Regulation No. 58 of 2023, and Minister of Finance Regulation No. 168 of 2023. Secondary legal materials include books on legal theory and legislation, tax-law scholarship, Islamic-law and zakat-management journals, studies on zakat as a tax deduction or tax credit, and doctrinal literature on legal certainty, justice, and regulatory synchronization.[6]

The analysis proceeded in four stages. First, the relevant norms were inventoried and classified by hierarchy. Second, their substantive content was compared with respect to legal subjects, qualifying zakat payments, authorized recipient institutions, evidentiary requirements, and the fiscal consequence of zakat. Third, the most recent PPh Article 21 withholding framework under Government Regulation No. 58 of 2023 and Minister of Finance Regulation No. 168 of 2023 was examined to determine whether the Effective Average Rate (TER) mechanism changes the substantive position of zakat. Fourth, the findings were evaluated through Radbruch's framework to distinguish formal certainty from substantive certainty and to formulate a prescriptive direction for reform. The doctrinal test distinguishes four concepts: validity, consistency, interconnection, and substantive consequence.[7] Validity concerns the binding force of a norm within the hierarchy; consistency concerns the absence of contradiction; interconnection concerns the extent to which tax and zakat rules recognize one another; and substantive consequence concerns whether that recognition creates a clear, proportionate, and predictable relationship between the two obligations. This framework enables the study to

[6] Lintje Anna Marpaung Samosir, *Metodelogi Penelitian Hukum Dan Pendekatan Analisis Normatif* (Jakarta: Mitra Wacana Media, 2021), 40.
[7] Yulianto Achmad Mukti Fajar ND, *Dualisme Penelitian Hukum Normatif & Empiris* (Yogyakarta: Pustaka Pelajar, 2010), 58.

conclude that norms may be formally synchronized while their substantive integration remains incomplete.

RESULT AND DISCUSSION

Vertical Synchronization of Tax and Zakat Regulations

Vertically, tax and zakat regulations demonstrate general normative consistency. The 1945 Constitution supplies the constitutional basis for taxation, while the Zakat Management Law legitimizes zakat management within national law. At statutory level, tax law accommodates zakat, and implementing rules such as Government Regulation No. 60 of 2010 provide mechanisms for deducting qualifying zakat or mandatory religious contributions from gross income.[8]

Under Hans Kelsen's hierarchy-of-norms theory, the implementing rules do not reveal a direct contradiction with higher norms. They operationalize statutory recognition and therefore satisfy the basic requirements of formal validity and vertical consistency. Nevertheless, vertical synchronization does not necessarily amount to integration. Zakat recognition remains limited to the income base used to calculate income tax. Thus, while no direct vertical normative conflict is identified, there remains a regulatory gap in integrating zakat and tax obligations more substantively.[9]

At the constitutional level, Article 23A of the 1945 Constitution establishes the legality principle for compulsory taxation. It does not classify zakat as a state fiscal obligation; consequently, recognition of zakat in taxation must be traced through sectoral statutes. The Zakat Management Law provides the national legal basis for zakat administration and connects zakat to taxation through a deduction mechanism. The legislative design therefore does not treat zakat as a substitute for tax, but as a distinct obligation that receives a specified consequence in the calculation of income tax.

At the implementing level, Government Regulation No. 60 of 2010 specifies zakat or compulsory religious contributions deductible from gross income, while PER-11/PJ/2017 concerns government-established or government-authorized recipient institutions. Vertically, these rules are operational. They do not create a construction contrary to the statutes; rather, they translate statutory recognition into administrative conditions capable of application. The hierarchy-of-norms analysis therefore produces two findings that must be separated. First, in terms of validity and consistency, the implementing rules do not negate the statutory recognition of zakat. Second, in terms of regulatory design, hierarchical consistency does not resolve the economic position of zakat in relation to final tax liability. Kelsen's theory explains validity and consistency, while an assessment of integration requires attention to legislative substance and

[8] Yudi Wicaksono Pratama and Kadek Wiwik Indrayanti, "Analisis Yuridis Pengaturan Pengelolaan Zakat Dan Pajak Menurut Sistem Hukum Di Indonesia Dan Malaysia," *Jurnal Cakrawala Hukum* 12, no. 1 (2021): 115.
[9] Arif Hidayatullah and Anita Priantina, "Toward Zakat Management Integration in Indonesia: Problems and Solution," *AHKAM: Jurnal Ilmu Syariah* 18, no. 2 (2018): 138.

Doi: 10.59631/slr.v4i2.600

regulatory purpose. At this point, the analysis moves from vertical synchronization to horizontal synchronization and substantive legal certainty.[10]

The most recent PPh Article 21 framework reinforces this distinction. Government Regulation No. 58 of 2023 introduces effective withholding rates to simplify monthly PPh Article 21 calculation, while Minister of Finance Regulation No. 168 of 2023 implements that scheme. The TER mechanism primarily simplifies withholding administration; it does not reconstruct zakat as a credit against tax payable. PMK No. 168 of 2023 continues to recognize qualifying zakat or mandatory religious contributions in determining annual net income for permanent employees and pensioners when paid through the prescribed channels. Thus, the new regime preserves legal recognition of zakat, but its substantive position remains that of an income-side deduction rather than a direct tax credit. The administrative modernization of PPh Article 21 therefore does not eliminate the integration gap identified in this study.

From the perspective of legal certainty, this is significant. The TER scheme makes monthly withholding simpler and more predictable as a tax-administration technique, but simplification of withholding is conceptually different from integration of zakat with final tax liability. The latest implementing rules therefore strengthen formal administrative certainty without changing the central normative relationship between zakat and income tax. This finding also confirms that the weakness is not a vertical conflict between PP No. 58 of 2023 or PMK No. 168 of 2023 and higher legislation; it is the continued legislative choice to place zakat within a deductible-income model.

Horizontal Synchronization and Substantive Regulatory Integration

Horizontally, the Zakat Management Law and the HPP Law share philosophical and normative points of convergence. Both contribute to public welfare through the collection and distribution of economic resources. Article 22 of the Zakat Management Law links officially paid zakat with tax calculation, while tax law recognizes qualifying zakat in income computation and excludes zakat received by entitled recipients from taxable objects.[11]

This mutual recognition shows that the two regimes are not entirely separate. Yet substantive integration remains incomplete. Zakat is not treated as a direct credit against tax payable; it operates as a deduction affecting taxable income. The resulting relationship is therefore predominantly coordinative rather than integrative.[12] From the perspective of legislative theory, this condition is not necessarily a normative conflict. The central weakness concerns the depth of

[10] Maria Farida. Indrati, *Ilmu Perundang-Undangan* (Yogyakarta: Kanisius, 2018), 80–81.

[11] Faisal Ahmad, Zuhdi Hsb, and Siti Kholijah, "Implementation of Policies Regarding Zakat as a Deduction of Taxable Income," *Journal of Islamic Economics Lariba* 10, no. 2 (2024): 641–662; Minati Maulida and Aulia Ulfah, "Peluang Dan Tantangan Pemberlakuan Undang-Undang No. 23 Pasal 22 Tahun 2011 Tentang Zakat Sebagai Pengurang Pajak Penghasilan," *JIOSE: Journal of Indonesian Sharia Economics* 2, no. 2 (2023): 191–208; Husnul Khotimah, Setiawan bin Lahuri, and Ainun Amalia Zuhroh, "Muslim Perception on Zakat as A Tax Deduction in Indonesia," *Share:Jurnal Ekonomi Dan Keuangan Islam* 11, no. 2 (2022): 477–501.

[12] Muhammad Ali Nuruddin, Muslich Anshori, and Imron Mawardi, "Zakat on Business Entities and Its Tax Treatment," *Media Trend* 18, no. 1 (2023): 41–53; Carmadi and Mohammad Saleh, "The Urgency of Recognizing Professional Zakat as an Income Tax Deduction in the Indonesian Positive Legal System," *Pattimura Magister Law Review* 5, no. 2 (2025): 309–321.

substantive integration: the rules recognize one another without creating a proportionate mechanism connecting the fulfillment of zakat obligations with the final amount of tax payable.

Horizontal synchronization first appears in the social objectives of the two regimes. Taxation is an instrument of state revenue and public financing, while zakat combines religious obligation with distribution to legally and religiously designated beneficiaries. Although their normative foundations differ, both intersect in redistribution and welfare. This overlap enables lawmakers to create points of connection without eliminating the distinct character of either regime. Synchronization therefore need not mean merging zakat into taxation, but it does require a mechanism through which the legal effects of zakat payments can be understood consistently within the tax system.

The clearest normative connection lies in Article 22 of the Zakat Management Law and tax rules recognizing zakat as a deduction. Tax legislation also excludes certain zakat receipts from taxable objects. These forms of recognition demonstrate that lawmakers have not treated zakat as entirely external to the fiscal legal system. At this level, horizontal synchronization exists because each regulatory regime recognizes the legal relevance of the other.

The recognition, however, remains partial. Under a tax-deductible model, zakat reduces the income base used for tax calculation, so the final benefit depends on the applicable tax rate. The amount of zakat paid does not automatically reduce final tax liability by the same amount. A tax credit, by contrast, operates after tax liability has been calculated and therefore creates a more direct relationship with the final tax burden. The different point at which the reduction is applied explains why two models may both recognize zakat while producing different degrees of integration.[13] Indonesian scholarship likewise shows continuing debate over zakat as a tax deduction, including its legal design, use of the facility, and effectiveness of implementation. Those studies are not treated as the primary empirical data of this research, but they reinforce the normative relevance of the problem: the existence of a facility does not automatically make the tax-zakat relationship simple, proportionate, or widely understood. Horizontal synchronization is therefore assessed not only by the existence of mutual-recognition clauses, but also by the extent to which the two statutes form a coherent substantive relationship.[14]

Table 1. *Legal Construction of Zakat and Taxation*

Positive-law element	Zakat Management regime	Taxation regime	Synchronization finding
Legal basis	Law No. 23 of 2011, especially Article 22	Income-tax provisions as amended through Law No.	Mutual recognition exists at statutory level; no direct horizontal

[13] Syarif Hidayat Hasibuan, "Tax Rebate Policy: Relevansinya Dengan Kebijakan Pengelolaan Zakat Di Indonesia," *Lex Renaissance* 5, no. 1 (2020): 57–71; Djatmiko, "Re-Formulation Zakat System as Tax Reduction in Indonesia."

[14] Hasibuan, "Tax Rebate Policy: Relevansinya Dengan Kebijakan Pengelolaan Zakat Di Indonesia"; Khotimah, Lahuri, and Zuhroh, "Muslim Perception on Zakat as A Tax Deduction in Indonesia"; Maulida and Ulfah, "Peluang Dan Tantangan Pemberlakuan Undang-Undang No. 23 Pasal 22 Tahun 2011 Tentang Zakat Sebagai Pengurang Pajak Penghasilan."

Doi: 10.59631/slr.v4i2.600

		7 of 2021 (HPP Law)	contradiction identified.
Qualifying payment	Zakat paid through BAZNAS or authorized LAZ	Only qualifying zakat/mandatory religious contributions meeting statutory and administrative requirements receive tax treatment	Recognition is conditional and institution-based, supporting verification but limiting informal payments.
Fiscal treatment	Payment discharges the zakat obligation in full	Qualifying zakat reduces the income base/net income used in tax calculation; it does not directly reduce tax payable	Formal linkage exists, but substantive integration is partial because the legal effect is indirect.
Implementing mechanism	Authorized zakat institutions issue accountable proof of payment	PP No. 60 of 2010 and PER-11/PJ/2017 regulate deductible payments and recognized recipient institutions	Vertical implementation is consistent with the statutory deduction model.
Recent PPh 21/TER framework	No change to the legal nature of zakat obligation	PP No. 58 of 2023 simplifies withholding through effective rates; PMK No. 168 of 2023 retains qualifying zakat among annual net-income deductions under specified conditions	Administrative simplification does not convert zakat into a tax credit; the substantive integration gap remains.
Legal-certainty implication	Zakat status and authorized channels are identifiable	Tax calculation and withholding procedures are identifiable	Formal certainty is relatively strong, while substantive

	certainty remains weaker because the relationship between zakat paid and final tax liability is not direct.

Implications for Legal Certainty of Muslim Taxpayers

The current framework provides formal legal certainty because taxpayers can identify the conditions, authorized institutions, and administrative mechanism for recognizing zakat in taxation. Substantive certainty, however, remains incomplete. Muslim taxpayers continue to discharge zakat and tax through separate mechanisms, while the fiscal benefit attached to zakat is not equivalent to the zakat amount paid.[15]

From Radbruch's perspective, procedural certainty alone is insufficient where the relationship between obligations does not adequately balance certainty, justice, and utility. The thesis identifies a perception of double financial burden because zakat does not directly reduce tax payable. This also affects the predictability of the economic benefit associated with formal compliance. Administrative design further influences substantive certainty. Tax recognition requires payment through recognized BAZNAS/LAZ channels and supporting evidence. Where taxpayers perceive the procedure as disproportionate to the fiscal benefit, incentives to use formal channels may weaken. Regulatory synchronization should therefore pursue not merely the absence of normative conflict but also simpler administration and stronger institutional data integration.[16]

Formal certainty is visible in the taxpayer's ability to identify the applicable rules. A taxpayer can determine that not every zakat payment automatically receives identical fiscal treatment; recognition is linked to payment through qualified institutions and to accountable evidence. From an administrative perspective, such limits are necessary for verification and accountability. The study therefore does not conclude that formal requirements should be removed. The issue is whether those requirements are accompanied by sufficiently clear benefits and integration so that formal compliance does not become an additional procedure standing apart from the substantive relationship between the two obligations. Substantive certainty requires more than knowledge of procedure. Taxpayers also need predictability concerning the legal and economic consequences of their actions. When zakat reduces income rather than tax liability, the relationship between the

[15] Syaifuddin Zuhdi, Aulia Lestari Rauf, and Widi Astuti, "Zakat as a Tax Reduction in the Framework of Realizing Indonesia as a Welfare State," *QISTHOSIA: Jurnal Syariah Dan Hukum* 5, no. 2 (2024): 112–126; Dwi Hantoro Prakoso and Arum Widiastuti, "The Gap in Utilizing Zakat as Tax Deduction: A Socio-Legal Review of Religiosity, Knowledge, and Law Awareness," *SASI* 31, no. 3 (2025).

[16] Miftakul Khoiri, Nirdukita Ratnawati, and Khomsiyah, "Zakat Profesi as Tax Deduction in Modern Tax System: A Triangulation of Systematic Literature Review Insights and Bibliometric Trends," *Accounting and Finance Review* 10, no. 2 (2025): 30–43.

nominal zakat payment and the reduction of final tax is not one-to-one. Legally, the calculation can still be certain, but the benefit is indirect from the perspective of integrating obligations. This is the basis for distinguishing "certainty of procedure" from "certainty of the relationship between obligations."[17]

The concept of double burden in this article must be understood carefully. Tax and zakat do not have identical legal foundations, purposes, or recipients; paying both is therefore not the technical equivalent of imposing the same tax twice on the same object. The term is used to describe a perception or financial consequence in which a Muslim taxpayer pays zakat in full while still paying tax that is reduced only indirectly. This distinction is important so that criticism of incomplete integration does not become a claim that tax and zakat are legally identical obligations.

Within Radbruch's three basic legal values, the current design is relatively strong in formal certainty but remains less satisfactory in terms of justice and utility. Legal certainty is reflected in the existence of identifiable rules, authorized institutions, and procedures for recognizing qualifying zakat payments. Justice, however, requires the legal system to examine whether the fiscal recognition granted to a taxpayer who has fulfilled an officially recognized zakat obligation is proportionate to the legal burden that remains. Utility requires the recognition mechanism to have a meaningful legal function rather than merely symbolic administrative value. These values need not be treated as absolute opposites; better policy should preserve certainty of state revenue while making the legal benefit of zakat recognition clearer.[18] A credit mechanism creates a more direct juridical relationship between zakat paid and tax payable than a deduction from income, and for that reason it offers a stronger model of substantive integration. The argument is not that zakat and tax are identical obligations or that one must replace the other, but that positive law may acknowledge the performance of a recognized religious-social obligation through a legal consequence that is more direct and intelligible.

Accordingly, the prescriptive direction of this study is twofold. Normatively, lawmakers should evaluate reconstruction of the current deductible model toward a limited tax-credit model at the statutory level, because the basic fiscal position of zakat cannot appropriately be transformed only through technical regulations. Administratively, integration between BAZNAS/LAZ payment evidence and tax administration should be strengthened so that recognition is verifiable without creating disproportionate procedural burdens. Fiscal simulation remains relevant for determining the technical design, scope, ceiling, and stages of implementation, but it is a subsequent policy-design question rather than the foundation of the juridical argument for greater justice, utility, and substantive legal certainty.

Accordingly, reform is not intended to replace tax with zakat or zakat with tax. Its purpose is to clarify the relationship between two obligations recognized within Indonesia's legal order.

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[17] Rahayu Paramita Anjelina and Suwandi, "A Tax Compliance Model with Legal Certainty Factors: A Laboratory Experiment Study," *Journal of Accounting Science* 8, no. 1 (2024): 22–39; Zuhdi, Rauf, and Astuti, "Zakat as a Tax Reduction in the Framework of Realizing Indonesia as a Welfare State."

[18] Zuhdi, Rauf, and Astuti, "Zakat as a Tax Reduction in the Framework of Realizing Indonesia as a Welfare State"; Gustav Radbruch, *Legal Philosophy* (Cambridge, MA: Harvard University Press, 1950).

Policy options may include strengthening the existing deductible mechanism, introducing a limited credit, or adopting a gradual model subject to a ceiling. The measure of success remains consistent with this study's findings: norms must be valid and non-contradictory, substantive content must be integrated, procedures must be workable, and legal consequences must provide more meaningful certainty for Muslim taxpayers.

This study finds that Indonesia's tax and zakat framework is formally synchronized but not yet substantively integrated. Vertically, the implementing regulations are consistent with the statutory deduction model; horizontally, the Zakat Management Law and tax legislation mutually recognize qualifying zakat. However, because zakat reduces the income base rather than tax payable, Muslim taxpayers receive a clear procedure without an equally direct legal relationship between the zakat obligation fulfilled and the final tax liability. PP No. 58 of 2023 and PMK No. 168 of 2023 strengthen the administrative simplicity of PPh Article 21 withholding, but they do not alter this substantive position. The principal implication is therefore a disparity between formal legal certainty—clarity of rules, institutions, and procedures—and substantive legal certainty—predictability, proportionality, justice, and utility in the relationship between the two obligations.

The study's conceptual contribution lies in distinguishing formal synchronization from substantive integration and, correspondingly, formal certainty from substantive certainty. On that basis, reform should be structured in two directions. At the normative level, lawmakers should evaluate a limited tax-credit construction at the statutory level so that recognition of qualifying zakat has a more direct juridical effect on tax payable. At the administrative level, evidence and data linkage between BAZNAS/LAZ and tax administration should be simplified and strengthened. Fiscal analysis remains necessary to determine the technical scope, ceiling, eligible categories, and stages of any credit mechanism, but it should not displace the normative assessment of justice and utility that supports deeper integration. The study remains limited by its normative character: it does not empirically measure taxpayer perceptions, the utilization rate of zakat deductions, or the revenue consequences of a tax-credit model. Future research may test these doctrinal findings using taxpayer data, BAZNAS/LAZ data, and fiscal simulations so that subsequent legislative design combines normative coherence with measurable administrative and fiscal effects.

CONCLUSION

Indonesia's tax and zakat regulations are normatively synchronized to a meaningful extent. Vertically, no direct conflict is identified between statutes and implementing regulations; horizontally, the Zakat Management Law and the HPP Law mutually recognize zakat. Substantive integration, however, remains incomplete because zakat is treated as an income deduction rather than a direct credit against tax payable. The current framework therefore provides stronger formal than substantive legal certainty for Muslim taxpayers. Future reform should strengthen both substantive and administrative integration. A tax-credit model may be evaluated gradually and within carefully defined limits, while preserving fiscal sustainability, accountability in zakat management, and administrative simplicity.

More specifically, the principal problem is neither a total regulatory vacuum nor a hierarchical conflict, but incomplete substantive integration. Lawmakers should therefore evaluate the relationship between zakat and income tax while preserving verification through authorized institutions. Simplification of payment evidence and closer administrative linkage between BAZNAS/LAZ and tax administration are also relevant to reducing procedural burdens. If a tax credit is considered, its introduction should be gradual, measurable, and preceded by fiscal analysis so that the objectives of legal certainty and justice do not undermine sustainable state revenue. The study is limited by its normative character. It does not empirically measure perceptions of double burden, the actual utilization rate of zakat deductions, or the revenue consequences of changing the model. Future research may test these normative findings using taxpayer data, BAZNAS/LAZ data, and fiscal simulations. Such evidence would allow future legislative recommendations to combine legal consistency with empirical assessment of effectiveness and impact

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