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Research Article

Implementation of Income Tax Article 21 (PPh 21) before and after the TER Rate and Progressive Tax Rate for Permanent Employees at PT FIF Lampung Branch

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Abstract: This study analyzes the implementation of Income Tax Article 21 (PPh 21) before and after changes in the Average Effective Rate (TER) and Progressive Rate based on Government Regulation (PP) No. 58 of 2023 on permanent employees of PT Federal International Finance (FIFGROUP) Lampung Branch. The purpose of the study was to evaluate the conformity of the calculation and reporting of PPh 21 with the latest regulations and to identify the impact of changes in rates on employee tax obligations. The research method used a qualitative descriptive approach with primary data (interviews and observations) and secondary data (financial documents, tax regulations, and internal company reports). Comparative analysis reveals that the use of TER tends to result in higher monthly tax burdens compared to annual progressive calculations, especially in the Non-Taxable Income (PTKP) K/3 and TK/3 categories. This finding indicates the need for adjustments to the payroll system to minimize tax differences and improve the accuracy of deductions.

Keywords: Average Effective Rate (TER); Income Tax; Payroll System; PPh 21; Progressive Rate

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1. Introduction

Taxpayer compliance in fulfilling tax obligations is directly proportional to the increase in state revenue, considering that 80% of state revenue comes from the tax sector. The level of public awareness in carrying out tax obligations has a crucial role, because disciplined fiscal contributions from taxpayers are a vital instrument for funding programs to improve public welfare through state budget allocations (Dian Nur Anissa et al., 2024) .

National development is a continuous effort aimed at maximizing the welfare of society. Its successful implementation depends on the availability of adequate funding. Based on data from the National budget instead (APBN), the main contributor to state revenue comes from the taxation sector, although there are a number of other sectors that play a role, such as oil and gas and foreign aid (Tumanggor, 2021) .

According to Law Number 28 of 2007 concerning General Provisions and Tax Procedures, tax is defined as a mandatory contribution paid by individuals or entities to the state based on statutory provisions, without any direct reward, and is used to finance the interests of the state in order to improve people's welfare. One of the objects of tax collection is income, namely income obtained in one tax year and taxed in accordance with applicable provisions.

The government has stipulated an update on the provisions of Income Tax (ITA) Article 21 (PPh 21) withholding through Government Regulation Number 58 Year 2023, which regulates the withholding rate on individual income obtained from work, services, and other activities. Income Tax Article 21 withholding is a tax obligation that must be fulfilled by individuals and entities, including permanent establishments, on income received from various business activities, services, or employment. This latest provision is contained in Government Regulation Number 58 Year 2023 related to the rate of withholding Income Tax Article 21 on individual income from work, services, or certain activities. The basic guideline for this derivative is Minister of Finance Regulation Number 168 of 2023, which presents the Implementation Framework for Tax Deduction on Income Related to Personal Work, Services, or Activities (PMK 168/2023). The applicable tax for employees is Income Tax Article (ITA) 21. Tax is a vital element for the sustainability of a country. In general, taxes function as the main source of funding for state financing and national development aimed at improving people's welfare. On the corporate side, taxes have a significant role in the company's operational activities, as well as being a determining factor in the calculation of the company's net profit (Engkol et al., 2023) .

The employee's income is subject to ITA 21 withholding by the agency/company, considering that the agency has legal authority as a tax withholder. The mechanism for calculating ITA 21 refers to a formula explicitly stipulated in the latest tax regulations. As a tax withholding agent, companies play a strategic role in supporting the effectiveness of the government's tax collection system (sarkoro et al., 2023).

The total amount of Income Tax Article 21 that must be withheld depends on the identity of the taxpayer and the type and amount of income earned. The Authority has updated the rules regarding the withholding of Income Tax Article 21 as specified in Government Regulation (PP) No. 58 Year 2023, which relates to the Deduction Rate of Income Tax Article 21 on Income Relating to Work, Services, or Personal Activities for Individual Taxpayers. Nonetheless, Indonesia's rapidly evolving economic landscape has spurred the growth of various sectors, especially the financial services sector. One of the strategies that companies can implement to achieve tax burden efficiency is through Tax Planning. Tax planning is a legal step taken by taxpayers to minimize tax liabilities, while still guided by the applicable statutory provisions (Khairani & Silalahi, 2022).

FIFGROUP, known as a leading financial institution in Indonesia, makes a significant contribution to economic progress through the financial services it provides to the community. In the midst of the activities of Lampung city, PT FIFGROUP Lampung Branch plays an important role in encouraging economic development. But in addition to the various achievements of the company, there are also challenges in managing employee Income Tax 21 accurately and efficiently. The number of employees and financial transactions at PT FIFGROUP's Lampung branch office increased along with the company's expansion. As a result, the management of employee income tax (PPh 21) becomes more challenging. Individuals employed by a company are called employees. They hold responsibility for their role and anticipate receiving remuneration for their contribution. ITA 21 deals with the taxation associated with a company's payroll or labor payment system. The term salary refers to the financial compensation that employees earn for their services towards the company. In Indonesia, there are several income taxes that are levied or withheld and then transferred to the state treasury, including PPh Article 21, PPh Article 22, PPh Article 23, PPh Article 25, PPh Article 26, and PPh Article 4 paragraph (2).

2. Literature Review

Taxes play a dual role in the Indonesian context, namely as an instrument of state revenue and regulator as well as stabilizer of economic activity in the framework of long-term development. This first function confirms the position of taxes as the main pillar of the government to optimize fiscal contributions through the taxation sector (Baguna et al., 2017) . Taxes are allocated to fund government operational expenses. If there is a revenue surplus, the funds are reallocated to finance public investment programs (Mardiasmo. (2018: 323). Taxation. edition, 2018) .

Taxes are the main source of state revenue, both directly and indirectly, which comes from the community to finance routine expenses, national development, and improve the community's economy. By definition, tax is a mandatory contribution charged to individuals or legal entities based on statutory provisions, is coercive, and is not accompanied by direct rewards. Its allocation is intended for the benefit of the state in order to achieve optimal prosperity of the people. Payment and reporting of taxes reflect a form of fulfillment of constitutional obligations as well as active participation of taxpayers in supporting state financing and national development through a collective and structured tax system (Abdullah et al., 2020) .

Income Tax Article 21 regulates the tax withholding mechanism on income obtained from work activities or *active* business-based economic activities (*active income*). A concrete example is an employee who receives compensation in the form of salary or wages as a result of work in a certain period, such as monthly. In addition, individuals who provide professional services or carry out independent work (such as consultants, freelancers, or freelancers) are also included in the category of active income that must be subject to withholding income tax Article 21 (Adityaningsih et al., 2016) .

Minister of Finance Regulation No. 101/PMK.010/2016 sets the limit of non-taxable income (PTKP) at IDR 54 million per year or IDR 4.5 million per month, which came into effect on June 27, 2016 (Ministry of Finance, 2016). This policy was welcomed by the community, especially workers with incomes below the Regional Minimum Wage (UMR). According to the Ministry of Finance (2016), major changes in the collection and use of taxes vary by country. As the majority of state revenue, taxes have an important role in Indonesia's taxation system with the passing of the Harmonization of Tax Regulations Law (HPP Law) Number 7 of 2021 by President Joko Widodo on 29 October 2021. The results of the study show that PT FIFGROUP has implemented TER for the January-November period and Progressive Tariff for December in accordance with PP No. 58 of 2023. However, a gap was found between the annual PPh 21 owed and the total deductions each month, resulting in an overpayment, for example for Mr. Su Rp264,650 and Mr. AK Rp76,35 at the end of the year.

Income Tax Article 21

Income Tax Article (ITA) 21 is one type of tax that is charged to income earned by individual taxpayers from work, services, or other activities in the country. This tax is directly related to the payroll system implemented by the company. Payroll management can be done either manually or with the help of software that provides various administrative features, including recording employee attendance.

Tax Regulations

Minister of Finance Regulation (PMK) Number 168 Year 2023 serves as the legal basis for the regulation of the Income Tax (PPh) reduction rate for Individual Taxpayers. With this PMK, there are updates and improvements to the provisions contained in PMK Number 252 Year 2008, as well as serving as an implementing regulation of Government Regulation (PP) Number 58 Year 2023.In this case, PMK Number 168 Year 2023 stipulates provisions related to income received by taxpayers from various activities, including employment and services provided. The purpose of this regulation is to provide certainty in tax calculation and make it easier for taxpayers to carry out their tax obligations.

Average Effective Rate

In calculating Income Tax Article 21 for permanent employees who are included in Individual Taxpayers, the average effective rate (TER) is applied. This rate is grouped according to the status of Non-Taxable Income (PTKP). In accordance with the provisions in the Minister of Finance Regulation (PMK) Number 168 of 2023 Article 9 paragraph (4), Non-Taxable Income is determined based on the taxpayer's circumstances at the beginning of the calendar year.

TER A, namely PTKP TK/0 (54 million) and PTKP TK/1 & K/0 (58.5 million);

TER B, namely PTKP TK/2 & K/1 (63 million) and PTKP TK/3 & K/2 (67.5 million);

TER C, i.e. PTKP K/3 (70 million).

Progressive Tariff

Tax rates for domestic individual taxpayers, as stipulated in Article 17 paragraph (1) letter a of the Harmonization of Tax Regulations Law (HPP Law) Number 7 of 2021.

Article 17 Rates (Progressive)

5% to PKP ≤ IDR 60.000.000

15% to PKP > IDR 60.000.000 – IDR 250.000.000

25% to PKP > IDR 250.000.000 – IDR 500.000.000

30% to PKP > IDR 500.000.000 – IDR 5.000.000.000

35% to PKP > IDR 5.000.000.000

(Source: HPP Law No.7/2021)

Non-taxable income (PTKP)

The Minister of Finance Regulation (PMK) stipulates the amount of non-taxable income (PTKP) which is the basis for calculating Income Tax (PPh) Article 21. Based on Article 7 of Law Number 36 of 2008, PTKP is part of the income of an individual taxpayer that is not subject to PPh Article 21. PTKP plays a role in reducing gross income to determine the value of net income that becomes the object of tax. The amount of PTKP can change every year, depending on the government's fiscal policy which is regulated through PMK as the implementation of the Income Tax Law.

PTKP Rate Lyers

TK/0:

Tahunan: IDR 54.000.000 | Bulanan: IDR 4.500.000 | Harian: IDR 150.009

TK/1:

Tahunan: IDR 58.500.000 | Bulanan: IDR 4.875.000 | Harian: IDR 162.500

TK/2:

Tahunan: IDR 63.000.000 | Bulanan: IDR 5.250.000 | Harian: IDR 176.388

TK/3:

Tahunan: IDR 67.500.000 | Bulanan: IDR 5.525.000 | Harian: IDR 187.500

K/0:

Tahunan: IDR 58.500.000 | Bulanan: IDR 4.875.000 | Harian: IDR 162.500

K/1:

Tahunan: IDR 63.000.000 | Bulanan: IDR 5.250.000 | Harian: IDR 176.388

K/2:

Tahunan: IDR 67.500.000 | Bulanan: IDR 5.645.000 | Harian: IDR 187.500

(Source: Minister of Finance Regulation No. 101/PMK/.010/2016)

Taxable Income (PKP)

According to Resmi (2019: 121), to determine the amount of taxable income for domestic taxpayers and permanent establishments, gross income is reduced by the costs used to obtain, collect, and maintain income. The gross income referred to refers to the provisions of Article 4 paragraph (1) of the Income Tax Law (PPh Law), excluding income subject to final income tax as stated in Article 4 paragraph (2), as well as income that is excluded from the tax object.

Deductible expenses are stipulated in Article 6 paragraph (1) of the Income Tax Law, while expenses that are not allowed to be deducted are listed in Article 9 paragraph (1). In addition, compensation for losses and non-taxable income from previous years can also be a deduction from gross income for Individual Taxpayers.

Classification of Income Tax 21

Permanent Employee or Pension Recipient

For permanent employees, compensation is in the form of salary, allowances, and insurance premiums paid by the company. Before tax, the gross income will be reduced by job expenses of 5% of the total gross income, with a maximum limit of Rp6,000,000 per year or Rp500,000 per month. Furthermore, income will also be reduced by pension contributions and Old Age Allowance (THT) or Old Age Security (JHT) paid independently by the employee. On the other hand, for pension recipients, income in the form of pensions received periodically will be reduced by office costs of 5% of gross income, with a maximum limit of Rp2,400,000 per year or Rp200,000 per month.

Calculation of Income Tax Article 21 Payable

Based on the provisions in Article 5 paragraph (1) letter a of the Minister of Finance Regulation (PMK) Number 168 of 2023, the income that becomes the object of Income Tax Article 21 withholding is all income received or obtained by permanent employees, both regular and irregular. Furthermore, Article 5 paragraph (3) details the types of income, which include:

a. Base salary, various types of allowances, as well as other regular income, including overtime and similar earnings;
b. Bonuses, holiday allowances, production services, tantiem, gratuities, premiums, and other irregular income;
c. Remuneration for work performed by an employee for an employer;
d. Payment of work accident and death insurance contributions to the employment social security organizing body paid by the employer;
e. Health care insurance contributions paid by the employer to the health social security organizing body;

Employer-paid insurance premiums, including health, accident, life, endowment, and scholarship insurance.

3. Method

This research uses a descriptive approach, meaning actual facts are used. The data obtained were sourced from primary and secondary sources. The primary data was obtained through direct observation and interviews with management at PT Federal Internasional Finance, while secondary data was obtained to supplement the primary data.

4. Results and Discussion

Basis for Imposition and Withholding of Income Tax Article 21

The tax imposition and rates applied depend on the type of income and the category of income recipient. For example, the calculation of Income Tax Article 21 for salaries received regularly by permanent employees will be different from the calculation for non-routine income, such as honoraria or rewards, even though they are received by permanent employees. Therefore, even though the type of income is the same, if it is received by a different group of recipients, the rate and tax base can also be different.

Basis for Calculation of Income Tax (PPh) Article 21 on Permanent Employees (employees)

Based on the data obtained from the financial department of PT Federal International Finance Lampung Branch, the authors will process the data regarding the calculation of Income Tax Article 21 payable registered as permanent employees.

Table 6 Salary list of permanent employees

Name	PTKP Status	Basic Salary Per Month (Rp)	THR 1x Salary (Rp)	Dues Cooperative & BPJS (Rp)	June Bonus (Rp)	Allowances (Rp)
Su	K/3	7.500.000	7.500.000	220.000	3.000.000	6.240.000
Ak	K/1	6.850.000	6.850.000	220.000	3.000.000	6.240.000
Te	K/2	6.950.000	6.950.000	220.000	3.000.000	6.240.000
Wa	K/1	6.750.000	6.750.000	220.000	3.000.000	6.240.000
Re	TK/3	6.250.000	6.250.000	220.000	3.000.000	6.240.000
Ea	K/0	7.125.000	7.125.000	220.000	3.000.000	6.240.000
En	K/1	7.250.000	7.250.000	220.000	3.000.000	6.240.000
Ok	K/1	7.100.000	7.100.000	220.000	3.000.000	6.240.000
Er	K/2	6.500.000	6.500.000	220.000	3.000.000	6.240.000
No	K/1	7.000.000	7.000.000	220.000	3.000.000	6.240.000

(Source: PT Federal International Finance FIFGROUP Cab. Lampung, 2025)

Calculation of Income Tax Withholding PPh Article 21 on Salaries of Permanent Employees Using the Average Effective Rate at PT Federal International Finance Lampung Branch

1. Su K/3 (TER C)

a. 9 months

Base salary + Allowances = Rp 7,500,000 + Rp 520,000 = Rp 8,020,000

IDR 8,020,000 x 1% = IDR 80,200

IDR 80,200 x 9 months = IDR 721,800

b. March THR 1x salary

Basic salary + THR + Allowance = Rp 7,500,000 + Rp 7,500,000 + Rp 520,000 = Rp 15,520,000

IDR 15,520,000 x 5% = IDR 776,000

c. June

Base salary + Bonus + Allowance = Rp 7,500,000 + Rp 3,000,000 + Rp 520,000 = Rp 11,020,000

IDR 11,020,000 x 1.75% = IDR 192,850

Income tax 21 that has been deducted = IDR 1,690,650

a. Calculation of Income Tax 21 for the last tax period

Base salary: IDR 7,500,000 x 12 months	IDR 90,000,000
THR 1x salary	IDR 7,500,000
Bonus	IDR 3,000,000
Allowance	IDR 6,240,000
Gross cost	IDR 106,740,000
Deduction:	

Position Cost (5%)	IDR 6,000,000
Dues: Cooperative	IDR 120,000
BPJS	IDR 100,000
Net Cost	IDR 100,520,000
PTKP	IDR 72,000,000
PhKP	IDR 28,520,000
Tariff Article 17	
5% x IDR 28,520,000	IDR 1,426,000
Income Tax 21 Payable	IDR 1,426,000
Income tax 21 that has been deducted	IDR 1,690,650
Income tax payable in December	IDR 264,650

So, if the nominal Income Tax 21 payable is less than the Income Tax 21 that has been deducted, the Income Tax payable in December is overpaid.

PPh 21 is calculated based on the employee's entire income for a year, including basic salary, bonuses, THR, and allowances. The monthly income of IDR 8,020,000 is the sum of the basic salary of IDR 7,500,000 and allowances of IDR 520,000. The 1% rate applies from January to September, so the total tax deduction is IDR 721,800 for nine months.

Mr. SU received THR once in March, so his total income for a month was IDR 15,520,000, which was subject to a rate of 5%. The tax deducted was IDR 776,000. Meanwhile, the employee received a bonus of IDR 3,000,000 in June. With a total income of IDR 11,020,000 per month with a rate of 1.75%, the PPh 21 for that month was IDR 192,850. The total PPh 21 that has been deducted is IDR 1,690,650.

The total gross salary of employees, including basic salary, THR, bonuses, and allowances, is Rp106,740,000 per year. Net income is Rp100,520,000 after deducting BPJS, cooperative contributions, and office costs. Taxable Income (PKP) after deducting Rp72,000,000 (status TK/0) is Rp28,520,000. The amount of tax payable is determined by taking 5% of PKP, or Rp1,426,000. The excess of Rp264,650 has been paid because the amount of tax deducted is greater.

2. Ak K/1 (TER B)

a. 9 months
Base salary + Allowances = IDR 6,850,000 + IDR 520,000 = IDR 7,370,000
IDR 7,370,000 x 1% = IDR 73,700
IDR 73,700 x 9 months = IDR 663,300

b. March THR 1x salary
Basic salary + THR + Allowance = IDR 6,850,000 + IDR 6,850,000 + IDR 520,000 = IDR 14,220,000
IDR 14,220,000 x 5% = IDR 711,000

c. June

Base salary + Bonus + Allowance = Rp 6,850,000 + Rp 3,000,000 + Rp 520,000 = Rp 11,020,000

IDR 10,370,000 x 1.50% = IDR 155,550

Income tax 21 that has been deducted = Rp 1,529,850

- **Calculation of Income Tax 21 for the last tax period**

Base salary: IDR 6,850,000 x 12 months	IDR 82,200,000
THR 1x salary	IDR 6,850,000
Bonus	IDR 3,000,000
Allowance	IDR 6,240,000
Gross cost	IDR 98,290,000
Deduction:	
Position Cost (5%)	IDR 6,000,000
Dues: Cooperative	IDR 120,000
BPJS	IDR 100,000
Net Cost	IDR 92,070,000
PTKP	IDR 63,000,000
PhKP	IDR 29,070,000
Tariff Article 17	
5% x IDR 29,070,000	IDR 1,453,500
Income Tax 21 Payable	IDR 1,453,500
Income tax 21 that has been deducted	IDR 1,529,850
Income tax payable in December	IDR 76.35

So, if the nominal Income Tax 21 payable is less than the Income Tax 21 that has been deducted, the Income Tax payable in December is overpaid.

Mr. Ak earns IDR 7,370,000 per month, consisting of a basic salary of IDR 6,850,000 and an allowance of Rp520,000. The PPh 21 rate of 1% applies from January to September (nine months), so the total deduction is Rp663,300. The worker receives one THR salary in March, so his total income is IDR 14,220,000 per month, plus IDR 711,000 which is subject to a rate of 5%. Mr. Ak receives a bonus of IDR 3,000,000 in June, so his total salary is IDR 10,370,000. This amount is then subject to PPh 21 deductions of Rp155,550 at a rate of 1.5%.

IDR 1,529,850 is the total PPh 21 that has been deducted this year. Meanwhile, his taxable income is Rp29,070,000 per year calculated from the gross amount of IDR 98,290,000 and deductions and PTKP of IDR 63,000,000. Based on the PPh Article 17 rate, the payment of PPh Article 21 is Rp1,453,500. There is an excess deduction of IDR 76,350 which can be refunded because the amount of tax withheld is greater.

Calculation of Income Tax Withholding PPh Article 21 on Salaries of Permanent Employees Using Progressive Rates at PT Federal International Finance Lampung Branch

1. **Su**

Base salary x 12 months		IDR 90,000,000
THR		IDR 7,500,000
Bonus		IDR 3,000,000
Allowance		IDR 6,240,000
Gross Income		IDR 106,740,000
Deduction:		
5% position cost		IDR 6,000,000
Dues:	BPJS	IDR 100,000
	Cooperative	IDR 120,000
Net Income		IDR 100,520,000
PTKP K/3		IDR 72,000,000
PhK		IDR 28,520,000
Article 17 tariff		
5% x IDR 28,520,000	IDR 1,426,000	
Income tax 21 per month : 12 months		IDR 118,834
Income tax 21 per year		IDR1,426,000

So, when using a progressive tax rate, the tax imposed on Mr. Su every month is the same, which is Rp. 118,834. Because the calculation of income tax article 21 with a progressive rate is done by annualizing the employee's basic salary.

Mr. Su receives a fixed income in the form of a basic salary of Rp90,000,000.00 per year, plus a Holiday Allowance (THR) of Rp7,500,000.00 per year, an annual bonus of Rp3,000,000.00, and Rp6,240,000.00 so that his gross annual income exceeds Rp106,740,000. From this amount, a 5% position fee is deducted (maximum Rp6,000,000), BPJS contributions of Rp100,000 and cooperative contributions of Rp120,000. After deductions, a net income of Rp100,520,000 is obtained.

In addition, Non-Taxable Income (PTKP) of Rp72,000,000.00 is based on marital status K/3 (married with three dependents). Thus, Taxable Income (PKP) is Rp28,520,000.

Based on Article 17 paragraph (1) letter a of the Income Tax Law, a rate of 5% is imposed, meaning that Rp1,426,000 is the total amount of Article 21 Income Tax owed in one year. The amount of Article 21 Income Tax owed each month if divided proportionally is around Rp118,834.

2. Ak

Base salary x 12 months	IDR 82,200,000
THR	IDR 6,850,000
Bonus	IDR 3,000,000
Allowance	IDR 6,240,000
Gross Income	IDR 98,290,000
Deduction:	
5% position cost	IDR 6,000,000
Dues: BPJS	IDR 100,000
Cooperative	IDR 120,000
Net Income	IDR 92,070,000
PTKP K/1	IDR 63,000,000
PhK	IDR 29,070,000
Article 17 tariff	
5% x IDR 29,070,000	IDR 1,453,500
Income tax 21 per month : 12 months	IDR 121,125
Income tax 21 per year	IDR 1,453,500

So, when using a progressive tax rate, the tax imposed on Mr. Ak is the same every month, which is IDR 121,125. Because the calculation of income tax article 21 with a progressive rate is done by annualizing the employee's basic salary.

Mr. Ak's annual gross income is IDR 98,290,000. The gross income includes a basic salary of Rp82,200,000, a holiday allowance (THR) of IDR 6,850,000, a bonus of IDR 3,000,000, and an allowance of IDR 6,240,000. From this amount, a 5% position fee of IDR 6,000,000 is deducted, plus BPJS contributions of Rp100,000 and cooperative contributions of IDR 120,000. The net income after deducting BPJS contributions is IDR 92,070,000.

Furthermore, IDR 63,000,000 is Non-Taxable Income (PKP) for those with PTKP K/1 status (married with one dependent). Thus, IDR 29,070,000 is Taxable Income (PKP) which is the basis for calculating tax. The PPh 21 payable for a year is IDR 1,453,500, based on the 5% rate stipulated in Article 17 of the Income Tax Law. The PPh 21 payable each month, on average, is IDR 121,125.

5. Conclusions

Research at PT FIFGROUP Lampung Branch concluded that the calculation of Article 21 Income Tax, both before and after the implementation of TER rates (January-November 2023 based on PP No. 58/2023) and progressive rates, was in accordance with HPP Law No. 7/2021. The findings indicate the need to increase government socialization regarding the new mechanism in PP No. 58/2023 to Taxpayers to increase awareness and compliance, in order to support sustainable tax reform and administrative transparency. In addition, harmonization of the HPP Law with its derivative regulations in the future is recommended as a consistent policy basis to minimize differences in operational interpretation.

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