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# Tax Incentives and Regional Tax Justice in Indonesia's Special Economic Zones: The Case of Mandalika, Central Lombok

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## Abstract

Tax incentives are frequently used to attract investment into Indonesia's Special Economic Zones (SEZs), including tourism-oriented areas such as Mandalika in Central Lombok. While such incentives may stimulate investment, employment, and infrastructure development, they also reduce potential tax revenue and raise questions concerning who ultimately benefits from fiscal concessions. This article examines the tax justice implications of investment incentives in the Mandalika Special Economic Zone. Using normative juridical research and policy analysis, the study evaluates tax incentives, investment regulation, local revenue, employment effects, and community benefits. The article argues that tax incentives should be justified not merely by the amount of investment generated but by measurable public and regional benefits. Where tax expenditures primarily benefit investors while local communities receive limited improvements in income, employment, infrastructure, or public services, the legitimacy of such incentives becomes questionable. The study proposes a regional tax justice framework requiring transparency of tax expenditures, measurable benefit-sharing obligations, periodic evaluation, and community-oriented performance indicators. The article concludes that investment incentives in Mandalika should be governed by principles of proportionality, accountability, and distributive justice so that fiscal concessions generate tangible benefits for the Central Lombok community.

[*Insentif pajak sering digunakan untuk menarik investasi ke Zona Ekonomi Khusus (KEK) Indonesia, termasuk daerah berorientasi pariwisata seperti Mandalika di Lombok Tengah. Meskipun insentif tersebut dapat merangsang investasi, lapangan kerja, dan pembangunan infrastruktur, insentif tersebut juga mengurangi potensi pendapatan pajak dan menimbulkan pertanyaan tentang siapa yang pada akhirnya mendapat manfaat dari konsesi fiskal. Artikel ini mengkaji implikasi keadilan pajak dari insentif investasi di Zona Ekonomi Khusus Mandalika. Dengan menggunakan penelitian yuridis normatif dan analisis kebijakan, studi ini mengevaluasi insentif pajak, regulasi* *investasi, pendapatan daerah, dampak lapangan kerja, dan manfaat masyarakat. Artikel ini berpendapat bahwa insentif pajak harus dibenarkan tidak hanya oleh jumlah investasi yang dihasilkan tetapi juga oleh manfaat publik dan regional yang terukur. Jika pengeluaran pajak terutama menguntungkan investor sementara masyarakat lokal hanya menerima peningkatan terbatas dalam pendapatan, lapangan kerja, infrastruktur, atau layanan publik, legitimasi insentif tersebut menjadi dipertanyakan. Studi ini mengusulkan kerangka kerja keadilan pajak regional yang mensyaratkan transparansi pengeluaran pajak, kewajiban pembagian manfaat yang terukur, evaluasi berkala, dan indikator kinerja yang berorientasi pada masyarakat. Artikel ini menyimpulkan bahwa insentif investasi di Mandalika harus diatur oleh prinsip-prinsip proporsionalitas, akuntabilitas, dan keadilan distributif agar konsesi fiskal menghasilkan manfaat nyata bagi masyarakat Lombok Tengah.*]

**Keywords:** Mandalika, tax incentives, special economic zones, fiscal justice, investment taxation

## Introduction

Special Economic Zones have become an important instrument of Indonesia's investment and regional-development policy. The basic policy logic is straightforward: by concentrating infrastructure, regulatory facilities, administrative services, and fiscal incentives within a geographically defined area, the government seeks to overcome investment constraints and create an economic cluster capable of generating employment and regional growth. Indonesia's Special Economic Zone framework has developed considerably since Law No. 39 of 2009 concerning Special Economic Zones, while Mandalika was formally established as a tourism-oriented SEZ through Government Regulation No. 52 of 2014. The Mandalika SEZ is located in Central Lombok, West Nusa Tenggara, and was designed around tourism activities that include accommodation, entertainment, supporting services, and international-scale events (Government of Indonesia 2009; Government of Indonesia 2014). Its development reflects a broader national strategy in which tourism investment is expected to create multiplier effects beyond the physical boundaries of the zone. The fiscal question, however, is whether tax concessions granted to investors produce benefits sufficiently broad and durable to justify the public revenue forgone.

Tax incentives represent a form of government expenditure even though they do not appear as conventional budgetary spending. When the state grants a tax holiday, tax allowance, accelerated depreciation, exemption, or customs facility, it forgoes revenue that would otherwise be available for public expenditure. The OECD has therefore emphasised that investment incentives should be assessed according to both their benefits and their fiscal costs, particularly because incentives may generate tax complexity, distort competition, and provide windfall gains to investments that would have occurred without preferential treatment (OECD 2020). Indonesia has made significant progress in reporting tax expenditures, and the Ministry of Finance estimated total tax expenditure at approximately IDR 400.1 trillion in 2024, equivalent to 1.81 percent of GDP (Ministry of Finance 2025). This figure demonstrates that tax expenditure is not a marginal fiscal issue. It represents a substantial allocation of public resources through the tax system. The justice question is therefore whether such resources are distributed in ways that promote inclusive regional development rather than disproportionately increasing the returns of already well-capitalised investors.

The Mandalika case is particularly relevant because the SEZ combines a substantial investment programme with a tourism-development model that depends on land, infrastructure, natural landscapes, local labour, and community participation. Unlike a purely industrial SEZ, tourism-oriented zones rely heavily on local environmental and cultural assets. The economic value created by hotels, resorts, restaurants, events, transportation, and tourism services therefore depends partly on resources and communities located outside individual investment projects. This creates a distinctive fiscal-justice problem. Investors may receive national tax incentives, while local governments and communities bear costs associated with infrastructure provision, land-use transformation, environmental management, public services, and social adjustment. If the economic benefits remain concentrated among investors and higher-skilled participants, tax incentives may effectively transfer public resources toward private capital without generating an equivalent regional return. The justice of the policy therefore depends on whether fiscal concessions create sufficiently strong linkages between private investment and local welfare.

The economic case for investment incentives should nevertheless not be dismissed. International evidence indicates that SEZs can generate positive effects on investment, employment, productivity, firm entry, and wages under appropriate institutional conditions. Research on China's economic zones by Lu, Wang, and Zhu demonstrates that place-based policies can produce significant increases in capital investment, employment, output, productivity, wages, and firm formation, although the benefits vary across industries and locations (Lu, Wang, and Zhu 2019). Similarly, Farole's comparative research on SEZs emphasises that successful zones depend on infrastructure, governance, strategic integration, and connections with the wider domestic economy rather than incentives alone (Farole 2011). The appropriate policy question is therefore not whether incentives should exist, but whether their design creates additional investment and regional spillovers that would not otherwise occur. Where incentives simply increase investor profitability without changing the investment decision or generating local externalities, the justification becomes substantially weaker.

Indonesia's own experience provides reasons for caution. The OECD has observed that Indonesian investment incentives have historically been complex and that SEZs may create fiscal costs and competitive distortions between firms operating inside and outside designated zones (OECD 2020). The organisation has recommended greater reliance on cost-based incentives, regular evaluation, transparency, and sunset mechanisms. This is important for Mandalika because a tourism project located inside the SEZ may receive fiscal treatment that is unavailable to comparable businesses elsewhere in Central Lombok. Such differentiation can be justified only if the SEZ produces additional public benefits. Otherwise, the tax system may undermine horizontal equity by treating economically similar firms differently solely because one operates within a designated geographic boundary. Regional tax justice therefore requires balancing place-based preferences against the principle that public fiscal privileges should correspond to demonstrable differences in public value.

The empirical evidence concerning Mandalika suggests that the development has generated meaningful economic opportunities while also revealing unequal access to those opportunities. Yuli et al. found that tourism development in the Mandalika SEZ generated positive effects on local welfare, including economic, educational, and health-related improvements (Yuli et al. 2023). Research on community readiness, however, indicates that local residents have been relatively prepared to host tourism but have faced limitations in their ability to participate directly in the tourism industry because of skills, capital, and institutional constraints (Azizurrohman et al. 2022). This distinction is critical. A community can benefit indirectly from tourism while remaining structurally excluded from the highest-value segments of the tourism economy. Regional tax justice therefore cannot be measured only by aggregate investment or tourist arrivals. It must examine who receives employment, who owns businesses, who participates in supply chains, who bears development costs, and whether local communities obtain durable economic capabilities.

Mandalika's development has also been accompanied by land-related disputes and concerns about the distribution of development benefits. Research by Jasmisari documents conflicts involving local residents and the Indonesia Tourism Development Corporation in connection with land acquisition and infrastructure development (Jasmisari 2022). Chaniago, Nugroho, and Isbah further argue that the development of Mandalika reflects a configuration in which state and capital exert significant influence over local social and economic structures (Chaniago, Nugroho, and Isbah 2024). These findings do not imply that investment incentives are inherently unjust. Instead, they demonstrate why fiscal policy cannot be separated from the broader political economy of regional development. If investors receive tax concessions while local communities experience land displacement, rising living costs, or limited access to formal employment, the distributional legitimacy of those concessions becomes difficult to establish.

This article argues that the central criterion for evaluating Mandalika's tax incentives should be regional additionality. Tax incentives are justified when they generate economic, social, environmental, and fiscal benefits that would not have materialised, or would have materialised to a substantially lesser extent, without the incentive. The analysis therefore moves beyond the conventional question of whether Mandalika has attracted investment. The more important question is whether the investment has generated measurable benefits for Central Lombok that are proportionate to the value of the fiscal concessions. A justice-oriented approach requires the government to connect tax expenditure with performance indicators such as local employment, local procurement, skills development, support for micro and small enterprises, infrastructure contributions, environmental protection, and community welfare. The article consequently conceptualises tax incentives as a form of fiscal contract between the state and investors rather than as an unconditional entitlement.

## Literature Review and Research Gap

The theoretical justification for investment tax incentives is primarily derived from the existence of market failures and positive externalities. Governments may provide fiscal incentives when private investors cannot fully capture the social benefits created by their activities. Such benefits may include employment, technology transfer, skills development, infrastructure, export growth, productivity spillovers, and regional agglomeration. From this perspective, an incentive can be efficient when it changes an investment decision that would otherwise not occur and when the resulting social benefits exceed the fiscal cost. The IMF, OECD, United Nations, and World Bank have nevertheless warned that incentives should be carefully targeted because they can generate revenue losses, distortions, administrative complexity, and opportunities for tax avoidance when poorly designed (IMF, OECD, UN, and World Bank 2015). The fundamental economic principle is therefore additionality: the state should sacrifice tax revenue only when the incentive produces incremental social value rather than simply increasing the profitability of investments that would have occurred anyway.

Tax competition creates another important theoretical problem. Governments may compete with one another by offering increasingly generous tax concessions to attract mobile investment. Such competition can produce a race toward lower effective taxation without necessarily increasing total investment or social welfare. Klemm and Van Parys found evidence that tax holidays and lower corporate tax rates can attract foreign direct investment under certain circumstances, but their effects on broader capital formation and economic growth are less straightforward (Klemm and Van Parys 2012). James similarly argues that investment incentives are more likely to influence investment decisions when they address specific constraints rather than merely reduce general taxation (James 2013). This distinction is highly relevant to SEZs. If infrastructure, legal certainty, market access, human capital, and administrative efficiency are the primary determinants of investment, excessive tax incentives may generate little additional investment while imposing substantial fiscal costs. Regional tax justice therefore requires determining whether the incentive addresses a genuine market failure or merely transfers fiscal value to investors.

The literature on SEZs further indicates that geographic concentration can generate agglomeration economies. Firms located near one another may benefit from shared infrastructure, labour markets, supplier networks, knowledge spillovers, and specialised services. Farole and Akinci argue that SEZs can contribute to development when they are integrated with national economies and supported by effective institutions (Farole and Akinci 2011). Zeng similarly identifies infrastructure, governance, human capital, and linkages with local economies as critical conditions for successful SEZs (Zeng 2011). These findings suggest that tax incentives are only one component of zone policy. A generous tax holiday cannot substitute for weak infrastructure or inadequate skills. In Mandalika, this is especially significant because tourism requires interconnected systems involving transportation, hospitality, food production, cultural services, digital infrastructure, waste management, and community-based enterprises. The regional value of tax incentives therefore depends partly on whether the zone strengthens these wider economic linkages.

The regional-development literature also distinguishes between growth inside a zone and spillovers outside the zone. A SEZ may attract investment and create employment within its boundaries while producing limited benefits for surrounding communities. OECD analysis of Indonesia has highlighted this risk, noting that previous zone-based policies did not always generate growth extending sufficiently beyond the immediate zone and that stronger connections with regional economies are necessary (OECD 2020). This distinction is central to fiscal justice. A local community should not be expected to accept tax-supported investment simply because the investment increases aggregate regional GDP. The relevant measure is whether the fiscal expenditure contributes to broad-based development. If most value added leaks to external investors, imported inputs, or highly skilled workers from outside the region, local multiplier effects may remain limited. Incentive policy must therefore encourage domestic and regional supply-chain integration rather than focusing narrowly on capital formation.

The concept of tax justice adds a normative dimension to this economic literature. Horizontal equity requires similarly situated taxpayers to receive similar tax treatment, while vertical equity recognises that differences in economic capacity can justify differentiated treatment. Investment incentives create a potential horizontal-equity problem because firms performing similar activities may face different tax burdens depending on their location or eligibility status. This differential treatment can be justified by place-based externalities, but only if those externalities are real and measurable. From a regional perspective, distributive justice also requires asking whether the benefits of tax expenditure accrue to the same population that bears the opportunity cost. If tax concessions reduce national revenue while the benefits accrue primarily to external investors, the affected local population may receive insufficient compensation through public services or employment. Tax justice therefore requires a connection between fiscal sacrifice and social return.

The concept of tax expenditure is especially useful for evaluating this relationship. Tax expenditures are deviations from a benchmark tax system designed to achieve policy objectives through preferential treatment. They should be evaluated similarly to direct government spending because both involve the allocation of public resources. Indonesia has institutionalised tax-expenditure reporting through the Ministry of Finance, increasing the transparency of fiscal concessions. The Ministry reported that tax expenditure reached IDR 400.1 trillion in 2024, demonstrating the material significance of the instrument (Ministry of Finance 2025). The OECD has recommended that Indonesia improve the evaluation of SEZ incentives by reporting their forgone revenue and comparing those costs with measurable benefits (OECD 2020). This provides a direct foundation for the argument developed in this article: tax justice requires not simply reporting the amount of tax revenue forgone but evaluating whether the corresponding regional benefits justify that expenditure.

The tourism literature adds another dimension because tourism investment frequently produces unequal participation. Tourism can generate employment, entrepreneurial opportunities, infrastructure, and improved public services, but it can also increase land values, living costs, environmental pressures, and dependence on volatile visitor flows. Sharpley argues that sustainable tourism development must consider the distribution of tourism benefits and costs rather than assuming that tourism growth automatically produces local welfare (Sharpley 2000). Scheyvens similarly emphasises empowerment and local participation as critical dimensions of tourism development, particularly in developing communities (Scheyvens 1999). These arguments are directly relevant to Mandalika because local residents may participate as informal vendors, homestay operators, transport providers, or employees without obtaining ownership or decision-making power over major tourism assets. A tax incentive that benefits large investors but does not strengthen local participation risks reinforcing rather than reducing regional inequality.

Existing empirical studies on Mandalika provide valuable evidence but leave a specific research gap. Yuli et al. identify positive welfare effects from tourism development, while Azizurrohman et al. demonstrate that community readiness does not necessarily translate into adequate capacity to participate in tourism businesses (Yuli et al. 2023; Azizurrohman et al. 2022). Chaniago, Nugroho, and Isbah analyse the relationship between state capitalism and local communities, while Jasmisari examines land-related conflict in the development process (Chaniago, Nugroho, and Isbah 2024; Jasmisari 2022). Kaharuddin et al. specifically examine the implementation of tax incentives for MSMEs in the Mandalika SEZ and identify the importance of tax facilities in supporting local business development (Kaharuddin et al. 2024). However, these studies have not sufficiently integrated the legal and economic analysis of tax incentives with a normative framework of **regional tax justice**. This article addresses that gap by evaluating fiscal concessions according to their distributional consequences and measurable regional additionality.

The research consequently contributes a framework that links four dimensions usually analysed separately: tax expenditure, investment additionality, regional development, and distributive justice. The argument is that the success of Mandalika's tax incentives cannot be established by investment realisation alone. Investment must generate a chain of public value extending from capital formation to employment, local procurement, skills, infrastructure, MSME participation, environmental sustainability, and community welfare. The fiscal concession should be considered legitimate only when the combined public benefits are proportionate to the revenue forgone. This approach also changes the meaning of accountability. Rather than asking simply whether investors have complied with formal tax-incentive requirements, government should assess whether the incentive has fulfilled its underlying public purpose. This creates a stronger foundation for periodic evaluation, performance conditions, clawback provisions, and transparent public reporting.

## Method

This study uses a normative juridical method combined with descriptive, argumentative, and analytical policy analysis. The normative juridical approach examines the statutory and regulatory framework governing Special Economic Zones and the tax incentives available to businesses operating within them. Primary legal materials include Law No. 39 of 2009 concerning Special Economic Zones, Government Regulation No. 52 of 2014 concerning the Mandalika SEZ, Government Regulation No. 40 of 2021 concerning the Implementation of Special Economic Zones, and relevant tax regulations governing corporate income tax facilities, customs, value-added tax, and other fiscal facilities. Government Regulation No. 40 of 2021 replaced the earlier regulatory framework and provides the principal contemporary legal foundation for the administration and facilities of SEZs (Government of Indonesia 2021). The legal analysis focuses on the nature of fiscal privileges, eligibility requirements, duration, conditionality, administrative mechanisms, and the relationship between central government incentives and regional development objectives.

The study also analyses the economic rationale of tax incentives through the concepts of additionality, tax expenditure, investment neutrality, and regional spillovers. Additionality is used to distinguish investment that genuinely depends on the incentive from investment that would have occurred without it. Tax expenditure analysis is used to conceptualise forgone tax revenue as a public-resource allocation requiring evaluation. Regional spillover analysis evaluates whether investment benefits extend beyond the investors receiving the fiscal concessions. These analytical categories are important because a tax incentive may be successful according to one criterion but unsuccessful according to another. For example, an investor may generate substantial capital expenditure while producing limited local employment or procurement. Conversely, a smaller investment may generate stronger regional spillovers. The study therefore avoids using investment value as the sole measure of policy success.

Secondary materials consist of peer-reviewed academic literature, government reports, official legal databases, international organisation publications, and empirical research concerning Mandalika and Indonesian SEZs. Particular attention is given to OECD assessments of Indonesian investment incentives, Ministry of Finance tax-expenditure reports, official SEZ performance data, and academic research on Mandalika's tourism development and community welfare. The use of official sources is important because fiscal incentives are legally defined instruments and their economic value depends on the actual eligibility conditions and implementation mechanisms. Academic studies are used to examine distributional effects that cannot be identified through fiscal statistics alone, particularly issues concerning local employment, skills, community participation, land, and supply-chain integration.

The analysis proceeds by comparing the normative objectives of tax incentives with observable regional outcomes. The study asks whether fiscal concessions have contributed to investment additionality, whether investment has generated employment and local economic linkages, whether local communities have obtained meaningful opportunities to participate, and whether the fiscal cost of incentives is subject to adequate transparency and evaluation. Because this is a normative policy study rather than an econometric impact evaluation, it does not claim to establish a statistically causal relationship between individual tax incentives and Mandalika's economic outcomes. Instead, the research uses available legal and empirical evidence to identify whether the existing policy design contains sufficient mechanisms to protect fiscal accountability and distributive justice. The principal analytical proposition is that tax incentives should be understood as conditional public investments whose legitimacy depends on measurable public returns.

## Analysis and Discussion

### A. The Legal and Fiscal Architecture of Tax Incentives in the Mandalika SEZ

The legal basis for the Mandalika SEZ originates in Government Regulation No. 52 of 2014, which formally established the area as a Special Economic Zone in Central Lombok. The establishment of Mandalika reflects the government's decision to use place-based policy to accelerate tourism development in a region considered capable of becoming a major international destination (Government of Indonesia 2014). The broader legal foundation is Law No. 39 of 2009, which authorises the government to establish SEZs and provide facilities designed to attract investment and promote regional economic development (Government of Indonesia 2009). The policy therefore contains a clear public-purpose justification: tax privileges are not intended merely to increase private profitability but to create economic activities that contribute to national and regional development. This distinction is critical for tax justice. If the public purpose of the SEZ is regional transformation, the evaluation of fiscal incentives must examine whether transformation actually occurs for the surrounding population rather than treating investor profitability as the final policy outcome.

Government Regulation No. 40 of 2021 provides the contemporary framework for SEZ administration and facilities and replaced earlier regulations concerning SEZ facilities. The regulation establishes the institutional and administrative architecture through which businesses may obtain fiscal and non-fiscal facilities (Government of Indonesia 2021). In practice, the incentive framework may include corporate income-tax reductions, tax allowances, value-added tax and luxury-goods tax facilities, customs facilities, and other forms of administrative support. The Directorate General of Taxes describes the SEZ regime as providing alternative income-tax facilities, including tax allowances and tax holidays. Tax holidays can provide a 100 percent reduction in corporate income tax for specified periods, with the duration linked to the value of investment (Directorate General of Taxes 2023). Such incentives are substantial. They should therefore be treated as significant fiscal interventions rather than minor administrative conveniences.

The relationship between investment size and incentive duration illustrates both the strength and weakness of the current framework. Under the SEZ tax-holiday regime, larger investment commitments can qualify for longer periods of corporate income-tax reduction. This structure is rational if larger projects generate proportionately greater employment, infrastructure, supply-chain, and technology benefits. However, investment value is not equivalent to public benefit. A capital-intensive hotel project may involve substantial investment but relatively limited employment compared with its tax expenditure, while a smaller project that employs local residents, purchases local products, trains workers, and supports community enterprises may generate greater regional welfare per rupiah of investment. The current approach therefore risks treating capital intensity as a proxy for social value. Regional tax justice requires a more nuanced approach in which investment size is one criterion but not the dominant determinant of fiscal privilege.

The tax-allowance alternative provides a potentially more targeted mechanism because it can be linked to investment expenditure rather than simply exempting profits. OECD analysis has repeatedly favoured cost-based incentives over profit-based tax holidays because cost-based incentives are more closely connected to actual investment decisions and less likely to reward projects that would have been profitable without government support (OECD 2020). In Indonesia, the tax allowance can include additional deductions, accelerated depreciation, reduced withholding tax on dividends, and extended loss carry-forward periods. The Directorate General of Taxes identifies a 30 percent reduction of net income based on qualifying investment value, spread over six years, among the relevant facilities (Directorate General of Taxes 2023). Such instruments may be more consistent with additionality because they reduce investment costs rather than simply eliminating tax on profits already generated.

The central fiscal concern is tax expenditure. When an investor receives a tax holiday, the government does not transfer money directly to the investor, but the economic effect can be similar to a public subsidy because the investor retains income that would otherwise have been taxed. The Ministry of Finance's tax-expenditure reporting framework recognises this relationship by treating tax expenditures as part of fiscal policy and emphasising the need for evaluation and transparency (Ministry of Finance 2024). The magnitude of Indonesia's total tax expenditure strengthens the argument that individual incentives must be evaluated more carefully. The OECD has specifically recommended that Indonesia improve estimates of forgone revenue from SEZ incentives and expand analysis from the costs of incentives toward the benefits they generate (OECD 2020). For Mandalika, this means the public should be able to assess not only how much tax has been forgone but what employment, local procurement, skills, infrastructure, and community outcomes have been generated in exchange.

A further issue concerns the relationship between central tax incentives and regional fiscal capacity. Corporate income tax is primarily a central government revenue source, while local governments rely heavily on regional taxes, transfers, and other revenues to finance public services. This institutional structure can create an asymmetry in which central government grants investment incentives while local governments must address some of the infrastructure and social consequences of tourism development. A hotel or resort may receive national tax privileges while local authorities remain responsible for roads, waste management, public spaces, water systems, safety, and social services. If local governments do not receive sufficient fiscal benefits from the resulting economic activity, the regional fiscal contract becomes unbalanced. Regional tax justice therefore requires greater coordination between national incentive policy and local revenue and expenditure responsibilities.

The legal framework already contains mechanisms that could support stronger conditionality. Certain tax facilities can be connected to employment, domestic content, infrastructure investment, research and development, or other measurable activities. The Directorate General of Taxes' description of additional incentive conditions illustrates that the legal system can differentiate the duration or scope of facilities according to specific economic contributions (Directorate General of Taxes 2015). This provides an important policy foundation for reform. Rather than creating an entirely new incentive regime, the government could strengthen the existing framework by making access to the most generous facilities conditional upon verified regional-performance indicators. Such a reform would shift the regime from an entitlement model toward a performance-based model without eliminating the investment function of the SEZ.

## B. Investment, Employment, and the Distribution of Regional Benefits

Mandalika has produced measurable investment and employment outcomes. Official SEZ data indicate that Mandalika recorded approximately IDR 672 billion in realised investment in 2023, bringing cumulative realised investment to approximately IDR 4.93 trillion and reporting substantial employment absorption associated with the SEZ (National Council for Special Economic Zones 2024). These figures demonstrate that Mandalika is not merely a regulatory designation; it has become a significant physical and economic development project. The zone has also attracted international attention through sport-tourism events, including MotoGP, which strengthens the destination's international visibility and creates demand for accommodation, transportation, food services, retail, and tourism-related businesses. From an investment-policy perspective, these outcomes provide evidence that the SEZ has generated activity. However, from a tax-justice perspective, the critical question is how much of that activity translates into durable local welfare.

Employment is one of the strongest potential justifications for investment incentives because jobs provide direct income to households. Nevertheless, the quantity of jobs should not be the only indicator. The quality, permanence, skill level, wage level, and local origin of employment determine the distributive value of investment. Research on Mandalika's community readiness found that local residents were relatively prepared to receive tourism activities but were less prepared to participate fully in the tourism industry because of limitations in skills, capital, and business capacity (Azizurrohman et al. 2022). This finding exposes a structural challenge. If local residents occupy mainly low-value or informal positions while managerial and specialised positions are filled by workers from outside the region, the headline employment figures may exaggerate the local distributional benefit. Tax incentives should therefore incorporate local employment and training indicators rather than simply total employment.

The distinction between employment creation and capability development is particularly important in tourism. Tourism jobs can generate immediate income, but long-term regional development requires human capital that enables residents to move into higher-value occupations and entrepreneurship. Training in hospitality management, culinary services, digital marketing, foreign languages, event management, financial management, and tourism technology can increase local participation. The tax system can support this process by linking incentive eligibility to verified investment in vocational training and partnerships with local educational institutions. Such conditions would transform part of the tax expenditure into a mechanism for human-capital development. OECD research has generally supported cost-based incentives targeted at activities with positive socioeconomic spillovers, including training and research and development (OECD 2020). For Mandalika, workforce development should therefore be treated as a core component of the public return generated by tax incentives.

Local procurement is another crucial mechanism for distributing tourism investment. Large hotels and tourism operators purchase food, beverages, furniture, construction materials, transportation services, maintenance, cultural products, and other inputs. If these inputs are sourced locally, tourism spending generates multiplier effects throughout Central Lombok. If inputs are sourced from outside the region, much of the economic value leaks away. Tax incentives should therefore encourage local supply-chain integration. Investors could receive enhanced incentive benefits when they meet verified thresholds for procurement from local MSMEs, farmers, fisheries, artisans, transportation providers, and service businesses. This would be more consistent with regional justice than simply rewarding the size of the initial investment. Kaharuddin et al.'s study of tax incentives for MSMEs in the Mandalika SEZ similarly emphasises the role of fiscal facilities in strengthening local business development (Kaharuddin et al. 2024). The policy objective should therefore move from attracting investment toward embedding investment within the regional economy.

The empirical literature suggests that Mandalika has already generated positive effects on local welfare. Yuli et al. found improvements in local economic conditions as well as education and health-related outcomes associated with tourism development (Yuli et al. 2023). These findings support the argument that the SEZ can generate genuine social benefits. However, positive aggregate effects do not establish that benefits are distributed equitably. Tourism development can improve average income while simultaneously increasing inequality if higher-income groups capture a disproportionate share of new opportunities. A regional tax-justice framework must therefore examine distribution, not simply average improvement. The question is whether the groups most affected by the development, including local households, small businesses, workers, and landowners, participate meaningfully in the resulting economic gains.

Land is particularly important because tourism development changes the economic value of territory. Infrastructure investment and improved destination visibility can increase land prices and create opportunities for landowners, but can also produce displacement risks for households lacking secure tenure or bargaining power. Research on conflicts between local residents and ITDC documents land-related disputes during the development of Mandalika (Jasmisari 2022). These disputes reveal that the benefits of rising land values are not automatically distributed to those who have historically occupied or used the land. From a tax-justice perspective, this means that fiscal incentives should not be assessed independently from land policy. If tax concessions increase the profitability of projects that depend on land acquired from local communities, the state should ensure that affected communities receive fair compensation and opportunities to participate in the subsequent economic activity. Otherwise, public fiscal support may amplify existing inequalities in land ownership.

Community participation is therefore a substantive component of tax justice. Irwan, Widawati, and Wiarti found that local communities around Mandalika generally viewed the development positively and had begun to participate, but their participation remained largely consultative, with major decision-making authority continuing to rest with developers (Irwan, Widawati, and Wiarti 2023). This suggests that participation exists but has not necessarily reached the level of shared decision-making or economic ownership. Fiscal incentives could be used to strengthen this dimension by requiring investors to establish community-development programmes, local supplier programmes, cooperative arrangements, or community-based tourism partnerships. Such conditions would convert fiscal concessions into instruments that build local agency rather than simply compensating communities after investment decisions have already been made.

## C. Tax Expenditure, Proportionality, and the Problem of Investor Windfalls

The most important normative problem with tax incentives is the possibility of windfall gains. A tax incentive produces a windfall when an investor receives a tax benefit for an investment that would have occurred even without the incentive. In that situation, the government sacrifices revenue without generating additional investment. The investor becomes richer, but society does not receive a corresponding marginal benefit. This is particularly problematic for established tourism destinations or projects with strong commercial fundamentals. Mandalika possesses significant natural attractions, government-funded infrastructure, international events, and strong policy support. Some investors may therefore find the location attractive even without extensive tax concessions. The more independently attractive the destination becomes, the more important it is to demonstrate that each additional tax benefit changes investment behaviour. OECD research warns that profit-based incentives can be especially vulnerable to windfall effects because they reward profitability rather than necessarily influencing the initial investment decision (OECD 2020).

Proportionality provides an appropriate legal and policy principle for addressing this problem. A fiscal incentive should be proportionate to the public objective it seeks to achieve. If a small tax concession generates substantial employment or infrastructure benefits, the concession may be justified. Conversely, a very generous tax holiday granted to a highly profitable investment with limited local spillovers may be disproportionate. Proportionality therefore requires comparison between the value of the incentive and the magnitude of the additional public benefit. This principle should also apply to the duration of incentives. Longer tax holidays may be justified for investments requiring significant capital and generating long-term externalities, but the continuation of the incentive should depend on continuing fulfilment of performance conditions. A fixed tax holiday that remains available regardless of actual outcomes weakens the connection between fiscal cost and public benefit.

Sunset clauses and periodic evaluation are therefore essential. The OECD recommends that Indonesia consider regular reviews and sunset mechanisms for generous sectoral incentives so that benefits do not continue indefinitely after the original policy rationale has disappeared (OECD 2020). Mandalika provides a strong case for such an approach because the economic environment of a tourism destination can change rapidly. Once infrastructure is established, tourism flows increase, and private investment becomes commercially viable, the justification for extensive incentives may diminish. The policy should therefore contain predetermined evaluation points at which the government assesses whether the incentive remains necessary. If the investment can continue without the incentive, the concession should gradually expire. If public benefits remain below expectations, the government should have the ability to reduce, suspend, or reclaim benefits.

Clawback mechanisms are equally important. A clawback allows the government to recover some or all of the fiscal benefit when an investor fails to satisfy the conditions attached to the incentive. This principle is consistent with good international practice and has been recognised in Indonesia's SEZ regulatory architecture (OECD 2020). In Mandalika, clawbacks could apply when investors fail to meet employment commitments, abandon projects, violate environmental requirements, fail to implement agreed local-procurement programmes, or materially deviate from approved investment plans. The objective is not punitive taxation. Rather, clawbacks protect the integrity of the fiscal contract by ensuring that investors cannot retain public benefits after failing to deliver the public purposes that justified them. Without such mechanisms, performance requirements may remain largely symbolic.

Transparency is another essential component. Tax expenditures are less visible than direct government spending because they operate through reduced tax liabilities. Citizens may therefore find it difficult to know which investors receive benefits, how much revenue is forgone, and whether the promised outcomes have been achieved. Indonesia's tax-expenditure reporting has improved considerably, including the publication of annual reports and greater methodological transparency (Ministry of Finance 2024). However, regional tax justice requires greater granularity. The public should ideally be able to identify the categories of incentives granted to the Mandalika SEZ, the estimated fiscal cost, the beneficiaries, the investment amount realised, the number and quality of local jobs generated, local procurement, training expenditure, and community-development outcomes. Without this information, meaningful public evaluation remains difficult.

The principle of neutrality also requires attention. Firms inside Mandalika may receive fiscal advantages that are unavailable to similar tourism businesses outside the SEZ. This creates potential competitive distortions. OECD analysis has warned that SEZ incentives can distort competition between firms located inside and outside zones (OECD 2020). Such differentiation is not necessarily unjust because the SEZ may involve additional policy objectives, but the difference must be justified by additional benefits. If two hotels compete for the same tourists and offer similar employment opportunities, granting one a substantial tax holiday solely because it falls within an administrative boundary may undermine horizontal equity. The justification becomes stronger if the SEZ hotel has contractual obligations to employ local residents, develop suppliers, invest in training, or contribute to infrastructure. Regional tax justice therefore requires distinguishing between geographic privilege and performance-based privilege.

The most defensible incentive structure would therefore combine cost-based benefits with measurable performance conditions. Rather than granting large tax holidays based primarily on investment value, the government could provide additional deductions or credits for verified local employment, training, domestic procurement, environmental investment, and infrastructure contributions. This approach would align fiscal expenditure with specific public outcomes. It would also reduce the risk of rewarding pure profitability. The OECD's analysis of Indonesia supports movement toward cost-based incentives because they can more directly target investment costs and socioeconomic spillovers (OECD 2020). For Mandalika, such reform would preserve the investment function of the SEZ while making the distributional logic more transparent and defensible.

## D. Toward a Regional Tax Justice Framework for Mandalika

A regional tax justice framework should begin with the principle that tax incentives are not merely investment-policy instruments but public-resource allocations. The state effectively transfers fiscal capacity to investors in expectation of future social benefits. This relationship should be treated as a fiscal contract. The investor receives a concession, while society receives a set of measurable commitments. The commitments should extend beyond capital investment to employment, local procurement, skills, infrastructure, environmental protection, and community development. This framework changes the central policy question from “How much investment did the tax incentive attract?” to “What measurable public value was purchased through the tax expenditure?” The distinction is fundamental. Investment is a means to development, not the ultimate development objective. Regional tax justice requires the government to ensure that the means produce outcomes distributed sufficiently widely among the population.

The first component should be investment additionality. Investors receiving substantial tax concessions should demonstrate that the incentive was material to the investment decision. This could be evaluated through investment plans, financial models, alternative-location analysis, and independent review. Although determining counterfactual investment is difficult, the absence of any additionality assessment creates a significant risk of windfall benefits. Incentives should be more generous where the investment faces genuine location disadvantages or substantial initial costs and less generous where commercial fundamentals are already strong. Such differentiation would make the fiscal system more efficient and fair. It would also reduce the tendency to compete for investment by offering increasingly generous tax holidays. The objective should be to compensate for genuine market failures, not to maximise the attractiveness of the tax regime regardless of fiscal cost.

The second component should be local employment and human-capital development. Investors receiving tax concessions should commit to employing a specified proportion of local workers while simultaneously providing training that enables progression into skilled and managerial positions. Local employment quotas alone may create incentives to hire workers into low-paid positions without increasing capabilities. Training requirements therefore need to accompany employment requirements. The state could recognise expenditures on accredited vocational training as qualifying performance for additional tax benefits. Partnerships with local universities, vocational schools, and tourism institutions should also be encouraged. This approach would strengthen the long-term productive capacity of Central Lombok and reduce dependence on imported skilled labour. It would also transform tax expenditure into a mechanism for expanding human capital, which is more consistent with sustainable regional development than temporary employment alone.

The third component should be local economic linkage and MSME integration. Tourism investment should be evaluated according to the extent to which it creates demand for local producers and service providers. Hotels, restaurants, event organisers, and tourism facilities should be encouraged to purchase agricultural products, seafood, handicrafts, transportation, maintenance, and other services from Central Lombok businesses. Tax incentives could be partially linked to verified local-procurement ratios or supplier-development programmes. Such conditions should be carefully designed so that investors are not forced to purchase inputs that are unavailable or uncompetitive. Instead, government should combine procurement targets with supplier-development support, financing, quality certification, and digital-market access. This would create a mutually beneficial relationship in which investors obtain reliable local suppliers while communities capture a greater proportion of tourism expenditure.

The fourth component should be community and environmental benefit sharing. Tourism depends heavily on landscapes, beaches, culture, water, and other public or quasi-public resources. Investors therefore derive value from assets that are not created entirely by private capital. Tax incentives should consequently be accompanied by commitments to environmental management and community development. These commitments could include waste reduction, water conservation, renewable-energy adoption, coastal protection, cultural preservation, community-based tourism, and public-space improvements. Such obligations should be measurable and independently verified. Environmental requirements are particularly important because tourism can create negative externalities that reduce local welfare. A tax incentive that increases tourism revenue while simultaneously increasing waste, water stress, or environmental degradation may generate a misleading appearance of development. Regional tax justice requires accounting for both positive and negative externalities.

The fifth component should be transparent fiscal reporting and public accountability. The government should publish an annual Mandalika tax-expenditure statement showing the estimated value of fiscal incentives, the categories of beneficiaries, and the performance outcomes associated with the concessions. The report should connect fiscal cost to indicators such as realised investment, local employment, average wages, local procurement, training, MSME participation, environmental performance, and community investment. This would allow citizens, local governments, academics, and investors to evaluate whether the incentive regime is functioning as intended. Indonesia's existing tax-expenditure reporting provides an institutional foundation for such an approach. The objective should be to move from aggregate transparency toward beneficiary-level and regional-outcome transparency, while protecting legitimate taxpayer confidentiality.

The sixth component should be periodic evaluation and adaptive conditionality. The value of tax incentives should not be assumed to remain constant throughout the life of an SEZ. As infrastructure improves, tourism grows, and investor confidence increases, the original rationale for fiscal concessions may weaken. Incentives should therefore be reviewed periodically against predetermined indicators. Investors that exceed performance targets could receive continued or enhanced benefits, while those that fail to meet commitments could face reduced benefits or clawbacks. Such a system would introduce flexibility while preserving accountability. It would also make fiscal policy responsive to changing economic conditions. International evidence and OECD recommendations support periodic evaluation because incentives that remain in place without reassessment can become costly and ineffective (OECD 2020).

Finally, regional tax justice requires institutional coordination between central government, local government, SEZ authorities, investors, and communities. The central government controls many tax incentives, while local governments manage numerous public services and regional development responsibilities. If these institutions operate separately, fiscal incentives may be granted without sufficient consideration of local costs and benefits. A regional incentive council or similar coordination mechanism could periodically evaluate the regional effects of major incentives. Community representatives, local business associations, universities, and civil-society organisations should have opportunities to provide evidence concerning employment, land, environmental impacts, and access to economic opportunities. Participation would not transfer investment decisions to local communities, but it would strengthen procedural justice by ensuring that the people affected by fiscal concessions have meaningful access to information and evaluation processes.

## Conclusion

The Mandalika Special Economic Zone demonstrates both the potential and the risks of investment-based tax incentives as instruments of regional development. Fiscal concessions can help overcome investment barriers, stimulate tourism infrastructure, create employment, and generate new business opportunities.

Evidence from Mandalika indicates that tourism development has produced positive economic and welfare effects, while official data demonstrate substantial investment and employment activity. Nevertheless, these outcomes do not automatically establish tax justice. The public value of an incentive depends on whether the investment would have occurred without the concession, whether local communities receive meaningful benefits, and whether those benefits are proportionate to the tax revenue forgone. The principal problem is therefore not the existence of tax incentives but their design. Incentives become difficult to justify when they primarily increase investor profitability without generating additional regional benefits. The Mandalika experience demonstrates that aggregate investment and tourism growth are insufficient measures of success because local participation remains constrained by differences in skills, capital, market access, land ownership, and decision-making power.

A regional tax justice framework should consequently transform Mandalika's tax incentives into performance-oriented fiscal arrangements. Future incentives should be based on demonstrable additionality and linked to local employment, skills development, local procurement, MSME integration, environmental protection, infrastructure contributions, and community welfare. Cost-based incentives should receive greater emphasis because they are more directly connected to investment expenditure and measurable policy objectives, while generous profit-based tax holidays should be subject to strict sunset clauses, periodic evaluation, transparency, and clawback provisions. The government should also strengthen public reporting by connecting tax expenditure with measurable regional outcomes. Such a framework would not weaken investment policy; instead, it would make investment incentives more credible and sustainable by ensuring that private beneficiaries of public fiscal concessions generate corresponding public value. In Mandalika, tax justice should ultimately be measured not by how much tax the government can waive to attract investors, but by whether every rupiah of forgone revenue produces a sufficiently broad and durable return for the people and economy of Central Lombok.

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