

## EDITORIAL NOTE

This issue of the Journal of Tax Administration includes six articles, covering a range of perspectives on different aspects of tax administration.

The first paper, “Tax audit quality: The role of experience and technology readiness in a digital world”, by Maarten A. Siglé, Stephan Muehlbacher, Lisette E. C. J. M. van der Hel, and Erich Kirchler offers an important and timely contribution to the growing literature on the digital transformation of tax administration. It investigates how tax auditor experience interacts with the adoption of digital tools in shaping the quality of tax audits. Drawing on rich administrative data from a tax authority, the authors construct detailed measures of auditor profiles and audit outcomes, and explore how variations in experience influence audit effectiveness in a technologically evolving environment.

As tax authorities around the world invest in digital infrastructures—from pre-filled returns to algorithmically guided audit selection—the question of how human judgement and institutional knowledge continue to shape enforcement outcomes becomes increasingly relevant. This paper brings fresh empirical evidence to this debate, demonstrating that experience still plays a critical role, but that its value is modulated by the availability and use of digital tools.

The analysis shows that digitalisation and auditor experience are not substitutes, but rather interact in complex ways—pointing to the need for thoughtful integration of technology and training in tax administrations. The results have clear policy relevance. They caution against overly technocratic visions of enforcement where experience is undervalued, and suggest that capacity building remains essential, even in digitally advanced environments. This has practical implications for recruitment, training, and audit strategy.

Arnaldo Purba and Alfred Tran’s paper, “How do multinationals shift profits out of Indonesia?”, makes a valuable empirical contribution to the literature on international tax avoidance. Using novel administrative data that links tax returns, customs records, and firm-level information, the authors offer policy-relevant insights into the channels and magnitude of profit shifting in a major emerging economy.

The paper’s primary contribution lies in its careful use of detailed firm-level microdata to identify transfer pricing practices. The findings carry strong policy implications for developing economies. They highlight the vulnerability of source-based corporate tax systems to base erosion via transfer pricing and underscore the need for better enforcement capacity and data integration. Importantly, the paper offers a practical contribution to how tax administrations can make use of existing administrative data to detect profit shifting without relying exclusively on OECD-style transfer pricing audits.

In “Understanding the BEPS project and other OECD tax initiatives including the Inclusive Forum in the context of treaties and state inequality”, Grahame Jackson offers a timely and thoughtful analysis of the Base Erosion and Profit Shifting (BEPS) agenda and related OECD tax initiatives from the perspective of developing countries. By combining institutional insights with country-level illustrations, it provides a nuanced account of the motivations, implementation challenges, and policy trade-offs that these international frameworks present for lower-income jurisdictions.

Rather than treating BEPS as a neutral set of technical standards, the author examines it as a politically and institutionally mediated process, shaped by asymmetries in negotiating power, administrative capacity, and global economic integration. This broader framing enables the paper to move beyond procedural overviews and ask important questions about distributional outcomes, enforcement feasibility, and long-term sustainability.

From a policy and research perspective, the paper raises critical issues for further exploration: the suitability of OECD standards for non-OECD contexts, the scope for greater representation of developing countries in global tax norm-setting, and the institutional prerequisites for effective reform uptake.

Next, Shelley Griffiths and Matthew Handford provide a compelling and critical analysis of tax exceptionalism—the notion that tax law and policy operate in a legal and institutional silo—through the lens of New Zealand's tax system. “Tax exceptionalism: A view from New Zealand” makes an important contribution to the theoretical and normative literature on tax law by grounding abstract debates in the concrete institutional and legal dynamics of a specific jurisdiction.

Rather than uncritically endorsing or rejecting the concept, the authors present it as a contingent institutional arrangement, the implications of which depend on legal culture, administrative design, and the broader political economy. The analysis situates tax exceptionalism in its local context, but also engages with comparative and theoretical debates, making the paper relevant to international audiences.

While focussed on New Zealand, the paper prompts broader reflection on when and why tax exceptionalism may be institutionally functional or problematic. It raises important questions about the relationship between tax administration and general public law, and the conditions under which exceptional governance structures may be warranted.

The fifth paper, “Media discourse around taxation in Ireland and the UK in the wake of financial crisis”, by Veronica O'Regan, Philip O'Regan, Sheila Killian, and Ruth Lynch, presents a rich and innovative exploration of how public discourse around taxation has evolved in two comparable yet institutionally distinct settings: Ireland and the United Kingdom. Drawing on a diachronic corpus analysis of mainstream newspaper reporting over a 20-year period (2000–2020), the authors trace shifts in media framing, keyword salience, and discursive strategies associated with tax-related themes. By juxtaposing the two jurisdictions, the paper highlights both shared discursive trends—such as the growing moralisation of tax evasion—and country-specific narratives, including Ireland's post-crisis austerity framing and the UK's emphasis on fairness and corporate responsibility. Importantly, the paper's relevance extends well beyond discourse analysis. For tax scholars, policymakers, and practitioners, it offers valuable insights into how taxation is socially constructed and interpreted—knowledge that is critical for shaping communication strategies, strengthening taxpayer engagement, and anticipating the political reception of tax reforms.

Sreeja K. and Sebastian T. K.'s paper, “Does decentralised local tax administration warrant re-examination?”, addresses a relatively underexplored question in tax administration: whether decentralised local tax enforcement enhances or undermines overall compliance and administrative effectiveness. The subject matter is both timely and conceptually rich. As governments around the world increasingly experiment with decentralisation in public service delivery, this paper critically examines whether similar delegation is appropriate—or

efficient—in the domain of tax enforcement. The paper makes a valuable and policy-relevant contribution by questioning the normative case for decentralised tax administration and highlighting the institutional, informational, and coordination frictions that it can introduce. It encourages a rethinking of enforcement models and offers important insights for tax administrators and policymakers navigating the trade-offs between local autonomy and the coherence and efficiency of the broader tax system. It also lays significant groundwork for further research on the institutional design of tax enforcement, particularly in systems with multilevel governance or capacity asymmetries.

### **OBITUARY: Stephen Martin Edge (1950–2025)**

The Journal of Tax Administration (JOTA) is deeply saddened to inform its readership of the passing of Steve Edge.

Steve was a long-standing supporter of JOTA and served as Chairman of the Advisory Group of the Tax Administration Research Centre (TARC). A distinguished graduate of the University of Exeter, Steve trained as a lawyer and spent his entire career at the renowned law firm Slaughter and May, where he specialised in corporate tax and became a partner in 1982.

Beyond his professional accomplishments, Steve was known for his generous spirit, sharp intellect, and unwavering commitment to advancing tax research and supporting the academic community. His guidance and encouragement were invaluable to countless colleagues and young researchers, and he played a pivotal role in fostering stronger links between tax practice and academic inquiry.

Steve's legacy will endure through his many contributions to the field and the people he inspired along the way. He will be greatly missed.

*Christos Kotsogiannis*  
*Managing Editor*