2027 ECONOMIC PACKAGE – KEY PROPOSED TAX REFORMS

I. INTRODUCTION

On September 8, 2026, the Federal Executive submitted to the Mexican Congress the **Economic Package for fiscal year 2027**. The package includes the Federal Revenue Law Initiative (**ILIF**), the initiatives to amend the Income Tax Law (**LISR**) and the Federal Fees Law (**LFD**), the Draft Federal Expenditure Budget, the General Economic Policy Criteria (**CGPE**), and the Report on the Use of the Tariff Authority Granted to the Federal Executive.

Under the CGPE, the Mexican economy is expected to register annual real growth of between **1.5% and 2.5%** in 2027, with projected inflation of **3.0%** at year-end, an exchange rate of 18.0 pesos per dollar, a 28-day CETES rate of 6.0%, a budget deficit of 3.4% of GDP, and a historical balance of the public-sector financial requirements (SHRFSP) of 55.0% of GDP. Notably, tax revenues are expected to reach an all-time high of **15.9% of GDP**, with total budgetary revenues of 23.2% of GDP and a primary surplus of 0.5% of GDP. The most relevant aspects of the proposals contained in the 2027 Economic Package are presented below.

II. FEDERAL REVENUE LAW

Surcharge Rates

It is proposed that the surcharge rate on tax liabilities remain at **1.38% per month** on outstanding balances. The default rate applicable in the event of noncompliance will be **2.07% per month**. For authorized installment payments under Article 66 of the Federal Tax Code, the proposed rates are as follows: **1.42%** per month for terms of up to 12 months; **1.63%** per month for terms of 12 to 24 months; and **1.97%** per month for terms exceeding 24 months.

Financial System Interest Withholding Rate (Decrease)

It is proposed that the annual withholding rate on interest paid by financial institutions be set at **0.68%** of the principal balance giving rise to the interest payment, in accordance with Articles 54 and 135 of the LISR. This rate represents a **decrease** from the **0.90%** rate in effect for fiscal year 2026. The new rate was calculated by taking into account the average nominal 28-day CETES rate, average inflation, and an effective ISR (Income Tax) rate for individuals of **23.5%**.

Tax Incentive for the Sale of Shares in Initial Public Offerings

The ILIF proposes applying a rate of **10%** as a tax incentive for the sale of shares on a stock exchange in connection with initial public offerings.

Revocation Appeal and Guarantee of the Tax Interest

A period of **six months** is proposed for guaranteeing the tax interest when a revocation appeal is pursued. It is also proposed that no guarantee be required when the taxpayer files a revocation appeal limited exclusively to the merits, thereby promoting the resolution of disputes through administrative proceedings.

Tax Incentive for Taxpayers with Final Tax Assessments

It is proposed that the tax incentive for taxpayers whose accrued income in tax year 2025 did not exceed $**300 million pesos** and who have final tax assessments be maintained. The incentive consists of a **100**% waiver of fines, surcharges, and collection expenses, provided that the taxpayer pays the full principal amount owed in a single payment before **December 31, 2027**.

III. <u>INCOME TAX LAW</u>

RESICO (Simplified Trust Regime)

It is proposed that the annual income threshold for individuals to be taxed under RESICO be increased from $**3.5 million to** $**5 million annually**. For legal entities, the threshold would increase from $**35 million to** $**50 million annually**. In addition, the regime would become **optional** rather than mandatory for legal entities, providing taxpayers with flexibility to choose the regime that best suits their needs.

Re-entry into the regime is permitted for taxpayers that have ceased to be taxed under RESICO, provided that they comply with their tax obligations. The tax exemption for individuals in the primary sector is increased from $**900,000 to** $**1,000,000**. Likewise, for legal entities, the deduction for investments in activities not otherwise specified is increased from **20**% **to 40**%.

Control Mechanism for Authorized Deductions (new Chapter X of Title II)

It is proposed to introduce a new mechanism limiting authorized deductions, applicable to **legal entities with accrued income exceeding** $**50 million** that determine taxable income. The mechanism operates as follows:

(a) If authorized deductions are equal to or less than 96.67% of accrued income, the limit on deductions will equal the deductions multiplied by the factor **0.9900**.

(b) If authorized deductions exceed 96.67% of accrued income, the limit on deductions will equal accrued income multiplied by the factor **0.9667**.

The remainder of unused deductions may be used to reduce taxable income in the **20 subsequent fiscal years**. The following taxpayers are excluded from the application of this mechanism: taxpayers taxed under the coordinated entities regime, taxpayers in the primary sector, taxpayers operating under the maquila regime (except with respect to domestic sales), companies in bankruptcy, and companies with fewer than five years in operation.

Limit on the Use of Tax Losses

It is proposed to establish a limit on the use of tax losses from prior fiscal years, equal to **50**% **of the taxable income** for the fiscal year (factor **0.5000**), after applying the limit on authorized deductions described in the preceding section. This measure seeks to ensure a minimum taxable base in each fiscal year.

2027 Estimated Tax Payments

For legal entities with accrued income exceeding $**50 million**, it is proposed to adjust the profit coefficient applicable to estimated tax payments for fiscal year 2027 using the following factors: **1.0658** when authorized deductions are equal to or less than 96.67% of accrued income, and **2.6162** when deductions exceed that percentage. With respect to tax losses, only **50**% of provisional taxable income may be offset by tax losses.

Net Interest

It is proposed to reduce the cap on the deduction of net interest from **30**% **to 20**% of adjusted taxable income, pursuant to Article 28, Section XXXII of the LISR. This amendment is aligned with the recommendations of **Action 4 of the OECD's BEPS project**, whose objective is to limit base erosion through excessive interest payments.

Payments to Foreign Residents

It is proposed to condition the deductibility of payments made to foreign residents on the corresponding **withholding tax being remitted**, in accordance with Articles 27, Section V and 153 of the LISR. **Accrual** is established as the time at which the withholding obligation arises, thereby reinforcing the obligation to withhold and remit the tax regardless of the actual payment date.

Elimination of the Optional Regime for Corporate Groups

It is proposed to repeal **Chapter VI of Title II** of the LISR, which governs the Optional Regime for Corporate Groups. Taxpayers currently taxed under this regime would be required to exit the regime as of **January 1, 2027** and remit all deferred ISR no later than **December 31, 2027**.

CUCA (Paid-in Capital Account)

It is proposed that, in the case of capitalization of liabilities, **accrued interest** and **IVA (Value Added Tax)** not be included in the CUCA. Contributions in kind, such as accounts receivable and assignments of rights, will be added to the CUCA only when they are **actually collected**.

CUFIN (Net Tax Profit Account)

It is proposed that the nondeductible items that must be subtracted to determine the CUFIN include both those identified in **Article 28 of the LISR** and expenditures that, although deductible by their nature, **do not meet the deductibility requirements** established by law.

Transitional Tax Incentives (Plan México)

It is proposed to incorporate into the law, through transitional provisions, the tax incentives arising from **Plan México**: (i) an **immediate deduction of 100**% of the original investment amount in new fixed assets, and (ii) an **additional deduction of 25**% on the increase in training or technological innovation expenses, applicable through fiscal year 2030.

IV. <u>FEDERAL FEES LAW</u>

Immigration Services

A **35**% increase is proposed in the fee for immigration services for visitors without permission to perform remunerated activities. A new allocation of the collected funds is established: **50**% for the Secretaría de la Defensa Nacional (SEDENA), **26**% for the Instituto Nacional de Migración (INM)—earmarked for technological infrastructure—and **24**% for the Tesorería de la Federación.

Consular Services

It is proposed to harmonize the fees for ordinary and visitor visas at $**1,639.80**, representing increases of **66**% and **153**%, respectively, compared with the fees currently in effect.

CNBV Services

A **16**% increase is proposed in the securities inspection and supervision fees charged by the Comisión Nacional Bancaria y de Valores.

Telecommunications

It is proposed to introduce new types of authorizations for the **secondary and temporary use** of the radio spectrum. A **12**% **reduction** is proposed in radio-spectrum fees for bands whose fees are above the international median (2.5

GHz, 1.9 GHz, 1.7/2.1 GHz, 800/850 MHz, 1.4 GHz, and 3.5 GHz). The **700 MHz and 600 MHz** bands will not be subject to an inflationary adjustment.

Archaeological Sites and Museums

It is proposed to reclassify sites administered by the INAH. A total of **53 museums and archaeological sites** will be removed from the fee schedule, meaning that admission will be free. New sites are also added to the catalog subject to the payment of fees.

Airspace

Adjustments are proposed to the fees for air navigation services provided by SENEAM, updating them in accordance with the applicable indices.

Extraction of Materials

It is proposed to eliminate geographic zoning (Zones 1 and 2) for the assessment of fees on the extraction of materials. The fees will be established based on the **type of material** extracted (gravel, sand, clay, stone, among others).

Water Services

It is proposed to make adjustments resulting from the elimination of the regime for the transfer of water rights, revising the applicable provisions to reflect the new regulatory framework.

V. REPORT ON THE USE OF TARIFF AUTHORITY

During the period from September 2025 to September 2026, the Federal Executive exercised the tariff authority conferred on it by Article 131 of the Constitution. The principal measures adopted include: extending the regulation of used vehicles; modifying the tariffs applicable to the sugar sector, moving from specific tariffs to **ad valorem** tariffs of **156**% **and 210.44**%; extending tariff exemptions for basic-basket products, with the elimination of **33 tariff items**; establishing a tariff-rate quota for railway rails; and modifying **185 tariff items** to protect domestic industry in sectors such as chemicals, textiles, and steel.

The simple average tariff under the Tariff Schedule of the General Import and Export Taxes Law (TIGIE) is **10.6**%, with a standard deviation of 13.3% and an effective tariff rate of 6.7%, across a universe of **8,183 tariff items**.

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