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2027 Economic Package Bill

On September 8, 2026, the Ministry of Finance and Public Credit ("**SHCP**"), submitted to the Chamber of Deputies of the Mexican Congress the bill for the Economic Package for Fiscal Year 2027 (hereinafter, the "**2027 Economic Package**" or the "**Bill**").

The 2027 Economic Package is composed of the General Economic Policy Guidelines ("**CGPE**"), the Federal Revenue Law Bill ("**LIF**"), the Federal Expenditure Budget Bill ("**PPEF**"), and bills amending various tax provisions, including the Income Tax Law ("**ISR Law**") and the Federal Duties Law ("**LFD**"). The main aspects of the Bill are summarized below.

I. General Economic Policy Guidelines

Under the 2027 CGPE, revenue policy for fiscal year 2027 seeks to strengthen tax collection without creating new taxes or increasing general tax rates, through adjustments to the tax framework aimed at preventing base erosion, combating tax evasion, and facilitating voluntary compliance by taxpayers.

The 2027 CGPEs set out, among other things, the following tax policy measures, which are addressed in detail below:

- Control mechanism to prevent abuse of deductions.
- Reduction of the net interest deduction percentage.
- Control of other deductions.
- Clarifications regarding the calculation of the Net Tax Profit Account.
- Clarifications regarding the calculation of the Capital Contribution Account.
- Elimination of the Optional Regime for Corporate Groups.
- Expansion of the income thresholds for micro and small businesses under the Simplified Trust Regime.
- Decrees promoting Plan Mexico and the Development Hubs for Wellbeing.
- Capital repatriation.
- Tax incentive on gains derived from the sale of shares.

II. Income Tax (ISR)

A. Simplified Trust Regime (“RESICO”)

The Bill proposes expanding the taxpayer base and the benefits applicable to persons taxed under this Regime.

a. Individuals

- Increase in the income threshold, from MX$3.5 million to MX$5 million per year.
- Elimination of the restriction under which non-compliance with tax obligations prevented a taxpayer from returning to RESICO, provided the taxpayer regularizes such obligations and does not exceed the annual income threshold.
- Increase in the ISR-exempt amount for taxpayers in the primary sector, from MX$900,000 to MX$1 million.

b. Corporations

- Increase in the income threshold, from MX$35 million to MX$50 million per year.
- Elimination of the restriction under which corporations that had ceased to be taxed under RESICO could not return to it, provided they remain current in their tax obligations and do not exceed the annual income threshold.
- Doubling the applicable investment depreciation percentages.

B. Control of deductions and tax losses

The Bill proposes establishing a control mechanism applicable to corporate deductions, equivalent to 96.67% of accruable income for companies whose deductions equal or exceed that threshold, and to 99% for companies with lower deductions. It also proposes allowing tax losses to be offset up to 50% of taxable profit.

The Bill further proposes reducing the net interest deduction limit to 20% (currently permitted at up to 30% of adjusted taxable profit).

C. Optional Regime for Corporate Groups

The Bill proposes eliminating the Optional Regime for Corporate Groups. Taxpayers under this regime must dissolve the group as of January 1, 2027, and must calculate and pay the deferred tax, as well as any tax that could have been deferred during the period in which they were taxed under the regime, no later than December 31, 2027, except for the payment corresponding to the third immediately preceding fiscal year under the regime’s ordinary mechanics, which must be paid no later than March 31, 2027.

D. CUCA and CUFIN

a. Capital Contribution Account (CUCA)

The Bill proposes clarifying that, in cases of debt capitalization, accrued interest and the corresponding Value Added Tax will not be included as capital contributions, on the understanding that this account should reflect only the principal amount actually contributed or capitalized, excluding ancillary items.

It is further provided that, in the case of in-kind contributions consisting of accounts receivable, assignment of collection rights, or negotiable instruments, these may only be added to the CUCA at the time they are actually paid, and only up to the amount actually collected in cash.

b. Net Tax Profit Account (CUFIN)

The Bill proposes clarifying that non-deductible items include both those set forth in Article 28 of the ISR Law and, more generally, any items that do not meet the deductibility requirements.

E. Tax incentives and programs

The tax incentives under Plan Mexico and the Development Hubs for Wellbeing are maintained.

A tax incentive is granted on gains derived from the sale of shares, applying a 10% rate, provided the sale takes place in connection with an initial public offering and other requirements are met, including that the sale be carried out on licensed stock exchanges or on stock exchanges located in recognized markets, and that the issuer's market value be equal to or less than MX$50 billion.

III. Federal Revenue Law (LIF)

The transitory provisions of the LIF provide for the following tax incentives:

A. Tax regularization

The tax incentive is maintained for individuals and corporations whose income has not exceeded MX$300 million and that have outstanding final or consented tax credits, consisting of a 100% reduction of fines, surcharges, and enforcement costs.

B. Capital repatriation

The Bill proposes implementing a capital repatriation program with a 7.5% ISR rate on the amount of repatriated capital, provided the funds are invested in the country in strategic assets and expenses for productive development.

Next Steps in the Legislative Process

As a bill submitted to the Chamber of Deputies, the 2027 Economic Package must follow the ordinary legislative process before it can potentially enter into force. Once approved, the Federal Executive will be responsible for its enactment and publication in the Federal Official Gazette, so that it may enter into force as of January 1, 2027.

It is important to note that, as of the date of this briefing, the 2027 Economic Package is only a bill submitted by the Federal Executive. Its content may be modified, supplemented, or removed during the legislative discussion and approval process before the Mexican Congress, prior to its possible publication in the Federal Official Gazette.

Pérez-Llorca Mexico's Tax team is available to provide further information on the contents of this Legal Briefing.

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