



# **2027 Economic Package: Key tax changes and their impact on businesses in Mexico**

Forvis Mazars in Mexico

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# Introduction

On 8 September 2026, the Federal Executive submitted the 2027 Economic Package to the Mexican Congress.

The package comprises the:

- General Economic Policy Guidelines;
- proposed Federal Revenue Law;
- proposed amendments to the Income Tax Law (LISR);
- proposed amendments to the Federal Duties Law (LFD);
- report on the exercise of tariff-setting powers; and
- proposed Federal Expenditure Budget.

Unlike reforms primarily focused on increasing nominal tax rates, the proposals for 2027 combine revenue-raising measures with enhanced compliance and enforcement mechanisms, alongside targeted investment incentives. For businesses, the key consideration is that several of these measures do not necessarily eliminate tax attributes; rather, they may defer their utilisation or accelerate the timing of tax payments.

As a result, their impact should be assessed not only from an effective tax rate perspective, but also in terms of cash flow, provisional tax payments, deferred taxes, and the ability to recover tax losses and utilise deductions.

The following sections outline the key changes that, due to their relevance and potential impact on taxpayers, we consider to be the most significant.

The references contained in this publication relate to legislative initiatives and draft proposals submitted to the Mexican Congress. As such, they remain subject to the legislative process and to any amendments that may be approved prior to their final enactment and publication.

# Macroeconomic and fiscal outlook

## Federal Revenue Law and Federal Budget

### Macrofiscal framework for 2027

The 2027 proposal combines gradual fiscal consolidation with an ambitious tax revenue target. The government's fiscal strategy seeks to maintain public spending while moderately reducing the fiscal deficit, without introducing a broad-based increase in tax rates. Within this framework, additional tax revenue is expected to be generated through:

- a more protected tax base;
- broader withholding mechanisms;
- enhanced traceability requirements; and
- restrictions on the immediate utilisation of certain tax attributes.

The proposed Federal Revenue Law estimates total revenues of MXN 10.636 trillion, including financing. Of this amount, tax revenues are expected to account for approximately MXN 6.264 trillion, comprising:

- approximately MXN 3.289 trillion from Income Tax (ISR);
- MXN 1.768 trillion from Value Added Tax (VAT); and
- MXN 828.3 billion from the Special Tax on Production and Services (IEPS).

The proposed Federal Expenditure Budget provides for total net expenditure of MXN 10.636 billion and a budget deficit of approximately MXN 1.359 billion. From a tax perspective, these figures highlight the pressure to increase effective tax collection without relying exclusively on higher tax rates.

The macroeconomic framework published for 2027 is based on:

- real **GDP growth** of between 1.5% and 2.5%;
- year-end **inflation** of 3.0%;
- a year-end **exchange rate** of MXN 18.0 per US dollar;
- a 28-day **CETES** rate of 6.0%; and
- a Mexican **crude oil basket price** of US\$61.8 per barrel.

In fiscal terms, the Public Sector Borrowing Requirements (RFSP) are projected at 3.9% of GDP, while the Historical Balance of the Public Sector Borrowing Requirements is expected to stand at 55.0% of GDP. Consequently, the economic outlook does not envisage extraordinary growth that would, in itself, expand the tax base. This underscores the importance of the proposed tax compliance and enforcement measures.

# Income Tax Law (LISR)

## Corporate taxpayers

### **Articles 78-A to 78-F: New framework for the control of tax deductions and tax loss carryforwards**

The proposal is based on the tax authorities' assessment that, where claimed deductions approach the level of taxable income, their risk models indicate a higher incidence of transactions linked to taxpayers exhibiting characteristics associated with invoice-selling schemes. According to the explanatory memorandum, when deductions exceed 96.67% of taxable income, expenditures with such characteristics account for an average of 10%, whereas the average observed in other cases is close to 1%. On this basis, the Executive proposes a broad control mechanism covering both deductions and tax loss carryforwards, rather than measures targeting a specific deduction.

The mechanism would be introduced as a new Chapter X of Title II of the Income Tax Law (LISR), comprising Articles 78-A to 78-F. It would apply to Mexican resident corporate taxpayers with taxable income exceeding MXN 50 million that generate taxable profits. The taxable profit base used for employee profit-sharing purposes (PTU) would continue to be determined under the rules set out in Article 9 without taking these limitations into account. Accordingly, the proposed restriction would apply exclusively for Income Tax (ISR) purposes.

### **Articles 78-A and 78-B: overall limitation on allowable deductions**

The proposal introduces a two-tier framework.

Under the first tier, where allowable deductions are less than or equal to 96.67% of taxable income, taxpayers would not be permitted to claim 100% of those deductions in the relevant tax year. Instead, the deductible amount would be capped at 99% of the total allowable deductions. In practical terms, even a company whose cost structure does not exceed the prescribed threshold would be required to defer 1% of its annual deductions.

Under the second tier, where allowable deductions exceed 96.67% of taxable income, the deduction cap would be set directly at 96.67% of taxable income. As a result, and before taking tax losses into account, taxpayers would be required to recognise a minimum taxable base equivalent to 3.33% of taxable income.

Deductions that cannot be utilised in the relevant tax year would not be forfeited immediately. Instead, they could be carried forward and deducted over the following 20 tax years in accordance with the methodology set out in Article 78-B. Any remaining balance would not be treated as a tax loss carryforward, and the corresponding right would be personal to the taxpayer and therefore could not be transferred through a merger or demerger.

### **Article 78-C: limitation on the utilisation of tax loss carryforwards**

The second component of the proposed framework introduces restrictions on the utilisation of tax loss carryforwards. The policy objective underlying the proposal is to prevent companies with current-year taxable profits from fully eliminating their Income Tax (ISR) liability through the use of accumulated tax losses. The explanatory memorandum compares this approach with limitations adopted in other jurisdictions and presents it as a measure designed to ensure a minimum level of tax collection in each tax period.

Under proposed Article 78-C, outstanding tax loss carryforwards could be offset against no more than 50% of the taxable profit for the year, after application of the deduction limitation rules set out in Article 78-B. Where the available tax loss carryforward is lower than the applicable limit, only the remaining balance could be utilised.

Any unused tax losses could continue to be carried forward and offset in future years, subject to the same limitation. For tax losses generated before the entry into force of the new rules, the proposal preserves the existing carryforward period of 20 tax years from the year in which the loss was incurred.

### **Article 78-E: Taxpayers excluded from the regime**

The proposal acknowledges that a broadly applicable rule may produce outcomes that are incompatible with certain tax regimes or business activities and, accordingly, provides for a number of exceptions. These include:

- Coordinated entities (coordinados);
- taxpayers engaged in agricultural, livestock, forestry and fishing activities;
- maquila operations qualifying under Article 182, except in respect of sales of goods within Mexico;
- taxpayers declared bankrupt;
- insurance institutions, with respect to activities carried out as part of their ordinary business operations; and
- certain investments or expenditures that already benefit from immediate or additional deduction incentives.

In addition, corporate taxpayers that have been registered with the Federal Taxpayer Registry (RFC) for fewer than five tax years would be excluded from the regime, subject to certain conditions. However, the article also introduces specific anti-avoidance provisions to prevent existing businesses from transferring assets, inventories, contracts, trademarks, customer portfolios or other essential business elements to a newly established entity with the same shareholders or under common control solely to benefit from the exception.

Specific rules are also proposed for mergers and demergers, under which only the remaining portion of the relevant qualifying period would be preserved for purposes of determining eligibility for the exemption.

## **Provisional tax payments**

### **Transitional provisions: adjustment to the profit coefficient for 2027**

One of the most significant aspects of the proposal from a treasury and cash flow management perspective is that it does not defer the impact of the new framework until the annual tax return is filed. Instead, through a transitional provision, the profit coefficient used to calculate provisional tax payments for 2027 would be adjusted for corporate taxpayers with taxable income exceeding MXN 50 million in their most recently filed annual tax return.

Where deductions reported in that return were less than or equal to 96.67% of taxable income, the ordinary profit coefficient would be multiplied by 1.0658. Where deductions exceeded 96.67% of taxable income, the coefficient would be multiplied by 2.6162. In addition, where tax loss carryforwards remain available, their utilisation for provisional tax payment purposes would be limited to 50% of provisional taxable profit. According to the explanatory memorandum, the objective is to spread the impact of the new regime throughout the tax year and prevent the entire increase in Income Tax (ISR) from being concentrated at year-end.

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## Groups of companies

### **Repeal of Articles 59 to 71: Optional Regime for Corporate Groups**

The proposal would repeal Chapter VI of Title II of the Income Tax Law (LISR), which governs the Optional Regime for Corporate Groups. According to the explanatory memorandum, the original rationale for granting the tax deferral benefit has effectively been exhausted. It also notes that, compared with tax consolidation and group taxation regimes in other jurisdictions, Mexico continues to provide a specific tax deferral benefit that the proposal seeks to eliminate.

Accordingly, Articles 59 to 71 would be repealed. Companies applying the regime as of 31 December 2026 would be required to exit the regime with effect from 1 January 2027. As a general rule, any outstanding deferred Income Tax (ISR) would become payable no later than 31 December 2027, adjusted for inflation from the date on which the tax would otherwise have become due had the election not been made. The transitional provisions also establish specific rules governing deferred tax relating to certain tax years.

## Capital, CUCA (Capital Contribution Account) and tax basis of shares

### **Articles 22 and 78 – debt capitalisations and capital contributions through receivables**

The reform also modifies the treatment of the Capital Contribution Account (CUCA) and the tax basis of shares. According to the explanatory memorandum, the tax authorities have identified debt capitalisation transactions in which not only the principal amount of a liability is contributed to share capital, but also accrued unpaid interest and the related VAT. In the government's view, these items do not constitute a new economic contribution and, therefore, should not increase the amount that may subsequently be returned to shareholders as capital.

Accordingly, in debt capitalisation transactions, accrued unpaid interest and the related VAT would not be included in the CUCA balance.

In addition, where an in-kind contribution consists of accounts receivable, assignments of collection rights or negotiable instruments, the corresponding increase in the CUCA would only be recognised once those rights are realised, and only to the extent of the amount effectively collected in cash.

## Simplified Trust Regime (RESICO)

### **Article 113-E and related provisions: RESICO for individuals**

With respect to RESICO, the proposal moves in a different direction from the new controls applicable to larger taxpayers. Rather than introducing additional limitations, it seeks to expand the pool of taxpayers eligible to remain within a simplified tax regime.

For individuals engaged in business activities, professional services or leasing activities, the annual income threshold would increase from MXN 3.5 million to MXN 5 million. The current maximum tax rate of 2.5% would also apply to the new threshold.

The proposal further introduces greater flexibility for taxpayers seeking to re-enter the regime after having been excluded due to non-compliance, provided that they regularise their tax obligations and continue to meet the applicable income threshold.

For taxpayers engaged in primary sector activities, the amount of tax-exempt income would increase from MXN 900,000 to MXN 1 million.

## **Articles 206, 209 and 214 – RESICO for corporate taxpayers**

For corporate taxpayers, the revenue threshold would increase from MXN 35 million to MXN 50 million. In addition, the regime would move away from its current mandatory approach and become elective: eligible companies would be able to choose whether to be taxed under RESICO or under the general corporate tax regime.

The proposal also introduces greater flexibility by allowing taxpayers to return to the regime in subsequent tax years, provided they once again satisfy the applicable revenue threshold and all other eligibility requirements.

This increased flexibility is accompanied by more accelerated depreciation rates for qualifying investments, as provided under Article 209. Examples set out in the proposal include enhanced deductions for computer equipment, tools, certain vehicles, restaurants, construction activities, research activities and other qualifying investments.

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## **Investment incentives**

### **Transitional provisions – Immediate deduction, training and innovation incentives (2027-2030)**

A parallel pillar of the proposal is the incorporation, through transitional provisions, of several tax incentives currently established under Executive Decrees, including those related to **Plan México** and the Development Poles Programme. The stated objective is to provide greater legal certainty for investments whose implementation and returns span multiple tax years, while preserving policy instruments intended to promote industrial development, nearshoring, employment, innovation and regional development.

Among the incentives retained under the proposal is the ability to claim immediate deductions for investments in new fixed assets, subject to differentiated deduction rates. The proposal also preserves an additional 25% deduction for certain incremental expenditures on training and innovation activities.

- Under Plan México, the incentives would remain available until 30 September 2030, while existing requirements relating to authorisation, registration and minimum asset holding periods would continue to apply.
- Within the Economic Development Poles and Circular Economy Poles, certain taxpayers may be eligible for an immediate 100% deduction in respect of qualifying new assets used within the relevant development zone.

# Federal Revenue Law (LIF)

## Value Added Tax (VAT)

### Article 25 – 7% VAT Option for RESICO taxpayers

The Federal Revenue Law (LIF) proposes a simplified VAT regime for individuals and companies taxed under RESICO. The stated objective is to simplify compliance. Rather than determining VAT under the standard mechanism of output VAT less recoverable input VAT, eligible taxpayers would be allowed to elect to pay 7% of the total taxable transactions or activities effectively collected during the month. The simplification does not mean that taxpayers would invoice their customers at a 7% VAT rate. VAT would continue to be charged to customers at the applicable statutory rate, and VAT on imports would remain payable in accordance with the VAT Law (LIVA).

The trade-off under the simplified regime is significant: taxpayers would not be entitled to recover VAT charged to them by suppliers or VAT paid on imports related to those activities.

## Digital economy and technology platforms

### Article 25, Section VI – Income Tax (ISR) withholding on corporate taxpayers operating through digital platforms

The proposal extends the use of digital platforms as a mechanism for advance tax collection to corporate taxpayers. According to the explanatory memorandum, withholding obligations applicable to individuals have proven to be an effective compliance tool, and the measure seeks to reduce differences in the tax treatment of taxpayers carrying out similar activities through e-commerce channels.

Under the proposal, digital platforms, applications and similar intermediaries would be required to withhold Income Tax (ISR) at a rate of 2.5% from corporate taxpayers deriving income from the sale of goods or the provision of services through such platforms. The tax withheld would be creditable against provisional tax payments or the annual Income Tax (ISR) liability. Where the corporate taxpayer fails to provide its Federal Taxpayer Registry (RFC) number, the withholding rate would increase to 20%.

### Article 25, Section IX – Expansion of VAT withholding obligations for digital platforms

For VAT purposes, the proposal seeks to address three behaviours that, according to the tax authorities, have been identified in practice:

- corporate taxpayers operating through digital platforms without remitting VAT;
- individuals presenting themselves as corporate entities to avoid withholding obligations; and
- non-resident taxpayers using third-party RFC registration numbers.

To address these issues, the proposal would expand both the VAT withholding framework and related reporting obligations to additional categories of taxpayers.

Under the proposal, domestic and foreign digital platforms would be required to withhold VAT from corporate taxpayers under rules broadly equivalent to those currently applicable to individuals: 50% of the VAT due where the taxpayer provides its RFC, and 100% where it does not.

In addition, platforms would be required to withhold 100% of the VAT due from:

- non-residents without a permanent establishment in Mexico selling goods within Mexican territory; and
- suppliers whose payments are deposited into foreign bank or deposit accounts.

Alongside these measures, the proposal would expand the information reporting requirements applicable to platform operators in respect of these transactions.

## Financial technology institutions

### **Article 25, Section VIII – Withholding obligations through crowdfunding institutions**

Crowdfunding institutions act as intermediaries between investors and borrowers and, by virtue of that role, have access to the information required to identify both participants and transaction flows. The proposal seeks to leverage this intermediary function by making these institutions responsible for withholding and remitting taxes associated with the interest payments they facilitate.

For Income Tax (ISR) purposes, the institution would be required to withhold 20% of the nominal interest paid to resident individuals and corporate taxpayers that provided the funding. In the case of non-resident recipients, the applicable withholding rate would be determined in accordance with the Income Tax Law (LISR).

For VAT purposes, the institution would be required to withhold 16% of the nominal value of accrued interest and remit the tax on behalf of the recipient, thereby assuming responsibility for compliance with that obligation.

## Insurance sector

### **25, Section XIV – VAT treatment of insurance indemnities settled through third parties**

The Federal Revenue Law (LIF) proposes a specific provision for the insurance sector. The issue it seeks to address concerns the recovery of VAT incurred on goods or services acquired by an insurer to fulfil an indemnity obligation, where, instead of making a cash payment to the policyholder, the insurer compensates the loss or replaces the insured asset through third-party providers.

Under the proposal, VAT charged by suppliers or paid on imports would not be recoverable where the relevant goods or services are used to satisfy obligations under an insurance contract and the indemnity is settled through repair, replacement or compensation in kind provided by third parties.

This change could have a direct impact on the claims cost structure of insurers that settle claims in kind or through supplier and repair networks.

## Fuels

### **Article 25, Section XIX – Excise Tax (IEPS) on inventory discrepancies and volumetric controls**

The proposal links tax policy with ongoing efforts to combat the illicit fuel market. According to the explanatory memorandum, recurring discrepancies between fuel volumes sold, acquisitions, electronic invoices (CFDIs), customs declarations and volumetric control records constitute a risk indicator, as they may reveal the presence of fuel whose legitimate origin cannot be substantiated.

Based on this rationale, taxpayers other than manufacturers, producers or importers that sell gasoline, diesel and other covered fuels would no longer rely exclusively on the exemption applicable to subsequent stages of the supply chain.

The proposal would require taxpayers to calculate IEPS on the positive difference between the quantity of fuel sold during the month and the quantity acquired during the same period. The applicable IEPS rate would be applied to that difference, without any entitlement to a credit or offset.

The tax authorities would be empowered to verify such discrepancies by reference to inventory balances, volumetric control records, CFDIs and customs declarations.

## Other VAT and IEPS measures

### **Article 25, Sections XIII, XV and XVI – menstrual products, books and nicotine products**

The Federal Revenue Law (LIF) also incorporates measures aimed at advancing social policy objectives and enhancing product traceability.

The proposal would apply the 0% VAT rate to menstrual underwear and menstrual discs, whether reusable or disposable. In addition, it introduces a 0% VAT incentive for taxpayers whose sales of books, newspapers and magazines represent at least 90% of their total revenue, allowing them to recover VAT incurred on purchases that are necessary for carrying out those activities.

For IEPS purposes, the proposal expands the security code and verification regime to additional products containing nicotine. The objective is to improve the tax authorities' ability to trace the commercialisation of such products and combat illicit trade.

While these measures are sector-specific, businesses operating in the affected industries should ensure they are reflected in their product tax matrices, indirect tax classifications, and packaging, labelling and coding compliance processes, as applicable.

## **Financial sector and capital markets**

### **Article 25, Sections IV and V – IPAB contributions and bad debt deductions**

For commercial banks, the Federal Revenue Law (LIF) proposes two significant measures.

The first would limit the deductibility of contributions paid to the Institute for the Protection of Bank Savings (IPAB). Under the proposal, three-quarters of such contributions would be non-deductible during 2027. According to the explanatory memorandum, this treatment seeks to prevent expenditures associated with the bank savings protection system from excessively reducing the Income Tax (ISR) base of financial institutions.

The second measure relates to bad debts. The proposal seeks to align the treatment applicable to credit institutions more closely with the general tax regime and to reduce the degree of discretion in determining when a debt is considered practically uncollectible.

While certain specific conditions and thresholds would be retained, the policy direction is clear: to require more objective and consistent evidence before a bad debt deduction may be recognised for tax purposes.

### **Article 25, Sections X and XI – securities lending transactions**

The proposal seeks to address a distortion identified in securities lending transactions. Under the current framework, where withholding tax is calculated on the principal amount generating the interest, the resulting withholding may absorb a disproportionate share of the lending fee actually received, thereby affecting both the liquidity and attractiveness of these transactions.

To address this issue, financial institutions acting as intermediaries would be required to apply a provisional withholding tax of 9% on the amount of the nominal interest defined as the agreed lending fee, replacing the existing withholding mechanism based on the underlying principal amount.

Investment funds engaged in securities lending transactions would exclude such lending fees from the calculation of their daily tax liability and would instead apply the corresponding withholding tax on behalf of their investors.

### **Article 25, Sections XII and XVII – Foreign funds and incentives for initial public offerings**

The Economic Package identifies the limited depth of the Mexican capital market as a structural challenge. According to the explanatory memorandum, the relatively small number of listed companies restricts market development, and the proposal seeks to enhance the competitiveness of the domestic market as a source of long-term financing.

Among the measures proposed is a preferential 10% Income Tax (ISR) rate on gains realised by Mexican resident individuals on the disposal of shares carried out directly in connection with an initial public offering (IPO), provided that the transaction is conducted through an authorised stock exchange and complies with applicable requirements relating to transparency, public disclosure, broad investor participation and other regulatory conditions.

The proposal also relaxes certain requirements that must be met for foreign legal structures associated with private equity funds to maintain their tax-transparent status.

### **Article 24 and Twenty-First Transitional Provision – Interest withholding tax and tax regularisation programme**

The Federal Revenue Law (LIF) sets the annual withholding tax rate on interest income at 0.68% for 2027 for purposes of Articles 54 and 135 of the Income Tax Law (LISR). The proposal also incorporates the calculation methodology into the legislation itself, with the stated objective of increasing transparency regarding the relationship between nominal returns, inflation and the effective Income Tax (ISR) rate applicable to individuals deriving investment income.

In addition, the Twenty-First Transitional Provision introduces a tax regularisation incentive for individuals and corporate taxpayers whose total revenue in 2025 did not exceed MXN 300 million and who have certain final or uncontested tax liabilities relating to 2025 or prior tax years.

The incentive may provide relief of up to 100% of penalties, surcharges and enforcement costs, provided that the underlying tax liability is paid or the relevant irregularities are corrected within the prescribed timeframe.

The proposal also includes certain exclusions. These include taxpayers listed under specific tax authority compliance programmes and those falling within the jurisdiction of the Large Taxpayers Division.

## Federal Duties Law (LFD)

### Updates to regulatory fees and charges

#### **Supervisory services provided by the National Banking and Securities Commission (CNBV)**

The proposed amendments to the Federal Duties Law (LFD) follow a different policy approach from those introduced under the Income Tax Law (LISR). Rather than seeking to redefine the tax base more broadly, the proposal aims to update the fees charged for public services, regulatory supervision and the use of public-domain assets.

According to the explanatory memorandum, several fees have fallen behind the actual cost of providing such services and no longer adequately reflect the additional technological and regulatory requirements imposed on supervisory authorities.

In relation to services associated with the securities market, the proposal identifies a cumulative real-term shortfall of approximately 16% in certain registration and supervisory fees. The rationale is linked to increased reporting, audit and sustainability obligations, which require a more intensive and technology-driven supervisory framework.

The proposed fee adjustments are intended to restore alignment between the cost of supervision and the regulatory charges imposed. While the impact is sector-specific, it is expected to be significant for issuers and regulated intermediaries supervised by the CNBV, as it would increase their direct regulatory costs.

#### **Article 31-B – Supervisory and inspection fees payable to CONSAR**

For AFOREs and public institutions performing similar functions, the proposal acknowledges that the variable inspection and supervisory fee has increased as a result of both the growth in assets under administration and the inflationary adjustment of the monetary fee component. According to the explanatory memorandum, this has led to a sustained increase in the regulatory burden borne by the sector.

The proposal would replace the additional fee of MXN 0.2877 for every MXN 1,000 of account balances with a factor of 0.1750 per thousand, applied directly to the relevant base.

However, a transitional provision establishes that the total amount payable in any given year may not be lower than the amount paid in the immediately preceding year. As a result, the theoretical reduction in the applicable factor would not necessarily translate into an immediate reduction in regulatory fee collections or compliance costs.

#### **Articles 232-B and 289 – Railways and Mexican airspace**

In the rail infrastructure sector, the proposal is based on the view that the fees currently charged for the use of public-domain assets have remained unchanged despite increases in operating and modernisation costs. The explanatory memorandum compares the Mexican fee structure with charges applied in other jurisdictions and infrastructure sectors.

For operators that have been using the railway infrastructure for more than 15 years, the rate established under Article 232-B, Section II would increase from 1.25% to 3% of gross revenue.

With respect to Mexican airspace, the proposal would increase the fees established under Article 289 by 10%, on the basis that this would help narrow part of the gap between current charges and the regional cost of providing air navigation services.

**Other updates to duties and regulatory charges**

The proposal also updates charges relating to immigration and consular services, port authorisations, sanitary services and various uses of public assets. For example, in the case of the extraction of materials from riverbeds and national deposits, the proposal would eliminate the current geographical zoning approach and instead determine the applicable charge based on the type of material extracted, with the objective of ensuring that the fee more directly reflects the nature of the resource being exploited.

While these changes are less far-reaching than the proposed Income Tax (ISR) reform, they may be particularly relevant for businesses operating under regulated frameworks, holding concessions or permits, engaging in import activities, or making intensive use of public infrastructure.

## Foreign trade and tariff policy

### Report on the exercise of tariff-setting powers

#### Amendments Implemented from 9 September 2025 to 8 September 2026

The tariff report accompanying the Economic Package should be distinguished from the other legislative proposals. It does not, in itself, constitute a new comprehensive tariff reform for 2027. Rather, it is the report submitted by the Federal Executive to the Mexican Congress on the exercise of the powers granted under Article 131 of the Mexican Constitution during the period from 9 September 2025 to 8 September 2026, so that the measures implemented during that period may be submitted for legislative approval.

During this period, eight tariff classifications within the sugar sector were amended, replacing specific duties with ad valorem tariffs of 156% and 210.44%.

In April 2026, tariff changes were introduced affecting 185 tariff classifications covering chemicals, cosmetics, paper and cardboard products, textiles, steel, aluminium, automotive parts, electrical equipment, bicycles, musical instruments, furniture and other goods. In addition, 11 tariff classifications associated with Sectoral Promotion Programmes (PROSEC) were amended to improve access to production inputs and machinery.

The temporary tariff exemption for basic consumer goods was also extended until 31 December 2026, with certain benefits remaining available until 31 March 2027 for businesses holding a Universal Single Licence (Licencia Única Universal) and meeting the applicable SAT requirements.

At the same time, 33 tariff classifications were removed from the exemption list, including products relating to meat, fish, rice, edible oils, beans and dairy products. As a result, the support scheme has become more targeted in scope.

The report notes that the TIGIE (Tariff Schedule of the General Import and Export Duties Law) contains 8,183 tariff classifications and that, following the measures described above, the simple average tariff rate stands at 10.6%, while the effective tariff rate paid between September 2025 and May 2026 was 6.7%.

For importing businesses, the key takeaway is the need for a tariff classification-by-classification review, as the actual impact cannot be inferred from the overall average tariff rate.

## Turn tax changes into a strategic advantage

The initiatives included in the 2027 Economic Package may not only introduce new compliance obligations and tax risks. They could also create opportunities related to investment incentives, innovation, training and tax optimisation.

Forvis Mazars in Mexico Tax professionals can help you:

- Assess the impact of the proposed reforms on your organisation.
- Identify tax and financial risks.
- Evaluate different scenarios and their impact on cash flow.
- Take advantage of available tax incentives and benefits.
- Develop compliance and adaptation strategies.

Contact our specialists to discuss how these proposed changes could affect your business and discover how to prepare your organisation for the evolving tax landscape.

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