



Tax and Legal
Economic Package 2027
September 9th, 2026

Economic Package 2027

On 8 September 2026, Mexico's executive branch submitted to the Chamber of Deputies for review the [2027 Economic Package](#) (in Spanish only), which comprises the General Economic Policy Criteria, the Federal Internal Revenue Law (LIF), the Draft Federal Expenditures Budget, the Income Tax Law (LISR), and the Fees Law. If approved by Congress, the proposals will be effective as from 1 January 2027.

A brief summary of the most relevant proposals is provided below.

Macroeconomic framework

The package relies on the following main economic variables:

	Approved - 2026	Estimated - 2027
Actual growth (GDP, %)	1.8-2.8	1.5-2.5
Inflation (%)	3.0	3.0
USD/MXN exchange rate	18.9	18.0
Interest rate (%)	6.0	6.0
Oil (USD/barrel)	54.9	61.8

Federal Internal Revenue Law (LIF)

Tax incentives and exemptions:

• The same tax incentives and exemptions available in 2026 would remain in effect, including:

a) Credit for the excise tax (IEPS) on imported or acquired diesel, biodiesel, and related blends;

b) Up to 50% tax credit for expenses incurred for the use of toll highway infrastructure;

c) IEPS credit for fossil fuel purchasers;

d) Credit for special mining duty for taxpayers with income below MXN 50 million;

e) Tax incentive for individuals and companies engaged in the sale of books, newspapers, and magazines and whose total income during the immediately preceding fiscal year did not exceed MXN 6 million and represents at least 90% of total annual income. The incentive would provide an additional 8% deduction for the cost of books, newspapers, and magazines; and

f) Exemption from customs processing fees on natural gas imports.

• The incentives mentioned in a. through d. are considered accruable income for income tax (ISR) purposes when they are effectively credited.

• Furthermore, an additional tax incentive would

be available for taxpayers that obtain at least 90% of their income from the sale of books, newspapers, and magazines, consisting of applying a 0% value added tax (VAT) rate to such activities and crediting the VAT related to the inputs and services necessary to carry out these activities, in accordance with the applicable legal requirements.

Interest withholding tax:

During 2027, the annual withholding tax rate on interest paid by banks to Mexican individuals and companies (referred to in articles 54 and 135 of the LISR) would be set at 0.68%. For the first time, the calculation methodology would be included in the text of article 24 of the LIF (average nominal rate of 28-day CETES (Mexican Federal Treasury Certificates), minus average annual inflation rate, multiplied by the effective income tax rate of the financial sector (23.5%, based on 2025 annual tax returns)).

Maximum amounts for film production and distribution:

The maximum authorized amounts to be distributed among all taxpayers and projects for film production and distribution completed in Mexico (referred to in article 189 of the LISR) would be updated.

Standardization of the treatment of bad debts by banks:

The special treatment by banks of debts that cannot be collected, as detailed in LISR article 27, section XV, paragraphs 3 and 4, would be standardized. Additionally, the treatment of bad debts provided for in rule 9.1.20 of the Omnibus Bill for 2026 would be incorporated into the LIF, with the aim of providing certainty on the applicable treatment in the case of loans granted to individuals who are taxed under a tax regime other than that for business activities.

VAT withholding by collective financing banks:

Collective financing banks would be required to withhold VAT on interest paid, applying a rate of 16% on accrued interest. The banks would make this withholding at the time of payment and would inform the tax authority through the corresponding return within the established deadlines.

IEPS for nicotine-containing products:

The fiscal control obligations (safety code on packets) applicable to products containing nicotine would be specified in the LIF, consistent with the Excise Law's treatment of cigarettes and other manufactured tobacco products, in the interest of protecting public health.

Tax incentive for stock market trading:

A tax incentive would be available for Mexican individuals, nonresidents without a permanent establishment in Mexico, and transparent foreign tax entities and foreign legal entities (article 4-A of the LISR) consisting of the application of a

10% rate to the sale of shares through national stock exchanges via public offerings and dual placements, provided the relevant requirements are met.

RESICO VAT administrative facilities:

Individuals and entities that pay taxes under the simplified trust regime (RESICO) would be allowed to choose to pay VAT by applying a rate of 7% to all activities taxed and effectively charged in the month in question, without the right to credit.

IEPS on fuels:

Persons other than manufacturers, producers, or importers would be able to pay the IEPS on fuels by using the quota applicable to the difference between fuel units sold and fuel units acquired during the same month, without any reduction or credit.

Tax regularization program:

The tax stimulus for individuals and legal entities

whose total income in fiscal year 2025 did not exceed MXN 300 million would be extended, and it would apply also to those who have obtained benefits previously.

Repatriation of capital:

An incentive would be established consisting of applying a rate of 7.5% (without any deduction) to resources held abroad that are repatriated to or invested in Mexico in productive activities for at least three years, with a withholding rate of 10% on dividends or capital redemptions distributed during that period (in accordance with article 140, second paragraph of the LISR). The benefit would apply to resources that are repatriated during 2027, with different investment terms depending on whether the resources are received in the first or second half of the year.

Suspension of the tax guarantee:

For administrative appeals limited to substantive issues, the tax liability would not have to be

guaranteed when the appeal is filed in a timely manner.

Income Tax Law (LISR)

New mechanism for controlling tax deductions and losses:

- A limit to the deductibility of both authorized deductions and pending tax losses would apply to Mexican entities with taxable income under the Title II general entity regime greater than MXN 50 million per year.
- Additionally, a special transition rule would be established to calculate estimated payments for 2027: Entities with income greater than MXN 50 million in their last annual return would adjust their profit coefficient by multiplying it by a factor of 1.0658 (if their deductions are no greater than 96.67% of their taxable income) or 2.6162 (if they exceed that threshold), and they would only be allowed to reduce their tax losses from previous years by up to 50% of the tax profit thus

calculated. This transitory rule would not apply to taxpayers exempted by article 78-E.

Repeal of the optional regime for groups of companies:

Chapter VI of Title II would be repealed. By means of a transitory provision, companies that are members of a group would be disintegrated as of 1 January 2027 and would have to pay any deferred tax no later than 31 December 2027 (with the exception of the total tax corresponding to the third immediately preceding fiscal year, which should be paid no later than 31 March 2027).

Limit on the deduction of net interest:

The adjusted tax profit percentage used to calculate the annual net interest deduction limit would be reduced from 30% to 20%.

Deduction of payments made to persons abroad:

Payments made to persons abroad would be deducted in the year in which the consideration is actually paid and the tax that is withheld pursuant to article 153, fifth paragraph, is remitted to the tax authorities (currently, compliance with the information requirement of article 76 is sufficient and withholding is not a condition). Also, the withholding tax would have to be reported at the time of enforceability, accrual, or payment, whichever occurs first (accrual is not considered currently and would be a new addition).

Advances for services and leases:

Advances for the provision of services and for the granting of the temporary use or enjoyment of goods would be deducted in the year in which the service is actually provided or the period of use or enjoyment lapses (no longer in the year the advance is paid). Additionally, the reference to “the service” in the second paragraph of article 27, section XVIII of the LISR (which currently provides that advances are deductible when paid

and an invoice should be obtained during the year of payment) would be eliminated and a final paragraph would be added, clarifying that the section does not apply to advances on services and leases that are governed by the new rule.

CUCA and tax basis of shares:

- When capitalizing liabilities, the unpaid accrued interest or the VAT corresponding to such liabilities could no longer be incorporated into the contribution capital account (CUCA); for contributions in kind, consisting of accounts receivable or assignment of credit rights, the CUCA would be increased when these are effectively collected and only for the amount collected in cash. Moreover, the treatment of redemptions and reductions of capital would also apply to the “amortization of losses” (currently, the rules only mention redemption, amortization, or reduction of capital and do not expressly refer to losses).
- On the other hand, consistent with the above,

interest and VAT on capitalized liabilities would not increase the tax basis of shares; contributions in kind from accounts receivable would only increase the basis when the receivables are effectively collected. Also, the reference to the amortization of losses would be aligned with the reform mentioned above.

Net tax profit account:

The legislation would specify that the “nondeductible items” that must be subtracted to determine net tax profit include both those expressly listed in article 28 and any other expenditure that does not meet the deductibility requirements of the LISR.

Extension of the RESICO:

The income limit to apply the RESICO regime would be increased from MXN 3.5 million to MXN 5 million for individuals, and from MXN 35 million to MXN 50 million for entities, among other adjustments.

Contact:

Eduardo Revilla

Tax and Legal Services Partner

erevilla@deloittemx.com

Tel. +52 55 5080 6081



tax@hand

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Aguascalientes

Blvd. A Zacatecas 845 Piso 4, Int. 410
Colonia Trojes de Alonso
20116 Aguascalientes, Ags.
Tel: (449) 910 8600
Fax: (449) 910 8601

Cancún

Av. Bonampak, L. 4C-2, Mz. 1, SMz. 4-A
Edificio Kun 21 86, piso 10, oficinas 1001-1002
77500 Cancún, Quintana Roo,
Tel: +52 (998) 872 9230

Chihuahua

Av. Valle Escondido 5500
Fracc. Des. El Saucito E-2, piso 1,
31125 Chihuahua, Chih.
Tel: (614) 180 1100
Fax: (614) 180 1110

Ciudad Juárez

Baudelio Pelayo No. 8450
Parque Industrial Antonio J. Bermúdez
32400 Ciudad Juárez, Chih.
Tel: (656) 688 6500
Fax: (656) 688 6536

Culiacán

Insurgentes 847 Sur, Local 103
Colonia Centro Sinaloa
80128 Culiacán, Sin.
Tel: (33) 1454 2000

Guadalajara

Avenida López Mateos Norte 2405, piso 29
Colonia Italia Providencia
44648 Guadalajara, Jal.
Tel: (33) 3669 0404
Fax: (33) 3669 0469

Hermosillo

Blvd. Eusebio Francisco Kino No. 315
Piso 8, Suite 804, Colonia Lomas del Pitic
83010 Hermosillo, Son.
Tel: (662) 109 1400
Fax: (662) 109 1414

León

Blvd. José Maria Morelos No. 1555 Piso 5
37130, Colonia Granjas del Rosario León,
Guanajuato, México

Mérida

Calle 56 B 485 Prol. Montejo Piso 2
Colonia Itzimna
97100 Mérida, Yuc.
Tel: (999) 913 4032
Fax: (999) 913 4052

Mexicali

Calzada Francisco López Montejano 1342
Piso 7 Torre Sur
Fracc. Esteban Cantú
21320 Mexicali, B.C.
Tel: (686) 905 5200
Fax: (686) 905 5231 y 5232

Ciudad de México

Paseo de la Reforma 505, piso 28
Colonia Cuauhtémoc
06500 México, D.F.
Tel: (55) 5080 6000

Monterrey

Av. Juárez 1102, piso 40
Centro
64000 Monterrey, N.L.
Tel: (81) 8133 7300

Puebla

Edificio Deloitte, Vía Atlixcayotl 5506, piso 4 Zona
Angelópolis
72190 Puebla, Pue.
Tel: (222) 303 1000
Fax: (222) 303 1001

Querétaro

Avenida Antea 1090, torre 2, piso 7
Colonia Jurica
76100 Querétaro, Qro.
Tel: (442) 238 2900
Fax: (442) 238 2975 y 2968

Reynosa

Carr. Monterrey-Reynosa 210-B, PA
Fracc. Portal San Miguel
88730 Reynosa, Tamps.
Tel: (899) 921 2460
Fax: (899) 921 2462

San Luis Potosí

Av. Salvador Nava Martínez 3125, 3-A
Fracc. Colinas del Parque
78294 San Luis Potosí, S.L.P.
Tel: (444) 102 5300
Fax: (444) 102 5301

Tijuana

Misión de San Javier 10643, Piso 8
Zona Urbana Río Tijuana.
Tijuana B.C., 22010
Tel: (664) 622 7878
Fax: (664) 681 7813

Torreón

Independencia 1819-B Oriente
Colonia San Isidro
27100 Torreón, Coah.
Tel: (871) 747 4400
Fax: (871) 747 4409



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