Budget Day Special
2027 Tax Plan

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This Budget Day Special outlines important proposals in the 2027 Tax Plan and additional legislative proposals. Many proposals have already been announced, for example in the Spring Memorandum.

This special is divided into the following topics:
- measures for companies;
- measures for employers;
- measures for VAT & excise duties;
- measures for immovable property;
- measures for cars & mobility;
- measures for (wealthy) individuals;
- measures for energy & environment;
- international measures;
- other measures.

The proposed measures will enter into force on 1 January 2027, unless stated otherwise.

Companies

Exemption for income from forestry activities ceases to apply

Exemption for income from forestry activities will be abolished on 1 January 2029. As a consequence, benefits from forestry will no longer be exempt from income tax or corporation tax from that date onwards. No transitional law applies. The abolition will not only affect forestry businesses, but also other enterprises which are now covered by the wide-ranging scope of the exemption, e.g. in the case of proceeds from Christmas trees, natural burial sites or pruning waste.

Take note!

Before 2029, identify the benefits now covered by the exemption for income from forestry, since they will in principle be taxed as from 2029.

Tax on priced-in foreign exchange results

A participation in foreign currency entails price risks. If this is hedged by a loan or futures contract, on request, the result fall under the participation exemption and is tax-exempt. The price of that hedge already includes the expected price development, via the interest rate difference between the two currencies. This interest is tax deductible, whereas the expected foreign exchange gains have remained tax-exempt. Such a skewed result will disappear. Only the portion that is not priced-in remains exempt, being the difference between what is expected and the actual rate. The priced-in portion will be taxed each financial year as from 1 January 2027.

Tip

The exemption applies only on request and will be set out by tax ruling. What is new, is that discontinuing the exemption may also be requested in future.

Take note!

For hedges that had already been approved or requested prior to 15 September 2026, the old law applies until 31 December 2027. Any extension will apply as a new contract.

Reducing and abolishing the tax relief for new businesses

The tax relief for new businesses will be phased out almost entirely as from 2027. The amount will decrease from €2,123 to €10 as of 1 January 2027 and will cease entirely as of 1 January 2028.
No transitional law will apply, so entrepreneurs who started a new business prior to 2027 will also be affected. At the same time, discretionary depreciation for new businesses will ceases to apply as from 2028. The tax relief for new businesses in the event of occupational disability will be abolished as of 1 January 2029. The phasingout and discontinuation of these schemes are reflected in the aggregate income, which could have implications for the system of allowances.

The fixed sum in the innovation box will be expanded

By applying the innovation box, profits from self-developed intangible assets will be taxed at a lower rate (9%) in corporation tax. The flat-rate scheme for calculating such profits will be expanded. Those who opt for this scheme may deem, as such, a benefit of 25% of profits on a flat-rate basis. The maximum amount that can thus be applied in the innovation box increases from €25,000 to €100,000 per annum and per taxpayer. The scheme applies in the year in which the asset is created and in the two years thereafter. This makes application more attractive and easier, especially for smaller businesses.

Tip

As from 2027, reassess whether the fixed sum is more advantageous than the regular calculation, now that the maximum quadruples.

Take note!
The fixed sum replaces the allocation of profit to the asset. For higher innovation gains, the regular calculation could provide more benefit.

Presumption in a restructuring will cease to apply

In the event of a merger or division, no immediate settlement of profits is required. This facility will cease to apply if the restructuring focuses on tax avoidance or deferral. Now a presumption applies to this: anyone who sells a particular company to an independent buyer within three years has to prove that there were business reasons. The Supreme Court ruled that this is in contravention of European law. The presumption will therefore disappear.
In future, the inspector will have to provide prima facie evidence of his own accord.

Take note!
Assurance in advance about a sale within three years is no longer possible. The inspector can simply continue to question a restructuring.

Employer

Higher tax-exempt travel allowance

The maximum tax-exempt travel allowance increases from €0.23 to €0.25 per kilometre retroactively as of 1 January 2026. Employers can reimburse this amount tax-free for commuting and business travel, but this is not mandatory. It does not make any difference what means of transport the employee uses, unless the employer provides the means of transport. In fact, it codifies the previous policy decision, which has already made it possible to reimburse €0.25 per kilometre tax-free for the whole of 2026. The increase also applies to the deductible travel costs of entre-preneurs and recipients of income from other activities. In addition, the fixed sum for certain travel expenses increases to €0.25 per kilometre when deducting specific healthcare costs, weekend expenses for the disabled, and donations.

Take note!

Employers may apply the increase retroactively from 1 January 2026, but they must agree to this together with their employees.

Capping threshold for pensions remains unchanged

Since 2015, a maximum income on which a tax-advantaged pension can be accrued has been in force, what is known as the capping threshold. Normally, this threshold is indexed annually. It is proposed not to index the capping threshold from 2027 to 2032. The threshold in 2026 amounts to €137,800 and therefore remains at the same nominal level during this period. Income above this threshold cannot be covered by a tax-facilitated pension in the second pillar nor accrued in annuities in the third pillar.

Take note!

Employers may apply the increase retroactively from 1 January 2026, but they must agree to this together with their employees.

Targeted staff discount exemption will cease to apply

The targeted exemption for discount on industry-specific products will be abolished. Currently, employers can offer their employees up to 20% discount on industry-specific products under certain conditions, with a maximum of €500 per employee per year, without this being at the expense of the discretionary margin. Once abolis-hed, the discount could possibly be used for final levy purposes and charged to the discretionary margin of the work-related expenses scheme, provided the customary practice criterion is met. The benefit will continue to be valued based on the economic value. Discounts granted to former employees will remain mandatory for final levy purposes.

Take note!

Employers who continue to provide staff discounts should take additional demands into account on the discretionary margin of the work-related expenses scheme.

Tax incentives for new businesses and scale-ups

Employees of qualifying new businesses and scale-ups will get more favourable tax treatment when acquiring share options. In principle, taxation takes place only on sale of the acquired shares and only 65% of the benefit is included in the salary. Now, it is usually levied as soon as the shares become negotiable or, if preferred, at the time of acquisition. The scheme is intended to apply as from 2027 and only if specific conditions are met, including in principle, a minimum period of two years between being granted and the sale. To cover this, the co-working partner's relief and the business discontinuation relief will initially be cut back by about 75% and completely abolished three years later. The co-working partner's relief applies to entrepreneurs whose unpaid partner also works in the business and, depending on the number of hours worked, decreases for example from 4% to 1% or from 2% to 0.5% of the profits. The business discontinuation relief initially decreases from a maximum of €3,630 to €908. After abolition, a greater portion of the discontinuation profits will therefore be taxed in the event of discontinuation of the business.

Take note!
The scheme may already apply to options granted on or after 17 April 2025 which have not yet been included in the payroll tax by the end of 2026. The ruling must then be requested by 31 December 2027 at the latest.

Vat & Excise Duties

VAT on ornamental horticulture to 21%

As from 1 January 2027, a pseudofinal levy will be introduced for employers who make a fossil-fuel passenger vehicle available to employees, including for private use. The pseudo-final levy amounts to 12% of the catalogue value for passenger vehicles up to 25-years old. For older vehicles, the market value is assumed. For vehicles already made available prior to 2027, transitional law applies until 17 September 2030. Vans and motorcycles are excluded from the levy. Furthermore, the levy only applies in the case of a (notional) employer/employee relationship.

Take note!

Florists, garden centres and other sellers of ornamental horticulture products must adapt their financial records and pricing in a timely manner to the 21% VAT rate.

VAT on hot-air balloon flights to 21%

The reduced VAT rate for hot-air balloon flights will be abolished as of 1 January 2028. From then on, the general VAT rate will be 21% instead of 9%. Advance payments and vouchers do not prevent application of the higher rate: it is the moment when the hot-air balloon flight actually takes place. If a prepaid hot-air balloon flight only takes place in 2028, then 21% VAT is payable.

Take note!

In the event of advance payments and vouchers, please keep account of the time of the hot-air balloon flight. The rate of 21% will apply for events as of 1 January 2028.

Refund of renewable fuels will cease to apply

The refund of excise duty on bio-based and renewable fuels will discontinue. The scheme now gives entitlement to a partial refund of excise duty, subject to certain conditions, if at least 10% of the energy content is derived from sustainable fuels. However, refund applications can still be made for fuels released for consumption by 31 December 2026 at the latest. After that, the scheme ceases to apply.

Alcohol duty is indexed annually

The excise duty on alcoholic beverages will now be adjusted annually to accommodate inflation. Indexation will apply to beer, wine, intermediate products and other alcoholic products and will be based on the adjustment factor of Statistics Netherlands. As a result, excise duty rates automatically increase in line with inflation. The minimum amount of excise duty on beer is not indexed, as it is linked to the non-indexed consumption tax on non-alcoholic beverages.

Take note!

As from 2027, take into account an automatic annual adjustment of the alcohol duty.

Small brewers relief scheme will cease to apply

The small brewers relief scheme will be abolished. Small independent breweries will therefore no longer be able to use the reduced rate of excise duty on beer and will pay the regular rate of excise duty. The scheme now applies to breweries which, on average, do not produce more than 200,000 hectolitres of beer per annum and which fulfil additional conditions of independence.
The abolition removes the difference in excise duty treatment between small breweries and other breweries.

Take note!

Small breweries will have to take into account the regular excise duty rate from 2028 onwards, over and above the annual indexation of the alcohol duty.

Discount on excise duty of petrol extended

The reduction in excise duty on unleaded petrol is extended by one year, until 1 January 2028. The excise duty rate increases slightly in 2027, from €0.84469 to €0.85169 per litre. Indexation does not take place. As a result, the discount will be greater: €0.17643 per litre, compared to €0.15738 in 2026. Without a discount and with indexation, the rate would have been €1.02812 per litre. The discount only applies to unleaded petrol. The aim of the measure is to avoid refuelling becoming even more expensive as of 1 January.

Take note!

The government has already announced that it will also partially extend the discount in 2028 and offer a discount on diesel too. This will be done by means of a separate memorandum of amendment.

Immovable Property

Transfer tax rate on housing to 7%

The standard rate in the transfer tax for housing that is not used as the main residence will decrease from 8% to 7%. The lower rate applies, among other things, to rental homes, second dwellings and holiday homes. The aim of the decrease is to make investing in rental homes more attractive.
The regular rate of 10.4%, the rate of 2% for housing that the buyer uses as the main residence, and the exemption of transfer tax for first-time home buyers, remain unchanged.

Tip!

In the event of an intended purchase of a non-main residence, it may be beneficial for tax purposes to postpone the acquisition until 2027, so that the lower rate of 7% applies.

Transfer tax exemption for housing corporations

Transfers of immovable property between housing corporations will be subject to a new transfer tax exemption. The exemption only applies to immovable property necessary for the provision of certain services of general economic interest (diensten van algemeen economisch belang, DAEB). Other immovable property, such as non-DAEB dwellings and commercial immovable property, are excluded. This allows housing corporations to transfer such immovable property among themselves without the standard rate in the transfer tax for housing of 8% being due (proposed: 7% as from 2027).

Take note!

Check beforehand whether the immovable property to be transferred is actually used for designated DAEB purposes; otherwise the new exemption will not apply.

Housing corporations excluded from interest deduction restriction

Housing corporations are excluded from the generic interest deduction restriction under corporation tax (the earnings stripping rule). As a result, they are no longer affected by this interest deduction restriction. This will allow them to raise more loan capital, thus increasing their financial strength. They can take the change into account in their multi-annual budget, which allows the Social Housing Guarantee Fund (Waarborgfonds Sociale Woningbouw) to provide more fiscal space for guarantees and thus more favourable financing. This offers more fiscal space for new projects.

Take note!

The exclusion has not been included in the submitted 2027 Tax Plan as yet, but will be added by means of a memorandum of amendment, according to the tender letter.

Cars and Mobility

Temporary reduction in goods vehicle charge in order to

In order to compensate for the sharp rise in fuel prices caused by the Middle East conflict, the rates of the goods vehicle charge will temporarily be reduced by 22.3% from 1 September to 31 December 2026. The discount applies to all tariff components and to all holders of goods vehicles. The reduced rates will automatically be applied by the service providers of the goods vehicle charge.

Take note!
The discount only applies from 1 September to 31 December 2026, after which regular rates will apply again.

Transitional arrangement 'youngtimer' scheme

The age limit for the 'youngtimer' scheme has been raised from 15 to 16 years as of 1 January 2026. For cars which were already covered by the scheme in 2025 and which reached the age of 15 in that year, a transitional arrangement will apply retroactively as from 1 January 2026. For these cars, the old 'youngtimer' scheme may be applied for the year 2026, in which the personal benefit is calculated at 35% of the economic value. Application is not mandatory: if the regular additional tax liability based on the list price value is more advantageous, that option can be selected.

Take note!
For cars that reached the 15-year limit in 2025, check whether application of the transitional arrangement is more advantageous than the regular additional tax liability.

Gradual pathway for 'youngtimer' scheme

Greater austerity in the 'youngtimer' scheme will be introduced gradually. As of 1 January 2027, the age limit will not increase to 25 years but to 17 years. As of 1 January 2028, the age limit will increase to 20 years, which then becomes the structural age limit.

Cars that did qualify by 31 December 2025 at the latest, will be subject to additional transitional duty. Cars that reach the age of 17 in 2027 are therefore allowed to have the 'youngtimer' scheme applied throughout the year. From 2028 onwards, it applies for all cars that are older than 20 years.

Take note!
For cars that did not qualify by 31 December 2025 at the latest, the additional transitional duty for 2027 does not apply.

Temporarily reduced motor vehicle taxes for delivery vans and goods vehicles

Due to the exceptionally high fuel prices as a result of war in the Middle East, the motor vehicle tax for delivery vans subject to the business rates has temporarily been halved, and temporarily set at zero for goods vehicles. The reduction will apply from 1 July to 31 December 2026 and pursuant to the law, will have retroactive effect.

Take note!
As from 1 January 2027 the regular rates will be revived. However, the reduction will apply from the first motor vehicle tax period beginning on or after 1 July 2026 and thereafter for two three-month periods. As a result, the reduced rate or zero-rate could continue in individual cases in 2027.

Adjustments to final levy on fossil-fuelled cars

The pseudo-final levy of 12% on fossil-fuelled cars that are also used privately is being eased in some respects. In the event of maintenance or repairs, replacement fossil-fuelled cars will not be levied for a period of up to fourteen (14) days per repair period. Manually-driven driving school cars are also excluded. In addition, the transitional duty for cars that already qualified prior to 2027 will be extended until 31 December 2030. For shortterm rented or shared fossil-fuelled cars, an exemption applies for a period of up to seven (7) consecutive days per calendar year until 2031.

Take note!
If the same fossil-fuelled rental car is made available to an employee for two separate periods, the exemption does not apply. Even if the total duration remains under seven (7) days.

(Wealthy) individuals

2027 Income tax rates for taxpayers below the statutory retirement age

Taxpayers who have not reached the statutory retirement age (Algemene ouderdomswet, AOW) at the beginning of 2027, can expect the following tax brackets to be applied in 2027.

2027 Income tax			
Box 1	Tax.inc. more than (€)	but not more than (€)	2027 rate (%)
Tax bracket 1		39,247	36.23%
Tax bracket 2	39,247	78,426	38.16%
Tax bracket 3	78,426		49.50%

2026 Income tax			
Box 1	Tax.inc. more than (€)	but not more than (€)	2026 rate (%)
Tax bracket 1		38,883	35.75%
Tax bracket 2	38,883	78,426	37.56%
Tax bracket 3	78,426		49.50%

These percentages include the National Insurance Contributions. A different rate structure applies for those who qualify for fewer or no National Insurance Contributions.

2027 Income tax rates for old-age pensioners

Taxpayers who have reached the statutory retirement age (Algemene ouderdomswet, AOW) at the beginning of 2027 and were born after 1946, are expected to have the following tax brackets applied in 2027.

2027 Income tax (old-age pensioners)			
Box 1	Tax.inc. more than (€)	but not more than (€)	2027 rate (%)
Tax bracket 1		39,247*	18.33%
Tax bracket 2	39,247	78,426	38.16%
Tax bracket 3	78,426		49.50%

** Born before 1946: tax bracket 1 up to €41,637*

2026 Income tax			
Box 1	Tax.inc. more than (€)	but not more than (€)	2026 rate (%)
Tax bracket 1		38,883*	17.85%
Tax bracket 2	38,883	78,426	37.56%
Tax bracket 3	78,426		49.50%

** Born before 1946: tax bracket 1 up to €41,123*

Changed tax credits

The tax credits below are expected for 2027. With the exception of the elderly person’s tax credit and the single elderly person’s tax credit, these are tax credits for taxpayers who are younger than the statutory retirement age. For people older than the statutory retirement age, lower limits apply.

Tax Credits	2027 (€)	2026 (€)
General tax credit max.	3,154	3,115
Employed person's tax credit max.	5,929	5,685
Income-dependent combination tax credit max.	2,918	3,032
Young disabled person’s tax credit	935	923
Elderly person's tax credit	1,993	2,067
Single elderly person's tax credit	547	540

Tax relief for specific healthcare costs will cease to apply

The deduction of expenses for specific healthcare costs for income tax purposes will expire on 1 January 2028. This will also remove the corresponding allowance for specific healthcare costs and related provisions. Healthcare costs which are now deductible under conditions above a threshold, can no longer be deducted via this scheme as from 2028. No transitional law will apply to refunds or arrears payments of healthcare costs deducted prior to 2028.

Tip!

Consider paying planned healthcare costs in 2027 if the deductible item can still provide benefit.

No inheritance regulation in the event of excessive borrowing from the proprietary company

This measure resolves unintentional double taxation. At present, regular benefits from an inherited substantial interest obtained within twentyfour (24) months of a death may, under certain conditions, remain excluded from the Box 2 levy; but then the acquisition price will decrease. This also applies to a notionally, regular benefit which arises from the fact that the debts to the proprietary company exceed the maximum amount (€500,000). It is specifically that which is unfavourable: the maximum amount will not increase at the same time, so that in the following year a levy will be charged again. This concurrence is excluded.

Take note!

In the case of inherited shares and debts to the proprietary company, a Box 2 levy could immediately be due on excessive debt.

Energy & Environment

Higher tax relief for energy-saving investments

The energy-saving investment credit (energie-investeringsaftrek, EIA) provides an incentive for investments in energy-saving business assets. For investments in a business asset appearing on the Dutch Energy List, an amount may be deducted from profits. That amount is now 40% of the investment and will increase to 45.5%. This makes investments in energy-saving efforts or sustainable energy more financially attractive. The EIA budget will remain unchanged. The increase fits within the provisions of the scheme.

Tip

For an investment commitment to be concluded in 2027 the higher percentage will apply. Postponing the decision until the end of the year may therefore pay off.

Take note!

The EIA only applies to business assets included in the Dutch Energy List. The investment must be reported to the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland, RVO) within three (3) months of the commitment.

Waste levy increases somewhat less

The previously announced increase in the waste tax will be mitigated. In 2028, the rate rises to €64 per ton of waste and will rise to €81 per ton in structural terms as from 2030. In the 2026 Tax Plan, this eventually became €117.10 per ton. The tightening of the carbon levy for waste incinerator plants has also been delayed. By 2035 the carbon levy rate will only have risen to €304 per ton and the dispensation rights will likewise be fully phased out in 2035.

Take note!

Expenses are still rising compared to the current level of €40.85 per ton, but less rapidly and somewhat less than previously envisaged.

Increased taxes on mains water

Taxes on mains water will rise by €0.10 per cubic metre (m3). The rate rises from €0.437 to €0.537 per m3 in 2027 and will then be indexed annually. As a consequence, the cost price of water thus increases by about 4%. An average household with children consumes about 155 m3 per annum and will have to pay about €15 more. Two amendments that were adopted earlier will be introduced simultaneously: the charge ceiling of 50,000 m3 is being abolished and only water of drinkingwater quality will still be subject to tax.

Take note!

In the case of companies, the total consumption will count from now on. At 120,000 m3 per annum, the price increase will mean an additional €12,000.

Reduction in highest rate of flight tax

As of 2027, flight tax will be differentiated according to the distance to the final destination. That means a high rate of €74.81 per passenger would be applied for faraway destinations. This measure reduces this highest rate to €59.43. These are destinations of more than 5,500 kilometres away from Amsterdam, e.g. the United States, South Africa and Indonesia. The low and mid-range rates will remain at €31.04 and €49.87 per passenger, respectively. Longer flights will therefore continue to be charged at a higher rate than shorter distances.

Lower energy tax for greenhouse horticulture

The reduced energy tax rates for greenhouse horticulture have been adjusted to compensate for the additional costs of the blending obligation for green gas. The reduction applies to the existing consumption categories up to 1 million m³ of natural gas and is extended to the third category up to 10 million m³. The compensation will only continue if the blending obligation for green gas actually enters into force on 1 January 2027. For 2027, the cost per m³ of natural gas is assumed to be a maximum of 1.5 eurocents.

Reference to waste transport amended

References in the Dutch Environmental Taxes Act (Wet belastingen op milieugrondslag, Wbm) to European legislation for cross-border waste transports will be amended. The old 2006 regulation is replaced by the new 2024 regulation. The waste tax does not change substantively: the relevant provisions remain the same. However, there will be transitional law for which authorisations were granted for waste transports under the old regulation, so that waste tax can also be levied there after 1 January 2027.

Take note!

For old authorisations under the 2006 regulation, transitional law will continue to apply to the waste tax.

Tax liability in greenhouse horticulture clarified

For the carbon levy in greenhouse horticulture, it is clarified who is liable for tax in unincorporated partnerships, such as a fellowship or general partnership. The levy rests with the partnership which runs the greenhouse horticulture farm as a business and not individually on the ultimate partners. Clarification is retro-active to 1 January 2025. This does not change the amount of the levy.

Take note!

In the case of a fellowship or general partnership, the carbon levy is determined and recovered at the level of the joint venture.

Final destination via the flight plan

The differentiated flight tax clarifies how the final destination of a passenger is determined if no contract of carriage has been concluded. In such case, the flight plan may be used to provide the final destination. This is true for private flights with private aircraft, for example. Without this adjustment, the highest rate of flight tax would always apply in such cases.

Take note!

In the absence of a contract of carriage, the final destination must be able to be identified in the flight plan to enable the correct rate to be applied.

Carbon border adjustment mechanism

The Dutch elaboration of the carbon border adjustment mechanism (CBAM) is being tightened further. Prohibitory provisions currently stated in subordinate legislation will be incorporated into the Dutch Environmental Management Act (Wet milieubeheer). There will also be a statutory basis for the exchange of data between the Dutch Emissions Authority (Nederlandse Emissieautoriteit, NEa) and the Tax Administration on admission of declarants. In addition, the fine system will be eased so that minor or unintentional infringements can have lower fines imposed. A duty to report will also be introduced for accredited independent persons.

Take note!

Since 2026, importers of goods subject to the CBAM have to be authorised declarants and must comply with the related reporting and certification obligations.

International

Refund via foreign fund

Those who invest in Dutch shares via a foreign investment fund are entitled to a refund of dividend withholding tax. A Dutch fund that has the status of a tax investment fund may offset the withheld dividend tax against the tax it remits itself. A foreign investment fund cannot do so, which has resulted in double taxation of the dividend. In 2024, the Supreme Court ruled that this is contradictory to the free movement of capital. The refund is based on a formula. If it is too low, a higher amount can be justified. For entities, corporation tax is the maximum.

Tip

An application may be filed up to five (5) years after the financial year in which the fund pays out. For private limited companies and other entities, that period is three (3) years.

Take note!

The scheme applies to dividend withholding tax withheld as from 1 January 2027. For previous years, recourse to EU law may be possible. Investors outside the Netherlands have no such right.

Higher kilometre allowance on BES

On Bonaire, St. Eustatius and Saba, the maximum kilometre allowance will increase from $0.20 to $0.22 per kilometre. This has a retroactive effect to 01 January 2026. The increase is reflected in three schemes, being: the deduction of car costs in respect of income from employment, business and occupation; the employer's tax-free kilometre allowance; and the car costs under the extraordinary expenses in case of illness, invalidity, childbirth and death. This was prompted by increased fuel prices.

Take note!

The increase has been in place since May 2026 based on an approved policy decision. The legislative proposal merely endorses that approval.

Reduced excise duty on petrol for BES islands

The excise duty on petrol for Bonaire, Sint Eustatius and Saba will temporarily be reduced. For Bonaire it is $0.055 per litre, for Saint Eustatius and Saba it is $0.0419 per litre. The re-duction applies from 1 January to 31 December 2027. The measure follows the excise duty reduction for petrol in the Netherlands in Europe. For fuels, the system on the BES islands only applies excise duty on petrol.

Take note!

The reduction in excise duty only applies in 2027 and ceases to apply without any further measures on 1 January 2028.

Acquisition price on transferring registered office to the Netherlands

If a foreign company transfers its actual management to the Netherlands, then a shareholder with a substantial interest who lives abroad becomes a taxpayer in the Netherlands under Box 2.
The acquisition price applicable is deemed to be the original counter-performance, usually the historical cost price. The Netherlands can therefore also tax the increase in value that arose before the tax liability arose. In future, the acquisition price will be the economic value at the time of transfer. Only the change in value thereafter is taxable.

Tip

A valuation at the time of transfer of the registered office is of importance. Without any substantiation, it is difficult at a later stage to show which portion of the profit is excluded from the levy.

Take note!

The step-up does not apply if the shareholder already was a non-resident taxpayer.
More detailed regulations will be laid down for returning to the Netherlands.

New customs code to be implemented

In anticipation of the introduction of the new Union Customs Code (Douanewetboek van de Unie), the Dutch General Customs Act (Algemene douanewet) will be amended. As some elements of the new Customs Code apply immediately after coming into force, definitions and delegation bases are already being amended. The most important amendment is that a new European handling fee is expected to be collected by the Customs Service for goods imported via distance sales as from mid-November 2026. This fee will be collected in a similar manner to import duties and other customs fees.

Take note!

The current and the new Customs Code are expected to apply on a temporary basis alongside each other, which means that entrepreneurs have to take a transitional period into account.

Number of inhabitants for BES via figures from Statistics Netherlands

The income tax system for Bonaire, St. Eustatius and Saba annually adjusts amounts for inflation. This is done using the adjustment factor, which includes the elderly person's allowance, the tax bracket limits, and the income limit for chargeable social insurance contributions. For this calculation, the number of inhabitants of the islands is needed. That figure is currently specifically described in the law and therefore needs to be updated every year by a change in the law. In future, reference will be made to the figures set by Statistics Netherlands as of 1 January. The calculation itself does not change.

Tip

This does not change the inflation adjustment level. The amounts for one year, as always, keep account of the annual adjustment scheme.

Take note!

The change is a technical one: only the source to the number of inhabitants changes. This has no consequences for the tax return and taxes payable.

New safe harbour rules Dutch Minimum Taxation Act (Wet minimumbelasting)

The global minimum tax ensures that large companies in every country pay at least 15% tax. If an entity is levied a lower tax in a country, then an additional levy will be charged. That calculation is burdensome. A separate legislative proposal adds four safe harbour rules agreed within the OECD. If the conditions are met, the additional levy for that country will be set at zero and the full calculation will not be made. The first is a simplified calculation: if the effective rate is at least 15%, then no other calculation is necessary. Two others apply to entities with a parent company in a country that has an equivalent system; e.g. the United States is a particular case in point. The fourth applies to incentives in actual activities, such as the tax credits for energy, the environment, and small projects investment. The temporary country-by-country reporting is also extended for one year. The Netherlands has little room for policy freedom: the agreements have comprehensively been taken over so that countries do not diverge.

Tip

The innovation box is not subject to the safe harbour rule for incentives because it keeps account of the income. As a consequence, application could still lead to an additional levy.

Take note!

The rules will enter into force in 2027, but will partly work retroactively to 31 December 2025 or 1 January 2026. The country-by-country reporting now applies to reporting years start-ing on or before 31 December 2027.

Other measures

Temporary exception to digital notifications

In 2027 the Dutch Tax Administration will temporarily be granted an exception to the more extensive notification obligation for some digital messages. These include the invitation to file an income tax return, the provisional income tax assessment, and the income tax assessment. For these messages, in 2027 the notification does not need to indicate the nature and legal effects of the notification and the time limit to take action. As from 1 January 2028, this exception ceases to apply.

Take note!

For those who only receive these messages digitally, in 2027 they will not always be notified of the full scope of actions to take.

Education and research exemption clarified

The education and research exemption permitted under corporation tax is clarified regarding a situation when public funding is involved. If the public funds are matched by a contractual counterperformance, this does not constitute public funding for this exemption. Consequently, commercial education or research conducted in return for payment on behalf of a legal entity governed by public law or a public body is not covered by this exemption. According to the government, this concerns a clarification of the existing regulation and not a substantive change.

Postponement of digital mail from Allowances Department

The Allowances Department has temporarily been granted an exception to the obligation to be able to receive certain official messages electronically. Most message flows have been digitised, but for messages regarding collections and reclaims, this does not happen in a timely manner as yet.

So for these messages, the Allowances Department need not yet fully comply with the modernised rules for electronic administrative matters. The exception will apply until 1 January 2030 and will only be applied where necessary.

Previously submitted legislation, including:

- The self-employed deduction will be reduced further from €1,200 to €900.
- For employers, a pseudo-final levy of 12% is being introduced for passenger cars that are not completely emission-free and which are also made available for private use. Commuting counts as private use; existing provisions are subject to transitional law.
- The additional tax liability discount for electric vehicles will be phased out further. For a first registration in 2027, a 20% additional tax liability applies to the first €30,000 and 22% applies to the rest. The maximum discount is €600.
- As from 2027, the 30% facility will become a 27% facility and the salary standards will rise. Those who were admitted at the latest by the end of 2023 will retain the 30% facility and the old, indexed standards; the inflows from 2024 onwards will reduce to 27%, but will maintain the old salary standard. Transitional law for the partial non-resident taxpayer will also expire.
- The discretionary margin in the workrelated expenses scheme for the first €400,000 of the wage sum rises from 2% to 2.16%. Over the rest, it remains at 1.18%.
- It has been proposed to remove the authorisation to impose a first-day notification, to replace the notification requirement when opting-in by a retention obligation, and to raise the fixed hourly wage for R&D from €29 to €33. The consequences of a late retirement commencement will also be eased.

- For simplification of the hiring company's liability, the liability is presumed to be 35% of the invoice sum. Deposits into G-accounts will be deducted from it under certain conditions; evidence to the contrary remains possible.
- The income-dependent combination tax credit will gradually be phased out until its abolition in 2035. The maximum amount will decrease by €134 in 2027, excluding the inflation adjustment.
- The Box 3 exemption for green investments reduces to €200 (€400 for partners for tax purposes). The tax credit will still exist; both facilities will be cancelled in 2028.
- The tax relief for no or a low home acquisition debt (the Dutch Hillen Act-Wet Hillen) reduces from 71.867% to 67.067% of the difference between the notional rental value and the deductible costs.
- It has been proposed to simplify the partner concept for the system of allowances. The criteria for reconstituted families, a partnership in the previous year, and a partnership for the rest of the year will be cancelled. Minors can no longer be an allowance partner and the capital limits for healthcare allowance and the childrelated budget will decrease.
- In the event of disputes concerning deferral of payment and remission of state taxes, the administrative appeal will be replaced by an appeal to the recipient and subsequently an appeal to the tax court.
- The charge ceiling of 50,000 m^3 per connection in the levy on mains water will cease to apply. The tax base is confined to water of drinking-water quality and the 1,000-customer scheme will disappear.
- The netting scheme for low-volume users ends. As from 2027, electricity fed back can no longer be netted with electricity consumed
- Exemptions in the coal tax for dual and non-energy use will be abolished. This means the use of coal in coke production and the production of iron and steel, among other things will be taxed.
- It is proposed to bring forward the fixed classic vehicle exemption by one year to 2027 for vehicles with a first registration before 1 January 1988. Furthermore, new vehicle definitions adopted earlier under Dutch motor vehicle taxes (motorrijtuigenbelasting, MRB) and Dutch private motor vehicle and motorcycle taxes (belasting van personenauto's en motorrijwielen, BPM) will enter into force; for goods vehicles, the in-clusion of European vehicle categories is still being proposed.

Our team

Christiaan Cornet
Director
C.Cornet@vanoers.nl

Thijs Bijlard
Director & VAT-specialist
T.Bijlard@vanoers.nl

Edgar van Hassel
Senior tax manager
E.vHassel@vanoers.nl

Kurt van Heerewaarden
Senior tax manager
K.vHeerewaarden@vanoers.nl

Kevin Treuren
Tax manager / VAT-specialist
K.Treuren@vanoers.nl

Wendy Joosen
Senior manager global mobility
W.Joosen@vanoers.nl

Wouter Jansen
Senior advisor transfer pricing
W.Jansen@vanoers.nl