Agencia International
Amsterdam – Rotterdam
The Netherlands

Tel: +31 20 6155431
Email: info@agenciainternational.com
https://www.agenciainternational.com

If you have any questions,
please contact us.

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DUTCH TAX PLAN 2027

28 September 2026

Abstract

On 15 September 2026, the Dutch Government presented the 2027 Tax Plan (Belastingplan 2027) package to Parliament (Staten-Generaal). This report explains the proposals and other scheduled changes relevant to employers, individuals and businesses.

Proposals remain subject to parliamentary approval.

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Introduction

In the Netherlands, Budget Day is known as Prinsjesdag and takes place on the third Tuesday in September. On 15 September 2026, the Government presented its budget and the 2027 Tax Plan package. The package comprises (i) the 2027 Tax Plan itself; (ii) the Miscellaneous Fiscal Measures Act 2027 (Overige fiscale maatregelen 2027; OFM 2027); (iii) the Safe Harbour Rules under the Minimum Tax Act 2024 (Wet veiligehavenregels Wet minimumbelasting 2024); and (iv) the Fiscal Incentives for Start-ups and Scale-ups Act (Wet fiscale stimulering start-ups en scale-ups).

The coalition does not hold a majority in either chamber of Parliament. The proposals may therefore be amended as the government seeks the parliamentary support needed for their adoption.

This report explains the principal changes relevant to Agencia International's clients for the 2027 calendar year. It also identifies measures affecting 2026 retrospectively and proposals with a later commencement date where these matter for current planning. The focus is the European Netherlands.

Position as at 28 September 2026. Budget Day proposals are not final legislation. Parliament may amend them. Measures described as already legislated or already in force are identified separately; budget estimates and indexed amounts awaiting publication remain provisional. Unless another date is stated, a new proposal discussed below is intended to apply from 1 January 2027.

Key Tax Changes for 2027

The proposals combine changes to household taxation, business incentives and selected tax reliefs. For international employers and businesses, the main planning points are as follows.

- **Payroll costs and expats.** The already legislated reduction of the allowance under the expat scheme (expatregeling / 30%-regeling, commonly called the 30% ruling) to 27% starts in 2027 for relevant cohorts. Transitional protection (overgangsrecht) differs according to when the ruling (beschikking) was first applied. Budgeted employer-paid employee insurance contributions (premies werknemersverzekeringen) and health contributions under the Zvw (Zorgverzekeringswet; Health Insurance Act) increase in several areas.
- **Income tax.** The published 2027 combined Box 1 (income from work and home ownership; inkomen uit werk en woning) rates for taxpayers below state pension age under the AOW (Algemene Ouderdomswet; General Old Age Pensions Act) are 36,23%, 38,16% and 49,50%. The top bracket starts at €78.426. The maximum employment tax credit (arbeidskorting) rises to €5.929, while the maximum elderly credit (ouderenkorting) falls to €1.993. These are proposed parameters.
- **Employee benefits and mobility.** The discretionary margin (vrije ruimte) under the WKR (werkkostenregeling; work-related costs scheme) rises to 2,16% over the first €400.000 of taxable payroll (fiscale loonsom) under previously enacted legislation. The package codifies a €0,25 tax-free kilometre allowance (onbelaste kilometervergoeding) with effect from 1 January 2026 and adjusts the impending employer pseudo-final levy (pseudo-eindheffing) on non-zero-emission company cars (auto's van de zaak).
- **Private wealth.** The published Box 2 (income from a substantial interest; inkomen uit aanmerkelijk belang) rates remain 24,50% and 31,00%, with a proposed first-bracket limit of €69.703. The Box 3 (income from savings and investments; inkomen uit sparen en beleggen)

rate remains 36%, with published exempt capital (heffingsvrij vermogen) of €60.098 per person. The future reform based on actual return (werkelijk rendement) remains unresolved.

- **VAT and property.** The real estate transfer tax (RETT; overdrachtsbelasting, OVB) rate for residential investment property would fall from 8% to 7% in 2027. Proposed value added tax (VAT; belasting over de toegevoegde waarde, btw) increases for ornamental horticulture (sierteelt) and balloon flights start in 2028, not 2027.
- **Businesses and innovation.** Corporate income tax (CIT; vennootschapsbelasting, Vpb) rates remain 19% and 25,8%. The innovation box (innovatiebox) lump-sum ceiling (maximum van de forfaitaire regeling) would rise to €100.000 and the Energie-investeringsaftrek (Energy Investment Allowance; EIA) to 45,5%. The starter deduction (startersaftrek) would fall to €10 in 2027, before abolition in 2028.
- **International groups.** Proposals address foreign-exchange hedges (valuta-afdekkingsinstrumenten) on participations covered by the participation exemption (deelnemingsvrijstelling), merger (bedrijfsfusie) and demerger (juridische splitsing) anti-abuse presumptions (onzakelijkheidsvermoedens), refunds of dividend tax (dividendbelasting) through foreign funds and additional Pillar Two (Pijler 2) safe harbours.

Planning approach

Budgets can use the published proposals as a planning scenario. Payroll configuration, distributions, acquisitions and restructurings should be checked against the final legislation, commencement provisions and published annual parameters before implementation. The specific unresolved items are listed at the end of this report.

1. Payroll and Employment

30% Ruling

The expat scheme permits a qualifying employer to reimburse extraterritorial costs (extraterritoriale kosten) through a tax-free flat-rate allowance (forfaitaire vergoeding), subject to the ruling and statutory conditions. The reduction to 27% from 2027 follows legislation enacted before this Budget Day; it is not a new proposal in the 2027 package. Transitional treatment depends on when the expat scheme was first applied.

First application of scheme	Maximum flat rate in 2027	Salary standard (salarisnorm)
Before 1 January 2024	30% during protected remaining term	Existing standard, annually indexed
During 2024	27%	Existing standard, annually indexed
On or after 1 January 2025	27%	Higher standard from 2027, annually indexed

The original higher salary-standard amounts of €50.436 and €38.338 for qualifying employees under 30 with a master's degree were expressed at the 2024 price level. They must not be presented as the final indexed 2027 thresholds. The exact applicable 2027 norms should be checked when officially published. An employee's taxable salary (belastbaar loon) after the tax-free allowance must satisfy the relevant test; immigration salary criteria remain a separate assessment.

The general remuneration ceiling under the WNT (Wet normering topinkomens; Standards for Remuneration Act) for 2027 has been published at €273.000. Where the expat scheme's WNT cap applies, this gives a full-year maximum flat-rate allowance of €73.710 at 27%, or €81.900 at 30%, subject to the applicable cohort, remuneration and time apportionment. These two maxima are calculated as €273.000 × 27% and × 30%; they are not minimum-salary thresholds.

Possibility of reimbursing extraterritorial costs actually incurred

Employers should compare the flat-rate allowance with eligible, evidenced actual extraterritorial costs. The two methods cannot simply be combined for the same costs. The annual choice, payroll documentation (loonadministratie) and exceptions must be applied consistently. The fall to 27% may make the actual-cost route more relevant in individual cases, but a change should follow a documented employee-specific calculation.

Abolition of the partial non-resident tax regime for individuals

The transitional option for qualifying existing expats to elect partial foreign taxpayer status (partiële buitenlandse belastingplicht) ends after 2026. From 2027, the ordinary Dutch residence rules therefore apply to their Box 2 and Box 3 position, subject to treaty relief and the underlying facts. Continuation of a 30% allowance under payroll transitional law does not extend this separate election for income tax (inkomstenbelasting; IB). Employers should alert affected employees to the potential personal-tax consequences.

WKR

Under the already legislated schedule, the work-related costs scheme (werkkostenregeling or WKR) gives employers a discretionary margin of 2,16% over the first €400.000 of taxable payroll in 2027. The rate above that amount remains 1,18%. On a payroll of exactly €400.000,

the first-tier margin increases from €8.000 to €8.640, a €640 increase. The 80% final levy (eindheffing) on an excess remains relevant.

Year	First €400.000 of taxable payroll	Excess payroll
2026	2,00%	1,18%
2027	2,16%	1,18%

The 2027 package proposes abolishing the specific exemption (gerichte vrijstelling) for discounts on products from the employer's own or an associated company's business (branche-eigen producten). The current targeted relief permits a discount of up to 20%, subject to a €500 annual ceiling. After abolition, a benefit may need to be treated as taxable wages or designated to the WKR discretionary margin where permitted. Employers should review their staff-purchase policy and the tax treatment of benefits before using the additional margin elsewhere.

Travel allowance and working from home

A policy decision already permits a maximum specifically exempt travel reimbursement of €0,25 per kilometre with retrospective effect from 1 January 2026, compared with the previous €0,23. The package proposes permanent statutory codification. The higher amount also carries forward into 2027. It is a tax exemption ceiling: an employee's entitlement to an increased reimbursement depends on the applicable employment terms or collective labour agreement (collectieve arbeidsovereenkomst, CAO). Any retrospective payroll correction should follow the applicable approval and administrative guidance.

The home-working exemption (gerichte vrijstelling voor thuiswerkkosten) was €2,45 per day in 2026. The final 2027 amount has not been verified for this edition and should be checked when the official annual adjustment is published. Employers must also apply the rules that restrict combining the home-working and commuting (woon-werkverkeer) exemptions for the same day.

Addition to income for private use of a company car

For newly qualifying zero-emission cars, the previously legislated private-use addition (bijtelling) is 20% in 2027 over the first €30.000 of catalogue value (cataloguswaarde), with 22% on the excess; the discount is scheduled to end in 2028. Special rules apply to hydrogen and qualifying solar-powered cars. The first registration date and the 60-month fixed-rate period can preserve a different percentage for an existing car. The employee's addition must therefore be checked per vehicle.

The older-company-car regime (youngtimerregeling) is proposed to change more gradually than the previously scheduled jump to a 25-year threshold. The age threshold would become 17 years in 2027 and 20 years from 2028. The qualifying addition remains based on 35% of the car's fair market value (waarde in het economische verkeer). A limited 2027 transition is also proposed for existing cars. The draft and explanatory wording require reconciliation on the precise eligibility dates, so individual cases should be checked against the final text rather than assuming protection for every older car.

Employer levy on non-zero-emission cars

An already legislated 12% employer pseudo-final levy is scheduled from 2027 for non-zero-emission passenger cars provided for private use. Commuting counts as private use for this employer levy. The levy is additional to the employee's private-use addition and must be distinguished from that employee tax. The existing transition for cars already provided by the

employer before 2027 would end in September 2030. The new proposal extends it through 31 December 2030. The levy may not be passed on to the employee.

Miscellaneous Fiscal Measures Act 2027 also proposes an exemption for temporary replacement cars during maintenance or repair for up to 14 calendar days per occasion, and an exclusion for manual driving-instruction cars. Through 2030, a separate incidental-use exemption would cover one period of no more than seven consecutive days per car, employer and calendar year. Repeated periods or exceeding seven days invalidate that exemption. The proposal also addresses overlap with the levy on excessive severance payments (pseudo-eindheffing excessieve vertrekvergoedingen). These exceptions require the final statutory wording and accurate usage records.

Zvw and employee insurance contributions

The Budget Day figures below are intended for cost planning. Most 2027 rates remain estimates pending annual regulations. National parameters for the Whk (Werkhervattingskas; Return-to-Work Fund) have already been established, but the employer-specific decision remains decisive. Eligibility for the low rate of the AWf (Algemeen Werkloosheidsfonds; General Unemployment Fund) depends on the statutory contract and other conditions; a permanent contract alone does not settle every case. The Aof (Arbeidsongeschiktheidsfonds; Invalidity Insurance Fund) category depends on employer size.

Contribution	2026	2027 published figure
Zvw employer levy (werkgeversheffing Zvw)	6,10%	6,27%
Zvw personal contribution (bijdrage Zvw), where applicable	4,85%	5,02%
AWf low	2,74%	2,74%
AWf high	7,74%	7,74%
Aof low	6,27%	6,67%
Aof high	7,63%	8,03%
Childcare surcharge (opslag kinderopvang)	0,50%	0,50%
Whk average, total	1,52%	1,67%

The Whk average comprises published 2027 averages of 1,07% for WGA (Werkhervatting Gedeeltelijk Arbeidsgeschikten; Return-to-Work Scheme for the Partially Disabled) and 0,60% for ZW (Ziektewet; Sickness Benefits Act). These national averages are not the rate for every employer. Sector classification, employer size, attributed benefit costs and any own-risk status (eigenrisicodragerschap) affect the applicable assessment. Employers should check the Whk decision when received.

The 2026 annual maximum contribution base (maximumpremieloon / maximumbijdrage-inkomen) is €79.409. The final 2027 amount has not been verified from an official publication for this edition and should be confirmed before operational use. The higher base can increase employer costs even where a contribution percentage is unchanged. No final maximum-premium calculation should be made using an unconfirmed base.

Payroll and income tax rates

For a taxpayer below AOW age throughout the year and insured for Dutch national insurance (volksverzekeringen), the official 2027 proposal gives the following combined income-tax and national-insurance rates. Tax residence, insurance status and reaching AOW age during the year can change the calculation.

Taxable Box 1 income	2026	2027 proposal
First bracket ceiling	€38.883	€39.247
First bracket rate	35,75%	36,23%
Second bracket ceiling	€78.426	€78.426
Second bracket rate	37,56%	38,16%
Rate above second ceiling	49,50%	49,50%

The first-bracket 2027 combined rate includes 8,58% income tax and 27,65% national-insurance contributions. For someone who has reached AOW age, the corresponding first-bracket combined rate is 18,33%; a separate first-bracket ceiling of €41.637 applies to persons born before 1946. Year-of-retirement calculations require the applicable time apportionment.

The published rates already include the proposed 0,06 percentage-point purchasing-power reduction in each of the first two brackets. They nevertheless increase compared with 2026 because of other previously scheduled changes. The reduction must not be subtracted a second time. Most indexed amounts use only 48% of the 2,6% inflation correction, while the top-bracket entry point is frozen.

General tax credit and employment tax credit

Maximum credit	2026	2027 proposal
General credit (algemene heffingskorting), below AOW age	€3.115	€3.154
Employment credit, below AOW age	€5.685	€5.929
Income-related combination credit (inkomensafhankelijke combinatiekorting, IACK), below AOW	€3.032	€2.918
Elderly credit	€2.067	€1.993
Single elderly credit (alleenstaandeouderenkorting)	€540	€547
Young disabled credit (jonggehandicaptenkorting)	€923	€935

Credits depend on income and individual eligibility; the table does not mean every taxpayer receives the maximum. The proposed starting incomes for tapering the general credit (€30.910) and employment credit (€47.834) remain provisional until the November 2026 determination of the statutory minimum wage (wettelijk minimumloon). The proposed taper rates are 6,638% and 6,510%, respectively, for taxpayers below AOW age. The general credit depends on aggregate income (verzamelinkomen), so income outside Box 1 may also matter.

Pension and employment developments

The package proposes freezing the fiscal pension and annuity income ceiling (aftoppingsgrens voor pensioen en lijfrente) at €137.800 for 2027 through 2032. This concerns the ceiling for tax-favoured accrual and should not be confused with the WNT cap for the expat scheme. Pension scheme amendments and payroll arrangements should be reviewed with the pension provider.

The AOW age remains 67 in 2027 under the established schedule. The proposed acceleration linking future increases more closely to life expectancy has been abandoned; this does not remove future increases under the existing system. Separately, the general pension-transition deadline (uiterste transitiedatum) remains 1 January 2028. Employers must follow the timetable applicable to their own scheme.

The Government has postponed the planned reduction in duration of unemployment benefit under the WW (Werkloosheidswet; Unemployment Insurance Act) and the abolition of compensation for transition payments (transitievergoedingen) after long-term sickness. The budget envisages introducing the proposed 12-month maximum WW duration on 1 January 2029 and abolishing transition-payment compensation on 1 January 2028; these remain policy timetables rather than enacted changes to current rights. Employers should continue to assess claims under the current conditions and monitor the eventual legislation.

Employment status and labour suppliers

The enforcement moratorium (handhavingsmoratorium) for false self-employment (schijnzelfstandigheid) ended on 1 January 2025. The actual working relationship remains decisive. Businesses should not treat a model contract (modelovereenkomst) or a future legislative proposal as a substitute for reviewing how the work is performed. The precise 2027 enforcement and penalty policy should be checked when published; current transitional concessions should not be assumed to continue automatically.

The labour-supplier admission regime under the Wtta (Wet toelating terbeschikkingstelling van arbeidskrachten; Provision of Personnel Accreditation Act) has a transition and application phase in 2027. Suppliers seeking transitional protection must register from 1 November to 31 December 2026, with admission applications from 1 May to 30 June 2027. The duty to use admitted suppliers or a valid exemption, and the corresponding enforcement, are scheduled from 1 January 2028. A statement that only admitted suppliers may be used throughout 2027 would therefore be premature. Hirers should prepare by checking supplier readiness, compliance with payroll taxes (loonheffingen) and any G-account arrangements (g-rekening, geblokkeerde rekening: a blocked account for payroll taxes and VAT).

Payroll administration proposals

The separate Fiscale verzamelwet 2027 (2027 Miscellaneous Tax Provisions Act) proposes replacing the opting-in notification (melding opting-in: an election to be treated as an employee for wage tax (loonbelasting)) with a dated, jointly signed declaration retained in the payroll records, removing the first-day notification obligation (eerstedagsmelding), and conditional relief where a pension is claimed after its latest commencement date (uiterste pensioeningangsdatum). These proposals were introduced before Budget Day and remain pending. Pension arrears would remain taxable when paid.

A separate employee share-option incentive (regeling voor aandelenoptierechten van werknemers) is proposed for qualifying start-ups and scale-ups. Its operation, qualification by the

Rijksdienst voor Ondernemend Nederland (Netherlands Enterprise Agency; RVO) and commencement dependencies are explained under Corporate below.

2. Personal Income Taxes

The Box 1 rates and main tax credits are set out under Payroll and Employment. The following points concern substantial interests, private wealth and personal business income (winst uit onderneming).

Tax rates in Box 2

The two Box 2 rates would remain 24,50% and 31,00%. The Ministry's 2027 fiscal key table places the first-bracket ceiling at €69.703, compared with €68.843 in 2026. Eligible fiscal partners (fiscale partners) may each use a first bracket through the allocation of joint Box 2 income. Dividend planning should also take account of the general tax credit and the shareholder's wider tax position.

Tax rates in Box 3

The published 2027 parameters retain the 36% rate and increase the exempt capital from €59.357 to €60.098 per person, or from €118.714 to €120.196 for fiscal partners. The current system based on deemed return (fictief rendement) remains relevant for 2027, together with the statutory rebuttal relief (tegenbewijsregeling) where the actual-return calculation is lower. Taxpayers should retain account statements, transaction records and valuation evidence.

The final 2027 savings and debt return percentages are not yet available. The 6,37% figure for other assets reported by professional sources has not been independently confirmed in the official material reviewed for this edition. It is therefore not presented as a confirmed 2027 parameter. It must not be substituted silently for the 2026 percentage of 6,00%.

Future Box 3 system remains unresolved

The actual-return reform has not completed parliamentary approval. In a letter dated 14 September 2026, the Government asked the Senate (Eerste Kamer) to hold consideration while alternative designs and funding are discussed. The 2028 start remains a planning baseline, not a confirmed commencement date. Suggestions for a 35% rate, a €1.900 tax-free annual return (heffingsvrij resultaat) and loss carry-back (achterwaartse verliesverrekening) concern future reform options; they are not the 2027 rules.

For planning purposes, 2027 should therefore be assessed under the existing system, with a separate scenario for future reform. The position should be updated after further parliamentary decisions rather than assuming either that the reform is certain to begin in 2028 or that it has been cancelled.

Green-investment relief

Previously enacted legislation reduces the Box 3 green-investment exemption (vrijstelling groene beleggingen) to €200 per person in 2027 (€400 for fiscal partners), compared with €26.715 per person in 2026. The 0,1% green-investment tax credit (heffingskorting voor groene beleggingen) applies to the exempt amount. Both reliefs are scheduled to disappear from 1 January 2028. These changes materially reduce the tax benefit of qualifying green savings and investments.

Entrepreneur deductions

Relief	2026	2027 position
Self-employed deduction (zelfstandigenaftrek)	€1.200	€900, existing schedule
Starter deduction	€2.123	€10 proposed
Midden- en kleinbedrijf (MKB) profit exemption (mkb-winstvrijstelling; small and medium-sized enterprise (SME) profit exemption)	12,70%	12,70%
Cessation deduction (stakingsaftrek), maximum	€3.630	€908 proposed; commencement-dependent

The self-employed and starter deduction amounts in the table assume that the taxpayer is below AOW age at the beginning of the year. Reduced amounts apply after reaching that age. The starter deduction would be abolished from 2028, together with arbitrary depreciation for starters (willekeurige afschrijving voor starters); abolition of the disability starter deduction (startersaftrek bij arbeidsongeschiktheid) is proposed for 2029. The assisting-partner deduction (meewerkaftrek) and cessation deduction would be reduced by 75% under the separate start-up bill and later abolished. If that bill commences in 2027 as intended, abolition follows in 2030. Eligibility conditions continue to matter, including the hours test (urencriterium) where applicable.

The MKB profit exemption remains 12,70%. The maximum rate for deductions subject to the statutory rate restriction (tariefsaanpassing aftrekposten), including the deduction for qualifying mortgage interest (hypotheekrenteaftrek), is 38,16% in the published 2027 parameters. A proposed deduction amount should not be equated with an equal cash tax saving.

Business succession and rollover relief

The abolition of the 5% investment-asset allowance (doelmatigheidsmarge) for doorschuifregeling aanmerkelijk belang (DSR-ab; substantial-interest rollover relief) should not be assumed to take effect in 2027: its commencement requires separate confirmation. The equivalent allowance under the bedrijfsopvolgingsregeling (BOR; business succession relief) was removed earlier. Succession planning should distinguish those regimes and check the commencement of each measure rather than treat all historical reforms as new 2027 rules.

Specific healthcare costs and substantial interests

The package proposes abolishing the deduction for specific healthcare costs (aftrek specifieke zorgkosten) and its linked tegemoetkoming specifieke zorgkosten (TSZ; compensation for specific healthcare costs) from 2028. It does not abolish the deduction for the 2027 tax year. The Government is developing targeted support for chronically ill people; the final form and individual effect should not be assumed in advance.

Miscellaneous Fiscal Measures Act 2027 clarifies the acquisition price (verkrijgingsprijs) for a non-resident substantial shareholder when a company’s effective management (werkelijke leiding) moves to the Netherlands. Fair market value at migration is the starting point, subject to exceptions for earlier Dutch tax exposure. This is not a blanket tax-free step-up (onbelaste verhoging van de verkrijgingsprijs) for every shareholder. The same bill prevents the fictional dividend (fictief regulier voordeel) arising under the excessive-borrowing rules (regeling excessief lenen bij de eigen vennootschap) from using the special dividend relief associated with

inherited shares (faciliteit voor een vererfd aanmerkelijk belang). Cross-border migration and estate planning require an individual review.

3. VAT

Activities subject to the reduced VAT rate

The general 21% and reduced 9% VAT rates remain unchanged for 2027. The Budget Day package proposes removing the reduced rate for ornamental horticulture products and hot-air-balloon passenger flights from 1 January 2028. Affected products include cut flowers, house and garden plants, bulbs and nursery products. Businesses should review pricing, contracts and invoicing in time for the proposed later commencement.

For balloon flights, the proposal also addresses advance payments and single-purpose vouchers (SPVs; vouchers voor enkelvoudig gebruik) connected with flights taking place from 2028. An earlier booking or payment should not be assumed to preserve the 9% treatment. Final transitional wording should be checked before accepting advance bookings.

Relevant 2026 baseline for 2027

The previously proposed VAT increase for culture, media and sport was subsequently reversed. Qualifying supplies in those categories retain their reduced treatment. By contrast, the 21% rate for lodging took effect on 1 January 2026. Camping is subject to its own classification and must not automatically be treated as hotel lodging.

The input-VAT adjustment regime (herziening van de aftrek van voorbelasting) for qualifying investment services (investeringsdiensten) to real estate also took effect in 2026. Services costing at least €30.000 excluding VAT and providing a lasting benefit can be subject to adjustment over the year of first use and the following four years. Changes between taxable and exempt use therefore remain relevant in 2027. Businesses should maintain a service-level adjustment register for affected renovations and similar works.

4. Real estate transfer tax (RETT)

Reduction of rates

The Government proposes reducing the rate for homes that the buyer will not use as their main residence (hoofdverblijf) from 8% to 7% on 1 January 2027. This includes qualifying rental and second homes. The 2% owner-occupier rate and the 10,4% non-residential rate remain unchanged.

Acquisition	2026	2027
Qualifying main residence	2%	2%
Other residential property	8%	7% proposed
Non-residential property	10,4%	10,4%
Starter exemption (startersvrijstelling) property-value ceiling (woningwaardegrens)	€555.000	€615.000, already fixed

The €615.000 starter-exemption value limit has already been set for 2027. Other conditions continue to apply, including being at least 18 but under 35 at acquisition, using the property as the main residence and not having used the exemption before. It is not necessarily limited to someone buying a first home. The test concerns the relevant full property value, not simply the price of the share acquired.

A separate proposal would exempt specified transfers of qualifying social-housing property (vastgoed voor diensten van algemeen economisch belang, DAEB; property used for services of general economic interest, SGEI) between authorised housing associations (toegelaten instellingen). This is not a general exemption for all property held by those associations. The legal classification and acquisition date remain decisive: signing a purchase agreement in 2026 does not itself secure the proposed 2027 rate.

5. Corporate

Corporate tax rate

The Budget Day framework retains the corporate income tax rates for 2027. The first €200.000 of the taxable amount remains subject to 19%, with 25,8% on the excess. These rates and the threshold are unchanged from 2026. The effective innovation box rate remains 9%.

Parameter	2026	2027 position
Lower corporate income tax rate	19%	19%
Lower-rate threshold	€200.000	€200.000
Higher corporate income tax rate	25,8%	25,8%
Innovation box effective rate	9%	9%

Earnings stripping rules

The current general interest deduction limitation (generieke renteaftrekbeperking, also called the earningsstrippingregeling) denies net interest deductions to the extent they exceed both €1 million and 24,5% of adjusted taxable earnings before interest, tax, depreciation and amortisation (tax EBITDA; gecorrigeerde winst or fiscale EBITDA). Disallowed interest can be carried forward (voortwenteling van rente). No general 2027 change to this percentage or threshold was identified in the submitted package.

The Government separately announces an intended exemption for housing associations from 2028. Detailed legislative implementation remains to be monitored. It is neither a general exemption for property businesses nor a 2027 operating rule.

Increased simplified innovation box amount

From 2027, the Government proposes increasing the annual cap under the simplified innovation box calculation from €25.000 to €100.000. Under this route, 25% of qualifying profit can be allocated to the innovation box, subject to the cap, eligibility conditions and time limits. The €100.000 amount is not a general ceiling on profits eligible for the ordinary innovation box. Companies should compare the simplified route with a substantiated calculation under the regular rules.

Currency hedges and the participation exemption

For financial years beginning on or after 1 January 2027, a proposal distinguishes between priced-in and unpriced currency results (ingeprijsde en niet-ingeprijsde valutaresultaten) on qualifying hedges of exempt participations. Only the unpriced component could fall within the participation exemption on request; the priced-in component would enter taxable profit. Fair-value rules would apply when a hedge enters or leaves the exemption.

Transitional protection is proposed for hedges entered into before 15 September 2026 where the relevant decision or complete application also predates that date, for results attributable through 31 December 2027. Companies should review the hedge instrument, election, timing and accounting treatment rather than assume that all foreign-exchange results remain exempt.

Business merger and demerger relief

Miscellaneous Fiscal Measures Act 2027 proposes removing the statutory presumption of non-business motives where a relevant company is sold to an unconnected entity within three years after a qualifying business merger or legal demerger. The inspector would first need evidence pointing to avoidance or the absence of commercial reasons. The substantive anti-abuse test remains; commercial reasons should continue to be documented. The proposal does not create unconditional restructuring relief.

Minimum tax and Pillar Two

A separate bill introduces four safe harbours under the Minimum Tax Act 2024: a simplified effective-tax-rate test (vereenvoudigde effectieve belastingtarief-veiligehavenregel; Simplified ETR Safe Harbour), a qualifying equivalent minimum-tax-system safe harbour (kwalificerend equivalent minimumbelastingstelsel-veiligehavenregel; Side-by-Side or SbS Safe Harbour), an ultimate-parent-entity safe harbour (uiteindelijkemoederentiteit-veiligehavenregel; UPE Safe Harbour), and a qualifying tax-incentive safe harbour (kwalificerende fiscale stimuleringsregeling-veiligehavenregel; Substance-based Tax Incentive or SBTI Safe Harbour). The transitional country-by-country reporting safe harbour (tijdelijke kwalificerend landenrapport-veiligehavenregel; Transitional CbCR Safe Harbour) would also be extended by one year. These measures concern groups within the minimum-tax regime, broadly groups meeting the €750 million consolidated-revenue test.

The intended commencement is 1 January 2027, with specified provisions applying to reporting years beginning in 2026 and, under conditions, from 31 December 2025 for the simplified effective-tax-rate test. An in-scope group should assess each jurisdiction and reporting year separately. These are targeted simplifications and exclusions; they do not abolish Pillar Two reporting generally.

Debt waiver and other separate legislative measures

The Fiscale verzamelwet 2027 was introduced on 23 April 2026 and is separate from the four Budget Day bills. It proposes clarifying Pillar Two credits for qualified domestic minimum top-up tax (kwalificerende binnenlandse bijheffing; QDMTT) under the participation credit (deelnemingsverrekening) and foreign-business profit credit (verrekening bij buitenlandse ondernemingswinsten) rules. It would also extend debt-waiver exemption (kwijtscheldingswinstvrijstelling) treatment to specified statutory write-downs in the resolution of financial institutions. This is a targeted measure, not a new blanket exemption for all debt forgiveness.

The ordinary corporate loss-relief rules (verliesverrekening) remain a one-year carry-back and, for qualifying losses, indefinite carry-forward (voorwaartse verliesverrekening). Annual use is generally limited to €1 million plus 50% of taxable profit above that amount. The interaction with debt-waiver income should be checked under the applicable existing provisions. No general replacement of those rules is announced for 2027 in the package reviewed.

Energy investment deduction and WBSO

The proposed energy investment deduction (EIA) rises from 40% to **45,5%** from 1 January 2027. The deduction reduces taxable profit and is not a cash subsidy equal to 45,5% of the investment. The Energy List (Energielijst), qualifying asset conditions and reporting deadlines must still be checked.

For the Wet Bevordering Speur- en Ontwikkelingswerk (Research and Development Promotion Act; WBSO), the published 2027 parameters remain 36% on the first €391.020 of the qualifying research and development (onderzoek en ontwikkeling; R&D) base, 50% for qualifying starters in that first band, and 16% above it. The standard R&D hourly wage would rise from €29 to €33. Final self-employed R&D deduction amounts are expected later in 2026. Work on artificial intelligence (kunstmatige intelligentie; AI) and software eligibility should be monitored; it does not yet establish an automatic entitlement for every such project.

Employee share options for start-ups and scale-ups

A separate bill proposes deferring tax on qualifying employee share options until disposal of the resulting shares and taxing only 65% of the qualifying gain. Employees could elect an earlier tax point. The 35% reduction is not available indiscriminately for selling an unexercised option or for an initial discount embedded at grant.

Conditions include an RVO status decision, an innovative and scalable business, qualifying written plan terms and a two-year period from option grant to share disposal, subject to exceptions. The intended start is 1 January 2027, but commencement is by Royal Decree (koninklijk besluit; KB) and depends on the applicable route for state aid (staatssteun). Transitional provisions could cover options granted from 17 April 2025 that have not already been subject to wage tax by 31 December 2026.

Employers should review existing option plans and information obligations for former employees and internationally mobile staff. The bill includes migration and protective-assessment rules (regels voor conserverende belastingaanslagen). RVO qualification does not by itself settle every state-aid or payroll condition. The final rules should be checked before a plan is amended or an employee is promised a particular net outcome.

6. Withholding taxes

Rates and scope

The ordinary Dutch dividend withholding tax rate remains 15%, subject to domestic exemptions, treaty relief and their conditions. Conditional withholding tax (conditionele bronbelasting) on specified related-party interest, royalties and dividends remains linked to the highest corporate income tax rate; the 2027 rate framework therefore gives 25,8%. The conditional tax targets low-tax jurisdictions and specified abusive situations. It does not apply automatically to every cross-border payment.

Refund for Dutch investors in foreign investment institutions

Miscellaneous Fiscal Measures Act 2027 proposes a statutory refund route for Dutch-resident individuals and Dutch-established entities receiving Dutch-source dividends through foreign investment institutions. It is intended to remove a disadvantage compared with investment through a Dutch fiscal investment institution (fiscale beleggingsinstelling; fbi).

The new route would cover Dutch dividend tax withheld at fund level from 1 January 2027. Earlier-year claims remain subject to the relevant case law under European Union (Europese Unie; EU) law and procedural rules. Corporate refunds are limited by the applicable corporate income tax amount. Investors would need sufficient information about the fund, withholding and distributions to substantiate their claim.

Holding cooperatives

The separate Fiscale verzamelwet 2027 would clarify aggregation of membership rights where investors form a cooperating group (samenwerkende groep) in a Dutch holding cooperative (houdstercoöperatie). The test concerns coordinated investment in that cooperative, even where the members are not otherwise connected under the referenced corporate-tax rule.

This proposal should not be confused with the qualifying-unit concept (kwalificerende eenheid) already used for conditional withholding tax. Those rules concern an earlier legislative change and do not provide a new exemption for 2027. Distributions should continue to be reviewed against the recipient, beneficial ownership (uiteindelijke gerechtigdheid), group arrangements, treaty position and anti-abuse requirements.

7. Additional taxes and planning

The following additional measures may affect budgets and investment decisions; their proposed commencement dates differ.

Consumption and environmental taxes

The package proposes extending the fuel excise duty (brandstofaccijns) discount through 2027. The Government's headline 2027 amounts are approximately €0,85 per litre for petrol and €0,55 for diesel. Alcohol excise duty (alcoholaccijns) would be indexed annually from 2027, while the small-brewery excise relief would end in 2028. These are tax components, not forecasts of the final retail price.

For the distance-based air passenger tax (vliegbelasting), the proposed high-band rate would be reduced from the previously scheduled €74,81 to €59,43 per departing passenger in 2027. The band applies to the relevant long-distance flights; the change is not a universal €59,43 charge on every departure.

The tap water tax (belasting op leidingwater) proposal adds €0,10 per cubic metre from 2027. Other scheduled changes concern the drinking-water-quality tax base and removal of the volume cap. Water-intensive businesses should assess their actual taxable consumption, rather than extrapolate a household bill. The package also revises the longer-term path of waste disposal tax (afvalstoffenbelasting) and the industrial carbon dioxide (koolstofdioxide; CO_2) levy (CO_2-heffing industrie). Detailed sector calculations require the final rate tables and the activity's classification.

Later measures requiring preparation

The forestry exemption (bosbouwvrijstelling) is proposed to end in 2029. The VAT increases for ornamental horticulture and balloon flights, abolition of the specific healthcare deduction and removal of several starter facilities are proposed for 2028 or later. Decisions made in 2027 may therefore have consequences under a later regime, even where the 2027 treatment itself is unchanged.

Energy and innovation subsidy outlook

The 2027 budgets continue support for industrial decarbonisation through Stimulering Duurzame Energieproductie en Klimaattransitie (Stimulation of Sustainable Energy Production and Climate Transition; SDE++), indirect cost compensation for the European Union Emissions Trading System (emissiehandelssysteem van de Europese Unie; EU ETS) under the Subsidieregeling Indirecte kostencompensatie ETS (Indirect ETS Cost Compensation Scheme; IKC-ETS), Versnelde klimaatinvesteringen in de industrie (Accelerated Climate Investments in Industry; VEKI) and innovation programmes including Energie en Klimaat Onderzoek en Ontwikkeling (Energy and Climate Research and Development; EKOO) and Demonstratie Energie- en Klimaatinnovatie (Demonstration of Energy and Climate Innovation; DEI+). Companies should check individual calls before committing expenditure. Broad Missiegedreven Onderzoek, Ontwikkeling en Innovatie (Mission-driven Research, Development and Innovation; MOOI) calls are not scheduled for 2027, although targeted calls may follow. Budget allocations do not themselves establish an applicant's entitlement.

For new large-scale solar and onshore wind projects, the Government is preparing two-way contracts for difference (tweerichtingscontracten; CfDs), with a first opening expected in autumn 2027. Support would vary with electricity prices and may require repayment when prices are high. Legislation and application arrangements remain in preparation.

The Nationaal Agentschap voor Disruptieve Innovatie (National Agency for Disruptive Innovation; NADI) is scheduled to start three pilots in 2027, ahead of its intended full launch in 2028. Separately, the proposed Subsidieregeling duurzaam aanpakken belastende werkzaamheden (Subsidy Scheme for Sustainably Addressing Demanding Work; SDABW) would support sector initiatives to reduce physically or mentally demanding work. A possible combination of Milieu-investeringsaftrek (Environmental Investment Allowance; MIA) and Willekeurige afschrijving milieu-investeringen (Random Depreciation of Environmental Investments; Vamil) with EIA remains under consideration; the final 2027 lists and conditions should be monitored.

Employer and business priorities

- Review expat cohorts, the end of partial non-resident status, employee benefit policies and company-car allocations before the first 2027 payroll.
- Use employer-specific Whk information and final payroll regulations when replacing provisional budget figures.
- Review dividends, property acquisitions, currency hedges and group restructurings against the applicable tax year and commencement provisions.
- Check final Energy List and RVO conditions before claiming investment or R&D incentives; a budget announcement alone does not establish project eligibility.
- Review budgets and plans after parliamentary adoption and the publication of outstanding indexed amounts. Maintain separate future-reform scenarios where the policy remains unsettled.

Matters to monitor

Next steps

The House of Representatives (Tweede Kamer) and the Senate will consider the 2027 Tax Plan and the related bills over the coming months. As the coalition lacks a parliamentary majority, the

proposals remain subject to change during the legislative process and require approval by both chambers.

Outstanding parameters and decisions

Item	Status at 28 September 2026	Handling
2027 expat salary norms	Final indexed amounts not verified	Update per cohort before payroll use
Home-working daily exemption	Final 2027 amount not verified	Await official annual adjustment
Maximum contribution base	2027 primary confirmation pending	Do not treat reported estimate as final
Payroll rates and credit taper points	Some budget or minimum-wage-linked amounts provisional	Check final annual regulations
Youngtimer transition details	Draft bill and explanatory wording require reconciliation	Review final text per vehicle
Box 3 deemed returns and future reform	2027 return parameters not fully verified; future system unresolved	Separate current rules from reform scenarios
Start-up options	Bill and commencement/state-aid conditions pending	No guaranteed 1 January implementation
Tax Plan and related bills	Parliamentary consideration continuing	Recheck adopted text and start dates

A proposal may be reported accurately without being enacted. "Already legislated" does not remove the need to test an individual taxpayer's eligibility. Amounts derived by calculation are identified where used.

28 September 2026

This report provides general information and does not replace advice on an individual transaction, employee or tax return. For further enquiries, please contact us at info@agenciainternational.com or your usual contact at Agencia International.

Sources: *Prinsjesdag — Belastingplan 2027, Rijksoverheid.nl* & *Belastingplan 2027, Rijksfinancien.nl* (as at 28 September 2026).