KPMG Meijburg & Co Tax & Legal

Tax aspects of the 2026 coalition agreement

On January 30, 2026 the political parties D66, VVD and CDA presented the coalition agreement *'Aan de slag – Bouwen aan een beter Nederland'*, setting out the new government's plans and ambitions for their term of office. This memorandum briefly addresses what is currently known about the proposed tax measures.

Please note that the coalition agreement only set outs the general features of the proposed measures. Moreover the new government is a minority government with 66 seats in the Lower House of Parliament, which means there is currently no majority for these plans. It remains to be seen to what extent a majority can be found for the proposed measures during the coalition government's term of office. While in office, the new government will present bills in order to implement the coalition agreement. The specifics of the various tax measures will only become apparent from those bills.

Corporate income tax and related measures

No increase in corporate income tax rate and stable tax business climate
There will be no increase in the corporate income tax rate. In order to ensure a level playing field, schemes that are often targeted for change but that are important for businesses will be retained. In this respect the coalition agreement refers to the Innovation Box, the loss set-off scheme, the participation exemption and the WBSO. The WBSO will be made less complex and the administrative burden reduced. The scheme will also be extended to cover the development of AI and technology. Where possible the energy investment allowance (EIA), the environmental investment allowance (MIA) and the free depreciation of environmental investments (VAMIL) will be merged into one robust investment scheme.

Freedom tax for businesses
Businesses will have to pay a 'freedom tax'. The freedom tax for businesses will realize EUR 1.5 billion in tax revenue in 2027 and as of 2028 EUR 1.7 billion per annum. The details will be discussed with business organizations, partly in light of the business climate.

Investment capacity housing associations
The investment capacity of housing associations will be expanded via corporate income tax relief. In 2028 an amount of EUR 250 million will be made available for this, and will increase each year to finally end up at EUR 325 million per annum as of 2032.

Steward ownership
In order to stimulate sustainable and responsible entrepreneurship, steward ownership will be included in law as a legal form for businesses. Administrative expenses and costs for companies that want to do business sustainably will be reduced.

Personal income tax and payroll tax and social security contributions

Reform of the tax and allowances system
According to the coalition, the tax and allowances system and other income schemes and income insurance are in need of reform. This new government wants to tackle this using three pillars:

1. The phased simplification of the tax, social security and allowances system, while also further simplifying its operation. For example, by gradually limiting the multiplicity of income-dependent tax schemes, starting with tax credits.
2. The completion of the modernization of the ICT landscape at the Dutch Tax and Customs Administration and the Allowances Department and ensuring adequate staffing levels. This should pave the way for the actual implementation of a specific reform scenario.
3. Before the end of 2026, the government will present a reform agenda containing specific timeline milestones for different segments, starting with the reform of the personal income tax system and steps in the allowances regime, other income schemes and social security. The starting points are simplicity in implementation, clarity and predictability for people, and working should always mean earning more than being on a benefit there where taxes are not further leveled out.

Freedom tax via adjustment factor
In addition to the freedom tax to be paid by businesses, citizens will also have to pay a tax for our freedom. This freedom tax will be paid via the adjustment factor that will be applied to a limited extent for personal income tax purposes in 2027 and 2028. The freedom tax for citizens will realize EUR 1.5 billion in tax revenue in 2027 and as of 2028 EUR 3.4 billion per annum.

Mortgage interest deduction
In order to keep the owner-occupied home affordable and to avoid an overheated housing market, the tax treatment of the owner-occupied home will remain unchanged.

Expat scheme
As mentioned under corporate income tax above, schemes that are often targeted for change but that are important for businesses will be retained. One scheme referred to in this context is the Expat scheme. The new government has explicitly stated that it will not be scaled back.

Work-related costs rules
The work-related costs rules will be made less complex and the administrative burden will be reduced. Employers will be able to use the work-related costs rules as a means to help employees repay their student loans faster.

Shares (share options) start-ups and scale-ups
Start-ups and scale-ups must be able to grow in the Netherlands. Therefore, it will become easier to partly pay employees in shares or share options and to expand

options so that financial employee participation plans can be provided in a tax-advantageous manner.

Pseudo self-employment
An ever-expanding group of self-employed persons has become an integral part of the modern labor market in which the desire for autonomy is increasing. The government wants to give this group clarity and room to grow. Pseudo self-employment will be tackled by splitting the draft bill on the VBAR Act (*Verduidelijking beoordeling arbeidsrelaties en rechtsvermoeden*; Assessment of Employment Relationships and Legal Presumption (Clarification) Act) into two bills and introducing a legal presumption of being an employee. The remaining part of the VBAR Act will be replaced as soon as possible by the Self-employed Persons Act.

Supplementary pension
Over the next six years, the tax subsidy for the supplementary pension of the highest-income earners will be reduced.

Box 3
Long-term investments will be encouraged by changing the new Box 3 regime based on actual return on investment into a capital gains regime.

Full-time bonus
Working more should pay off. In order to realize this, the government is examining unorthodox measures, such as relaxing the Equal Treatment (Working Hours) Act (bonus for working full-time), a labor tax credit per hour and making it advantageous to work additional hours.

Donations
Donations will continue to be tax deductible.

Healthcare costs
The deduction of specific healthcare costs and the allowance for specific healthcare costs will completely end as of 2028.

DMS and business succession

DMS and carrying on a business
The government believes that the tax burden on director-major shareholders (DMS) must be equitable and proportionate.

Business Succession scheme
Family businesses play an important role in our economy and therefore the business succession scheme and the transfer facility will not be scaled back.

VAT and indirect taxes

Low VAT rate for floriculture to end
The low VAT rate for the supply of floriculture products will end as of 2028. This means that the 9% VAT rate for floriculture products will be replaced by the general VAT rate of 21%.

Sugar tax
As of 2030 a tax will be introduced for producers, based on the sugar content of certain foods, i.e. foods with a sugar content of 6% or more. The tax will apply to pre-packaged products, so that the sugar content of the product will appear on the label.

Climate and environmental taxes

Excise taxes
The reduction in the excise duties on fuel will be extended through to 2027.

Motor vehicle tax
The government is looking into revising the Motor Vehicle tax to base it on the surface area or size of a vehicle, on the condition that motorists do not end up paying more tax.

CO_2 tax on emissions
The national CO_2 tax on emissions will be abolished.

Real estate transfer tax

Real estate transfer tax for private investors to be reduced from 8% to 7%
As of 2027, the real estate transfer tax rate for the purchase of a home a buyer will not live in (such as homes intended for rent or vacation homes) will be reduced from 8% to 7%.

If you would like to know more, feel free to contact us or your usual Meijburg tax advisor.

KPMG Meijburg & Co
January 30, 2026

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