



SPECIAL REPORT — TAX REFORM

The Simples Nacional Window

The September window and the hybrid CBS/IBS regime — who should opt in, who should stay put, and the math your customer will be doing in 2027

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IMPORTANT NOTICE

About this publication

This report is an SPCG analysis dedicated to the election of the regular IBS and CBS regime (the "hybrid Simples") available to companies under the Simples Nacional — Brazil's simplified tax regime for micro and small businesses — between September 1 and 30, 2026. It consolidates the applicable legislation (LC 214/2025, LC 123/2006), the acts of the CGSN (Comitê Gestor do Simples Nacional, the regime's managing committee) and of the RFB (Receita Federal, Brazil's federal tax authority), and the regulations available as of the dates indicated. It does not constitute individualized legal or tax advice. It is a companion to the report "Reforma Tributária na Prática" [Tax Reform in Practice] (SPCG, July 2026), which provides the full overview of the reform, and expands on its section 05.

Rigor on sources

Some of the rules are already law in force; some depend on further regulation; and a good share of the figures in circulation are estimates. Throughout the text, each item of information is labeled: law in force × pending regulation × estimate/study × position. Analysis and recommendations are labeled SPCG view. This report was prepared with the support of Estaiada, SPCG's proprietary artificial intelligence technology — which, like any AI technology, may contain errors, inaccuracies or outdated information; the content was reviewed by consultants, and the decisions it informs should be validated with qualified professionals. Research consolidated as of September 5, 2026, with pending items re-verified on September 12, 2026.

SPCG bulletin

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SECTION 01

Executive summary

For the first time since the Simples Nacional was created, the regime's decisive month is no longer January. Between **September 1 and 30, 2026**, through the Portal do Simples Nacional (the regime's online portal), micro and small businesses will make two choices taking effect on January 1, 2027: the Simples election itself for 2027 — moved forward from January to September — and, the subject of this report, the election of the **hybrid regime**: remaining in the Simples but paying CBS and IBS "outside" the single guide, under the regular regime. In plain terms, here is what your company needs to know:

Key conclusions

- 01 September has become the most important month in the Simples calendar.** A single window from September 1 to 30, 2026 (Resolução CGSN 186/26), on the Portal do Simples Nacional, for the 2027 regime election — including the hybrid. Companies that stay silent remain under the current model, "inside" the DAS (the single unified tax payment guide). Not deciding is also a decision.
- 02 The hybrid in one line:** the company remains in the Simples (IRPJ/CSLL/CPP — corporate income tax, social contribution on profits and employer payroll contribution — and the other taxes stay in the DAS), but assesses CBS/IBS under the regular regime, stating them on the invoice, taking credits on its purchases and assuming the corresponding ancillary obligations (LC 214, art. 41).
- 03 The reason to decide is your customer's credit.** A buyer purchasing from a company "inside" the Simples credits only what was actually paid within the DAS — a small fraction; a buyer purchasing from a hybrid company takes a full credit (LC 214, art. 47). Large buyers are likely to compare suppliers on the **net-of-credit price** in 2027.
- 04 The illustrative math:** a R\$ 10,000 service from a hybrid supplier comes out roughly 8.5% cheaper, in effective cost, for a customer under the lucro real (actual-profit) regime — with no change to the list price (estimate; see section 04). That is competitiveness — but, without a negotiated pass-through, it is also a heavier tax burden of your own.
- 05 Rule of thumb:** it tends to pay off for companies selling mostly to legal entities under the regular regime and with significant taxed purchases; it tends not to pay off for B2C businesses and for those selling to other Simples taxpayers. Gray area = run the simulation customer by customer (sections 05 and 06).
- 06 Getting it wrong is not final:** the request can be canceled up to November 30, 2026, and the election runs in six-month cycles — a new window opens in March 2027 for the second half of the year. The MEI (individual microentrepreneur) is outside this choice and continues under the single consolidated payment.
- 07 Companies that do not opt in still have homework — and the first deadline falls in 2026:** the national NFS-e (electronic service invoice) issuer becomes mandatory for ME and EPP on **November 1, 2026** (Resolução CGSN 191/26). January 1, 2027 then brings the CBS/IBS fields on invoices (Ato Conjunto RFB/CGIBS 4/26), the R\$ 3.6 million sub-limit taking the IBS into account, and the replacement of the Defis (the annual socioeconomic return) by the PGDAS-D (Resolução CGSN 190/26).
- 08 The SPCG view in one sentence:** segment your customer base between those that can use the credit and everyone else, simulate both regimes with labeled estimates, and reach September 30 with a documented decision — the worst version of September is discovering the window in its final week.

SECTION 02

The September window on one page — what happens and when

In 2027, the CBS replaces PIS and Cofins and the IBS begins its transition toward replacing the ICMS and the ISS. The CGSN moved the Simples elections forward to September so that companies, accountants and the tax authority's systems reach January 2027 with the choices made. The full calendar:

The timeline that matters

When	What happens	Nature
Sept. 1–30, 2026	Single window on the Portal do Simples Nacional: election of the Simples for 2027 and, optionally, of the hybrid CBS/IBS regime (Resolução CGSN 186/26). It covers ME and EPP; the MEI is excluded.	Law in force
Nov. 1, 2026	National NFS-e issuer becomes mandatory for ME and EPP (Res. CGSN 191/26).	Law in force
by Nov. 30, 2026	Deadline to cancel, irrevocably, the election made in September.	Law in force
Jan. 1, 2027	The election takes effect. The CBS fully replaces PIS/Cofins; the IBS applies at a test rate; invoices issued by Simples taxpayers must include the CBS/IBS fields (Ato Conjunto RFB/CGIBS 4/26).	Law in force
March 2027	New window to elect the hybrid regime for the second half of 2027.	Law in force
2027 → 2028	Split payment: the Receita Federal stated (Aug. 30, 2026) that the business-to-business requirement moves to 2028 ; in 2027, adoption is optional and phased in, one payment method at a time. "Pure" Simples taxpayers are outside it; hybrid electors fall within scope.	Official statement — no regulation published
2027	CBS reference rate to be set by Senate Resolution — RFB→TCU calculation due Sept. 14, 2026, TCU→Senate due Oct. 30, 2026; Imposto Seletivo (selective excise tax) rates by provisional measure not yet issued.	Pending regulation

The rate: the number missing from the math

The estimated benchmark for the dual VAT rose over the course of 2026. The most recent official estimate is the one in **Resolução CGIBS 14, of July 29, 2026: 27.91% in total — IBS 18.70 pp + CBS 9.21 pp**, presented by the Management Committee as a budgeting parameter rather than a final rate, and one that **exceeds the 26.5% cap** under art. 475 of LC 214. The earlier estimate (CBS ~8.8% + IBS ~17.7% = 26.5%) still circulates widely. In 2027, only the CBS will be fully in force — the IBS will be charged at a test rate of 0.1% — so the weight of the September decision lies almost entirely with the CBS. The official figure follows a set procedure: the calculation goes from the Receita to the **TCU by Sept. 14, 2026**, the TCU forwards it to the **Senate by Oct. 30, 2026**, and the Senate Resolution is issued before 2027 — that is, probably **after** the September window. As of the closing of this edition (September 12, 2026), **that submission to the TCU had not taken place** — and the Ministry of Finance signaled to the press that it will not release a reference percentage alongside the filing (*press — no regulation published*). Private projections for the 2027 CBS range from ~9.2% to more than 11% — ROIT's 9.43% (Sept. 2026) among them (*estimate/study*). Until then, every simulation is an estimate.

SPCG view: do not waste time debating whether the CBS will be 8.8% or 9.21% — that number is not within your control. What is: knowing what share of your revenue comes from customers that can use the credit, and deciding in September with the calculations on record.

SECTION 03

The hybrid regime — how it works, what changes and what does not

Today, a Simples company pays everything through a single collection guide, the DAS. LC 214/2025 (art. 41) opened up the alternative of staying in the Simples while treating CBS and IBS as a regular-regime company would. There are two possible models as of January:

"Pure" Simples — everything inside the DAS

- **How it is paid:** CBS and IBS embedded in the single guide, at the reduced rates of the Simples brackets. No separate assessment, no tax stated on the invoice and no credits on purchases.
- **What the corporate customer gets:** a credit **limited** to the amount of CBS/IBS effectively paid within the DAS (LC 214, art. 47) — generally a small fraction of the price.

Hybrid regime — CBS/IBS outside the DAS

- **How it is paid:** the CBS/IBS portion is removed from the DAS. The company states the taxes on the invoice under the regular regime, takes **credits on its own purchases** (inputs, goods, services) and pays the difference.
- **What the corporate customer gets:** a **full credit** for the amount stated, on the same terms as with any regular-regime supplier — it is this asymmetry that makes the hybrid a commercial decision, not merely a tax one.
- **The trade-off:** self-assessment of CBS/IBS, invoicing with the tax stated separately and the ancillary obligations of the regular regime — for these two taxes, the tax routine starts to look like that of a company outside the Simples.

What does not change for those who opt in

The company **remains a Simples Nacional taxpayer**: corporate income tax, social contribution on profits, employer social security contribution and the other taxes continue in the DAS guide. Leaving the Simples is a separate decision — and it is not the subject of this window.

Four changes that apply to everyone — hybrid or not

- **National NFS-e:** mandatory for ME and EPP as early as **November 1, 2026** (Resolução CGSN 191/26) — the first hard deadline on the calendar, two months ahead of the CBS/IBS fields.
- **Invoices:** Simples taxpayers must issue invoices with the CBS/IBS fields as of January 1, 2027 (Ato Conjunto RFB/CGIBS 4/26). Whoever fails to configure their invoicing system cannot bill.
- **Sub-limit:** the R\$ 3.6 million ceiling that today applies to the ICMS/ISS will also take the IBS into account during the transition (Resolução CGSN 190/26).
- **Obligations:** the Defis is discontinued and the socioeconomic data moves to the PGDAS-D on an annual basis.

SPCG view: the hybrid is not "leaving the Simples one step at a time" — it is repositioning your company within the new system's credit chain while keeping the simplification for everything else. Treat the choice as a matter of pricing and customer relationships, not of tax paperwork.

SECTION 04

The credit math — why your "net" price changes without you changing your price

Picture a Simples service provider (Annex III, first bracket) billing **R\$ 10,000** a month to a single customer under the lucro real regime. Here is how that customer sees the purchase in each scenario — using, for illustration, a CBS of 9.21% (the Resolução CGIBS 14/26 estimate) and the IBS test rate of 0.1% in 2027:

From the customer's perspective (lucro real)	"Inside" the Simples	Hybrid regime
Price charged by the supplier	R\$ 10,000	R\$ 10,000
CBS/IBS the supplier pays on the transaction	≈ R\$ 94 (share within the DAS)	≈ R\$ 931 (stated on the invoice)
Credit the customer can take	≈ R\$ 94	≈ R\$ 931
Effective cost of the purchase to the customer	≈ R\$ 9,906	≈ R\$ 9,069

Simplified illustration (estimate): the PIS/Cofins share in the first bracket of Annex III ≈ 0.94% of revenue (allocation under LC 123/2006); 2027 rates still to be set — see section 02. It does not factor in the supplier's own credits on its purchases or any price adjustment.

From the customer's standpoint, the same service becomes **roughly 8.5% cheaper** when the supplier is under the hybrid regime — without the list price changing by a single cent. That is why large buyers are likely, over the course of 2027, to compare suppliers on the **net-of-credit price** rather than the invoice price. Suppliers "inside" the Simples may start to look more expensive than larger competitors, even while charging less.

The other side of the coin: under the hybrid regime, it is your company that now owes that ≈ R\$ 931 outside the DAS (less the credits on your purchases), rather than paying only the ≈ R\$ 94 embedded in the guide. **Without renegotiating prices, your own tax burden goes up.** The math only works when the competitive gain — or the price adjustment negotiated with the customer, who now takes a larger credit — offsets the additional tax and the compliance cost.

SPCG view: the right question is not "will I pay more or less tax?" — it is "how much of what I sell goes to buyers that can use the credit, and how much of that credit can I convert into price, volume or contract retention?". This is a decision about commercial positioning within the chain, supported by numbers.

SECTION 05

Who it works for — the SPCG decision framework

There is no single answer: the same rule can be advantageous for a manufacturer and ruinous for the retailer on the same corner. Four factors settle most cases (*SPCG view*):

- 01 Customer mix.** What percentage of revenue comes from regular-regime companies (lucro real / lucro presumido, the actual-profit and deemed-profit regimes), which take the full credit? The larger that share, the stronger the case for the hybrid. Sales to end consumers and to other Simples companies do not generate this benefit.
- 02 Pass-through leverage.** Will the customer now taking a larger credit agree to revisit the price (or the contract) to share the gain? Without a pass-through, the hybrid tends to be nothing more than a heavier tax burden.
- 03 Your own credits.** How much does your company buy in inputs, goods and services with CBS/IBS stated on the invoice? Structures with heavy taxed purchases recover a meaningful share of the liability through credits; payroll-intensive service providers, almost none — payroll generates no credit.
- 04 Compliance cost.** Regular assessment, tax stated on invoices, ancillary obligations and an accountant who is prepared for it. This is a new fixed cost — and it weighs more heavily the smaller the company.

Rule of thumb

- **It tends to pay off** when most revenue comes from regular-regime customers, there is room to renegotiate prices on a "net-of-credit" basis and the company has significant taxed purchases.
- **It tends not to pay off** when revenue is mostly B2C, highly fragmented, or comes from other Simples taxpayers — the extra credit benefits no one, and all that is left is a higher tax bill and more paperwork.
- **Gray area** — a balanced mix, tight margins or contracts up for renewal: the classic case for simulating before September, customer by customer, using the company's own numbers.

One factor less in 2027: split payment

One legitimate concern against the hybrid regime is **split payment** — the withholding of CBS/IBS at the moment the transaction is financially settled, which changes the cash flow of anyone under the regular regime. On **August 30, 2026**, the Receita Federal stated that the requirement for business-to-business transactions should only apply from **2028**, with optional, phased adoption during 2027, one payment method at a time. "Pure" Simples taxpayers are outside it; those moving to the hybrid regime fall within the scope of the mechanism. **Note the label:** this is a statement by the authority, not a rule — LC 214 (art. 35, §2º) requires a joint CGIBS/RFB act to set that timeline, and **no such act had been published as of the closing of this edition**. Plan around the scenario, but do not treat it as settled. (*official statement — no regulation published*)

One calendar reminder that lowers the stakes of the decision: the September election applies to the **first half of 2027**, a new window opens in **March 2027** for the following six months, and the request made now can be **canceled up to November 30, 2026**. Getting it wrong is not final — but starting 2027 on the wrong side of the math can cost contracts.

SPCG view: September 2026 is the reform's first "irreversible-for-the-half-year" decision — and deciding on gut feel is a gamble, not management. The way forward: segment the customer base between regular-regime corporate buyers and individuals/Simples companies, estimate the credit each side would come to demand, and simulate the tax burden under both regimes.

SECTION 06

Three companies, three answers — typical profiles

The profiles below are illustrative (estimate · SPCG view), built from recurring cases. The summary, in the format of our sector map:

Profile	Tendency	Why
B2B manufacturer (supplies large producers)	Hybrid favored	90% of revenue from lucro real customers; high-volume taxed purchases generate credits of its own; buyers already compare on the net-of-credit price.
Restaurant / neighborhood retail (B2C)	Stay "pure"	End consumers cannot use the credit; stating the tax would only add burden and obligations.
Consulting / IT (corporate + individual mix)	Depends on the mix	The gain is concentrated in contracts with large corporates; payroll generates no credit; a contract-by-contract decision.

Component manufacturer selling to large producers

A small-business (EPP) manufacturer, 90% of revenue from B2B supply to lucro real customers. Buyers are already signaling that, from 2027, they will compare quotes on the net-of-credit price. **Typical recommendation:** elect the hybrid regime and get ahead of the commercial conversation — come to the renegotiation table with the simulation ready, before the buyer runs the numbers alone.

Restaurant and neighborhood retail, selling to end consumers

A microenterprise (ME) with 100% B2C revenue. End consumers cannot use the credit: stating CBS/IBS on the invoice creates no advantage for anyone. **Typical recommendation:** do not opt in — and use September for another equally urgent task: adapting invoice issuance to the new layout, mandatory from January 2027.

Consulting/IT serving both companies and individuals

A small-business (EPP) service provider with 60% of revenue in contracts with regular-regime corporates and 40% from smaller customers. Payroll-intensive — low credits of its own. **Typical recommendation:** simulate contract by contract; often the answer is to opt in only if the two or three largest customers agree to renegotiate — and the six-month window allows testing with controlled risk.

SPCG view: the three profiles have something in common — the decision was made ahead of the deadline, with numbers and with customers in the conversation. The worst version of September is discovering the window in its final week, or letting it pass without knowing it existed.

SECTION 07

Five misconceptions that can prove costly

"Once I opt in, there is no going back."

There is: the request made in September can be canceled up to November 30, 2026. After that, the election applies to the first half of 2027 — and March 2027 brings a new window for the following six months. *(law in force)*

"This only matters to companies looking to leave the Simples."

No. The hybrid regime exists precisely to allow a company to stay in the Simples while changing only the way CBS/IBS are paid. Leaving the regime is a separate decision, with separate math. *(law in force)*

"The MEI also has to decide in September."

It does not: the MEI is outside this election and keeps the single consolidated payment, on its own calendar (January). The September window covers ME and EPP. *(law in force)*

"I do not sell to companies, so September does not affect me."

The election may not — but 2027 does: a new invoice layout with CBS/IBS fields from January (Ato Conjunto RFB/CGIBS 4/26), a sub-limit that takes the IBS into account, and the replacement of the Defis by the PGDAS-D. September is the month to go through all of this with your accountant. *(SPCG view)*

"We can already calculate the exact 2027 tax amount."

Not yet: the CBS rate for 2027 depends on a Senate Resolution, and the reference rates are still under debate in Congress. Simulations today work with estimates — useful for deciding, provided they are labeled as such. *(pending regulation)*

SPCG view: there is also a legal debate over the six-month election cycle introduced by Resolução CGSN 186/26 as against the annual rule in art. 16 of LC 123/2006 — a point to monitor, with no immediate practical effect on the September window. We will update this report if the picture changes.

SECTION 08

SPCG checklist — what to do before September 30

Seven steps, in the order in which they should happen. The first one already drives most of the decision:

- 01** **Map your revenue by customer type** — regular regime, Simples, end consumer — over the last 12 months. That single number already drives 80% of the decision.
- 02** **Take stock of your taxed purchases** (inputs, goods, services) to estimate the credits of your own that the regular regime would allow you to take.
- 03** **Simulate both scenarios** with your accountant, using labeled estimates for the 2027 rates — and redo the math once the Senate sets the official figure. As a **first test**, Sebrae offers a **free simulator** for the hybrid regime (sebrae.com.br), useful for a quick order-of-magnitude check before taking the numbers to your accountant.
- 04** **Talk to your main corporate customers** before deciding: ask how they will treat Simples suppliers in their 2027 sourcing — their answer is half of your decision.
- 05** **Check the company's tax compliance status** — outstanding issues can block the elections on the Portal do Simples Nacional.
- 06** **Prepare your invoicing — for two deadlines:** the national **NFS-e** standard, mandatory for ME and EPP on **November 1, 2026** (Resolução CGSN 191/26), and the layout with **CBS/IBS fields**, mandatory on **January 1, 2027**. Both are required whether or not you elect the hybrid regime.
- 07** **Document the decision** — including a decision not to opt in — together with the supporting calculations. In March 2027 the window reopens, and the analysis already done becomes a review rather than rework.

SPCG view: if there is time for only one step, do number 01. A company that can say "X% of my revenue comes from customers that can use the credit" is already able to talk on equal terms with its accountant, with its customers — and with the competition.

SECTION 09

Action plan, what may still change, and how SPCG can help

The plan by profile, in order of urgency

Timing	Who	Action
Immediate	Everyone	Map the customer base by customer type and check tax compliance status on the Portal do Simples Nacional.
First half of Sept.	Simples companies with corporate customers	Simulate pure DAS × hybrid regime using the real customer base (credit demanded by customers × new tax burden of your own) and talk to your main customers.
Sept. 1–30, 2026	Simples companies with corporate customers	Make (or decline) the hybrid election — a documented decision, not a gut call.
Oct. 2026	Everyone	Migrate to the national NFS-e issuer (Resolução CGSN 191/26).
by Nov. 30, 2026	Companies that opted in	Reconsideration window: reassess in light of new facts (official rate, customer reaction) and cancel if necessary.
Q4 2026	Everyone	Configure the invoicing system for the CBS/IBS fields and clean up master data (NCM product codes, CNAE activity codes, transaction types).
March 2027	Everyone	Review the decision for the second half of the year in the new window, now with actual January and February data.

What may still change

- **2027 CBS rate** — Senate Resolution pending. The most recent official estimate (Resolução CGIBS 14/26) works with **9.21 pp for the CBS**, within a total of **27.91%** — above the 26.5% cap under art. 475 of LC 214. Procedure: RFB→TCU by Sept. 14, 2026, TCU→Senate by Oct. 30, 2026 (as of Sept. 12 the submission had not taken place; the Ministry of Finance signaled it will not release a percentage alongside the filing). *(pending regulation)*
- **Split payment timeline** — the Receita stated (Aug. 30, 2026) that the business-to-business requirement moves to 2028, with optional adoption in 2027. The joint CGIBS/RFB act required by art. 35, §2º of LC 214 **has not yet been published**. *(official statement — no regulation published)*
- **The six-month election cycle** — a controversy with art. 16 of LC 123/2006; monitor the CGSN and any litigation. *(position)*
- **Practical mechanics of the assessment** — RFB/CGIBS guidance on assisted assessment and on the hybrid regime should develop through December. *(pending regulation)*

How SPCG can help: a pure Simples × hybrid simulation using your real customer base, contract repricing on a credit basis, and a sector-level reading of the impact on your business. Start at no cost: our **Pré-Diagnóstico** reads the public data tied to your CNPJ and shows, in 30 seconds, how your activity is classified under the reform — at spcg.com.br/pre-diagnostico. For a free 45-minute conversation: contato@spcg.com.br or WhatsApp +55 (11) 94745-2609.

REFERENCES

Bibliography and sources

Sources consulted through September 5, 2026 — research consolidated as of September 5, 2026, with pending items re-verified on September 12, 2026. The regulatory framework is still evolving — we recommend consulting the official sources for the most current version.

Legislation and official sources

- EC 132/2023; LC 214/2025 (the general IBS/CBS/IS statute — planalto.gov.br; in particular arts. 35, 41, 47 and 475); LC 123/2006 ("Estatuto do Simples" [Simples Nacional Statute] — art. 2, §6; art. 16; Annexes I to V)
- Resolução CGSN 186/26 (April 9, 2026) — deadlines and conditions for electing the Simples and the regular IBS/CBS regime for 2027; window from September 1 to 30, 2026; cancellation until November 30, 2026
- Resoluções CGSN 190, 191 and 192/26 (Aug. 2026) — alignment of the Simples with the reform: CBS/IBS in the regime's procedures, sub-limit including the IBS, discontinuation of the Defis, national NFS-e mandatory from November 1, 2026 (Res. 191, of Aug. 4), MEI tax documents and the revenue-sharing flow
- Resolução CGIBS 14/2026 (July 29) — estimate of the IBS and CBS reference rate (27.91%) for budgeting purposes (cgibs.gov.br); no new Resolução CGIBS after no. 17, of July 30, 2026
- Ato Conjunto RFB/CGIBS 4/2026 (Official Gazette, July 31) — phased timeline for the CBS/IBS fields in tax documents; Simples Nacional as of January 1, 2027
- Receita Federal — "CGSN define prazos de opção pelo Simples Nacional e pelo regime regular do IBS e da CBS para 2027" [CGSN sets deadlines for electing the Simples Nacional and the regular IBS and CBS regime for 2027] (gov.br, Apr. 2026); "CGSN atualiza regras do Simples Nacional" [CGSN updates Simples Nacional rules] (gov.br, Aug. 2026); "NFS-e Nacional será obrigatória para ME e EPP a partir de 1º/11/2026" (gov.br, Aug. 2026); "Começa hoje o prazo para opção..." [The election period opens today] (gov.br, Sept. 1, 2026)
- Portal do Simples Nacional — "Prazos de opção" [Election deadlines] and "Manual da Opção pelo Regime Regular do IBS e da CBS no Simples Nacional" [Manual on electing the regular IBS and CBS regime]

Studies and analysis

- ConJur — "Resolução CGSN nº 186/2026: janela de setembro para empresas do Simples" [Resolução CGSN 186/2026: the September window for Simples companies] and "Nova opção do IBS e CBS no Simples expõe lacunas e controvérsias jurídicas" [New IBS and CBS election within the Simples exposes gaps and legal controversies] (Apr. 2026)
- IBPT — more than 70% of Simples companies sell mainly to other companies; e-Auditoria — pure DAS × hybrid simulations (advantageous in ~40% of the cases analyzed)
- Contábeis — "Simples Nacional: opção IBS/CBS em setembro de 2026" [Simples Nacional: the IBS/CBS election in September 2026]; ESNC — "Regime regular de IBS e CBS no Simples Nacional" [The regular IBS and CBS regime within the Simples Nacional] (calendar and mechanics of the election)
- Private projections for the 2027 CBS rate — ROIT, 9.43% (Sept. 2026), and other market estimates ranging from ~9.2% to more than 11% (*estimate/study — not official*)
- Statements by the Receita Federal on the split payment timeline (G1/Estadão/Poder360, Aug. 30–31, 2026) — B2B requirement pushed to 2028, **with no regulation published** as of the closing of this edition
- SPCG — "Reforma Tributária na Prática" [Tax Reform in Practice] (July 2026), sections 02, 05 and 09, available at spcg.com.br/relatorios

Methodological notes

- The standard rate (27.91%) and the 9.21% CBS used in the examples are estimates from Resolução CGIBS 14/2026, adopted for budgeting purposes: the official 2027 figure will be set by Senate Resolution based on the test year. The private projections cited (e.g., ROIT, 9.43%) are *estimate/study* and do not replace the official figure. The numerical examples have been labeled as such in the text.
- The PIS/Cofins share within the DAS ($\approx 0.94\%$ in the first bracket of Annex III) follows the allocation set out in LC 123/2006; the percentages vary by annex and bracket — each company's simulation must use its own table.
- Imposto Seletivo rates had not been published as of September 12, 2026 (provisional measure not yet issued); they do not affect the conclusions of this report. The split payment timeline remains without a joint CGIBS/RFB act as of September 12, 2026 (latest Ato Conjunto published: no. 6, of August 28, 2026). We will update this edition if the pending points are resolved.



Thank you for reading this far.

If this material was useful and you would like to discuss how it applies to your business, we would be glad to talk.

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