SPECIAL — TAX REFORM

Tax Reform in Practice

What changes for MSMEs — who wins, who loses, and the decisions that cannot wait – the first of them has a deadline: September 2026

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IMPORTANT NOTICE

About this publication

This report is an SPCG analysis consolidating the legislation of Brazil's consumption tax reform (EC 132/2023, LC 214/2025, LC 227/2026), publicly available quantitative studies and the regulation issued as of the dates indicated. It does not constitute individualized legal or tax advice. It is a sister piece to the report "Split Payment for MSMEs" (SPCG, Jul/2026), which is dedicated to automatic collection and cash flow.

Rigor with sources

Some of the rules are already law in force; some depend on pending regulation; and a good share of the figures in circulation are estimates from studies or industry bodies. Throughout the text, every piece of information is labeled: law in force × pending regulation × estimate/study × position. Analyses and recommendations are labeled as an SPCG Insight. Research consolidated on July 21, 2026.

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Executive summary

The biggest tax change in Brazil in 60 years has left the drawing board: LC 214/2025 is in force, 2026 is the test year, and from 2027 onward CBS and IBS begin to replace five taxes. This report translates what is already a rule, what is still to be defined and — above all — what each MSME (micro, small and medium-sized enterprise) profile needs to decide and do, in plain language. It is a companion piece to our report on split payment (Jul/2026), which digs deeper into the effect on cash flow.

Key takeaways

01 The clock is running — now in batches: Ato Conjunto RFB/CGIBS 4/2026 (Official Gazette 31 July) staggered the CBS/IBS field obligation. **For NF-e/NFC-e under the regular regime, the 3 August 2026 milestone still stands**; NFS-e (general rule) starts 1 October, specific groups 1 December, and Simples Nacional (including MEI) only on 1 January 2027. Whoever fails to parameterize the invoicing system by their batch's deadline stops billing.

02 The estimated standard rate of the new VAT is **26.5% to 28%** (official estimates; legal cap of 26.5% with a review trigger). But almost no one will pay "the rate": a zero-rated basic food basket, reductions of 60% (healthcare, education, agribusiness) and 30% (regulated professions) create a map of winners and losers by sector.

03 The pattern of the redistribution: **industry and much of commerce tend to gain** (broad credit, the end of cascading taxation and of the tax war); **services tend to lose** — the burden of those who today pay ~8.65% may more than double, because payroll generates no credit (FENACON/Planning studies).

04 For Simples Nacional (the simplified tax regime for small businesses), the decision of the decade has a fixed date: **from September 1 to 30, 2026** the window opens to elect the hybrid regime (CBS/IBS charged "on top," with full credit for the B2B client), effective from January 2027. More than 70% of Simples companies sell to other companies (IBPT) — and "pure" Simples generates little credit, with a real risk of losing contracts.

05 Regulated liberal professionals (30% reduction) may see their burden nearly double: from ~14.5% to ~29.4% under Lucro Presumido (the presumed-profit corporate tax regime) (Gazeta do Povo estimate). Services with no reduction — IT, marketing, consultancies — pay in full, with projected price increases of 14% to 19%.

06 Low-income consumers gain purchasing power: a zero-rated national basic food basket + cashback that raises the income of CadÚnico (the federal social registry) families by ~10% (FGV/IBRE, ~73 million people) — a tailwind for popular retail and neighborhood businesses.

07 The transition carries its own cost: dual assessment from 2029 to 2032 (ICMS/ISS falling, IBS rising), an expanded DIRBI (the declaration of tax incentives, waivers, benefits and immunities), a national NFS-e (electronic service invoice), tax-authority-assisted assessment and the revision of long-term contracts. And the daily routine of the tax department changes in nature — routines that die, that reverse and that are born, mapped in section 08.

08 The SPCG Insight in one sentence: **2026 is the only year in which getting it wrong is cheap** — the test rates are symbolic and every inconsistency fixed now is one less problem when the tax becomes real. The action plan in section 09 organizes what to do, by profile, through December.

SECTION 02

The new system on one page — what changes and when

Five consumption taxes (PIS, COFINS, IPI, ICMS and ISS) will be replaced by a **dual VAT**: the CBS (federal contribution on goods and services) and the IBS (states and municipalities), plus a Selective Tax on harmful products. The principles that change everything: full non-cumulativity (credit on virtually every purchase tied to the activity), taxation at destination (the tax war ends) and charging "on top" (the tax itemized, visible in the price).

The timeline that matters

When	What happens	Nature
2026	Test year: CBS 0.9% + IBS 0.1%, offsettable against PIS/COFINS (those who meet the ancillary obligations do not even remit). Symbolic rates, real obligations.	Law in force
08/03/2026	CBS/IBS field obligation begins, in batches (Ato Conjunto RFB/CGIBS 4/2026): NF-e/NFC-e/CT-e under the regular regime on 3 Aug; NFS-e general rule 1 Oct; platforms, rentals and condominiums 1 Dec; Simples Nacional and MEI on 1 Jan 2027.	Law in force
Sep/2026	Simples election window for the hybrid regime (Sep 1–30), effective in 2027 — see section 05.	Law in force
2027	Full CBS; PIS/COFINS abolished; IPI zeroed (except the Manaus Free Trade Zone); debut of the Selective Tax; optional B2B split payment.	Law in force
2029–2032	ICMS/ISS→IBS transition: 10% / 20% / 30% / 40% per year — dual assessment in practice.	Law in force
2033	Full system: only CBS + IBS + IS. End of ICMS and ISS.	Law in force

The rate: the number everyone asks about

The estimated benchmark is **CBS ~8.8% + IBS ~17.7% ≈ 26.5%** (the official estimate used as a reference). The Treasury's last public calculation (Aug/2024) pointed to 27.97% after the benefit expansions in Congress — and Resolução CGIBS 14/2026 (Jul/2026) already works with an IBS reference rate of 18.7%, consistent with a combined standard rate around 28%. LC 214 created a safeguard: if the estimate exceeds **26.5%**, the Executive is required to propose benefit cuts (art. 475). In practical terms: the standard rate will be high — among the highest in the world — precisely because so much was left outside it. What matters for your company is not the average: it is where YOUR sector landed on the map of exceptions (section 03).

Regulation: LC 227/2026 (Jan/2026) structured the IBS Managing Committee, administrative litigation and ITCMD/ITBI rules; the Selective Tax rates have not yet been published (a provisional measure is expected in August 2026 — pending regulation); and the first cases have already reached the Supreme Court (exporters, the Manaus Free Trade Zone, the zero rate for people with disabilities) — the risk of targeted adjustments exists and we monitor it in every edition.

> **SPCG Insight:** Do not waste time debating whether the rate will be 26.5% or 28% — that number is not yours to control. What you do control: issuing correct invoices by your batch's deadline (3 Aug under the regular regime; 1 Jan 2027 for Simples), knowing how your sector is classified, deciding the Simples regime in September and using the test year to make mistakes for free. That is what the following sections focus on.

SECTION 03

Who wins and who loses — the sector map

The VAT redistributes the burden among sectors — this is the essence of the reform. Ipea estimates a cumulative gain of +2.39% of GDP through 2032 and 82% of municipalities gaining revenue; but the average hides the extremes. The map, with each source labeled:

Sector	Trend	Why (and source)
Industry	WINS	End of cascading taxation, full credit on investment, exports relieved of tax (CNI; official studies)
Commerce/retail	Mixed, tends to gain	Broad credit + end of tax substitution + zero-rated basket; but high adaptation cost and full repricing (TOTVS; ConJur)
Agribusiness (MSME)	Protected	Producers up to R$ 3.6M outside IBS/CBS; presumed credit to the buyer; inputs -60% (LC 214)
Construction/real estate	Own regime	Reducers of 50%, social reducer (R$ 100k/unit), RET kept through 2028 (LC 214/LC 227)
Healthcare and education	Partial relief	Reduction of 60% → effective rate ~10.6% (LC 214)
Regulated professions	LOSES (less)	Reduction of 30% → ~18.6%; total burden may go from ~14.5% to ~29.4% (Gazeta do Povo estimate)
Services with no reduction (IT, marketing, consulting)	LOSES (more)	Full rate; payroll generates no credit; projected increases of 14–19% (FENACON/Planning)
Transport/logistics	Depends on the link	Urban public transit -60%; freight under the general rule, but with 40-45% creditable inputs (FENACON)

Two cross-cutting effects deserve the attention of any MSME: first, **the end of the tax war reshapes geography** — with taxation at destination, state incentives lose value and distribution centers tend to move back closer to the large consumer markets (a move already observed in 2026); second, **credit becomes a purchasing criterion**: companies under the regular regime will prefer suppliers that generate full credit — which puts pressure on those under Simples (section 05) and turns the "correct invoice" into a commercial argument, not just an obligation.

> **SPCG Insight:** Sector classification is not destiny — it is a starting point. Within the same sector, those who understand their own position in the chain early (do you generate credit? do you use credit? who do you sell to?) will price better than the competition during the transition. In SPCG projects, this analysis of the position in the chain is the first exercise we do with the client.

SECTION 04

Services: the epicenter of the impact

The services sector concentrates the negative impact for a structural reason: its biggest cost is people — and **payroll generates no CBS/IBS credit**. A provider that today remits ~3.65% of PIS/COFINS + 2% to 5% of ISS (total ~6.65% to 8.65% under Presumido) will have to live with a benchmark VAT of 26.5%–28%, deducting credit only on inputs that, in services, are the smallest part of the cost.

The figures in circulation (estimates from industry bodies and consultancies)

- **FENACON:** projected price increases of 14.19% to 18.76% in the sector; extreme cases, such as accounting under Simples, with a burden increase above 300% (the body's scenarios — treat as a ceiling, not an average).
- **Regulated liberal professionals:** even with the 30% reduction (effective rate ~18.55%), the total burden under Presumido may go from ~14.53% to ~29.43% — nearly double (Gazeta do Povo estimate).
- **IT and consultancies (no reduction):** effective rate after credits estimated at 18%–22% (Planning) — a net increase of 9 to 13 points over the current burden.
- **Input intensity matters:** security and cleaning (inputs ~20–26% of revenue) suffer more; transport (40–45%) suffers less — credit offsets part of the increase (FENACON).

Who gets a discount — and who was left out

60% reduction: healthcare, education, urban public transit, agricultural services, cultural productions. **30% reduction:** the ~18 professions regulated by a professional council (lawyers, accountants, engineers, physicians...). **No reduction (full rate):** IT, marketing/advertising, agencies, management consulting and every unregulated B2B service. A detail that changes strategy: when the client is a legal entity under the regular regime, it credits the tax — the price pass-through is negotiable; when the client is an individual, there is no credit — the pass-through is full and demand feels it.

> **SPCG Insight:** For service providers, the question is not "how much does the tax go up," but "who absorbs the difference." With a corporate client, the conversation is about the price net of credit — start renegotiating contracts with that logic now. With an individual client, the answer will have to come from productivity and repositioning, because the market will not accept a 15% increase in silence. And if your service is regulated by a council, confirm your classification under the 30% reduction — there are categories on the borderline, and getting it wrong in either direction is costly.

SECTION 05

Simples Nacional: the decision of the decade has a date

Simples survives the reform — the DAS (its single monthly tax payment) continues, the thresholds (R$ 4.8M; R$ 3.6M sub-threshold) continue, the MEI (individual micro-entrepreneur) continues. What changes is the competitive position of those who sell to other companies: under the new system, **the credit your client can use is limited to the tax you actually paid in the DAS** (LC 214, art. 47, §9, II) — a small fraction, against the ~26.5%–28% that a regular-regime supplier passes on. IBPT estimates that more than 70% of Simples companies sell mainly to other companies: it is for them that the reform creates the dilemma.

The hybrid regime — and the September window

- **What it is:** keeping IRPJ/CSLL/CPP (and the rest) in the DAS, but remitting CBS/IBS "on top," under the regular regime — generating FULL credit for the B2B client (and using the credit on your own purchases).
- **When to decide:** a window from September 1 to 30, 2026 (Resolução CGSN 186/2026), effective from January 2027; cancellation until Nov 30, 2026; thereafter, reviews in semiannual cycles. Silence = you stay in "pure" Simples.
- **Who it tends to suit:** those who sell mainly to legal entities under the regular regime (industries, wholesalers, B2B services) — market simulations indicate an advantage in ~40% of the cases analyzed (e-Auditoria). The trade-off: more obligations and exposure to split payment from 2027.
- **Who it does NOT tend to suit:** those who sell to end consumers (bakeries, gyms, clinics, salons) — the individual client uses no credit; pure DAS remains unbeatable in simplicity.

MEI and nano-entrepreneur

The MEI is retained (with no access to the hybrid regime) and gains an obligation: **an NF-e (electronic invoice) for all operations from 2027**, including sales to individuals. LC 214 also created the "nano-entrepreneur" (revenue up to ~R$ 40.5k/year): exempt from IBS/CBS since 2026 — for ride-hailing/delivery apps, only 25% of revenue counts toward the threshold. Neither the MEI nor the nano-entrepreneur generates credit for the buyer — one more force pushing these profiles toward B2C retail.

> **SPCG Insight:** September 2026 is the reform's first decision that is irreversible-within-the-semester — and deciding "on a hunch" is a bet, not management. The right path: split your book of clients between regular-regime legal entities and individuals/Simples, estimate the credit each side would come to demand, and simulate the burden under both regimes. It is a calculation of a few hours that determines contracts lasting years — and it is exactly the kind of simulation SPCG runs with clients. If your competitor elects the hybrid regime and you do not, the difference will show up in your client's net price in January.

SECTION 06

Consumers and the market: zero-rated basket, cashback and the end of the tax war

More money at the base of the pyramid

Two mechanisms change popular consumption: the **National Basic Food Basket at a zero rate** and the **cashback** — a refund of CBS/IBS to CadÚnico families (100% of CBS and 20% of IBS on electricity, water, gas and telecom; 20%+20% on the rest). FGV/IBRE estimates a ~10% rise in the income of benefiting families (~28.8 million families, 73 million people), with a greater effect in the North and Northeast. For neighborhood retail, grocers, pharmacies and popular services, this is new demand — one of the few clear tailwinds for B2C MSMEs.

Selective Tax: those who resell "sin" products

From 2027, cigarettes, alcoholic beverages, sugary drinks, polluting vehicles and betting will pay the IS — with no credit generated. The rates have not yet been published (a provisional measure is expected in Aug/2026 — pending regulation). Bars, beverage distributors, tobacco shops and resellers should keep watch: the IS enters the cost and does not come back as credit.

The end of the tax war reshapes the logistics map

With taxation at destination, the ICMS benefit that sustained distribution centers in "generous" states loses value over 2029-2032. The move has already begun: distribution centers returning closer to the large consumer hubs, pressure on warehouse rents in metropolitan regions and a redesign of logistics networks. MSMEs that supply these chains (transport, storage, local services) should anticipate the redesign — and anyone who chose an address for a tax incentive needs to redo the math without it.

> **SPCG Insight:** Consumption will neither fall nor rise uniformly — it will move: more income at the base (cashback and the zero-rated basket), prices under pressure in services, logistics re-addressed. For the MSME, the strategic question for 2026-2028 is simple to phrase and laborious to answer: "where will MY client have more money — and where will my cost change address?".

SECTION 07

The cost of transition — obligations and adaptation

The reform promises simplicity in 2033 — but charges complexity until then. What is already on the obligations agenda:

Obligation / change	Since when	What to do
CBS/IBS fields on fiscal documents	Batches: 3 Aug 26 – 1 Jan 27	Update ERP/invoicing system and test by your batch's deadline
National standard NFS-e	2026 (migration)	Check your municipality's adoption and the new layout
Expanded DIRBI (173 benefits)	IN 2.294/2025	Declare EVERY benefit used — penalty for omission
CNPJ for individuals subject to CBS/IBS	postponed to 1 Jan 2027 (Res. CGIBS 13/26)	Check classification (e.g., landlords, freelancers)
Assisted assessment (authority pre-calculates)	2026-2027	Registration quality (NCM/CNAE) becomes critical
Dual ICMS/ISS + IBS assessment	2029–2032	Systems and accountant ready for both worlds
NF-e mandatory for MEI (every sale)	2027	Free issuer + issuing routine

Contracts: the clause that became mandatory

Every contract that spans the transition (rent, supply, continuous services) needs an economic-financial rebalancing clause for tax change: what triggers the review (a burden variation above X%), how it is proven (calculation memo) and renegotiation deadlines. Old contracts without this clause are margin bombs primed for 2027 and 2029 — reviewing the contract portfolio is 2026 work, not 2028.

And how much does adapting cost?

For MSMEs on cloud ERP, the technical adaptation tends to come in the subscription (the major vendors have already built in CBS/IBS); the real cost is in **configuration, accountant and training** — there is no consolidated estimate in reais for small businesses (a gap we note), but the practical rule is: the worse the current registry of products and operations, the bigger the bill. With assisted assessment, the tax authority will calculate the tax from YOUR invoices — wrong data at the source becomes an assessment notice, no longer a "closing adjustment."

Relief on the horizon: Ato 4/2026 mandated the creation, within 30 days, of a **compliance program** — the official signal is guidance and self-correction before fines during the test year (the specific act has not yet been published: pending regulation).

> **SPCG Insight:** Treat 2026 as a full dress rehearsal in complete costume: the rates are symbolic, but the obligations are real and the mistakes are recorded. The sequence we recommend: first the invoicing system (by your batch's deadline), then registry quality (NCM/CNAE/operations), then contracts, then the regime simulations. Anyone who reverses the order — starting with "how much will I pay in 2033" — spends energy on what they do not control and forgets the deadline that has already passed.

SECTION 08

The new daily routine of the tax department

The reform does not just change how much you pay — it changes what the tax team DOES every month. Today, the routine is assessment: collect documents, calculate debits and credits, book entries, transmit obligations, generate payment slips, offset. In the new system, much of that machinery reverses: the tax authority calculates first (based on the invoices the company itself issued) and the taxpayer reviews. It is a change in the nature of the work — for better AND for worse, depending on the item and the year. The map:

Routines that die, that reverse and that are born

Today's routine	What happens to it	When
Assess PIS/COFINS (EFD-Contribuições)	DIES for new facts — but the bookkeeping and the stock of credits live on for ~5 more years (amendments, audits, offsets)	2027
Calculate the tax due	REVERSES: assisted assessment — the authority pre-assesses CBS/IBS from the invoices and the team reviews, adjusts or contests; silence within the deadline = automatic approval	2027
Generate slips and offset (PER/DCOMP)	CHANGES: part of the debit is extinguished at financial settlement (split payment); the PIS/COFINS stock migrates to PER/DCOMP Web via quarterly requests (PUC)	2027
EFD ICMS/IPI, state GIAs	CONTINUE during the transition — and CBS/IBS stay OUT of the current blocks (separate reporting): two tracks in parallel	until 2032
Check at month-end close	BECOMES validation at the source: registry (NCM, CST, new cClassTrib) and the right IBS/CBS fields BEFORE issuing — the error that was an adjustment becomes a rejection or an assessment	already in 2026
Automatic credit on inbound	BORN: real-time credit management — credit only exists once the supplier's debit is extinguished (art. 47) — monitoring the tax health of those who sell to you becomes routine	2027
Simple bank reconciliation	BORN: three-way reconciliation — net receivable × invoice × split withholding, transaction by transaction	2027
Litigation (one federal rite)	BORN: DUAL litigation — CBS at the Federal Revenue/CARF; IBS at the Managing Committee with its own 3 instances — different deadlines and rites for the SAME operation	2027
DIRBI and benefits	GROWS: expanded benefits declaration (+85 items in 2026) — every incentive used must be reported	now

For better: the (promised) end of the 1,500 hours

Brazil is the world record holder in tax bureaucracy: up to **1,500 hours a year** just to meet obligations (World Bank). The new design attacks this head-on: five taxes become two (plus the Selective Tax), the assessment comes pre-filled like an individual's income tax return, and the Reform Platform — 17 integrated systems sized for ~70 billion documents/year — promises a single portal and fewer duplications. Official training is already running at scale: the CFC/Revenue course has surpassed 268,000 enrollments. How much time is actually saved has no official figure yet (a promise, not a rule) — but the direction is clear: less manual assessment, more review.

For worse: the crossing doubles the work before reducing it

From 2027 to 2032, the two systems coexist: ICMS/ISS falling, IBS rising, dual ERP configuration and a dual checking routine. PIS/COFINS "die" in 2027, but live on for ~5 years in audits, amendments and the stock of credits. And the market has already priced in the squeeze: **53% of companies plan to hire 3 or more professionals** for the transition (Robert Half via FENACON), while 61% of accountants admit they have not mapped the impact on their clients. In the short term, the tax department needs MORE people and more systems — the savings come later, for those who cross over organized.

The professional’s profile changes too

The "assessment executor" tax specialist gives way to the data-quality analyst: someone who ensures the information is born correct in the registry and the issuing system, monitors the authority’s pre-assessment, manages credits and refund deadlines, and talks to IT and finance. An error that used to be discovered (and fixed) at month-end close now appears in real time — for the tax authority too.

> **SPCG Insight:** The right question for 2026 is not "how many people will the tax team lose," but "who on my team becomes a data reviewer and who carries the transition." The process redesign is this year’s project: whoever arrives in 2027 with clean registries and configured systems receives assisted assessment as a relief; whoever arrives with a dirty registry receives the same tool as a continuous audit. The difference between the two scenarios is built now — and it is months of work, not weeks.

SECTION 09

SPCG Insights and 2026-2027 action plan

The plan by profile, in order of urgency. These are SPCG Insights — our interpretation drawn from the rules and studies cited, with proprietary prioritization.

Deadline	Who	Action
Your batch's deadline	Everyone	Ensure invoices carry the CBS/IBS fields — regular regime 3 Aug 26; Simples/MEI 1 Jan 27 (test it for real; don't trust "the system updates itself")
August 2026	Simples with corporate clients	Simulate pure DAS × hybrid regime with the real client book (credit demanded by clients × new own burden)
Sep 1–30, 2026	Simples with corporate clients	Exercise (or not) the hybrid election — a documented decision, not a "hunch"
H2 2026	Services	Reprice contracts with the net-of-credit logic (corporate clients) and a productivity plan (individuals)
H2 2026	Everyone	Review long-term contracts: tax rebalancing clause with calculation memo
H2 2026	Industry/commerce	Map new credits (investments, energy, freight) and reassess suppliers through the credit lens
By Dec 2026	Everyone	Clean up registries (NCM, CNAE, operations) — assisted assessment charges for data quality
2027	Everyone	Track B2B split payment (optional), the IS and benchmark rates — review prices and cash

How SPCG can help: a pure Simples × hybrid simulation with your real client book, contract repricing under the credit logic, a readiness diagnosis (issuer, registries, contracts) and a sector reading of the impact on your business. For a free 45-minute exploratory conversation, write to contato@spcg.com.br.

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Sources consulted through 3 August 2026; the date in parentheses is that of publication. Regulation is evolving — we recommend consulting the official sources for the most current version.

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- Receita Federal — "Entenda a Reforma Tributária do Consumo" (gov.br, consulted Jul/2026); Ato Conjunto RFB/CGIBS nº 1/2025 (2026 obligations)
- Ato Conjunto RFB/CGIBS 4/2026 (DOU 31 Jul 2026) — staggered schedule for CBS/IBS fields and compliance program; NT ENCAT 2025.002 v1.40; Resoluções CGIBS 13, 14 and 16/2026 (Jul/2026)
- Resolução CGSN 186/26 — Simples hybrid-regime election window (Sep 1–30, 2026)
- IN RFB 2.294/2025 — DIRBI expanded to 173 benefits (Dec/2025)
- SERT-MF technical note on rates (Aug/2024 — 27.97% estimate); 26.5% cap and the art. 475 trigger of LC 214

Quantitative studies

- Ipea — macro impact of the reform: +2.39% of GDP through 2032; federative redistribution (82% of municipalities gain) (2023)
- FGV/IBRE — impact of cashback on family income (~+10%; R$ 46.50/month average; 28.8M families)
- IBPT — the fragility of Simples in B2B (>70% of Simples companies sell to other companies)
- FENACON — impacts on the services sector (increases of 14.19% to 18.76%; scenarios by segment)
- Planning — effective rates by services segment (2025-2026); e-Auditoria — pure DAS × hybrid simulations (~40% of cases favorable to the hybrid)
- Gazeta do Povo — burden on liberal professionals (~14.53% → ~29.43%, estimate); ABRAS — basket tax relief (R$ 26.3B/year)

Specialized press and analysis

- Câmara dos Deputados and Agência Senado — passage and content of LC 214/LC 227; Contábeis — Selective Tax, provisional measure expected Aug/2026; optional B2B split payment 2027
- ConJur — end of tax substitution and retail pricing (Jul/2025); dual-VAT litigation (Jul/2026); agribusiness deferral (Jan/2026)
- Migalhas — the Simples hybrid regime and the September window; the Supreme Court and judicialization of the transition (2025-2026)
- Sebrae — "Reforma tributária: o que muda para os pequenos negócios" (report, 2026); CRCMG/FENACON — MEI and nano-entrepreneur
- Brazil Economy — relocation of distribution centers with the end of the tax war (Feb/2026); CartaCapital — pricing during the transition
- SPCG — "Split Payment for MSMEs" (Jul/2026) — sister report on automatic collection, available at spcg.com.br/relatorios

Operational routines and assisted assessment (section 08)

- Receita Federal / CGIBS — guidance on the 2026 effective date of CBS/IBS (Dec/2025); Tax Reform Platform (17 systems; launch Jan/2026); NT 2025.002 and cClassTrib/CST IBS-CBS tables (Portal NF-e)
- CFC/RFB — Qualification Cycle, Module 6 "Apuração Assistida" (06/30/2026); course with 268k+ enrollments (CRCMG); CFC-FENACON-RFB partnership
- Contábeis — "Como funcionará a apuração assistida"; "Extinção da EFD-Contribuições em 2027"; "Qualidade dos Dados e Apuração Assistida" (Celini and Alves) (2026)
- Barcellos Tucunduva — PIS/COFINS credits via PER/DCOMP Web/PUC from 2027 (art. 602 of the CBS Regulation; Portarias CODAR 316/319-2026) (Jul/2026)
- Reforma Tributária (portal) — art. 47 of LC 214/2025: credit conditioned on the extinction of the debit; split payment and reconciliation (2025)

- APET — "IBS × CBS: o contencioso administrativo dual da reforma" (May/2026); Reforma Tributária 360 — CBS/IBS outside the EFD ICMS/IPI blocks (GT48 COTEPE)
- FENACON/Robert Half — 53% of companies plan to hire 3+ professionals for the reform (Jul/2025); FENACON — 61% of accountants without an impact mapping (2026)
- World Bank (Doing Business) — up to 1,501 hours/year to meet tax obligations in Brazil

Methodological notes

- The standard rate (26.5%–28%) is an estimate: the official 2027 benchmark will be set based on the test year. Sector estimates (FENACON, Planning, e-Auditoria) are scenarios from bodies/consultancies, not official statistics — they were labeled as such in the text.
- The credit percentages for "pure" Simples (tables by CNAE/bracket) depend on a joint CGIBS/RFB act not yet published — the examples cited use market estimates.
- Selective Tax rates were not published as of July 21, 2026 (a provisional measure is expected in Aug/2026); we will update this report when they are released.

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Thank you for reading this far.

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

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