



Subsidy Questionnaire (Government) Case AS0079: Creamy/White Limestone exported from Portugal

Period of Investigation (POI):	1 January 2025 to 31 December 2025
Injury period:	1 January 2022 to 31 December 2025
Deadline for response:	30 March 2026
Contact details:	AS0079@traderemedies.gov.uk
To be completed on behalf of:	Portugal

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

☐ Confidential

☒ Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **30 March 2026**.



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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that Creamy/White Limestone from Portugal are causing injury to producers in the UK because the goods have benefited from a subsidy from a foreign authority.

A subsidy exists if there is:

- a financial contribution by a foreign authority which confers a benefit on the recipient (usually an industry or business manufacturing goods); or
- a form of income or price support.

Not all subsidies are countervailable (meaning they can be offset through trade remedies). A subsidy is countervailable if it is specific to certain companies or industries and granted either directly or indirectly for the manufacture, production, export or transport of goods.

Why should I take part?

We are seeking your cooperation as the government of Portugal to identify whether a countervailing duty may be required to counteract the effect of a subsidy.

The information your government provides will help us to determine a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section.

Please provide all the information requested by 23:59 UK time on **30 March 2026**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.



If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AS0079@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. You will need to substantiate all your information with relevant data. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to Portugal, please explain why.
- If the answer to a question is "zero", "no" or "none", please write this rather than leaving the answer blank.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a



corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.

- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Please refer to the case number, AS0079, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*)



and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

What happens next

Once you have completed your questionnaire responses including the corresponding annex and any additional documents requested, you must upload both confidential and non-confidential versions through our [Trade Remedies Service](#).

Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required; and
- the non-confidential responses will be placed on the public file.



The scope of this investigation

Goods concerned

This investigation covers **Creamy/White Limestone** exported from **Portugal**, described as:

Creamy/White limestone originating in Portugal in the form of slab and finished stone. Slab refers to natural stone that has been simply cut or sawn. Finished stone refers to natural stone that has been processed and worked in a factory, making it ready for installation. For these purposes, 'processed and worked' includes but is not limited to cutting, shaping, and surface finishing to meet the specifications required for its intended use.

The product **Creamy / White Limestone** is currently classifiable within the following commodity code(s): 68010000, 68022100, 68022900, 68029100, 68029200. These codes are only given for information.

In this questionnaire, these goods will be referred to as '**the goods concerned**'. Any reference to the 'goods' or 'goods concerned' in this questionnaire refers to the goods description above, regardless of the tariff classification code under which they are exported.



SECTION A: General information

A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Government dept./ body/ organisation:	DGE – Directorate-General for the Economy
Name (point of contact):	[REDACTED]
Position:	[REDACTED];
Address:	Avenida da República, 79, 1069-218 Lisboa
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	www.dgae.gov.pt

A2 About the sector

1. Please provide a description of the sector producing Creamy/White Limestone. Please detail any changes over the past 5 years such as entry to or exit from the sectors and mergers or acquisitions.

The Portuguese Creamy/White Limestone sector forms part of the broader natural stone and ornamental stone value chain. It covers quarry extraction, block selection, sawing, dimensional cutting, finishing, project-based processing, packaging, logistics and export. This value chain is strongly based on processing, in line with the actual profile of Portuguese industry.

In Portugal, the **natural stone sector**, which includes creamy/white limestone, is often subdivided into two stages of the value chain:

- the initial extractive industry (quarries), which produces blocks extracted directly from the rock,
- and the processing industry (manufacturers), which produces slabs, tiles, custom pieces, masonry, and other ornamental stone elements, through cutting, sawing and finishing processes.

The development of both stages reflects the long-standing experience and expertise of Portuguese extractive companies and ornamental stone manufacturers, along with investment in modernising machinery and the increasing specialisation of workers (particularly pronounced in the last decade), as well as through industry associations.

Complementary to these stages, the sector also comprises commercialization/export companies, focused on a strong international orientation, particularly Europe, the Middle East and the United States.



Between 2022 and 2024, the **natural stone sector** has remained structurally stable, comprising approximately 2,017 companies in 2024. Of these, around 385 operate in extraction and 1,632 in transformation, confirming the strong predominance of processing activities within the value chain.

In Portugal, the **natural stone sector** is predominantly composed of micro, small and medium-sized enterprises, founded on private initiative. There are no public shareholders, relevant State holdings, special State rights or government representation in the management of the sector's companies.

The **extraction segment** is characterised by a smaller number of firms. Between 2022 and 2024, the number of extraction companies declined moderately, from **414 to 385 firms**, reflecting continued consolidation and rationalisation within quarrying activities. Extraction companies are small and medium enterprises, with **around 8.5 workers per firm in 2024**, a figure that has remained broadly stable in recent years. This structural profile reflects the capital-intensive nature of quarrying operations, regulatory and environmental constraints, and the increased use of mechanisation and specialised equipment. As a result, the extraction segment tends to be less fragmented, with higher fixed costs and a stronger dependence on scale efficiency.

The **processing industry** displays a much larger business base, and a network of small and medium-sized enterprises focused on processing, finishing, design and customisation of stone products. From 2022 to 2024, the number of these firms remained relatively stable, decreasing slightly from **1,651 to 1,632 companies**, suggesting a mature and consolidated industrial structure. Average firm size in transformation increased gradually, reaching **approximately 6.7 workers per company in 2024**, up from around 6.4 workers in 2022.

Source: Statistics of Portugal

In recent years, the sector has been oriented to investment with a focus on:

- energy efficiency
- automation (CNC cutting, finishing)
- waste reduction

These developments have led to a product upgrading, namely:

- a shift from raw blocks to higher value-added processed products
- increased focus on architecture and design

This evolution indicates incremental scaling and professionalisation, associated with investment in technology, digital equipment, and higher value-added production (such as architectural applications, tailored solutions and finished stone products), rather than extensive firm entry or exit dynamics.

It supports a **vertically articulated value chain**, in which domestic extraction underpins a competitive processing industry, reinforcing Portugal's positioning not only as a stone-producing country, but increasingly as a **supplier of processed and design-oriented natural stone products**.

The productive structure of the **subsector of marble and other carbonate rocks** is extensive and geographically distributed: the extraction mainly in the regions of Alentejo



and Centro; the manufacture distributed across the North, Centro, Lisbon and Alentejo regions. Centro is the main cluster of production, comprising the municipalities of Leiria, Santarém, Alcobaça, and Porto de Mós.

Currently, according to the Information System of the Portuguese Classification of Economic Activities (SICAE), that is a centralised electronic database used in Portugal to register, manage, and provide official information on the CAE codes (economic activity codes), there are 120 companies registered with main activity CAE 08113 (Extraction of limestone, chalk, and gypsum) and 1085 companies registered with main activity CAE 23701 (Manufacturing of marble and similar stone articles).

We note that new quarries and new ornamental stone processing plants are rare, and we have not observed any significant changes in the past five years.

In summary, the domestic industry producing Creamy/White Limestone is SME-based, private, mainly nationally owned and organised on a competitive basis.

Appendix reference:

2. Please describe the main distribution channels in the Creamy/White Limestone sector and the degree of any upstream or downstream vertical integration.

Upstream: Owned quarries that are operated (exploited).

Downstream: Specifiers (e.g., architects/designers) and construction companies.

The main distribution channels follow the usual sector logic:

- (i) quarry or extractor to processing unit;
- (ii) vertically integrated extraction and processing company;
- (iii) processor to distributor, importer, contractor or specialist stockist; and
- (iv) direct supply to site, architectural project or institutional end client.

The new sources reinforce that Portugal's external positioning, including in the United Kingdom, depends above all on these channels for supplying finished product.

Some Portuguese companies show vertical integration to varying degrees, combining extraction, block selection, sawing, cut-to-size production, finishing, packaging and export. Such integration is a normal economic response in a sector where differentiation by quality, finishing, delivery time, technical compliance and project support is decisive for value creation. Downstream integration may also include samples, prototyping, dimensional coordination, technical support, logistics preparation and direct supply to site.

Portugal has a stronger presence in product lines for processed stone than in product lines for crude stone in the British market. In practical terms, Portugal's presence in the United Kingdom is more closely associated with articles, dimensioned elements, kerbs, slabs, masonry and other already worked supplies than with the simple shipment of block for subsequent processing. This is relevant because it rules out the idea of mass exports of undifferentiated raw material.

Appendix reference:



3. Please describe any forms of government involvement with either domestic producers of Creamy/White Limestone or upstream raw materials suppliers.

The involvement of the Portuguese Government in this sector is only regulatory, supervisory, administrative and horizontal in nature. It relates to licensing (including quarrying licences and industrial licensing), environmental and safety requirements, land-use planning, health and safety at work, energy, taxation, foreign trade and the management of public programmes of a general scope.

There is no mechanism through which the Government determines production, prices, customers, export volumes or product mix. Public Authorities have no direct involvement in commercial activities or sales.

There are, however, support measures made available to the industry (all sectors, not exclusively limestone) through EU funding programs, in areas such as R&D, innovation, digitalisation, sustainability, energy efficiency, internationalisation, skills and collective promotion. They are not designed specifically to favour Creamy/White Limestone or to subsidise exports to any country, including the United Kingdom.

Appendix reference:

4. Please specify any changes to laws or government regulations that have affected the sector for Creamy/White Limestone since 1 January 2025.

Portugal has not identified any legal or regulatory measure adopted since 1 January 2025 that is specific to the Creamy/White Limestone product or to processed *light/white* limestone. The most visible institutional change during this period is the creation of the *Agência de Geologia e Energia, I.P.* (Geology and Energy Agency), in 2026, but this is a general administrative reorganisation within the Ministry of Environment and Energy.

The sector therefore remains subject to the general legal framework applicable to quarries, industrial processing, environmental compliance, health and safety, land-use planning, energy, taxation. We note two minor legal updates relevant for quarries and processing industry (manufacturers) in Portugal since 1 January 2025, not exclusively for Creamy/White Limestone:

- Decree-Law No. 9/2025 updates the classification of activities, affecting administrative and licensing procedures.
- Order No. 57/2026/2 (26/01/2026) regulates the use of inert waste for backfilling quarry excavations.

These changes modify certain administrative and environmental requirements but do not affect the overall structure of the sector or operational rules.

Appendix reference:

5. Please describe the ownership structure of your domestic industry that produces Creamy/White Limestone. In your response, indicate what share of the industry is represented by state-invested enterprises (SIEs), state-owned enterprises (SOEs), foreign-invested enterprises (FIEs) and domestically-owned private enterprises.



There is no evidence of major recent mergers or acquisitions specifically in the Portuguese ornamental limestone sector. The domestic industry producing Creamy/White Limestone in Portugal is predominantly composed of small and medium-sized enterprises (SMEs).

The sector continues to be dominated by independent, family-owned companies. There are no state-owned enterprises (SOEs) or state-invested enterprises (SIEs) active in this sector, and foreign investment in the production of Creamy/White Limestone is limited.

There are no public shareholders, percentages of public ownership, special State rights, directors representing government or other formal mechanisms of public control over management.

Appendix reference:

6. Please complete **Annex 1, A2 – Domestic manufacturers & traders** listing all domestic manufacturers and traders of the goods concerned operating in 1 January 2025 to 31 December 2025. Where the government is represented in the company or is a shareholder in it, please:
- provide a description and diagram of the organisational structure covering all subsidiaries and associated companies; and
 - attach copies of the last two annual reports.

In substantive terms, there are Portuguese producers and processors that manufacture, market and directly export limestone articles under normal commercial conditions.

Currently, according to the Information System of the Portuguese Classification of Economic Activities (SICAE), that is a centralised electronic database used in Portugal to register, manage, and provide official information on the CAE codes (economic activity codes), there are 1085 companies registered with main activity CAE 23701 (Manufacturing of marble and similar stone articles).

There are no state-invested (SIE) companies in the limestone sector, nor any Portuguese government authority holding shares of those companies. Furthermore, there are no type of government representation in these companies.

Appendix reference:

7. Please complete **Annex 1, A2 – Domestic upstream suppliers** listing all domestic upstream suppliers related to the production of the good concerned in 1 January 2025 to 31 December 2025. Where the government is represented in the company or is a shareholder in it, please:
- provide a description and diagram of the organisational structure covering all subsidiaries and associated companies; and
 - attach copies of the last two annual reports.

Currently, according to the Information System of the Portuguese Classification of Economic Activities (SICAE), that is a centralised electronic database used in Portugal to register, manage, and provide official information on the CAE codes (economic activity codes), there



are 120 companies registered with main activity CAE 08113 (Extraction of limestone, chalk, and gypsum).

There are no state-invested (SIE) companies in the domestic upstream suppliers of the limestone sector, nor any Portuguese government authority holding shares of those companies. Furthermore, there are no type of government representation in these companies.

Appendix reference:

8. Please use the table below to provide details of any industry associations that represent producers of Creamy/White Limestone (both national and regional).

Name of industry association	Level of representation (e.g. national)	Address	Website	Contact details (email/telephone no.)
ANIET	National	Rua da Boavista 844, 1.º Sala 1.2 4050-106 Porto	www.aniet.pt	geral@aniet.pt +351226096699
ASSIMAGRA	National	Largo do Rossio, Edifício S. Pedro, Escritório nº5, 2480-314 Porto de Mós	www.assimagra.pt	assimagra@assimagra.pt +351244491803 +351217121930

<+ add or remove rows>

A3 Imports and exports

1. Please complete **Annex 1, A3 – Imports and exports** with quarterly data on import and export volumes and values of Creamy/White Limestone, for the past 5 calendar years. Please specify in the annex whether values are based on ex-works, CIF, FOB, etc.

Source: International trade statistics, Statistics of Portugal.

Notes:

- "Total" refers to CN 68010000, 68022100, 68022900, 68029100, 68029200
- According to the rules of Intrastat (trade between EU Member States) the companies must declare the weight in kilograms and value (euros). Following the available data, the Annex 1, excel file shows the weight in kilograms, instead of the volume (in m³).



SECTION B: Government involvement in the sector producing Creamy/White Limestone

B1 Roles and responsibilities of government

Please identify and describe the specific roles of all levels of central and regional government and/or any public bodies that are involved in the activities below. Such roles could relate to administration, government policies, regulations or decisions affecting the relevant sectors, both direct and indirect. Please provide contact details for the officials responsible for the roles you identify, including mailing address, email address and telephone number.³⁾

1. Involvement in policy, economic regulation and decision-making activities related to the production of Creamy/White Limestone

Ornamental stone quarries (extractive activities)

At central, regional and local levels, several public bodies are involved in policy, regulation and decision-making related to quarrying activities:

Land-use planning - the establishment of a quarry requires a grant of planning permission for the proposed location, depending on the circumstances, this may be issued at different levels of government: national level by the Institute for Nature Conservation and Forests (ICNF), where the quarry is located within a classified or protected area; regional level Regional Coordination and Development Commission (CCDR); local level by the Municipal Council, where provided for in the Municipal Master Plan (PDM).

Environmental impact assessment (EIA) - depending on the type and scale of the quarry, a prior environmental impact assessment may be required. The competent authority is either the Portuguese Environment Agency (APA) or the relevant CCDR.

Licensing and decision-making - quarries classified as Type 1 and 2 are licensed by the Directorate-General for Energy and Geology (DGEG), quarries classified as Type 3 and 4 are licensed by the relevant Municipal Council. In all cases, environmental rehabilitation plans are approved by the CCDR or, where applicable, by ICNF (for classified areas) and the quarrying plans are approved by DGEG.

Monitoring and enforcement - technical supervision of quarrying activities is carried out by DGEG; environmental monitoring of rehabilitation obligations is carried out by CCDR or ICNF; administrative enforcement is ensured by Municipal Councils, the police authorities, ASAE (Food and Economic Safety Authority) and IGAMAOT (General Inspectorate of Agriculture, Sea, Environment and Spatial Planning); occupational health and safety is overseen by the Authority for Working Conditions (ACT) and Regional Health Administrations.

Ornamental stone processing plants (industrial activities)

Public involvement in industrial processing activities depends on whether the plant is integrated within a quarry.

Land-use planning – if not within a quarry, the establishment of an industry needs a grant of planning permission for the proposed location, issued by the relevant Municipal Council.



Environmental impact assessment (EIA) - depending on the type and scale of the industry, a prior environmental impact assessment may be required. The competent authority is either the Portuguese Environment Agency (APA) or the relevant CCDR.

Licensing and decision-making - where processing plants are integrated as annexes to quarries, they are licensed by DGEG; where they operate independently, licensing is carried out, depending on the type, either by the relevant Municipal Council or by IAPMEI.

Monitoring and enforcement - environmental and administrative supervision is carried out by the relevant CCDR, as well as by the police authorities, ASAE and IGAMAOT; occupational health and safety is overseen by ACT and Regional Health Administrations.

Contacts:

Portuguese Environment Agency (APA)
(geral@apambiente.pt; +351 214 728 200)

Regional Coordination and Development Commissions (CCDR)

- North: geral@ccdr-n.pt | +351 226 086 300
- Centre: geral@ccdr-c.pt | +351 239 400 100
- Lisbon and Tagus Valley: geral@ccdr-lvt.pt | +351 213 837 100
- Alentejo: geral@ccdr-a.gov.pt | +351 266 740 300
- Algarve: geral@ccdr-alg.pt | +351 289 895 200

Directorate-General for Energy and Geology
geral@dgeg.gov.pt; +351 217 922 700 / +351 217 922 800

Municipal Councils with territorial jurisdiction.

Institute for Nature Conservation and Forests
icnf@icnf.pt; geral@icnf.pt; +351 213507900

IAPMEI – Agency for Competitiveness and Innovation, Public Institute (info@iapmei.pt;
+351 213 836 000

Food and Economic Safety Authority (ASAE)
geral@asae.pt | +351 217 983 600

General Inspectorate of Agriculture, Sea, Environment and Spatial Planning (IGAMAOT)
igamaot@igamaot.gov.pt | +351 213 211 500

Authority for Working Conditions (ACT)
geral@act.gov.pt | +351 300 069 300

Appendix reference:

2. Involvement in the manufacture, sale, purchase or acquisition of Creamy/White Limestone and used in their production.

Public authorities in Portugal are not directly involved in the manufacture, sale, purchase or acquisition of Creamy/White Limestone or the raw materials used in its production. These activities are carried out exclusively by private operators under market conditions. Government involvement is limited to regulatory, supervisory and administrative functions.

Appendix reference:



3. The general supervision of the sector for Creamy/White Limestone, with reference to the management and administration of any SIEs or SOEs that operate within it.

The general supervision of the Creamy/White Limestone sector in Portugal is carried out through regulatory, administrative and environmental oversight by public authorities (see B1, 1, above). This includes the Directorate-General for Energy and Geology (DGEG), the Portuguese Environment Agency (APA), the Regional Coordination and Development Commissions (CCDR), and other relevant authorities, within their respective competences.

Such supervision relates to compliance with licensing requirements, environmental obligations, land-use planning and health and safety regulations. It does not involve any direct management or operational control of companies in the sector.

There are no state-owned enterprises (SOEs) or state-invested enterprises (SIEs) operating in the Creamy/White Limestone sector in Portugal. Consequently, no public bodies are involved in the management or administration of companies within the sector.

Appendix reference:

4. Any requirements affecting market entry for production of Creamy/White Limestone, including any environmental regulations affecting either sector.

Market entry for production of Creamy/White Limestone in Portugal is subject to a range of regulatory and environmental requirements, applicable to both extractive and processing activities.

For quarrying activities, market entry requires:

- A favourable location decision in accordance with land-use planning instruments;
- Compliance with environmental regulations, including, where applicable, prior Environmental Impact Assessment (EIA);
- A quarrying licence issued by the competent authority (DGEG or the relevant Municipal Council, depending on the type of quarry);
- Approval of a quarrying plan and an environmental rehabilitation plan.

For ornamental stone processing plants, market entry requires:

- Industrial licensing, either as an annex to a quarry (licensed by DGEG) or as an independent facility (licensed by the relevant Municipal Council or IAPMEI, depending on the type);
- Compliance with environmental and industrial regulations, including emissions, waste management and, where applicable, environmental permitting requirements.

In both sectors, operators must also comply with occupational health and safety regulations and are subject to ongoing supervision by the relevant authorities.

These requirements are of a regulatory and environmental nature and apply equally to all operators, without discrimination.

Appendix reference:



5. The integration of producers of Creamy/White Limestone.

The production of Creamy/White Limestone in Portugal is generally characterised by a two-stage value chain, comprising extractive companies (quarries) and ornamental stone processing companies (manufacturers).

Vertical integration exists in the sector, although it is not universal. In some cases, processing companies are integrated upstream, operating their own quarries or establishing processing plants within quarry sites. However, a significant number of operators remain specialised in either extraction or processing activities.

Horizontal integration is limited, and the sector remains largely fragmented, being predominantly composed of small and medium-sized enterprises (SMEs). While mergers and acquisitions and transfers of quarrying rights and operating rights do occur, they do not appear to have significantly altered the overall structure of the sector.

Overall, the level of integration in the sector can be described as moderate, with both integrated and non-integrated operators coexisting.

Appendix reference:

6. The provision of industrial policy and guidance related to the Creamy/White Limestone sectors.

There is no specific industrial policy or dedicated strategic framework in Portugal exclusively targeting the Creamy/White Limestone sector.

However, the sector is covered by general industrial, environmental and economic policies applicable to the broader extractive and manufacturing industries. These include policies related to environmental protection, resource efficiency, industrial modernisation, innovation and internationalisation.

Public bodies such as the Directorate-General for Energy and Geology (DGEG) provide regulatory guidance for extractive activities, while the Portuguese Environment Agency (APA) and the Regional Coordination and Development Commissions (CCDR) issue environmental guidance and ensure compliance with applicable regulations.

In addition, IAPMEI – Agency for Competitiveness and Innovation, Public Institute, may provide general support and guidance to industrial operators, particularly in areas such as innovation, competitiveness and access to funding programmes.

Overall, government involvement in this area is limited to horizontal policy measures and regulatory guidance, without sector-specific industrial planning or direct intervention.

Relevant contacts:

Directorate-General for Energy and Geology
geral@dgeg.gov.pt +351 217 922 700 / +351 217 922 800



IAPMEI – Agency for Competitiveness and Innovation, Public Institute
info@iapmei.pt; +351 213 836 000

Appendix reference:

7. Any regulation of land-use affecting production of Creamy/White Limestone.

Land-use regulation in Portugal directly affects the production of **Creamy/White Limestone**, as both quarrying and processing activities require approval for their location. The key regulatory mechanisms are:

- Regional land-use plans: Projects must conform to the Regional Territorial Plans (Planos Regionais de Ordenamento do Território) overseen by the Commissions for Regional Coordination and Development (CCDRs), which assess regional spatial impacts and approve environmental rehabilitation measures.
- Local land-use plans: Compliance with the Municipal Master Plan (PDM) is required for any development outside classified areas. Municipal authorities evaluate zoning, building, and operational conditions.
- Classified or protected areas: Where quarrying is proposed in nationally protected or environmentally classified areas, approval is required from the Institute for Nature Conservation and Forests (ICNF), which ensures the activity does not compromise conservation objectives.

Regional Coordination and Development Commissions

geral@ccdr-n.pt +351 226 086 300

geral@ccdr-c.pt +351 239 400 100

geral@ccdr-lvt.pt 351 213 837 100

geral@ccdr-a.gov.pt +351 266 740 300

geral@ccdr-alg.pt +351 289 895 200

Municipal Councils with territorial jurisdiction.

Institute for Nature Conservation and Forests

icnf@icnf.pt; geral@icnf.pt; +351 213507900

Appendix reference:

8. Any banking or financial regulations relating to production of Creamy/White Limestone.

The production of Creamy/White Limestone in Portugal is carried out by private operators, and there are no sector-specific banking or financial regulations directly targeting the limestone industry.

Appendix reference:

9. The inspection and investigation of facilities that produce Creamy/White Limestone, e.g. health and safety compliance, environmental standards and quality assurance.



The inspection and investigation of quarrying and processing facilities for Creamy/White Limestone in Portugal are carried out by public authorities to ensure compliance with health and safety, environmental, and quality standards.

Responsibilities are divided according to sector and type of regulation:

- technical supervision of quarrying activities is carried out by DGEG;
- environmental monitoring of rehabilitation obligations is carried out by CCDR or ICNF;
- administrative enforcement is ensured by Municipal Councils, the police authorities, ASAE and IGAMAOT;
- occupational health and safety is overseen by the Authority for Working Conditions (ACT) and Regional Health Administrations

Relevant Contacts:

Directorate-General for Energy and Geology
geral@dgeg.gov.pt +351 217 922 700 / +351 217 922 800

IAPMEI – Agency for Competitiveness and Innovation, Public Institute
info@iapmei.pt; +351 213 836 000

Food and Economic Safety Authority
correio.asae@asae.pt; 217 983 600

Authority for Working Conditions
geral@act.gov.pt; +351 21 330 87 00

General Inspectorate for Agriculture, Sea, Environment and Spatial Planning
igamaot@igamaot.gov.pt; +351 21 321 55 00

Appendix reference:

10. The issuing of import licenses and certificates for raw materials used in the production of Creamy/White Limestone.

As a member of the European Union, Portugal only applies the published Common External Tariff. The product “Creamy/white limestone” is currently classified under the following commodity codes: 68010000, 68022100, 68022900, 68029100, 68029200.

No import licenses are issued or must be issued in Portugal for these tariff classifications. All these measures are European Union measures applicable throughout the Union. There are no measures at national level.

Relevant contacts:
Customs and Taxation Authority
dsl@at.gov.pt | +351 217 206 707

Appendix reference:



11. The implementation of export controls, including the issuing of export licensing relating to Creamy/White Limestone industry.

Exceptionally, due to European regulations, for the five tariff codes listed, restrictions apply only to Tariff Code 6802 92 00, with the description "Other limestone," specifically restrictive measures on trade with Russia and Belarus, namely prohibitions or authorizations, under Regulations (EU) 833/14 and 765/06.

For the remaining tariff codes 68010000, 68022100, 68022900, and 68029100, there are no additional controls involving the issuance of authorizations by any entity.

Appendix reference:

12. The imposition and supervision of taxation, including export taxes, export tax rebates and value added tax (including any rebates) in relation to Creamy/White Limestone.

All taxation, as well as any tax deductions or benefits, are established by the Portuguese Parliament or the Government (authorized by the Parliament) through legislation.

The supervision of all taxation, including income taxes, VAT, and customs duties, falls under the exclusive competency of the Tax and Customs Authority.

Appendix reference:

B2 Laws and regulations

1. Please list and provide a copy of any laws, regulations, directives or guidelines specific to the regulation of the price of Creamy/White Limestone product. In your answer, please specify the relevant government authorities responsible for each law or regulation.

There are no price controls or restrictions on production or exports in effect.

Appendix reference:

2. Please list and provide a copy of any laws, regulations, directives or guidelines specific to investment in projects related to Creamy/White Limestone production. In your answer, please specify the relevant government authorities responsible for each law or regulation.

- The production of limestone and other ornamental stones in Portugal is regulated under the legal framework governing mineral masses (quarries), primarily established by Decree-Law No. 270/2001 of 6 October, amended and republished by [Decree-Law No. 340/2007 of 12 October](#) (Ministry of Environment) (English version available online)
- [Law No. 54/2015 of 22 June](#) (English version available online), which establishes the legal framework for the disclosure and exploitation of geological resources



located within the national territory, including those situated in the national maritime space (Assembly of the Republic)

- Decree-Law No. 169/2012, of 1 August, establishing the Responsible Industry System, which regulates industrial activity, the establishment and operation of responsible business zones, and the process for accrediting entities under this System. (Ministry of Economy and Employment)
- [Decree-Law No. 73/2015, of 11 May](#) (English version available online), which makes the first amendment to the Responsible Industry System, approved in the annex to Decree-Law No. 169/2012, of 1 August. (Ministry of Economy)

Appendix reference:

B3 Taxes and tariffs

1. Please provide a schedule for the last 5 calendar years showing the corporate tax rates applicable to producers of both Creamy/White Limestone. Please explain any differences in taxation rates between and whether these differences are due to government policies.

The general corporate tax rates are as follows:

Year	Corporate tax rates
2021	17% (first € 25,000 of taxable profits, in the case of micro, small and medium companies and small mid cap companies)
	21%
2022	17% (first € 25,000 of taxable profits, in the case of micro, small and medium companies and small mid cap companies)
	21%
2023	17% (first € 25,000 of taxable profits, in the case of micro, small and medium companies and small mid cap companies)
	21%
2024	12,5% (first € 50,000 of taxable profits, in the case of startups)
	17% (first € 50,000 of taxable profits, in the case of micro, small and medium companies and small mid cap companies)
	21%
2025	12,5% (first € 50,000 of taxable profits, in the case of startups)
	16% (first € 50,000 of taxable profits, in the case of micro, small and medium companies and small mid cap companies)
	20%

The corporate income tax rates applicable to producers of creamy and white limestone are exactly the same as those applied to all companies.

There are no specific rates applicable depending on the sector of activity. The rates set out in the table above apply to all corporate income tax (CIT) taxpayers, with the only differences relating to the size of the taxpayers, as shown in the attached table.



There were no specific tax benefits for producers of creamy and white limestone in the last five years.

Appendix reference:

2. In relation to the question above, please indicate and provide details of any industry-specific tax exemptions or tax rebates.

There are no specific corporate tax exemptions or rate reductions for entities operating in this or any other sector/economic activity.

Nevertheless, companies producing Creamy/White Limestone may, provided they meet the relevant requirements, qualify for the tax benefits provided for in the "Investment Tax Code" or the "Tax Benefits Act," just like any other company operating in the manufacturing sector in general.

Appendix reference:

3. Please detail the tariff rates and/or quotas applying to imports and exports of Creamy/White Limestone during the past 5 calendar years.

As a member of the European Union, Portugal only applies the published Common External Tariff.

The product "Creamy/white limestone" is currently classified under the following commodity codes: 68010000, 68022100, 68022900, 68029100, 68029200.

Commodity code	Tariffs	
6801 00 00	0%	
6802 21 00	1,7%	
6802 29 00	1,7%	
6802 91 00 10	1,7%	K* (090104): 0%
6802 91 00 90	1,7%	
6802 92 00 10	1,7%	K* (090104): 0%
6802 92 00 90	1,7%	

* Quota for the following origins:

Certain handicrafts by presenting certificate of origin A014 HANDI

AR | Argentina BD | Bangladesh BO | Bolivia BR | Brazil CL | Chile EC | Ecuador GT | Guatemala HN | Honduras ID | Indonesia IN | India IR | Iran LA | Laos LK | Sri Lanka MX | Mexico MY | Malaysia PA | Panama PE | Peru PH | Philippines PK | Pakistan PY | Paraguay SV | Salvador TH | Tailand UY | Uruguay

Appendix reference:

4. Please provide a schedule for value added tax (VAT) or equivalent export rebates applicable to exports of Creamy/White Limestone for the last 5 calendar years.



For the last 5 calendar years:

These products are subject to VAT in Portugal at the standard rate of 23%. The export of these goods (as, indeed, of any others) is exempt from VAT (0%). No export discounts are applied.

Appendix reference:

5. If any export quotas have applied to Creamy/White during the last 5 calendar years, please specify the relevant government authorities responsible for setting and monitoring the quotas.

There are no export quotas on the product in question.

Exceptionally, due to European regulations, for the five tariff codes listed, restrictions apply only to Tariff Code 6802 92 00, with the description "Other limestone," specifically restrictive measures on trade with Russia and Belarus, namely prohibitions or authorizations, under Regulations (EU) 833/14 and 765/06.

For the remaining tariff codes 68010000, 68022100, 68022900, and 68029100, there are no additional controls involving the issuance of authorizations by any entity.

Appendix reference:

B4 Financial assistance

1. Please provide details of any financial assistance provided, in the last 5 calendar years, by the government of Portugal for production of Creamy/White Limestone.

During the period 2021-2025, the Government of Portugal (as also the Government of the United Kingdom) has implemented several support measures that are horizontal economic policy instruments, funded by European mechanisms and accessible to various sectors of activity. The main objective was to mitigate the adverse impacts of the successive crisis. The health, economic and financial crisis triggered by the COVID-19 pandemic was exacerbated by rising energy prices, which have had a significant impact on production costs, affecting global and European supply chains, with consequences for production, employment and prices stemming from the geopolitical context, a situation that has been further aggravated by Russia's invasion of Ukraine and latter on by the announcement of USA Administration of the "Reciprocal Tariff Policy".

Appendix reference:

2. Please provide details of any government involvement in the issuance of debt and/or equity instruments to any company involved in the production of Creamy/White Limestone industry in the last 5 calendar years. In each case, please provide:
- name and address of each relevant company;
 - reasoning for the form of financial instrument(s) used;



- the number and value of shares or bonds;
- the period of investments; and
- the rate of return(s) and/or expected yields.

Not applicable.

Appendix reference:

3. If any of the instruments identified in the question above are listed in any securities exchange in Portugal or abroad, please identify:
- the name of the securities exchange; and
 - any known trading restrictions by the company and/or the securities exchange.

Not applicable.

Appendix reference:

4. Please indicate and specify the value of any government of Portugal guarantee(s) for any commercial loans provided to any companies involved in producing Creamy/White Limestone in the last 5 calendar years.

As mentioned in question B4.1, during the period 2021-2025, the support measures that were implemented are horizontal economic policy instruments, which were accessible to various sectors of activity. Under these programmes were granted guarantees for commercial loans through the National Mutual Guarantee System that is managed by the national promotional bank of Portugal, the Banco Português de Fomento (BPF), with a similar mission to the British Business Bank in the UK.

The companies involved in producing Creamy/White Limestone (registered with CAE 08113 - Extraction of limestone, chalk, and gypsum) that benefited from these guarantees' programmes are listed in Appendix A1.

Appendix reference:

A1 - Guarantees for commercial loans in Creamy White Limestone

B5 Market access and government policy initiatives

1. Please provide details on whether any producers of Creamy/White Limestone operating in your country have required any types of licenses for production, or government verification for entering the market in the last 5 calendar years? If so, please substantiate your answer with evidence.

See B1.4.

Appendix reference:



2. Please indicate and explain any restrictions (such as limits or quotas) placed on the production and/or export of Creamy/White Limestone in Portugal in the last 5 calendar years. Please substantiate your answer with evidence.

There were no price controls or restrictions on production and/or exports of Creamy/White Limestone in effect in the last 5 calendar years.

Appendix reference:

3. Please identify and provide details of any government policies and/or initiatives that directly or indirectly affect the Creamy/White Limestone industry.

Any public policies and initiatives affecting the Creamy/White Limestone industry, whether directly or indirectly, are general and horizontal in nature. They fall within areas such as innovation, applied research, digitalisation, energy efficiency, decarbonisation, internationalisation, skills, external promotion and productive modernisation.

These policies and initiatives do not regulate prices, do not restrict market access, do not impose export targets and do not amount to an industrial policy exclusive to Creamy/White Limestone.

Appendix reference:

4. Please identify and explain any Portuguese economic/industrial/social strategies/plans/frameworks, in effect since 1 January 2025, that directly or indirectly affect producers of Creamy/White Limestone. Please substantiate your answer with evidence.

There are no strategies/plans (economic, industrial, or social) in effect as of January 1, 2025.

Appendix reference:



SECTION C: Subsidies

[Note to Case Teams: consider whether you want to ask further questions to support likelihood assessment here, referring to the transition review assessments POG.]

C1 Subsidy programmes

Table 1 – Subsidy programmes See below for the list of programmes that are being investigated. Please note that programme titles listed are to the best of the TRA's knowledge and may differ from official programme titles used by Portugal.

Please provide the information requested for each of the programmes identified in the table below and for any additional programmes Portugal has identified. To be relevant to this investigation, programmes should have conferred a benefit for producers of Creamy/White Limestone during the POI.

Table 1 - Subsidy programmes

No.	Subsidy name	Subsidy type
1	INOVSTONE 4.0 - Advanced Technology and Software for Natural Stone – SP9, SP10, SP12 & SP13	Grant
2	INOVMINERAL 4.0 - Advanced Technology and Software for Natural Stone – SP7 & SP8	Grant
3	LSI StoneWorld - SP16	Grant
4	LSI Stone Digital Factory - SP15	Grant
5	Sustainable Stone by Portugal Agenda - MT5	Grant
6	Business Innovation Project - POCI-02-0853-FEDER-047397 – SP1	Grant
7	Business Innovation Project - CENTRO-02-0853-FEDER-018610 – SP2	Grant
8	SME INTERNATIONALIZATION PROGRAM – SP3 & SP4	Grant
9	Hiring of Highly Qualified Human Resources (SME or CoLab) SP5 & SP6	Grant
10	SDF 365 – Stone Digital Fabrication SP5 & SP6	Grant
11	INTERSTONE SP11	Grant



12	PRR Project Incorporation of Renewable Energy and Energy Efficiency Measures – MT1	Non-refundable financing
13	PRR Project Intelligent Automation in Natural Stone Extraction – MT2	Non-refundable funding
14	PRR Project PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization – MT3	Non-refundable financing

+ Add additional rows as required

1. Please use the text box below to record any programmes in **Table 1 – Subsidy programmes** that Portugal is unfamiliar with. If Portugal is aware of the programme that it seems to relate to, or one that is similar, please provide its official name and its subsidy type below. In addition, please include any such programmes in the table above and answer the questions that follow with reference to these programme(s).

Under the listed programmes as identified in Table 1, numbers 1, 2, 3, 4, 6, 7, 10 and 11 - described in Annex C4 – are related with Portugal 2020 and Portugal 2030 (see C2.1). Numbers 13 and 14 are related with National Recovery and Resilience Plan/RRP (PRR) (see C2.1).

Programmes 8, 9 and 12 are not described in Annex C4 for the following reasons:

Programme 8 - SME Internationalization Programme

“SME Internationalisation” refers not to a specific programme or project, but to a **type of support**, with no regional or sectorial specificity.

Programme 9 - Hiring of Highly Qualified Human Resources (SME or CoLab)

Hiring Highly Qualified Human Resources (SMEs or CoLABs)” refers not to a project but to a type of project. It aims at supporting technological centres and collaborative laboratories, not companies. **No project for the stone sector was supported.**

Programme 12 “PRR Project - Incorporation of Renewable Energy and Energy Efficiency Measures” is not a specific project, but a PRR component - Component 11 Industry Decarbonization. This Component 11 aims at supporting low-carbon processes and technologies in industry, energy efficiency measures, incorporation of renewable energy, storage, and development of decarbonization roadmaps. **No specific project from the stone sector was financed under this Component 11.**

Please note that programme 13 is technically equivalent to programme 5: they represent the same initiative under different designations. The “13 - PRR Project - Intelligent



Automation in Natural Stone Extraction" refers to the project "Sustainable Stone by PORTUGAL" (identified also as programme 5, on the Table 1). It was financed under PRR Component 5 - Investment and Innovation, that aims to increase the competitiveness and resilience of the economy based on R&D, innovation, diversification, and specialization of the productive structure. It was presented by a consortium of Companies, Academia, Associations and other entities, including some (but not all) from the stone sector.

Therefore, in Annex C4, programme 13 is indicated as equivalent to programme 5.

Appendix reference:

2. Please indicate in the text box below if Portugal is aware of any other programmes that constitute a subsidy and are not addressed in **Table 1** or in the question above. This includes any market development assistance programmes or domestic support programmes that are related to the production of Creamy/White Limestone and conferred a benefit during 1 January 2025 to 31 December 2025.

Please add any such programmes to **Table 1**, clearly indicating the subsidy type and name of the programme.

No.

Appendix reference:

C2 General information on programmes

1. Please answer each of the following questions for **all** programmes listed in **Table 1**, including any additional programmes that have been identified in the previous section.

Please use the programme numbers listed in the table when referencing programmes and provide evidence to support responses.

For **each** programme, please provide full details of the following:

- the policy objective and/or purpose of the programme;
- the nature or form of the subsidy;
- the nature of benefits or concessions granted;
- when the programme was established;
- the duration of the programme; and
- the laws and regulations under which the subsidy is granted (including English translations);
- how the programme operates; and
- which Portuguese authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.)



For all programmes that are no longer operational, please state the date from which a company could no longer apply for, or claim benefits through, them. Please substantiate all your answers with evidence.

Regarding the listed programmes as identified in Table 1, numbers 1, 2, 3, 4, 6, 7, 10 and 11 - described in Annex C4 – related with Portugal 2020 and Portugal 2030:

Portugal 2020 was a national strategic framework for applying European funds during the programming period 2014–2020, aligned with the European Union's strategy to promote smart, sustainable, and inclusive growth.

Its primary **objective** was to promote economic growth, competitiveness, social inclusion, employment, and territorial cohesion, in line with the EU Cohesion Policy and the Europe 2020 Strategy.

Order nr. 57-A/2015 of 27 February (Specific Regulation for the Competitiveness and Internationalisation domain – RECI, English version available online) establishes the rules applicable to the financing, by the European Regional Development Fund (ERDF) and the European Social Fund (ESF), of operations in the field of competitiveness and internationalization.

Expenditures eligible until 31 December 2023, according to Article 1(5) of the RECI, as currently in force: "The conditions and rules to be observed by the various incentive and support schemes set out in this Regulation are extended in their validity until 31 December 2023, in line with the period of application of [Commission Regulation \(EU\) No 1407/2013](#) of 18 December and [Commission Regulation \(EU\) No 651/2014](#) of 16 June, as established by [Commission Regulation \(EU\) No 2020/972](#) of 2 July, on the Community frameworks for State aid."

Portugal 2030 is the strategic framework for applying European funds during the programming period 2021–2027, aligned with the EU priorities for smart, green, inclusive growth.

Portugal 2030 is the framework for applying EU Cohesion Policy funds for 2021–2027, with the main **objective** to support: Innovation and digital transition; Climate action and sustainability; Skills, employment, and social inclusion; Territorial cohesion and competitiveness.

Order Nr. 103-A/2023 (English version available online) establishes the rules for applicable to the financing, by the European Regional Development Fund (ERDF) and the European Social Fund (ESF), of operations in Thematic Area Innovation and Digital Transition.

Detailed information related to support granted to the operations identified in **Annex C4** is set out in **Appendix A2**.

Both Portugal 2020 and Portugal 2030:

- **Are applied to the entire national territory and to all economic activities.** They have a broad scope and a non-specific design and are open to companies across all



sectors nationwide. They do not target a specific industry group, being the limestone, or other. There is no legislation limiting the funds to specific firms/sectors.

- **Are aligned with EU Policy.** They implement EU Structural and Investment Funds (European Regional Development Fund (ERDF) and European Social Fund (ESF)), governed by EU regulations and public eligibility rules; are not discretionary or selective beyond the published criteria of eligibility, are national implementations of EU-open programs, not tailored to a specific sector or firm; comply with the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#) and EU competition rules. There is an explicit prohibition on financing activities directly linked to exports (exported quantities, distribution networks abroad, current costs), preventing distortions in international trade.
- **include clear rules regarding eligibility criteria, procedures for the analysis, selection, and decision of applications, and selection criteria.** The selection process is transparent and non-discriminatory:
 - The Managing Authorities publish calls for applications, available online on the Portugal 2020 (<https://portugal2020.pt/candidaturas/>) and Portugal 2030 (<https://portugal2030.pt/avisos/>) websites.
 - Eligibility criteria, rules of procedures for the analysis, selection, and decision of applications are defined in the Specific Regulations prior mentioned [Order nr. 57-A/2015 (Portugal 2020), [Order Nr. 103-A/2023](#)(Portugal 2030)] and reflected in the calls for applications.
 - Eligibility is not automatic. Any company could be eligible if it met the requirements set out in the call for proposals. Support with European funds is dependent on the availability of funds within the call's budget, which is determined by the merit of the proposals.
 - Companies and their respective projects that meet the eligibility criteria and achieve a project merit score (both in absolute and relative terms) above the selection threshold are eligible for funding.
 - The list of approved operations is available online, for search and download, on the Portugal 2020 (<https://portugal2020.pt/projetos-aprovados/lista-de-operacoes-aprovadas/>) and Portugal 2030 (<https://portugal2030.pt/resultados-pt2030/>) websites.
 - Also, the website "Mais Transparência Portugal"¹ (<https://transparencia.gov.pt/pt/>), the informative portal on public resource management topics in Portugal, gathers information regarding beneficiaries and projects of Portugal 2020 and Portugal 2030.

Regarding programmes as identified in Table 1, numbers 13 and 14 - described in Annex C4 – related with **National Recovery and Resilience Plan/RRP (PRR)**:

The PRR is Portugal's national plan under the EU Recovery and Resilience Facility (RRF), created in response to the COVID-19 crisis. Its **objectives** are to: Restore economic growth; Strengthen social, economic, and institutional resilience; Accelerate the green and digital transitions.

The incentive system "agendas for business innovation" aims to promote and financially support projects that seek a transformative recovery of the economy in a lasting, fair, sustainable and inclusive way, particularly in terms of innovative business investment.

- the nature or form of the subsidy: Non-refundable financing
- the nature of benefits or concessions granted:



- a) Research, development and innovation projects;
- b) Productive investment projects that materialize the production of new goods and services;
- c) Projects for the qualification and internationalization of organizations;
- d) Human resource capacity building projects, including advanced training programs;
- e) Projects for the dissemination and promotion of initiatives and products, processes or services developed within the scope of the agendas.
- f) 'Investment projects with strategic importance for the transition to a net-zero emissions economy'.

- when the programme was established: 19 january 2022
- the duration of the programme: from 2022 to 2026
- the laws and regulations under which the subsidy is granted:
Order n.º 43-A/2022, 19 january, in its current wording (English version available online)
Notice n.º 01/C05-i01/2021 (as appendix)
Notice N.º 02/C05-i01/2022(as appendix)
Regulation UE n.º 651/2014 (GBER - General Block Exemption Regulation) from the Comission, 17 june 2014, in its current wording
- how the programme operates:
The consortium presented applications, that were analysed by a commission and experts. The applications selected were approved and contracted with objectives to deliver new products, processes or services.
The programme is in final months of execution.
- which Portuguese authority administers the programme and the types of records that they maintain for a programme (e.g. company-specific files, accounting records, programme databases, budget approvals, etc.): IAPMEI administers the programme and keep records of entities contracted, execution of projects in terms of objectives and financial, all in its own information system.

PRR has a broad and national coverage and transparent criteria: the scope of each PRR component is established in its specific Order; the territorial scope is the entire national territory; it is open to any economic sector; there is no regional or sectoral specificity, apart from compliance with aid schemes, administered through public calls with transparent eligibility criteria; it does not target a specific industry group, being the limestone, or other; there is no legislation limiting the funds to specific firms/sectors.

PRR does not contain any export contingency; eligibility criteria are established in the specific Order; none of these criteria are based on export performance or the use of domestic products over imported ones.

PRR is aligned with EU Policy: implementation falls under NextGenerationEU, governed by EU regulations, including the Recovery & Resilience Facility, both eligibility and oversight are subject to EU approval, transparency, and open application processes; is not discretionary or selective beyond the published criteria of eligibility and is not tailored to a specific sector or firm.



PRR selection process of the projects that will benefit from grants is transparent and non-discriminatory: calls for proposals follow the scope and eligibility criteria established in the specific Order; calls for proposal establish the selection criteria, that are publicly available and uniformly applied (<https://recuperarportugal.gov.pt/candidaturas-prr/>); eligibility is not automatic; companies must comply with eligibility criteria; applications are evaluated and scored with specific criteria of merit and selected the ones that have enough score to fit in the budget allocated; monitoring reports are available online on the Recuperar Portugal website (<https://recuperarportugal.gov.pt/monitorizacao-relatorios-de-monitorizacao/>); also, the website "Mais Transparência Portugal", the informative portal on public resource management topics in Portugal, gathers detailed information, updated daily, regarding beneficiaries and projects of PRR (<https://transparencia.gov.pt/pt/>).

Programme 13 "PRR Project - Intelligent Automation in Natural Stone Extraction" refers to the project "Sustainable Stone by PORTUGAL" (identified also as programme 5. It was financed under PRR Component 5 - Investment and Innovation, that aims to increase the competitiveness and resilience of the economy based on R&D, innovation, diversification, and specialization of the productive structure. It was presented by a consortium of Companies, Academia, Associations and other entities, including some (but not all) from the stone sector.

Under Component 5 - Investment and Innovation [Order 43/A/2022] applications are evaluated according to specific selection criteria:

- Degree of innovation or differentiation;
- Impact of the project on business competitiveness and on changing the country's productive specialization profile;
- Potential impact on the region where the project is developed;
- Ability to leverage investment;
- Potential for economic valorisation of innovation and scalability;
- Contribution of the project to carbon neutrality and energy resilience;
- Quality of the consortium in terms of the promoters' competencies in relation to the project objectives and the consortium's governance model;
- Economic and financial viability of the projects and the proponents.

Programme 14 "PRR Project - PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization" refers to the project "PRODUTECH R3 – Recovery, Resilience, Reindustrialization". It was financed under PRR Component 5 - Investment and Component 10 - Innovation. It was presented by a consortium of Companies and other entities from the Production Technologies sector.

Appendix reference:

A2 - Detailed information related to support granted (to be translated)

A3 – Notice 01.C05.i01.2021 (to be translated)

A4 - Notice 02.C05.i01.2022 (to be translated)



2. Please provide details of future changes expected to the programmes listed in Table 1.

No changes expected.

Appendix reference:

C3 Programme eligibility

Please answer each of the following questions for **all** programmes listed in Table 1 above. Your responses should include information on any additional programmes that have been identified and added to the table in the process of completing this questionnaire.

In the questions that follow, please use the programme numbers listed in Table 1 to refer to programmes and substantiate responses with evidence.

1. For each programme, please explain the application process, including details of any application fees charged by the relevant government authority.

Portugal 2020 and Portugal 2030 - Applications are submitted in response to a specific Call for Proposals (see C2.1) and are free of charge for applicants. Applications are submitted via electronic application form. All beneficiaries may access the platform, subject to prior registration, and submit their application.

The selection process is transparent and non-discriminatory:

- The Managing Authorities publish calls for applications, available online on the Portugal 2020 (<https://portugal2020.pt/candidaturas/>) and Portugal 2030 (<https://portugal2030.pt/avisos/>) websites.
- Eligibility criteria, rules of procedures for the analysis, selection, and decision of applications are defined in the Specific Regulations prior mentioned [Order nr. 57-A/2015 (Portugal 2020), Order Nr. 103-A/2023 (Portugal 2030)] and reflected in the calls for applications.
- Eligibility is not automatic. Any company could be eligible if it met the requirements set out in the call for proposals. Support with European funds is dependent on the availability of funds within the call's budget, which is determined by the merit of the proposals.
- Companies and their respective projects that meet the eligibility criteria and achieve a project merit score (both in absolute and relative terms) above the selection threshold are eligible for funding.
- The list of approved operations is available online, for search and download, on the Portugal 2020 (<https://portugal2020.pt/projetos-aprovados/lista-de-operacoes-aprovadas/>) and Portugal 2030 (<https://portugal2030.pt/resultados-pt2030/>) websites.
- Also, the website "Mais Transparência Portugal"¹ (<https://transparencia.gov.pt/pt/>), the informative portal on public resource management topics in Portugal, gathers information regarding beneficiaries and projects of Portugal 2020 and Portugal 2030



RRP (PRR) - The application process is detailed in the call for presenting a expression of interest Notice n.º 01/C05/i01/2021 and no fees are charged.

The selection process of the projects that will benefit from grants is transparent and non-discriminatory:

- calls for proposals follow the scope and eligibility criteria established in the specific Order;
- calls for proposal establish the selection criteria, that are publicly available and uniformly applied (<https://recuperarportugal.gov.pt/candidaturas-prr/>);
- eligibility is not automatic; companies must comply with eligibility criteria;
- applications are evaluated and scored with specific criteria of merit and selected the ones that have enough score to fit in the budget allocated;
- monitoring reports are available online on the Recuperar Portugal website (<https://recuperarportugal.gov.pt/monitorizacao-relatorios-de-monitorizacao/>);
- also, the website "Mais Transparência Portugal", the informative portal on public resource management topics in Portugal, gathers detailed information, updated daily, regarding beneficiaries and projects of PRR (<https://transparencia.gov.pt/pt/>).

Appendix reference

A2 - Detailed information related to support granted (to be translated)

A3 - Notice 01.C05.i01.2021 (to be translated)

2. For each programme, please describe the decision-making process used by the relevant government authority to approve or reject an application. Please clearly indicate any differences in the process across different types of subsidies or programmes.

See C2 and C3.1

Portugal 2020 and Portugal 2030 - The analysis and decision-making process for applications is based on compliance with eligibility requirements/conditions and an assessment according to merit criteria, for the purposes of ranking, selecting, and approving applications, as set out in the section "Application Analysis and Decision Procedures" of the Calls for Proposals.

RRP (PRR) - The decision-making process used by the relevant government authority to approve or reject an application are defined in Notice n.º 01/C05/i01/2021 a pre-selection phase and Notice N.º 02/C05-i01/2022 where the final applications were selected to be financed.

Appendix reference:

A2 - Detailed information related to support granted (to be translated)

A3 - Notice 01.C05.i01.2021 (to be translated)

A4 - Notice 02.C05.i01.2022 (to be translated)



3. Please answer the following questions regarding eligibility for receiving benefits provided under each programme:

- a. Please specify whether eligibility for the programme is at all conditional on a company's export performance. If so, please provide details of the criteria that apply.

Portugal 2020 and Portugal 2030 - None of the programmes' eligibility is conditioned on a company's export performance.

Only in the context of Programmes 3, 4 and 11 did export intensity constitute an assessment criterion for the selection of operations, as established in the Calls for Proposals. Regarding the operations associated with No.11, and considering that they aimed to support the internationalisation efforts of the participating SMEs, the level of export intensity in international markets is assessed at the operation closure stage.

It should be emphasized that the support measures are aimed at improving the SMEs operating conditions, namely through the introduction of innovations (process or products), and/or participation in international trade fairs, and do not constitute direct support for exports, as provided for under the applicable regulatory framework.

As Pursuant to point (d) of Article 1(2) of the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#), as amended and in its consolidated version, aid linked to export-related activities is not applicable, namely:

- aid directly linked to the quantities exported;
- aid for the establishment and operation of a distribution network;
- aid for other current expenditure related to export activities.

RRP (PRR) - There is no exclusion condition using company's export performance. Only in one of the 8 selection criteria (A to H) is better evaluated export performance – E criteria. Please see Annex F of [Notice N.º 02/C05-i01/2022](#).

Appendix reference:

A4 - Notice 02.C05.i01.2022 (to be translated)

- b. Please specify whether eligibility for the programme is at all conditional on a company's use of domestic goods over imported goods, and if so please provide details.

Portugal 2020 and Portugal 2030 + RRP (PRR) - There is no eligibility condition regarding the use of domestic goods over imported goods.

Furthermore, pursuant to point (c) of Article 1(2) of the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#), as amended and in its consolidated version, the Regulation is not applicable to aid that favours national products over imported products.



This means that any public support measure, that directly or indirectly requires the use of domestic goods or services, cannot be granted under the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#).

This condition also derives from Article 107(1) of the Treaty, as such measures are incompatible with the internal market insofar as they distort competition and affect trade between Member States.

Appendix reference:

- c. Please specify whether eligibility for the programme is at all conditional upon, or limited to, the location of companies or industries within specific regions. If so, please specify the companies or industries and the designated regions.

Portugal 2020 and Portugal 2030 – These programmes are applied to the entire national territory and to all economic activities. They have a broad scope and a non-specific design and are open to companies across all sectors nationwide.

These programmes are, however, implemented through Operational Programmes (OPs) organised into:

- Thematic (national) Operational Programmes
- Regional Operational Programmes (Norte, Centro, Lisboa, Alentejo e Algarve)

The Regional Operational Programmes (ROP) are designed to: address territorial-specific needs; promote regional development, competitiveness and cohesion; support local actors such as municipalities, SMEs, universities, and NGOs. Each ROP is managed by the respective CCDR (Regional Coordination and Development Commission).

RRP (PRR) - The companies were eligible from all Portugal regions.

Appendix reference:

- d. Please specify whether eligibility for the programme is limited to any individual or groups of companies and/or industries. If so, please detail the relevant companies and/or industries and the laws that govern this criterion.

See C2 and C3.1

Portugal 2020 and Portugal 2030 – The only limitations arise from the applicable State aid framework, as established in Article 4 and Annex B of the Specific Regulation for the Competitiveness and Internationalisation domain ([RECI](#), English version available online).

RRP (PRR) - Only the limitations imposed by state aid - [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#).

Appendix reference:



C4 Subsidies received under the programmes

1. Please complete **Annex C4 – Programme beneficiaries** identifying all companies that accrued or received a subsidy (or subsidies) under the programmes during 1 January 2025 to 31 December 2025. This may include benefits from programmes that were in place well before the POI. Please add additional rows as required.

Please ensure the columns under 'Programme information' are populated using the exact information in **Table 1**, ensuring any programme(s) detailed in Section C1 are included.

2. Please identify and provide copies of any contractual agreements between Portugal and any companies that receive benefits under the programme (e.g. loan contracts, grant contracts, etc.).

The Terms of Acceptance signed by the beneficiaries of the operations identified in Annex C4 are provided as Appendixes.

Appendix reference:

A5 - TA Programme 1 (to be translated)
A6 - TA Programme 2 (to be translated)
A7 - TA Programme 3 (to be translated)
A8 - TA Programme 4 (to be translated)
A9 - TA Programme 6 (to be translated)
A10 - TA Programme 7 (to be translated)
A11 - TA Programme 10 (to be translated)
A12 - TA Programme 11_COMPETE A - 2020_0000069 (to be translated)
A13 - TA Programme 11_COMPETE 2020_026344 (to be translated)
A14 - TA Programme 11_COMPETE 2020_038085 (to be translated)
A15 - TA Programme 11_COMPETE 2020_179265 (to be translated)
A16 - TA Programme 11_COMPETE 2030_00249800 (to be translated)
A17 - TA Programme 11_COMPETE 2030_01475400 (to be translated)
A18 - TA Programme 13 (to be translated)
A19 - TA Programme 14 (to be translated)

3. For **each** programme beneficiary listed in **Annex C4 – Programme beneficiaries**, please answer the following questions:
 - a. Please explain the subsidy (or subsidies) provided to the beneficiary. Include an explanation of whether the subsidy was one-off or recurring, including the years it recurred and whether the subsidy varied between years. Please also



explain how the amount stated in **Annex C4** has been estimated, including the methodology and assumptions used (if relevant).

Portugal 2020 e Portugal 2030 - The applicable aid intensities and financing conditions are ruled by the relevant EU regulatory framework, namely the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#), as amended and in its consolidated version, the Regional State Aid and R&D Guidelines, and by national legislation, particularly the [RECI](#) (English version available online).

Aid is granted following applications submitted under open competitive calls, which define the eligible investments and the corresponding implementation timetable. Disbursement of aid is conditional upon the level of execution achieved, up to the closure of the operation. The analytical tools supporting the determination of the final incentive amount granted to the beneficiaries are attached in annex.

RRP (PRR) - The support rates and conditions of the funding granted are framed within EU regulations, namely the [GBER \(General Block Exemption Regulation – Commission Regulation \(EU\) No 651/2014\)](#), in its consolidated version and national legislation, namely the Regulation for the Mobilizing Agendas. Support is granted based on applications submitted within open calls for proposals, which establish a set of investments and a specific timetable. Funding is disbursed according to the progress made until the operation closes.

The Mobilizing and Green Agendas are consortium projects with investments in various areas, namely Productive Innovation, R&D, Dissemination and Promotion, Qualification and Internationalization, and Human Resources.

The funding was therefore calculated within the framework of the General State Aid Scheme (GSA), as provided for in [Commission Regulation \(EU\) No 651/2014 of 17 June](#), as amended.

Appendix reference:

- b. Please indicate what functions the company performs and specify whether the nature of any such functions could be recognised as being equivalent to those of a Foreign Authority.

Portugal 2020 e Portugal 2030 - All beneficiaries of the aid are commercial SMEs and private non-profit entities.

RRP (PRR) - The entities eligible for the support are commercial companies, public entities and private non-profit organizations.

Appendix reference:

- c. Please state whether any of the company's functions are undertaken on behalf of Portugal and specify whether the company is required to support Portuguese policies.



None of the company's functions are undertaken on behalf of Portugal and to none is required to support Portuguese policies.

Appendix reference:

- d. If the company has been trusted, vested or tasked with any responsibility normally associated with a Foreign Authority please specify the nature and function of this responsibility and provide copies of the relevant legal instruments or regulations.

Not applicable.

Appendix reference:

- e. Please indicate whether the company has the authority to entrust or direct a private body to undertake responsibilities or functions on behalf of the Foreign Authority.

Not applicable.

Appendix reference:

4. For each SIE and SOE identified in **Annex C4**, if any, please answer the following questions:

- a. Please indicate any payments and/or injections of funds provided by Portugal to the SIE/SOE (e.g. grants, awards, purchase of shares, injection of capital funds etc.). Please detail the date, amount and the reason(s) for the provision.

Not applicable.

Appendix reference:

- b. Please identify and provide details on whether the SIE/SOE has any financial liabilities with any financial institutions in which Portugal holds an interest.

Not applicable.

Appendix reference:

- c. Please detail how each SIE/SOE funds its operations.

Not applicable.

Appendix reference:

- d. Please explain how and to whom the SIE/SOE distributes its profits.



Not applicable.

Appendix reference:

- e. Please explain how the performance of the SIE/SOE is measured, specifying which authority in Portugal inspects or reviews its performance (e.g. output and quality performance, employee performance, financial performance etc.) Include an explanation of what action, if any, is taken by such authorities if its performance targets are not met.

Not applicable.

Appendix reference:

- f. Please provide details of any official Portuguese reporting methods and/or procedures that the SIE/SOE must comply with.

Not applicable.

Appendix reference:



SECTION D: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire the declaration on the following page should be signed by an authorised official.

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 25 March 2026. The checklist in Section F of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and spreadsheet annex must be submitted. You can find guidance on how to complete confidential and non-confidential versions in our guidance on [how to submit information](#).



Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by the TRA.

Government representative: [REDACTED]

Government body: Direção-Geral da Economia and Direção-Geral dos Assuntos Europeus

14 April 2026
Date

[REDACTED]
Signature of authorised official

[REDACTED]
Name and title of authorised official

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

MINISTRY FOR FOREIGN AFFAIRS



SECTION E: Checklist and appendices

This section is an aid to ensuring all sections of this questionnaire are completed.

Section	Please tick if you have responded to all questions
Section A – General information	✓
Section B – Government involvement in the Creamy/White Limestone sector	✓
Section C – Subsidies	✓
Section D – Next steps and declaration	✓

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
A1	Guarantees for commercial loans in Creamy White Limestone
A2	Detailed information related to support granted (to be translated)
A3	Notice 01.C05.i01.2021 (to be translated)
A4	Notice 02.C05.i01.2022 (to be translated)
A5	TA Programme 1 (to be translated)
A6	TA Programme 2 (to be translated)
A7	TA Programme 3 (to be translated)
A8	TA Programme 4 (to be translated)
A9	TA Programme 6 (to be translated)
A10	TA Programme 7 (to be translated)
A11	TA Programme 10 (to be translated)
A12	TA Programme 11_COMPETE A - 2020_0000069 (to be translated)
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A19	TA Programme 14 (to be translated)

+Add additional rows as required

