



Subsidy Questionnaire (**European Union**)

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:	<i>European Commission – Directorate-General for Trade and Economic Security – Unit G5 Relations for with third countries for trade defence matters</i>

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 European Commission 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:	European Commission – Directorate-General for Trade and Economic Security – Unit G5 Relations for with third countries for trade defence matters
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	Rue de la Loi 170 – 1040 Brussels - Belgium
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	https://policy.trade.ec.europa.eu/index_en

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

Appendix reference:

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

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.



Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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).

Please refer to Portugal's reply to the Subsidy Questionnaire



Name of industry association	Level of representation (e.g. national)	Address	Website	Contact details (email/telephone no.)

<+ 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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)



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.

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire



Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

Appendix reference:

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

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

B4 Financial assistance

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

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy Questionnaire

Appendix reference:



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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

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.

[Please refer to Portugal's reply to the Subsidy Questionnaire](#)

Appendix reference:



SECTION C: Subsidies

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).

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

Please refer to Portugal's reply to the Subsidy Questionnaire

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.

The European Commission did not receive a specific government questionnaire for the European Union. Therefore, we have adapted the Government questionnaire for Portugal to the specificities of EU funds.

The Projects on Table 1 are managed by Portugal. Please refer to Portugal's reply to the subsidy questionnaire. These projects could be financed by the following EU Funds:

- **European Regional Development Fund (ERDF)**
- **Recovery and Resilience Facility (RRF).**

The European Commission is answering the questions below with regards to these two funds.



1, Introduction: General explanation Regional Policy

The cohesion policy has its origins in the Treaty of the European Union. Article 3 of the treaty reads that the Union shall promote economic, social and territorial cohesion and solidarity among Member States.

The policy is part of the shared competences of the Union and therefore, the method for its budget implementation is shared management, where the Commission and the national authorities jointly manage the funding. The resources of the cohesion policy account for a quarter of the EU budget (one third in previous funding periods).

Cohesion policy is the EU's main investment tool. It aims to enhance economic, social and territorial cohesion in the Union, by:

- 1) Contributing to reducing economic disparities among EU regions, with financial support focusing in particular in less developed regions.
- 2) Empowering all EU regions to participate actively in the EU's internal market.
- 3) Ensuring all EU regions make a significant contribution to EU-wide priorities, such as the green and digital transitions.

For each multi-annual financial framework, the legislative bodies of the Union adopt a Common Provisions Regulations, containing the general rules for the policy, and fund-specific regulations, including fund-specific rules. These regulations do not provide for a targeted sectoral support. In principle all economic sectors may be supported, with the specific exclusions included in the regulations (e.g. decommissioning and construction of nuclear power stations, manufacturing and processing of tobacco, etc).

The common specific regulation includes the methodology of the allocation of the global resources per Member State. For the programming period 2021-2027, the resources of the cohesion policy include the Cohesion Fund, the European Regional Development Fund (ERDF), the European Social Fund, the Just Transition Fund, the European Maritime, Fisheries and Aquaculture Fund (EMFAF), the Asylum, Migration and Integration Fund (AMIF), the Internal Security Fund (ISF) and the Instrument for Financial Support for Border Management and Visa Policy (BMVI).

The split of the resources of the national envelope between the regions and the various programmes is decided by the Member States.

Cohesion policy programmes are implemented under shared management rules for budget implementation and are under the responsibility of the managing authorities appointed by each Member State.

The mechanism of shared management: the Commission negotiates with the Member States a Partnership Agreement, establishing the strategic priorities for implementation of the policy in the specific Member State for the funding period (2014-2020, 2021-2027) and approves the funding programmes that detail the



intervention logic and the typologies of actions of the policy (R&D, support to enterprises, transport, environment, etc.).

The programmes can cover a NUTS II region (<https://ec.europa.eu/eurostat/web/nuts>) (regional programme) or can have a broader coverage (national or thematic) covering more regions or the whole territory of the Member State. Also, the programmes can be financed by one fund or can be multi-fund. Under shared management the Member States are in charge of the actual organisation of the calls for projects, selection and approval of the projects and monitor the implementation of projects.

All projects need to comply with the applicable European and national legislation (State aid, public procurement, environmental requirements, etc). Each Member State needs to ensure the visibility of support in all activities relating to operations supported by the cohesion policy funds.

1. European Regional Development Fund (ERDF)

The European Regional Development Fund (ERDF) is one of the funds that supports cohesion policy in the Member States.

The ERDF was originally enacted in 1975, following the accession of Denmark, Ireland and the UK, to help procure funds for struggling economic regions during a time when many industrial and agricultural regions were increasingly in need of economic strategies to boost competitiveness.

ERDF supports a broad typology of investments (R&D, productive investment by enterprises, broadband investments, water and wastewater and other environmental interventions, health and education infrastructure, etc.).

All Member States' regions (NUTS II level) are eligible for support under ERDF. However, the ERDF resources are allocated depending on the development level of each region:

- 1) Less developed regions - whose GDP per capita is less than 75 % of the average GDP per capita of the EU – receive a co-financing rate of 85%
- 2) transition regions, whose GDP per capita is between 75 % and 100 % of the average GDP per capita of the EU – receive a co-financing rate between 60% to 70%
- 3) more developed regions, whose GDP per capita is above 100 % of the average GDP per capita of the EU - receive a co-financing rate of 50%.

Most of the projects in the area of support to enterprises financed by ERDF are subject to State aid schemes under the General Block Exemption Regulation. These schemes are sent by the Member States to the Commission (DG COMPETITION)



according to the transparency rules. Compliance with the approved State aid schemes undergoes various controls and audits. Also, in certain cases, the Commission (DG COMPETITION) can make targeted investigations regarding the compliance with State aid rules. The General Block Exemption Regulation does not target specific sectors, except for exclusions expressly included in the regulation – e.g. fisheries and aquaculture, primary agricultural production sector, processing and marketing of agricultural products, etc – that may receive support from other EU funds and are subject to other State aid rules.

Programming period 2014-2020	
Common Provision Regulation	Regulation (EU) No 1303/2013 of the European Parliament and of the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006
ERDF Regulation	Regulation (EU) No 1301/2013 of the European Parliament and of the Council of 17 December 2013 on the European Regional Development Fund and on specific provisions concerning the Investment for growth and jobs goal and repealing Regulation (EC) No 1080/2006
Programming period 2021-2027	
Common Provision Regulation	REGULATION (EU) 2021/1060 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2021 Publications Office
ERDF Regulation	REGULATION (EU) 2021/1058 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund Publications Office
Cohesion Policy on Europa	
Inforegio - Cohesion Policy	

As per the EU programmes covering Portuguese projects affected by this investigation:



A. Regional Operational Programme Lisbon 2014-2020

1. Policy objective and/or purpose of the programme

Affirm Lisbon as a cosmopolitan and competitive region within the European regional system, supported by creativity, knowledge, and innovation, and by strengthening national and international intermediation, contributing to Smart Growth in the European Union.

2. The nature or form of the subsidy

- Incentive “Research and Technological Development (SI & IDT) [Sistema de Incentivos “Investigação e Desenvolvimento Tecnológico (SI & IDT)”]
- Incentive “Productive Innovation” [Sistema de Incentivos “Inovação Produtiva”]
- Incentive “Internationalisation of SMEs - Joint Projects” [Sistema de Incentivos “Internacionalização das PME” - Projetos Conjuntos]

3. The nature of benefits or concessions granted

- Technology transfer and cooperation between universities and businesses, especially for the benefit of SMEs.
- General productive investment in small and medium-sized enterprises (SMEs).
- Advanced support services for SMEs and groups of SMEs (including management, marketing, and design services).

4. When the programme was established

- 18 December 2014

5. The duration of the programme

- Eligibility start date: 1 January 2014, Eligibility end date: 31 December 2023

6. The laws and regulations under which the subsidy is granted

- Specific Regulation for the Competitiveness and Internationalisation domain, Ordinance No. 57-A/2015 of 27 February [Regulamento específico do domínio da Competitividade e Internacionalização, Portaria n.º 57-A/2015 de 27 de fevereiro]

7. How the programme operates

- The Managing Authority of the Lisbon Regional Operational Programme 2014–2020 is a mission structure, created by Council of Ministers Resolution No. 73-B/2014 of 16 December, responsible for the management, monitoring, and implementation of the programme. It includes the Steering Committee, composed of a manager - who is, by virtue of the role, the President of CCDR-LVT - and two non-executive members, as well as the technical secretariat.

B. Operational Programme for Competitiveness and Internationalisation (COMPETE) 2014-2020

1. Policy objective and/or purpose of the programme



Enhance the economic competitiveness by effectively mobilising and maximising its resources and capabilities, with the goal of creating jobs and support the convergence with the EU's more developed economies.

2. The nature or form of the subsidy

- Incentive "Research and Technological Development (SI & IDT) [*Sistema de Incentivos "Investigação e Desenvolvimento Tecnológico (SI & IDT)"*]"
- Incentive "Internationalisation of SMEs - Joint Projects" [*Sistema de Incentivos "Internacionalização das PME" - Projetos Conjuntos*]

3. The nature of benefits or concessions granted

- Technology transfer and cooperation between universities and businesses, especially for the benefit of SMEs.
- Advanced support services for SMEs and groups of SMEs (including management, marketing, and design services).
- Business development

4. When the programme was established

- 16 December 2014

5. The duration of the programme

- Eligibility start date: 1 January 2014, Eligibility end date: 31 December 2023

6. The laws and regulations under which the subsidy is granted

- Specific Regulation for the Competitiveness and Internationalisation domain, Ordinance No. 57-A/2015 of 27 February [*Regulamento específico do domínio da Competitividade e Internacionalização, Portaria n.º 57-A/2015 de 27 de fevereiro*]

7. How the programme operates

The Managing Authority of the Competitiveness and Internationalisation Operational Programme 2014–2020 is created by the Resolution of the Council of Ministers no 73-B/2014, of 16 December, the COMPETE 2020 Management Authority is a structure in the Central Administration of the State. COMPETE 2020's mission is to manage, monitor and implement the programme, as well as ensuring the closure of the COMPETE programme. It includes a Steering Committee – composed by a president and two non-executive members - as well as the technical secretariat – including five Operational Units and eight Support Areas.

C. Regional Operational Programme Centro 2014-2020

1. Policy objective and/or purpose of the programme

The main goal is to achieve a more developed region, with greater well-being, a higher level of education, stronger scientific and technological qualifications, more and better employment, and greater equity and justice. The path to achieving this ambition lies in competitiveness and innovation, as well as social and territorial cohesion, as defined in the regional development strategy for the 2014–2020 period.



2. The nature or form of the subsidy
 - Incentive “Productive Innovation” [*Sistema de Incentivos “Inovação Produtiva”*]
 - Incentive “Internationalisation of SMEs - Joint Projects” [*Sistema de Incentivos “Internacionalização das PME” - Projetos Conjuntos*]
3. The nature of benefits or concessions granted
 - General productive investment in small and medium-sized enterprises (SMEs).
 - Advanced support services for SMEs and groups of SMEs (including management, marketing, and design services).
4. When the programme was established
 - 18 December 2014
5. The duration of the programme
 - Eligibility start date: 1 January 2014, Eligibility end date: 31 December 2023
6. The laws and regulations under which the subsidy is granted
 - Specific Regulation for the Competitiveness and Internationalisation domain, Ordinance No. 57-A/2015 of 27 February [Regulamento específico do domínio da Competitividade e Internacionalização, Portaria n.º 57-A/2015 de 27 de fevereiro]
7. How the programme operates

The Managing Authority of the Centro Regional Operational Programme 2014–2020 is created by the Resolution of the Council of Ministers no 14/2023 of 10 February, with the mission to ensure the management, monitoring and implementation of the program, in accordance with the objectives and results defined in the text of the program approved by the European Commission. It operates alongside the Centro’s Regional Coordination and Development Commission (CCDR-Centro) - thus, the president of the Programme’s Steering Committee is also the president of CCDR Centro. Besides the president, there are also two non-executive members, as well as the technical secretariat.

D. Regional Operational Programme Alentejo 2014-2020

1. Policy objective and/or purpose of the programme

The six pillars of the regional strategy aim to integrate the Smart, Sustainable, and Inclusive dimensions for the region’s future growth, and reflect the Vision for Alentejo 2020. An Alentejo with symbolic capital and a distinctive identity, in a territory endowed with material resources, knowledge and skills, and amenities, open to the world and capable of building a renewed economic base based on its environmental value, attracting residents, visitors, investment, and activities that generate employment and social cohesion.
2. The nature or form of the subsidy
 - Incentive “Productive Innovation” [*Sistema de Incentivos “Inovação Produtiva”*]



3. The nature of benefits or concessions granted
 - General productive investment in small and medium-sized enterprises (SMEs).
4. When the programme was established
 - 18 December 2014
5. The duration of the programme
 - Eligibility start date: 1 January 2014, Eligibility end date: 31 December 2023
6. The laws and regulations under which the subsidy is granted
 - Specific Regulation for the Competitiveness and Internationalisation domain, Ordinance No. 57-A/2015 of 27 February [Regulamento específico do domínio da Competitividade e Internacionalização, Portaria n.º 57-A/2015 de 27 de fevereiro]

7. How the programme operates

The Managing Authority of the Alentejo Regional Operational Programme 2014–2020 is a mission structure, created by the Resolution of the Council of Ministers No. 73-B/2014, dated 16 December, with the task of ensuring the management, monitoring and implementation of this program. It operates alongside the Alentejo's Regional Coordination and Development Commission (CCDRA) - thus, the president of the Programme's Steering Committee is also the president of CCDRA. Besides the president, there are also two non-executive members, as well as the technical secretariat.

E. Operational Programme for Competitiveness and Internationalisation (COMPETE) 2021-2027

1. Policy objective and/or purpose of the programme
Support investment in research and innovation, digitalisation, competitiveness and internationalisation of enterprises, namely in the fields of smart specialisation and industrial transition. The programme also aims to address the climate transition, supporting decarbonisation and energetic efficiency, as well as the improvement of labour skills and qualifications.
2. The nature or form of the subsidy
 - Incentive "Productive Innovation" [*Sistema de Incentivos à Competitividade Empresarial "Inovação Produtiva"*]
 - Incentive "Internationalisation of SMEs - Joint Projects" [*Sistema de Incentivos à Competitividade Empresarial "Internacionalização das PME" - Operações Conjuntas*]
3. The nature of benefits or concessions granted
 - Business development and SME internationalisation, particularly for the benefit of SMEs
4. When the programme was established
 - 14 December 2022
5. The duration of the programme



- Eligibility start date: 1 January 2021, Eligibility end date: 31 December 2030

6. The laws and regulations under which the subsidy is granted

- Specific Regulation of the Thematic Area Innovation and Digital Transition, Portaria n.º 103-A/2023 of 12 April [Regulamento Específico da Área Temática Inovação e Transição Digital, no âmbito dos Sistemas de Incentivos do Portugal 2030]

7. How the programme operates

The Managing Authority of the Innovation and Digital Transition Thematic Programme 2021–2027 is created by the Resolution of the Council of Ministers no 14/2023, 10 February, the COMPETE 2030 Management Authority is a structure in the Central Administration of the State. COMPETE 2030's mission is to manage, monitor and implement the programme, as well as ensuring the closure of the programme. It includes a Steering Committee – composed by a president and two non-executive members - as well as the technical secretariat.

2. Recovery and Resilience Facility (RRF)

The Recovery and Resilience Facility (RRF) is the cornerstone of the EU's response to the COVID-19 pandemic. Established as part of the NextGenerationEU initiative, the RRF provides financial support to Member States to implement reforms and investments that promote sustainable growth and recovery.

The RRF operates on a performance-based delivery model, which is a significant innovation in funding mechanisms: Member States receive disbursements only upon the successful implementation of pre-agreed reforms and investments, which are defined as milestones and targets.

The performance-based approach incentivises efficiency, as disbursements are tied to the delivery of concrete outputs.

Member States are required to prepare and submit their recovery and resilience plans (RRPs) to the Commission, outlining their proposed reforms and investments.

Member States must also demonstrate robust control systems to prevent fraud and ensure compliance with EU law, including State aid, throughout the implementation of their RRP.

Once approved, the RRP serve as the basis for disbursements, with funds released upon the successful achievement of milestones and targets.

As a temporary recovery instrument, the RRF is time-barred: all investments must be completed by 31 August 2026.

Investments under the RRF do not qualify as 'subsidies' under WTO law.



1) No 'specificity'

All Member States have access to RRF funds, based on their recovery plan: there is no regional specificity. The allocation key determines the distribution of financial support under the RRF to each Member State. It is designed to ensure a fair and equitable distribution based on specific criteria (population, inverse of GDP/capita, etc.).

The funding is not targeted at specific companies or sectors, but rather it supports broader economic recovery efforts across Member States. As explained, the funding is provided to the Member States based on realised progress checked against the commitments in their National Plans.

In the case of the PT measures identified, as explained below, such investments were implemented through open calls that did not target either one sector or area but rather were defined by scope: decarbonisation measures for enterprises. This means that all economic operators had access to the funding, based on the terms of reference in the calls.

2) No 'benefit'

Funding under the RRF cannot be interpreted as constituting a benefit under WTO law in the sense that the financial support does not confer blanket economic advantages to specific entities. Instead, they are payments against realised progress.

The funds are intended to enhance growth potential, resilience, and job creation across the economy, rather than providing selective benefits to individual firms or sectors

Overview of the RRF and its projects	Recovery and Resilience Facility - European Commission
RRF Scoreboard	Recovery and Resilience Scoreboard
Interactive map of RRF-supported projects	Interactive Map
Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility (RRF Regulation)	Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility The act has been changed. Current consolidated version here .



As per the programmes covering projects affected by this investigation:

Policy objective/purpose

- Mitigate the economic and social impact of the COVID-19 pandemic
- Support recovery through reforms and investments
- Accelerate structural transformation, especially through measures in six policy areas:
 - green transition (climate neutrality, sustainability)
 - digital transformation
 - smart, sustainable and inclusive growth and jobs
 - social and territorial cohesion
 - health and resilience
 - policies for next generation, including education and skills
- Enhance economic resilience and preparedness for future shocks
- Address European Semester recommendations (economic governance framework)
- Implement EU strategic priorities such as REPowerEU (energy independence)

Nature/form of subsidy

The RRF constitutes a public financial support programme funded at EU level, with the following features:

- Financing source:
 - European Commission borrows on capital markets (EU bonds)
- Forms of financial support:
 - Non-repayable grants
 - Loans to Member States
- Budget: EUR 338 billion grants and EUR 386 billion loans (current prices)

This is therefore a hybrid subsidy instrument combining direct transfers (grants) and preferential sovereign lending (loans)

Nature of benefits

The RRF provides financial and economic advantages to EU Member States, which then channel support domestically. Key benefits include:

- (a) Direct financial transfers
 - Grants that do not need to be repaid
- (b) Preferential loans
 - Loans on favourable terms backed by EU borrowing capacity
- (c) Indirect benefits to firms/sectors

Through national plans, funds support:

- infrastructure projects
- green energy investments
- digitalisation of businesses
- public sector reforms
- (d) Pre-financing
 - Up to 13% upfront payments to kick-start implementation
- (e) **Performance-based payments**



- Disbursements conditional on achieving milestones and targets, not actual costs

Establishment of the programme

Created as part of the NextGenerationEU recovery package following COVID-19. The Council adopted the Recovery and Resilience Facility on 11 February 2021.

Duration of the programme

- Key deadlines:
 - Implementation of measures: **by 31 August 2026**
 - Final payments: **by 31 December 2026**
- Operational period: **2021–2026**

Legal basis (laws and regulations)

- Primary legal act
Regulation (EU) 2021/241 establishing the Recovery and Resilience Facility (Directly applicable EU regulation).
“Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility”
The act has been changed. Current consolidated version [here](#).
- Related legal framework
 - EU Financial Regulation
 - Own Resources Decision (for EU borrowing)
 - European Semester framework

How the programme operates

The RRF follows a centralised, performance-based model:

Step 1: National plans

- Each Member State submits a Recovery and Resilience Plan (RRP):
 - Reforms and investment projects
 - aligned with EU priorities
 - minimum:
 - 37% climate spending
 - 20% digital spending

Step 2: Approval

- European Commission assesses plans against the criteria laid out in Regulation (EU) 2021/241 (eligibility criteria are laid out in Art. 17 and assessment criteria are laid out in Art. 19)
- Council adopts implementing decisions approving them

Step 3: Financing

- Commission raises funds via EU bond issuance

Step 4: Disbursement mechanism

- Payments made:
 - upon achievement of milestones and targets
 - up to twice per year upon request

Step 5: Monitoring and evaluation

- Continuous monitoring



- Mid-term evaluation (e.g., 2024 evaluation)

Administering EU authority & records

(a) Main administering authority

- European Commission
 - Primary responsibility (direct management)

Within the Commission:

- Directorate-General for Economic and Financial Affairs (DG ECFIN)
- Recovery and Resilience Task Force (SG-REFORM)

(b) Supporting / complementary bodies

- Council of the EU – approves national plans
- European Court of Auditors – audits implementation
- European Investment Bank (EIB) – may implement financial instruments

(c) Types of records maintained

The programme involves extensive administrative, financial, and performance documentation, including:

1. Programme-level records

- RRF Regulation and implementing acts
- EU budget allocations and borrowing records
- Annual reports and evaluations
- Recovery and Resilience Scoreboard data

2. Country-level records

- National Recovery and Resilience Plans (RRPs)
- Commission assessments of plans
- Council implementing decisions
- Payment requests and disbursement decisions

3. Performance and compliance records

- Milestones and targets tracking databases
- Monitoring indicators (green/digital spending)
- Audit and control reports
- Anti-fraud documentation

4. Financial records

- EU bond issuance documentation
- Payment authorisations
- Accounting records of grants and loans

5. Project-level (indirect)

- Maintained primarily by Member States:
 - beneficiary-level files
 - procurement documentation
 - project accounting records



Appendix reference:

3. Please provide details of future changes expected to the ~~programmes listed in Table 1~~ **EU Funds**:

1. European Regional Development Fund (ERDF)

Not applicable.

The programmes 2014-2020 are in the closure process, therefore no further changes are expected.

2. Recovery and Resilience Facility (RRF)

Not applicable.

Appendix reference:

C3 Programme eligibility

Please answer each of the following questions for ~~all programmes listed in Table 1~~ **EU Programmes** 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~~ **EU Programmes** 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.

1. European Regional Development Fund (ERDF)

The Portal “Balcão” serves as the access point to the Operational Programmes funded by the ESIF (European Structural and Investment Funds) and Programmes funded by Cohesion Funds for all entities wishing to apply for funding for their projects and is available on the [Portugal 2020 portal](#) and [Portugal 2030 portal](#). The calls for project applications are published there and the applicants can submit their proposals.

2. Recovery and Resilience Facility (RRF)

See reply to question C2. No application fees are charged.



Appendix reference:

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.

1. European Regional Development Fund (ERDF)

In accordance with the Regulation (EU) 1303/2013, and the Regulation 2021/1060 which lays down common provisions for shared management EU funds, assistance under the cohesion policy funds (including the ERDF) for the programming period 2014-2020 and 2021-2027 is provided according to an approach of complementarity and cooperation between the Commission and the Member States, with due regard for their respective powers. This means that projects co-financed by the cohesion policy funds are selected by and implemented under the responsibility of the Member States. The European Commission is not involved in this process.

2. Recovery and Resilience Facility (RRF)

See reply to question C2. Assessment criteria are laid out in Art. 19 of Regulation (EU) 2021/241.

Appendix reference:

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.

1. European Regional Development Fund (ERDF)

The eligibility for the programmes funded by the ERDF is not conditional on a company's export performance. In accordance with Article 5 of Specific Regulation for the Competitiveness and Internationalisation domain, Ordinance No. 57-A/2015 of 27 February, the eligibility criteria are the following:

- Maintain organized accounting in accordance with the applicable legislation.
- Not be an undertaking in difficulty, according to the definition provided in Article 2 of Regulation (EU) No. 651/2014 of 16 June;
- Declare that it is not an undertaking subject to a pending recovery order following a previous Commission decision declaring aid illegal and



- incompatible with the internal market, as provided in point (a) of paragraph 4 of Article 1 of Regulation (EU) No. 651/2014 of 16 June;
- d. Declare that it has no outstanding wage payments.

The eligibility for the programmes funded by the ERDF is not conditional on a company's export performance. In accordance with 6 of Specific Regulation of the Thematic Area Innovation and Digital Transition, Portaria n.º 103-A/2023 of 12 April, the eligibility criteria are the following:

- a. Not be an undertaking in difficulty, in accordance with the definition set out in point 18 of Article 2 of Commission Regulation (EU) No 651/2014 of 17 June, in its current version;
- b. Present a balanced economic and financial situation and demonstrate the capacity to finance the operation, under the terms defined in Annex III, which forms an integral part of this Regulation;
- c. Present, where applicable, an Electronic Certification proving SME status, under the terms provided for in Decree-Law No 372/2007 of 6 November, in its current version, at the time of approval;

Declare that it has no overdue salary payments.

2. Recovery and Resilience Facility (RRF)

See reply to question C2. The Commission is not directly involved in the tenders that MS launch to implement the investments. In addition, funds are disbursed directly to the Member States (not final beneficiaries) based on the progress in the implementation of national recovery and resilience plans. This progress is measured via the fulfilment of milestones and targets (Art 24 of Regulation (EU) 2021/241).

Appendix reference:

- 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.

1. European Regional Development Fund (ERDF)

The eligibility for the programmes funded by the ESIF (European Structural and Investment Funds) or the Cohesion Funds is not conditional on a company's use of domestic goods over imported goods (Please refer to the Point 3a above).

2. Recovery and Resilience Facility (RRF)

See reply to question C3.3.a.



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.

1. European Regional Development Fund (ERDF)

Projects across all economic activities are eligible. Whilst the specific rules to geographic application may apply in certain calls, as a general rule all NUTS II regions of the mainland Portugal are covered. The location of the investment corresponds to the NUTS II region where the establishment in which the investment will be carried out is located.

According to Article 2(7) of Regulation (EU) 1303/2013, '*programme area*' means a geographical area covered by a specific programme or, in the case of a programme covering more than one category of region, the geographical area corresponding to each separate category of region.

2. Recovery and Resilience Facility (RRF)

See reply to question C3.3.a.

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.

1. European Regional Development Fund (ERDF)

Regarding the type of operation, including support for the Internationalisation of SMEs – Joint Projects, it is promoted by one or more public or private non-profit entities of an associative nature, possessing specific expertise in SMEs, which implement a joint action plan targeting a group of SMEs.

There is no limitation regarding individual or groups of companies and/or industries. However, according to the Article 3(3) of Regulation (EU) 1301/2013 and the Article 7(1) of Regulation 2021/1058 certain activities are not eligible for the support of the European Regional Development Fund (e.g. nuclear decommissioning, manufacturing of tobacco products, etc.).



2. Recovery and Resilience Facility (RRF)

See reply to question C3.3.a.

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.).

Please refer to Portugal's reply to the Subsidy

Appendix reference:

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).

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy

Appendix reference:

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



Please refer to Portugal's reply to the Subsidy

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.

Please refer to Portugal's reply to the Subsidy

Appendix reference:

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

Please refer to Portugal's reply to the Subsidy

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: [European Commission](#)

SEE ATTACHED DOCUMENT

Date [27/03/2026](#)

Signature of authorised official

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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	X
Section B – Government involvement in the Creamy/White Limestone sector	X
Section C – Subsidies	X
Section D – Next steps and declaration	X

+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	NC Declaration
A2	CONF Declaration

+Add additional rows as required