



# Registration form for interested parties and contributors

Case No.: AS0079

Anti-subsidy investigation

Creamy/White Limestone exported from Portugal

Completed on behalf of (provide the name of your business or organisation):	<b>Portugal</b>
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## Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

When you have completed each form, indicate the **confidentiality** status of the document by placing an  in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential
- Non-confidential (will be made available on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	29 January 2026
Case team contact:	AS0079@traderemedies.gov.uk



## Introduction

### Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation.

### Scope of the investigation

Goods concerned	Creamy/White limestone from 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.	
Period of investigation (POI)	1 January 2025 to 31 December 2025	
Alleged subsidies	14 subsidy programmes made up of 11 grants and 3 non-refundable financing programs.	
	<b>Subsidy name</b>	<b>Subsidy type</b>
	INOVSTONE 4.0 - Advanced Technology and Software for Natural Stone	Grant
	INOVMINERAL 4.0 - Advanced Technology and Software for Natural Stone	Grant
	LSI StoneWorld	Grant
	LSI Stone Digital Factory	Grant
	Sustainable Stone by Portugal Agenda	Grant



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	Business Innovation Project - POCI-02-0853-FEDER-047397	Grant
	Business Innovation Project - CENTRO-02-0853-FEDER-018610	Grant
	SME INTERNATIONALIZATION PROGRAM	Grant
	Hiring of Highly Qualified Human Resources (SME or CoLab)	Grant
	SDF 365 – Stone Digital Fabrication	Grant
	INTERSTONE	Grant
	<b>PRR Project</b> Incorporation of Renewable Energy and Energy Efficiency Measures	Non-refundable financing
	<b>PRR Project</b> Intelligent Automation in Natural Stone Extraction	Non-refundable financing
	<b>PRR Project</b> PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization	Non-refundable funding

For further details, please refer to the *Notice of Initiation* on the public file:  
<https://www.trade-remedies.service.gov.uk/public/cases/>.

## Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 29 January 2026 using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and



signatures. Please see the [TRA's public guidance](#)<sup>1</sup> for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation.

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<sup>1</sup> <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.

[A1.1] During the POI, we produced the goods concerned in Portugal.  
**Note: Please complete sections A2 and B.**

[A1.2] During the POI, we directly exported the goods concerned from Portugal to the UK.  
**Note: Please complete sections A3 and B.**

[A1.3] During the POI, we indirectly exported the goods concerned from Portugal to the UK via a third party (located either in Portugal or a third country not subject to the investigation).  
**Note: Please complete sections A3 and B.**

[A1.4] During the POI, we imported the goods concerned originating in Portugal to the UK.  
**Note: Please complete sections A4 and B.**

[A1.5] During the POI, we produced goods that are like the goods concerned in the UK.  
**Note: Please complete sections A5 and B.**

[A1.6] Other.  
**Note: Please complete section B.**

If you are not a Foreign Government body, please **do not complete** section B5.

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

Portugal 's Government



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3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.

## A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in Portugal subject to the investigation.**

4. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description.

5. Please provide your business' total production volumes and production capacity for the goods concerned during the period of investigation (POI) in the table below.

Total production volume (POI) (m3 or kg – please specify which used)	
Total production capacity (POI) (m3 or kg – please specify which used)	

Consider providing these figures in ranges in your non-confidential version of this form.

6. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

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7. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume (POI) (m3 or kg – please specify which used)	
Total domestic sales value (POI) [€]	

Consider providing these figures in ranges in your non-confidential version of this form.

8. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

9. Is your company or any of your associated parties related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods concerned in the UK?

10. Do you produce and/or sell other goods for the UK market other than the goods concerned?

### A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from Portugal**.

11. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)
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Add additional rows as required

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12. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in Portugal or a third country, are to be considered indirect exports.

Total direct export volume (POI) (m3 or kg – please specify which used)	
Total indirect export volume (POI) (m3 or kg – please specify which used)	
Total direct export value (POI) (€)	
Total indirect export value (POI) (€)	

Consider providing these figures in ranges in your non-confidential version of this form.

13. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

14. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below.

15. If your company is part of a larger group of associated companies and subsidiaries, please describe how your company relates to the structure of the group of companies. Please outline if it utilises intra-group loans, cash-pooling, or other mechanisms for the consolidation of resources.



16. Is any of the research and development conducted in relation to the goods your company manufactures performed by other companies within the same corporate group? If so, please provide details.

### A4. UK imports of the goods concerned

**Complete this section if you indicated under A1 that you are an importer of the goods concerned from Portugal.**

17. Please provide the total of your import volumes and import values of the goods concerned originating in/exported from Portugal subject to the investigation to the UK during the POI in the table below.

Total import volume (POI) (m3 or kg – please specify which used)	
Total import value (POI) [€ or £ – please specify which used]	

Consider providing these figures in ranges in your non-confidential version of this form.

18. Please provide details for your suppliers of the goods concerned originating in/exported from Portugal in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

19. Please specify your purpose in importing the goods concerned from Portugal. Select all of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.



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- We use the goods as input in our production of \_\_\_\_\_.  
(specify the product/s).
- We reexport the good to third countries, namely \_\_\_\_\_
- Other.

20. "If you selected "other", please specify your purpose for importing the goods concerned from the country subject to the investigation in the field below.

21. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

## **A5. Production and sales of goods produced in the UK that are like the goods concerned**

**Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods concerned.**

22. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

23. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during the POI in the table below.



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Total production volume (POI) (m3 or kg – please specify which used)	
Total production capacity (POI) (m3 or kg – please specify which used)	

Consider providing these figures in ranges in your non-confidential version of this form.

24. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the POI in the table below.

Total domestic sales volume (POI) (m3 or kg – please specify which used)	
Total domestic sales value (POI) [£]	
Total export sales volume (POI) (m3 or kg – please specify which used)	
Total export sales value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

25. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

26. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods concerned in the UK?



## Section B: Additional information

### B1. Other interested parties

27. We need contact information in order to notify potentially interested parties. Please provide contact details of any other known exporters, importers of the goods concerned and UK producers of the goods that are like the goods concerned in the UK in the table below

Name	Website	email

Add additional rows as required

28. Please provide a list of as many of the following domestic companies as possible:

- Those that produce goods that are like the goods concerned in the UK;
- Those that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries;
- Those that are producer or sell raw materials used in the production goods that are like the goods concerned in the UK
- Those that purchase the product, including those that sell use product in their products or services; and those that sell product directly to consumers
- Please specify which category they belong to.

**The list below includes companies and business associations of the stone sector (not necessarily limestone or exporters to the UK) which benefited from the programs and projects identified in the application.**

INOVOPEDRA - INDUSTRIA INOVADORA DE ROCHAS ORNAMENTAIS LDA

LSI STONE, Lda

FARPEDRA – Exploração de Pedreiras, Lda

DIMPOMAR – ROCHAS PORTUGUESAS, Lda.

SOLANCIS - SOCIEDADE EXPLORADORA DE PEDREIRAS S.A.

A. BENTO VERMELHO, LDA

AIRELIMESTONES, LDA

BRITAFIEL - AGREGADOS E ORNAMENTAIS, S.A.

FILSTONE, COMÉRCIO DE ROCHAS, S.A.

GRANUMLUX, LDA

GRUPO FRAZÃO, S.A.

JULIPEDRA-INDUSTRIA DE TRANSFORMAÇÃO DE MARMORES, LDA.



LOPESTONE - EXTRAÇÃO DE GRANITOS, LDA  
MARFILPE - MÁRMORES E GRANITOS S.A.  
MARMOCAZI-INDUSTRIA DE MARMORES LDA  
MARMORES GALRÃO-EDUARDO GALRÃO JORGE & FILHOS S.A.  
MOCAMAR-MÁRMORES DE ALCANEDE, LIMITADA  
MRF - NATURAL STONE, LDA  
PEDRAMOCA - SOCIEDADE EXTRACTIVA DE PEDRA, S.A.  
POLIMAGRA-GRANITOS, S.A.  
RAFAEIS MÁRMORES S.A.  
ROCKING LDA  
A.FERREIRA & PEREIRA, LDA  
A.PIRES LOURENÇO & FILHOS S.A.  
AQUINOS, S.A.  
PEREIRA & LADEIRA LDA  
TORRE - ITM, INDÚSTRIA TRANSFORMADORA DE MÁRMORES LDA  
Joaquim Duarte Urmal & Filhos Lda  
GRANIALPA – Extracção e Comércio de Granitos Lda  
GRANOGULI – Lda  
GRANATUR – Sociedade Europeia de Transformação de Rochas Ornamentais, Unipessoal, Lda  
MVC – Mármores de Alcobaça Lda  
Mármores Vigário Lda  
ACPMR – Associação Cluster Portugal Mineral Resources -  
ASSIMAGRA - Associação Portuguesa Industriais Mármores, Granitos e Ramos Afins

## B2. Scope

29. If you consider that the goods description in scope of the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.

## B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.



PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country subject to an investigation.

We have created the following draft PCN table:

Category	Code	Description
<b>Type of stone</b>	S01	Limestone
	S02	Travertine
	S03	Other calcareous stone
	S04	Non-calcareous stone
<b>Colour of stone</b>	C01	Creamy/White
	C02	Other colour
<b>Form of stone at sale</b>	F01	Block
	F02	Slab/Scant
	F03	Finished Stone
	F04	Loadbearing
	F05	Other
<b>Volume of stone in m3</b>	V01	0.000 m3 to ≤ 0.699 m3
	V02	> 0.699 m3 to ≤ 0.999 m3
	V03	> 0.999 m3
<b>Thickness</b>	T01	20mm
	T02	30mm
	T03	40mm
	T04	50mm
	T05	75mm
	T06	100mm
	T07	150mm
	T08	Other
<b>Length</b>	L01	600mm
	L02	700mm
	L03	800mm
	L04	900mm
	L05	1000mm
	L06	1100mm
	L07	1200mm
	L08	1300mm
	L09	1400mm



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	L10	1500mm
	W01	400mm
<b>Width</b>	W02	500mm
	W03	600mm
	W04	700mm
	W05	800mm
	W06	900mm
	W07	1000mm
	W08	1100mm
	W09	1200mm
	W10	1300mm
	W11	Other
	C01	0 Hours
<b>Time on CNC Saw</b>	C02	1 Hour
	C03	2 Hours
	C04	3 Hours
	C05	4 Hours
	C06	5 Hours
	C07	6 Hours
	C08	7 Hours
	C09	8 Hours
	C10	9 Hours
	C11	10 Hours
	C12	11 Hours
	C13	12 Hours
	C14	13 Hours
	C15	14 Hours
	C16	Other
	M01	0 Hours
<b>Time with Masons</b>	M02	1 Hour
	M03	2 Hours
	M04	3 Hours
	M05	4 Hours
	M06	5 Hours
	M07	6 Hours
	M08	7 Hours
	M09	8 Hours



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	M10	9 Hours
	M11	10 Hours
	M12	11 Hours
	M13	12 Hours
	M14	13 Hours
	M15	14 Hours
	M16	Other
	S01	Honed
<b>Surface Finish</b>	S02	Fine Rubbed
	S03	Brushed
	S04	Other

30. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your business.

31. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the goods that are like the goods concerned in the UK

32. If you are an overseas exporter or importer of the goods concerned or a UK producer of the goods that are like the goods concerned in the UK, comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on

- the categorisation of product features;
- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs; and
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or are like the goods concerned in the UK which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”.



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- Do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

33. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or are like the goods concerned in the UK.

### B4. Economic Interest Test

34. If, following an investigation or review, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the [goods concerned) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)

[Add additional rows as required]

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

### B5. Questions for the Foreign Government of the exporting country (Portugal)

Please complete this section if you are a Foreign Government body of the exporting country.



The below table sets out the allegations of subsidies provided to exporters of the goods concerned.

Subsidy name	Subsidy type
INOVSTONE 4.0 - Advanced Technology and Software for Natural Stone	Grant
INOVMINERAL 4.0 - Advanced Technology and Software for Natural Stone	Grant
LSI StoneWorld	Grant
LSI Stone Digital Factory	Grant
Sustainable Stone by Portugal Agenda	Grant
Business Innovation Project - POCI-02-0853-FEDER-047397	Grant
Business Innovation Project - CENTRO-02-0853-FEDER-018610	Grant
SME INTERNATIONALIZATION PROGRAM	Grant
Hiring of Highly Qualified Human Resources (SME or CoLab)	Grant
SDF 365 – Stone Digital Fabrication	Grant
INTERSTONE	Grant
<b>PRR Project</b> Incorporation of Renewable Energy and Energy Efficiency Measures	Non-refundable financing
<b>PRR Project</b> Intelligent Automation in Natural Stone Extraction	Non-refundable financing
<b>PRR Project</b> PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization	Non-refundable funding

35. Please identify the level of government which these programmes are granted/managed at (e.g. national, provincial/municipal, prefectural, county). Please name the relevant authorities.

#### Portugal 2020 and Portugal 2030

**Portugal 2020** was a 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.

[Ordinance nr. 57-A/2015](#) 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.



**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.

[Ordinance Nr. 103-A/2023](#) 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.

**These set of rules are applied to the entire national territory and to all economic activities. They have a broad scope and a non-specific design:**

- They are open to companies across all sectors.
- They are open to 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.

**Both are aligned with EU Policy:**

- They implement EU Structural and Investment Funds, 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.
- The programs comply with the **GBER (General Block Exemption Regulation)** 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.

**Both 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 [[Ordinance nr. 57-A/2015](#) (Portugal 2020), [Ordinance 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”<sup>2</sup> (<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.

**Subsidies in lines 1, 2, 3, 4, 6, 7, 10 and 11** of the Table relate to projects under Portugal 2020 and/or Portugal 2030 from the stone sector – not specifically the limestone, but all kind of stones.

They all are financed by the European Regional Development Fund (ERDF) and the European Social Fund (ESF). The only exception is example 4 (LSI Stone Digital Factory), which is financed with national funds. Nevertheless, all are subject to the same specific rules, established in Ordinance Nr. 103-A/2023.

**Subsidies in line 8** - SME Internationalization, refers not to a project but to a program under Portugal 2020.

**Subsidies in 9** - Hiring of Highly Qualified Human Resources (SME or CoLab), refers not to a project but to a type of project under PORTUGAL 2020, However, this type of projects aims at supporting Technological Centres and Colabs, not companies. No project for the stone sector was supported.

### **Portugal’s Recovery and Resilience Plan (PRR)**

**PRR** is a national program to promote sustainable economic growth and recovery after the pandemic.

It is funded by the EU's NextGeneration EU instrument and managed by Mission Structure Recover Portugal.

The PRR provides for the implementation of a set of reforms and investments aimed at restoring the country’s sustained economic growth, organized into **20 Components** grouped around three structural dimensions: Resilience, Climate Transition, and Digital Transition.

#### **PRR has a Broad and National Coverage and Transparent Criteria**

- The scope of each PRR component is established in its specific Ordinance.
- The territorial scope is the entire national territory.

<sup>2</sup> “More Transparency Portugal”



- 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 Ordinance.
- None of these criteria are based on export performance or the use of domestic products over imported ones.

#### **PRR is aligned with EU Policy**

- PRR 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.
- PRR is not discretionary or selective beyond the published criteria of eligibility. It is not tailored to a specific sector or firm.

#### **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 Ordinance.
- 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/>).

**Subsidies in line 13** “PRR Project - Intelligent Automation in Natural Stone Extraction” refers to the project “**Sustainable Stone by PORTUGAL**” (identified also as subsidies referred to in line 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](#) [[Ordinance 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.

**Subsidies referred to in line 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.**

**Subsidies referred to in line 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 Innovation](#). It was presented by a consortium of Companies and other entities from the Production Technologies sector. It did **not include companies from the stone sector.**

36. Please provide any further information on the programmes in the table that you consider relevant.



Confidential

Non-confidential

## B6. Other comments

37. Please use the field below to provide additional information that you consider relevant to this investigation.

If you have any information about any alleged subsidies in the country subject to the investigation that are affecting the production or sales of the goods concerned, please provide details in the box below.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).