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From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

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To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject: Proposal for a COUNCIL IMPLEMENTING DECISION amending the Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Portugal

Delegations will find attached document COM(2025) 718 final.

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Brussels, 20.11.2025
COM(2025) 718 final

2025/0372 (NLE)

Proposal for a

COUNCIL IMPLEMENTING DECISION

**amending the Implementing Decision of 13 July 2021 on the approval of the assessment
of the recovery and resilience plan for Portugal**

{SWD(2025) 375 final}

2025/0372 (NLE)

Proposal for a

COUNCIL IMPLEMENTING DECISION

amending the Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Portugal

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility¹, and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

Whereas:

- (1) Following the submission of the national recovery and resilience plan ('RRP') by Portugal on 22 April 2021, the Commission proposed its positive assessment to the Council. On 13 July 2021, the Council approved the positive assessment by means of an implementing decision ('the Council Implementing Decision of 13 July 2021')². The Council Implementing Decision of 13 July 2021 was amended by Council Implementing Decisions of 17 October 2023³, 8 October 2024⁴, 13 May 2025⁵ and 29 September 2025⁶.
- (2) On 31 October 2025, Portugal made a reasoned request to the Commission to make a proposal to amend the Council Implementing Decision of 13 July 2021 in accordance with Article 21(1) of Regulation (EU) 2021/241 on the grounds that the RRP is partially no longer achievable because of objective circumstances. On that basis, Portugal has submitted an amended RRP.

Amendments based on Article 21 of Regulation (EU) 2021/241

- (3) The amendments to the RRP submitted by Portugal because of objective circumstances concern 136 measures.
- (4) Portugal has explained that five measures are no longer achievable, because of supply chain constraints and unexpected technical difficulties. This concerns measure C01-i12 (Construction of the East Lisbon Hospital), measure C14-i01 (Hydrogen and

¹ OJ L 57, 18.2.2021, p. 17, ELI: <https://eur-lex.europa.eu/eli/reg/2021/241/oj>

² ST 10149/21 INIT; ST 10149/21 ADD 1 REV 1.

³ ST 13351/23 INIT; ST 13351/23 ADD 1 REV 1.

⁴ ST 13497/24 INIT; ST 13497/24 ADD 1.

⁵ ST 8055/25 INIT; ST 8055/25 ADD 1.

⁶ ST 12491/25 INIT; ST 12491/25 ADD 1.

renewable gases), measure C15-i07 (Expansion of the Lisbon Metro Network — Red Line to Alcântara, construction phase), measure C21-i06 (Scaled-up measure: Hydrogen and renewable gases) and measure C21-i08 (Network flexibility and storage). On this basis, Portugal has requested that those measures be removed. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (5) Portugal has explained that ten measures are partially no longer achievable, because of unexpected technical difficulties. This concerns measure C01-i01 (Primary health care services with more answers), measure C03-i07-RAA (Upgrading and expanding the network of residential care homes for the elderly (ERPIS)), measure C06-i06 (Capacities in Science), measure C07-i06 (Business Reception Areas – Completion), measure C08-i02 (Rural property registry and Land Cover Monitoring System), measure C09-i01 (Algarve Water Efficiency Regional Plan), measure C15-i08 (Construction of the Porto Metro Network extension — Casa da Música-Santo Ovídio, construction phase), measure C17-i01 (Public Financial Management Information Systems), measure C19-i03 (Strengthening the overall cybersecurity framework) and measure C19-i05-RAM (Digital transition of Madeira’s public administration). On this basis, Portugal has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (6) Portugal has explained that six measures are partially no longer achievable, because of supply chain constraints. This concerns measure C02-i02 (National Emergency and Temporary Accommodation Grant), measure C03-i01 (New generation of equipment and social responses), measure C08-i04 (Means to prevent and combat rural fires), measure C10-i01 (Blue Hub, Network of Infrastructure for the Blue Economy), measure C20-i01 (Digital transition in education) and measure C21-i04-RAM (Energy efficiency in public buildings in Madeira). As those circumstances justify an amendment of the measures, the Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (7) Portugal has explained that ten measures are partially no longer achievable, because of a lack of demand. This concerns measure C01-i02 (National Network of Integrated Continued Care and National Network of Palliative Care), measure C01-i05-RAM (Strengthening Madeira’s Regional Health Service), measure C03-i02 (Accessibility 360°), measure C04-i01 (Cultural Networks and Digital Transition), measure C05-i04-RAA (Recapitalisation of the Business System of the Azores), measure C13-i01 (Energy efficiency in residential buildings), measure C13-i02 (Energy efficiency in central government buildings), measure C16-i02 (Digital Transition of Enterprises), measure C16-i03 (Catalyst for the Digital Transition of Enterprises), and measure C21-i03 (Scaled-up measure: Energy efficiency in buildings used by the services sector). As those circumstances justify an amendment of the measures, the Council Implementing Decision of 13 July 2021 should be amended accordingly.
- (8) Portugal has explained that two measures have been amended to implement a better alternative in order to achieve its original ambition. This concerns measure C01-i11-RAA Modernisation and requalification of the Regional Health Service and measure C03-i04-RAA (Implementing the Regional Strategy for Combating Poverty and Social Exclusion — Social Support Networks). On this basis, Portugal has requested to amend the aforementioned measures. As those circumstances justify an amendment of the measure, the Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (9) Portugal has explained that 100 measures have been amended to implement a better alternative that allow the administrative burden to be reduced and simplify the Council Implementing Decision of 13 July 2021, while still achieving the objectives of those measures. This concerns measures C01-i03 (Completion of the mental health reform and implementation of the dementia strategy), C01-i04 (Modernization and renovation of hospital areas and equipment for hospitals), C01-i06 (Digital Health Transition), C01-i07-RAM (Digitalisation of Madeira’s Regional Health Service), C01-i08-RAA (Digital Hospital in the Azores), C01-i09 (Universal Active Life Support System), C01-i10 (NHS Technology Modernisation Programme), C02-i01 (Support Programme for Access to Housing), C02-i03-RAM (Strengthening of the supply of social housing in the Autonomous Region of Madeira), C02-i04-RAA (Increasing housing conditions in the housing stock of the Autonomous Region of the Azores), C02-i05 (Affordable public housing stock), C02-i06 (Student accommodations at affordable prices), C02-i07-RAA (Infrastructure of parcels of land for residential housing), C02-i09 (Support Programme for Access to Housing), measure C02-i08-RAA (Reinforcement of the social housing stock), C03-i03-RAM (Strengthening social responses in the Autonomous Region of Madeira (ARM)), C03-i05 (Platform + Access), C03-i06 (Integrated operations in disadvantaged communities in the Metropolitan Areas of Lisbon and Porto), C03-r38 (Simplification and Effectiveness of the Social Security System), C04-i02 (Cultural Heritage), C05-i01.01 (Mobilising and Green Agendas/Alliances for Business Innovation), C05-i02 (Interface mission — renewal of the scientific and technological support network and guidance for productive fabric), C05-i03 (Research and innovation agenda for sustainable agriculture, food and agro-industry [Innovation Agenda for Agriculture 2030]), C05-i05-RAA (Economic Recovery of Azorean Agriculture), C05-i06 (Capitalisation of companies and financial resilience/Banco Português de Fomento), C05-i07-RAM (Capitalisation instruments for companies in Madeira), C05-i08 (More Digital Science), C05-i11 (Scale-up: Mobilising Agendas/Alliances for Business Innovation (Loans)), C05-i13 (Scientific research units), C05-i14 (Business innovation), C05-i15-RAA (Equity fund for the recapitalisation of the Business System of the Azores), C05-i16 (InvestEU Member State Compartment), C06-i01 (Modernisation of supply and vocational education and training institutions), C06-i03 (Adult incentive), C06-i04 (Youth impulse – STEAM), C06-i05-RAA (Adult Qualification and Lifelong Learning (ARA)), C06-i07 (More digital impulse), C06-i09 (New or renovated schools), C06-r14 (Reform of vocational education and training), C07-i00 (Extension of the electric vehicle charging network), C07-i02 (Missing links and Increasing the capacity of the Network), C07-i03 (Cross-border links), C07-i04 (Business Reception Areas — Road accessibility), C07-i05-RAA (Logistic Circuits — Regional Network of the Azores), C08-i01 (Landscape Transformation in Vulnerable Forest Areas - Investment), C08-i03 (Fuel management breaks — primary network), C08-i05 (More Forest Programme), C09-i03-RAM (Plan for water efficiency and strengthening of supply and irrigation systems of Madeira), C09-i05 (Alqueva Photovoltaic Park), C10-i02 (Green and Digital Transition and Safety in Fisheries), C10-i03 (Atlantic Defence Operations Centre and naval platform), C10-i04-RAA (Development of the ‘Cluster do Mar dos Açores’), C10-i05-RAA (Energy transition, digitalisation and reduction of environmental impact in the fisheries and aquaculture sector), C10-i06-RAM (Oceanic technologies), C10-i07 (Green Shipping), C11-i01 (Decarbonisation of industry), C12-i01 (Bioeconomy), C12-i02 (Recycling and recovery of waste), C12-r39 (Promoting circular economy and more efficient waste management), C13-i03 (Energy efficiency in buildings used by the services sector), C14-i02-RAM (Renewable electricity potentiation in the Madeira Archipelago), C14-i03-RAA (Energy transition in the Azores), C15-i04 (Bus

Rapid Transit Boavista – Império), C15-i06 (Digitisation of Rail Transport), C16-i04 (Industry 4.0), C16-i05-RAA (Digital Capacity and Transformation of Enterprises in the Azores), C16-i06-RAM (Enterprise 4.0), C17-i02 (Modernisation of the information systems of the Tax and Customs Authority for rural property taxation), C17-i03 (Digital transition of Social Security services), C17-r32 (Modernisation and Simplification of Public Financial Management), C17-r40 (Simplification of the Tax System), C18-i01 (Economic justice and business environment - Investment), C18-r33 (Economic justice and business environment - Reform), C19-i01 (Redesign of public and consular services), C19-i02 (Sustainable electronic services), C19-i04 (Efficient, secure and shared critical digital infrastructure), C19-i06-RAA (Digital transition of the public administration in Azores), C19-i07 (Public administration empowered to create public value), C19-i08 (Intelligent Territories), C19-r42 (New evaluation system to empower and rejuvenate the public administration workforce), C20-i02-RAA (Digital education (Azores)), C20-i03-RAM (Accelerating the digitalisation of ARM education), C20-r37 (Digital Education Reform), C21-i01 (Scaled-up measure: Decarbonisation of Industry), C21-i02 (Scaled-up measure: Energy efficiency in residential buildings), C21-i05 (Support to the Development of Green Industry), C21-i07 (Technical studies for offshore energy potential), C21-i09 (One-stop-shop for the licensing and monitoring of renewable energy projects), C21-i10-RAA (System of incentives for the purchase and installation of renewable energy storage systems in the Azores), C21-i11-RAM (System of incentives for the production and storage of energy from renewable sources in Madeira and Porto Santo), C21-i12 (Scaled-up measure: Decarbonisation of Public Transport), C21-i13-RAM (Decarbonisation of transport), C21-i14 (Bus Rapid Transit Braga), C21-i16 (Nazaré Funicular), C21-r43 (National Energy Poverty Observatory), C21-r44 (Development of energy efficiency one-stop-shops for citizens (Citizens Energy Spaces)), C21-r45 (Green Skills) and C21-r48 (Simplification of the legal and regulatory framework applicable to renewable energy projects). On this basis, Portugal has requested that those measures be amended. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

- (10) Following the removal and decrease in the level of implementation of measures in accordance with Article 21 of Regulation (EU) 2021/241, Portugal has requested to use the resources freed up by the removal of measures and the decrease in the level of their implementation to add three new measures. This concerns measure C14-i04 (Grant Scheme for Hydrogen and renewable gases), measure C21-i17 (Scheme to support renewable hydrogen and renewable gases) and measure C21-i18 (Scheme to support network flexibility and storage). Furthermore, Portugal has requested to increase the level of implementation of 12 measures. This concerns measure C01-i01 (Primary health care services with more answers), measure C01-i02 (National Network of Integrated Continued Care and National Network of Palliative Care), measure C01-i04 (Modernization and renovation of hospital areas and equipment for hospitals), measure C02-i01 (Support Programme for Access to Housing), measure C02-i04-RAA (Increasing housing conditions in the housing stock of the Autonomous Region of the Azores), measure C02-i05 (Affordable public housing stock), measure C05-i02 (Interface mission — renewal of the scientific and technological support network and guidance for productive fabric), measure C05-i13 (Scientific research units), measure C05-i15-RAA (Equity fund for the recapitalisation of the Business System of the Azores), measure C05-i14 (Business innovation), measure C06-i09 (New or renovated schools), measure C08-i05 (More Forest Programme) and measure C16-i05-RAA (Digital Capacity and Transformation of Enterprises in the Azores). On this basis, Portugal has requested that the level of implementation of 12 measures be

increased and that three new measures be added. The Council Implementing Decision of 13 July 2021 should be amended accordingly.

Distribution of milestones and targets

- (11) The distribution of milestones and targets in instalments should be amended to take into account the amendments to the RRP and the indicative timeline presented by Portugal.

Commission's assessment

- (12) The Commission has assessed the amended RRP against the assessment criteria laid down in Article 19(3) of Regulation (EU) 2021/241.

Do no significant harm

- (13) In accordance with Article 19(3), point (d), of and Annex V, criterion 2.4, to Regulation (EU) 2021/241, the amended RRP is expected to ensure that no measure (rating A) for the implementation of reforms and investments projects included in the RRP does significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council⁷ (the principle of 'do no significant harm').
- (14) Portugal submitted an assessment of the principle of 'do no significant harm' for each of the new investments. Other modifications of the measures included in the original RRP do not have an impact on the assessment of the principle of 'do no significant harm'. The information provided allows to conclude that the modified plan is expected to ensure that no measure does significant harm within the meaning of Article 17 of Regulation (EU) 2020/852.

Contribution to the green transition including biodiversity

- (15) In accordance with Article 19(3), point (e), of and Annex V, criterion 2.5, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (rating A) to the green transition, including biodiversity, or to addressing the challenges resulting therefrom. The measures supporting climate objectives account for an amount which represents 37,33% of the amended RRP's total allocation and 94,69% of the total estimated costs of measures in the REPowerEU chapter calculated in accordance with the methodology set out in Annex VI to Regulation (EU) 2021/241. In accordance with Article 17 of Regulation (EU) 2021/241, the amended RRP is consistent with the information included in the National Energy and Climate Plan 2021-2030.
- (16) Overall, due to the differing climate tagging content of the increased measure and the decreased measures, the amendments to Portugal's RRP entail a net decrease in the overall contribution to the climate target of the RRP by 1,76 percentage points to 37,33% from 39,09%. Despite the reduction, the overall ambition of the plan regarding the green transition remains high. The measures of the plan are still expected to reduce the greenhouse gas emissions and facilitate the uptake of renewable energy and thus contribute to the attainment of the 2030 climate targets and the objective of the Union climate neutrality by 2050.

⁷ Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (OJ L 198, 22.6.2020, p. 13, ELI: <https://eur-lex.europa.eu/eli/reg/2020/852/oj/eng>).

Contribution to the digital transition

- (17) In accordance with Article 19(3), point (f), of and Annex V, criterion 2.6, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (rating A) to the digital transition or to addressing the challenges resulting from it. The measures supporting digital objectives account for an amount which represents 22,80% of the amended RRP's total allocation calculated in accordance with the methodology set out in Annex VII to that Regulation.
- (18) Overall, due to the differing digital tagging content of the increased measure and the decreased measures, the amendments to Portugal's RRP entail a net increase in the overall contribution to the digital target of the RRP by 1,14 percentage points to 22,80% from 21,67%. The modified RRP continues to significantly contribute to the digital transition, including by increasing digitalisation of the public administration and enterprises, increasing the number of digital services for citizens and business as well as investments in e-health and digitalisation of transport sector.

Costing

- (19) In accordance with Article 19(3), point (i), of and Annex V, criterion 2.9, to Regulation (EU) 2021/241, the justification provided in the amended RRP on the amount of the estimated total cost of the RRP is to a medium extent (rating B) reasonable and plausible, is in line with the principle of cost efficiency and is commensurate to the expected national economic and social impact.
- (20) Portugal has provided individual cost estimates for the modified and new investments included in the modified RRP, relying on proportional reduction or increase, and on several sources to justify them. The cost information provided is mostly sufficiently detailed and substantiated. Portugal provided estimates and assumptions on costs, including descriptions and explanations of the main drivers and changes in the costs of the modified measures and their proportionality. The assessment of the cost estimates and supporting documents shows that the majority of the costs of the new and modified measures are well justified, reasonable and plausible. Portugal has also provided sufficient information and evidence that the amount of the estimated total costs is not covered by existing or planned Union financing. Finally, the estimated total cost of the RRP is in line with the principle of cost-efficiency and commensurate to the expected national economic and social impact.

Any other assessment criteria

- (21) The Commission considers that the amendments put forward by Portugal do not affect the positive assessment of the RRP set out in the Council Implementing Decision ST 12491/25 of 13 July 2021 on the approval of the assessment of the RRP for Portugal regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (da), (db), (g), (h), (j) and (k).

Measures supporting investment operations contributing to the objectives of the Strategic Technologies for Europe Platform (STEP)

- (22) In accordance with Article 4(4) of Regulation (EU) 2024/795 of the European Parliament and of the Council of 29 February 2024 establishing the Strategic

Technologies for Europe Platform (STEP)⁸, Portugal considered as a matter of priority projects that have been awarded a Sovereignty Seal pursuant to Article 4(1) of Regulation (EU) 2024/795. However, Portugal considered that no project having been awarded a Sovereignty Seal was to be included in the amended RRP because part of these projects have already secured funding from European sources other than the Recovery and Resilience Facility. In addition, projects with a Sovereignty Seal that have not yet secured funding could be funded under the new measure C05-i14 Business innovation in the revised RRP.

Positive assessment

- (23) Following the positive assessment by the Commission of the amended RRP, with the finding that the RRP satisfactorily complies with the criteria for assessment set out in Regulation (EU) 2021/241, in accordance with Article 20(2) of and Annex V to that Regulation, the reforms and investment projects necessary for the implementation of the amended RRP, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the amended RRP should be set out.

Financial contribution

- (24) The estimated total costs of Portugal's amended RRP is EUR 21 905 333 169. As the amount of the estimated total cost of the amended RRP is higher than the updated maximum financial contribution available for Portugal, the financial contribution determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council⁹, and with Article 20(4) and Article 21a(6) of Regulation (EU) 2021/241 that is allocated for Portugal's amended RRP should be equal to EUR 16 325 113 960. Therefore, the financial contribution made available to Portugal remains unchanged.

Loans

- (25) In order to support additional reforms and investments, a total loan support of EUR 5 890 756 353 was made available to Portugal by means of Council Implementing Decision of 13 July 2021. Following the removal of measures C01-i12 Construction of the East Lisbon Hospital and C15-i07 Expansion of the Lisbon Metro Network – Red Line To Alcantara – construction phase and the decrease in the level of implementation of measure C07-i06 Business Reception Areas – Completion and C15-i08 Construction of the Porto Metro Network extension – Casa da Música-Santo Ovídio – construction phase under Article 21 of Regulation 2021/241, Portugal has not requested to use part of the freed up loan resources to support new measures or to increase the level of implementation of the existing measures within the RRP. The amount of the estimated total costs of the RRP is lower than the combined financial contribution available for Portugal and the loan support that had been made available

⁸ Regulation (EU) 2024/795 of the European Parliament and of the Council of 29 February 2024 establishing the Strategic Technologies for Europe Platform (STEP), and amending Directive 2003/87/EC and Regulations (EU) 2021/1058, (EU) 2021/1056, (EU) 2021/1057, (EU) No 1303/2013, (EU) No 223/2014, (EU) 2021/1060, (EU) 2021/523, (EU) 2021/695, (EU) 2021/697 and (EU) 2021/241

⁹ Regulation (EU) 2021/1755 of the European Parliament and of the Council of 6 October 2021 establishing the Brexit Adjustment Reserve (OJ L 357, 8.10.2021, p. 1, ELI: <http://data.europa.eu/eli/reg/2021/1755/oj>).

to Portugal by means of Council Implementing Decision of 13 July 2021. Therefore, the total loan support made available to Portugal should be reduced to EUR 5 580 219 209.

- (26) The Council Implementing Decision of 13 July 2021 should therefore be amended accordingly. For the sake of clarity, the Annex to the Council Implementing Decision of 13 July 2021 should be replaced entirely.
- (27) This Decision should be without prejudice to the outcome of any procedures relating to the award of Union funds under any Union programme other than the Facility or to procedures relating to distortions of the operation of the internal market that may be undertaken, in particular under Articles 107 and 108 of the Treaty. It does not override the requirement for Member States to notify instances of potential State aid to the Commission under Article 108 of the Treaty,

HAS ADOPTED THIS DECISION:

Article 1
Approval of the assessment of the RRP

The assessment of the amended RRP of Portugal on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved.

Article 2
Amendments

The Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Portugal is amended as follows:

(1) in Article 3, paragraph 1 is replaced by the following:

“1. The Union shall make available to Portugal a loan amounting to a maximum of EUR 5 580 219 209.”;

(2) the Annex to the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Portugal is replaced by the text set out in the Annex to this Decision.

Article 3
Addressee

This Decision is addressed to the Portuguese Republic.

Done at Brussels,

For the Council
The President