THE COMPLETE GUIDE

Southern Europe · Seven jurisdictions

# Retiring in Europe.

Portugal, Spain, Greece, Italy, France, Cyprus and Malta. What each route actually requires, what you will actually be taxed, and what the official numbers say about how this usually goes.

AUTHOR

Tom Purdy

Founder, Citizenship360

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# Contents

Every figure in this guide traces to a primary source: a statute, an official gazette, a tax authority, a national statistics office, Eurostat or a published government fee schedule. Sources are listed at the back, grouped by chapter, each with the date it was checked.



Where a point is genuinely contested, or where official sources disagree, it is marked as a contested point rather than asserted. Where something cuts against our own commercial interest, it is marked as candour. There are more of both in this guide than in most, which is deliberate. We do not publish professional fee levels; government and consular fees are stated exactly, because they are fixed and published. This guide is information, not advice.

CHAPTER 1

# Who this guide is for, and the decision you are actually making

Three profiles, four decisions, and the order in which they should be taken. Plus a self-assessment you can score in ten minutes.

This guide is written for three people. You may recognise yourself in one and be married to another.

**The pension-income retiree.** Sixty-two to seventy-two, a defined-benefit or state pension plus modest capital, household income EUR 40,000 to EUR 90,000. Cash flow is the constraint, and the exposure is the ordinary income tax scale where you land. The special regimes were supposedly designed for you and, as Chapter 3 shows, almost nobody uses them.

**The capital-rich early retiree.** Fifty to sixty, a business sold or options exercised, income drawn from a portfolio. Small income tax bill; real exposure to wealth taxes, deemed-income rules, reporting regimes and capital gains on assets not yet sold.

**The returning EU national, or the spouse of one.** Free movement solves the immigration question and none of the tax, healthcare or succession questions. Two thirds of this guide is legally irrelevant to you; the other third matters more than you think.

## The four decisions, and why the order matters

Which country is four questions, usually taken in the wrong order.

**First, where you want to live.** The only real preference: climate, language, distance from adult children, whether you know anybody there in February.

**Second, what you will be taxed on.** The base, not the rate: a worldwide system changes what is taxable, and that is where the damage happens.

**Third, what happens to you at eighty.** On the evidence in Chapter 14, neither Brexit nor money sends retirees home; loss of the ability to run a household does.

**Fourth, what your heirs inherit.** Habitual residence at death governs succession across most of the EU; inheritance tax sits outside that regulation, and the two can point at different countries.

In that order tax constrains the shortlist; in the usual order, tax first, people end up somewhere they do not want to be, saving less than expected.

> CANDOUR
>
> ### We would rather you did not move at all than move for the tax
>
> A meaningful proportion of the enquiries we receive should end in a decision not to relocate, or to relocate later. The commercial incentive runs entirely the other way: nobody is paid for the advice to stay. If the move is driven by a tax saving of a few thousand euros a year and nothing else, that is not a sufficient reason to move a household and a marriage 2,000 kilometres.

## Self-assessment: twelve questions

Score each answer: **2** if you can evidence it today, **1** if you have thought about it but not documented it, **0** if you have not addressed it.

*Where you want to live*

1. Have you spent at least six consecutive weeks in the specific town or district, outside the peak season?
2. Can you name three people, not relatives, who will be within thirty minutes of you?
3. Have you agreed with your spouse or partner, in explicit terms, what would cause you to move back?

*What you will be taxed on*

1. Do you know whether your intended country taxes on a worldwide basis and what falls into the base beyond pension income?
2. Have you identified which double tax treaty article governs each of your pensions, separately?
3. Do you know your exposure to net wealth, property wealth or deemed-income taxes in that country, and the reporting obligations attaching to non-local assets?

*What happens to you at eighty*

1. Do you know how you will access the state health system on day one, and on what legal basis?
2. Have you priced residential and domiciliary care locally, rather than assuming it resembles home?
3. Would the surviving spouse be able to run the household, in the local language, alone?

*What your heirs inherit*

1. Do you know which country's succession law would govern your estate on your current plans?
2. Have you made, or taken advice on, a choice-of-law election in favour of your national law?
3. Do you know which country would charge inheritance tax, and on which assets?

**Scoring.** Add your twelve scores, maximum 24.

**19 to 24.** You are ready to choose a jurisdiction. The remaining work is execution and sequencing, not analysis.

**12 to 18.** You have a sequencing problem rather than an information problem. Typically the place and tax questions score well and the age-eighty and inheritance questions score zero. This is the most common profile among people who have already engaged an adviser.

**6 to 11.** You are eighteen months from a decision. Use Chapters 4 to 9 to build a shortlist of two, and do not lodge an application yet.

**0 to 5.** The move is still an idea rather than a plan. Nothing in this guide will be wasted, but no professional should be taking your money yet.

CHAPTER 2

# The 2026 reset

Five things changed between 2024 and 2026, and together they redrew the map. Each is stated with its instrument, its date and its practical consequence.

Between 2024 and 2026 the map was redrawn, largely against Portugal. Five changes carry the weight.

## One. Portugal's naturalisation minimum is now ten years

**Instrument:** Lei Orgânica n.º 1/2026, de 18 de maio. **In force:** 19 May 2026.

Naturalisation rises from five years to **ten** for most nationals, **seven** for nationals of Portuguese-speaking countries **and citizens of EU member states**. That second limb is widely missed: the seven-year band is not CPLP-only, and British, American and South African nationals sit in the ten-year band.

The quieter provision does more damage. Article 5.º **revokes article 15.º(4)**, which let time count from the date the permit was *applied for*. Residence now counts from grant, adding one to three years for anyone in the AIMA backlog.

On a preventive review sought by fifty deputies rather than the President (Acórdão n.º 1133/2025), the Constitutional Court struck four limbs of the decree, including paragraphs 3 and 4 of the draft article 7.º, which is why the enacted article has only two paragraphs. **The ten-year and seven-year periods were never challenged and were left standing.**

## Two. The Portuguese transitional provision protects almost nobody

**Instrument:** article 7.º of Lei Orgânica n.º 1/2026.

Article 7.º(2) preserves the old law only for administrative procedures **pending at the date the law entered into force, 19 May 2026**. In practice that means a nationality application already lodged with the IRN or the Conservatória dos Registos Centrais; what is not settled is the administrative test for when a procedure counts as pendente, meaning submission as against acceptance or payment. Holding residence before that date buys nothing.

> CONTESTED POINT
>
> **Portugal's transitional provision is legally clear and politically contested**
>
> The legal position is not genuinely unresolved. Article 7.º(2) is short, the Ministry of Justice has confirmed it in terms, and there is no acquired-right protection, no phase-in and no cut-off referenced to the date residence was granted. What is contested is political. Three petitions (n.º 12/XVII, n.º 60/XVII and n.º 73/XVII) are attached to the parliamentary file seeking exactly the grandfathering that does not exist, and as at 12 August 2026 none has produced a legislative change. Two things do remain open: whether political pressure eventually produces a transitional amendment, and the precise administrative test for when a procedure counts as "pendente", meaning the date of submission as against the date of acceptance or payment. Anyone who tells you the old five-year rule still protects long-standing residents is describing a campaign, not the law.

Article 4.º gave the Government **ninety days from publication, expiring in mid-August 2026** (16 August on a raw count, 17 August applying article 279.º of the Civil Code), to amend the Regulamento da Nacionalidade Portuguesa annexed to Decreto-Lei n.º 237-A/2006. **As at 12 August 2026 it had not been published.** The deadline is directory, not preclusive. So the new language, culture, history and civic-knowledge tests have **no prescribed form, syllabus, CEFR level or examining body**.

## Three. Spain's golden visa was abolished

**Instrument:** Ley Orgánica 1/2025, de 2 de enero, disposición final vigesimoprimera, which left articles 63 to 67 of Ley 14/2013 "sin contenido". **Effective:** 3 April 2025.

Applications filed before that date are decided under the old law, visas valid on 3 April 2025 keep their term, and **renewals follow the law in force when the initial authorisation was granted**. Otherwise the investment route is closed, leaving the non-lucrative visa as the principal passive-income route.

## Four. The Entry/Exit System is live; ETIAS is not

**Instrument:** Regulation (EU) 2017/2226, with the progressive start under Regulation (EU) 2025/1534 and Commission Implementing Decision (EU) 2025/1544. **Fully operational:** 10 April 2026 at all external Schengen crossing points.

Automated biometric records have replaced stamping, so overstays are detected by the system. **ETIAS is not yet in operation and no legally binding start date has been fixed by implementing decision.** The Commission's published expectation, on the official ETIAS page as updated 24 July 2026, is that it will become operational in the last quarter of 2026, followed by a transitional period of at least six months and then a grace period. Plan on that expectation, not on a date. The fee is EUR 20, raised from EUR 7 by Commission Delegated Regulation (EU) 2025/1411.

A holiday-home owner with no residence permit now faces automated enforcement of the ninety-days-in-any-180 rule. A residence permit or long-stay visa holder is outside both systems, by article 2(3) EES and article 2(2) ETIAS. The exception matters, and it runs the other way from what most guidance says: **Cyprus and Ireland do not operate the EES, so passports are still stamped manually there, and a Cypriot or Irish residence permit confers no exemption anywhere else.** A Cypriot permit holder is registered in the EES on entering the Schengen area and will need ETIAS to visit it. A residence card issued under Directive 2004/38/EC by either country does exempt the holder from both systems.

## Five. A new EU driving licence directive exists but does not yet apply

**Instrument:** Directive (EU) 2025/2205, adopted 22 October 2025, in force 25 November 2025.

It repeals Directive 2006/126/EC only from **26 November 2029**, transposition due 26 November 2028, so **2006/126/EC remains the operative law for several years yet.** Exchange on taking up residence stays voluntary under EU law, though national deadlines bite: six months in Spain and Greece, twelve months in France for post-2020 licences, six years in Italy before refusal.

## Two tax changes that belong in the same list

**Portugal's NHR is closed and its successor excludes pensioners.** Repealed by article 317(b) of Lei 82/2023 from 1 January 2024, grandfathering under article 236, final registration window closed 31 March 2025. Its successor, IFICI under article 58-A EBF, takes its foreign-income exemption from article 81(4) CIRS, listing categories A, B, E, F and G. **Category H, pensions, is absent from that closed list**, as the tax authority says expressly in Ofício Circulado 20276/2025.

**Greece changed article 5B twice in 2026.** Article 94 of L. 5313/2026 moved the payment date for the 7 per cent charge from July to the last working day of December, and repealed the 31 March application deadline, leaving it to the AADE Governor. For 5A the replacement decision has issued (A.1147/2026, setting 30 September). **For 5B no equivalent decision could be located as at 12 August 2026**, so most published guidance on 5B deadlines is wrong.

CHAPTER 3

# What the official numbers actually show

What the official statistics say about how many people do this, how long it takes and how often it fails. No industry estimates, no crowd-sourced surveys.

Sources here are Eurostat, the OECD, national statistics offices, tax authorities, courts, ombudsmen and the DWP alone. Industry numbers without an official basis are flagged, not replaced by estimates.

## The regimes are famous. The take-up is tiny.

933

The number of people in the whole of Italy on the celebrated article 24-ter 7 per cent flat tax for foreign pensioners in tax year 2024, raising EUR 4.0m.

*MEF, Dipartimento delle Finanze, Analisi dei dati IRPEF, Anno d'imposta 2024. Accessed 12 August 2026.*

Seven years in: 933 people (159 in 2020 and 672 in 2023, from the 2020 and 2023 editions of the same MEF series) against 42.8 million Italian taxpayers. The attribution to article 24-ter is our inference; the MEF document does not use the term. Greece's equivalent is smaller, around 1,000 approvals as at December 2025, press-reported from ministry statements, not a dataset. No projection was ever published, so "far below projections" is attributable to no one.

EUR 1,741m

Portugal's NHR tax expenditure in 2024, being 66.4 per cent of all IRS tax expenditure and 38.6 per cent above the budget forecast; 128,958 people were registered, and fifty tax returns account for 24.2 per cent of the benefit.

*Tribunal de Contas, Parecer sobre a Conta Geral do Estado de 2024: Gráfico 74 (EUR 1,741m and 128,958); Anexo F3, Quadro F 2, p.276 (38.6 per cent); pp.199 and 200 (66.4 and 24.2 per cent). Accessed 12 August 2026.*

That last clause is why NHR was repealed: a regime marketed to retired couples was, fiscally, one for fifty tax returns out of the 48,723 with a non-zero benefit.

## Volumes, where volumes exist at all

30,325

Initial non-lucrative residence authorisations granted by Spain in 2025, within a total of 61,352 non-lucrative documents issued including renewals and modifications, the total down 18.0 per cent on 2024's 74,837; 88,891 were in force at 31 March 2026.

*Ministerio de Inclusión, Observatorio Permanente de la Inmigración, flow and stock series, release of 11 June 2026. Accessed 12 August 2026.*

The initial-grant count is the best country-level retiree number there is, and it is falling. **AIMA publishes no D7 count and nor did SEF; Greece subsumes financially independent persons within an undifferentiated "Other" category; ISTAT confirms elective residence sits inside "Altri motivi" and publishes only the 7.2 per cent aggregate.** Any D7, FIP or elective-residence volume figure you have seen is unsourced.

2.8 times

The increase in US nationals resident in Portugal between end-2021 and end-2024, from 6,885 to 19,258, while British residents in Portugal grew 15 per cent over the same period and the British population of Spain fell 8.5 per cent from its 2022 level. Note that the 2024 Portuguese stock reflects the regularisation of a large inherited backlog, so the ratio overstates the rate of new arrival; the SEF and AIMA reports could not be reopened at the verification stage, so treat both Portuguese figures as reported rather than independently confirmed.

*SEF RIFA 2021; AIMA RMA 2024, INE Spain ECP table 56936. Accessed 12 August 2026.*

## The administrative reality

## Over 1 million, reduced to about 30,000

The AIMA pending caseload when the Mission Structure began in July 2024, and what the Secretary of State told parliament remained on 1 July 2026, against a mission-structure output of 386,791 decisions, 327,597 grants and 59,194 refusals.

*Governo de Portug Balanço da p December 202 statement 1 July 2026 Lusa. Accessed 12 A*

So was the litigation: 130,946 cases pending against AIMA in Lisbon in February 2026 (CSTAF figures via Lusa), 28 extra judges in post 7 April 2026. The 30,000 is a ministerial statement, not published data.

## 38.4 per cent

Malta's Schengen visa refusal rate in 2025, the highest of any member state consular network and more than three times Italy's 10.8 per cent; Portugal's rate doubled in a single year, from 11.3 to 23.4 per cent.

*European Commission DG HOME, 2025 visa statistics, published 28 May 2026. Accessed 12 August 2026.*

Short-stay figures are no proxy for long-stay decisions, but they are the only refusal data published at network level.

### Health, which is what the decision turns on later

## 27.8 per cent

Share of Greeks aged 65 and over reporting an unmet need for medical examination or treatment in 2025, against an EU average of 3.3 per cent, of which 21.2 percentage points is cost rather than waiting lists.

*Eurostat EU-SILC, hlth_silc_08. Accessed 12 August 2026.*

## 34.3 per cent and 9.3 per cent

Household out-of-pocket payments as a share of current health spending in Greece and in France respectively in 2023, with Portugal at 29.4 per cent, Malta 30.9 per cent and the EU27 average 15.0 per cent (provisional).

*Eurostat hlth_sha11_hf. Accessed 12 August 2026.*

The Greek 7 per cent regime and the out-of-pocket burden are one decision from two ends: the tax saving buys into the most cost-exposed health system of the seven.

1,769

Deaths of British nationals handled by the FCDO in Spain in 2024, being 27.1 per cent of the 6,521 handled worldwide, two and a half times the next country (Thailand, 691) and more than six times the next European country (France, 279); Spain also accounted for 369 of the 1,170 repatriations, 31.5 per cent.

*FCDO consular data 2024, management information rather than official statistics, published 26 May 2025. Accessed 12 August 2026.*

That measures the size and age of the British population in Spain, not risk.

## Money

263.9

Portuguese house prices in 2025 as an index of their 2015 level, a cumulative rise of 163.9 per cent, against 116.2 for Italy; by Q1 2026 the index reached 291.0.

*Eurostat prc_hpi_a and prc_hpi_q. Accessed 12 August 2026.*

1.10 million

UK State Pensioners living abroad in 2024/25, 8.5 per cent of the total caseload, receiving £5,352m of which £2,862m went to EEA countries and £831.2m to Spain alone. The £5,352m is the "Overseas and Unknown" row; the narrower "State Pension paid outside UK" line gives £5,329.9m, so the pairing with the caseload is approximate.

*DWP, State Pension expenditure by country of residence, a supplementary table added to Benefit expenditure and caseload tables 2025 in the update of 18 December 2025; Benefit expenditure and caseload tables 2026, published 14 April 2026. Accessed 12 August 2026.*

DWP has published no full country-level recipient counts since 2017 (latest complete table August 2016), though partial figures appear in ad hoc publications, and expenditure cannot be divided by an assumed average pension: mean weekly amounts vary widely by country, on figures supplied by DWP in answer to a parliamentary question (UIN 184212) rather than in a published statistical release.

## On the numbers this guide does not use

The industry runs on annual counts of "millionaires" arriving in and leaving countries. **No official statistical authority in any of the seven countries publishes such counts, and no Eurostat, OECD or national statistics office series measures the phenomenon at all.** Those figures come from commercial firms whose method is unpublished and cannot be replicated, and clients make timing decisions on them. Nor is any figure here taken from crowd-sourced expatriate surveys, which have no sampling frame and no weighting.

CHAPTER 4

# The routes compared

Seven routes, side by side: what each one asks of you, what it gives you, and how long it takes to become a citizen if that is what you want.

Seven passive-income routes, one card each. Figures are as at 12 August 2026.

## Portugal, D7

- **Income threshold.** Minimum wage EUR 920 a month × 100/50/30% (first adult, further adult, child): single **EUR 11,040 a year**, couple **EUR 16,560**, 12 months assured.
- **Savings or insurance.** No statutory savings test. Travel insurance at visa stage; health insurance or SNS at residence. EUR 30,000 is the Schengen figure, not this one.
- **Work.** No express bar; income source only: retirement, property, intellectual property, investment.
- **Duration.** Visa 4 months, 2 entries; permit **2 years, then 3-year renewals**.
- **Presence.** Cancelled after 6 consecutive or 8 non-consecutive months absent.
- **Permanent residence.** 5 years plus "português básico" (A2 or CIPLE is convention).
- **Citizenship.** **10 years** (7 for CPLP and EU), from grant of legal residence.
- **Special tax regime.** **None for pensioners**: NHR closed, IFICI excludes category H. IRS to 48%, 53% with surcharge.

## Spain, non-lucrative visa

- **Income threshold.** 400% of IPREM (EUR 600 a month, 2026) plus 100% per dependant: single **EUR 28,800 a year**, couple **EUR 36,000**.
- **Savings or insurance.** Sickness insurance, article 61.2(b). "No copayment, no waiting period, no cap, Spain-authorised insurer" is consular instruction, not the reglamento.
- **Work.** Prohibited, article 61.1, applied to remote work for a foreign employer.
- **Duration.** **1 year, then 2, then 2.**
- **Presence.** Since 20 May 2025, expressly **183+ days a calendar year**, a renewal condition.
- **Permanent residence.** 5 years continuous.
- **Citizenship.** **10 years**; 2 for Ibero-American states, Andorra, the Philippines, Equatorial Guinea, Portugal and Sephardim (closed list). CCSE, DELE A2, renunciation.
- **Special tax regime.** **None for pensioners**: article 93 "Beckham" covers displaced workers, professionals, entrepreneurs and investors.

## Greece, financially independent person (type I.8)

- **Income threshold.** **EUR 3,500 net a month**, plus 20% spouse, 15% per child: EUR 4,200 a couple. EUR 42,000 a year is arithmetic, not published.
- **Savings or insurance.** Travel insurance at visa stage, private sickness insurance for the permit.
- **Work.** Prohibited, employment and independent activity, applicant and family.
- **Duration.** **3 years, renewable for 3.**
- **Presence.** No minimum-days rule; absences up to 6 months a year are harmless.
- **Permanent residence.** EU long-term status at 5 years, on income and integration tests.
- **Citizenship.** Nominally 7 years, **but I.8 is not among the titles at article 5(1)(ε) of the Nationality Code**: **12 years** unless long-term status is taken first.
- **Special tax regime.** **Article 5B: 7% on all foreign income for 15 years**, foreign tax credit, no relief from inheritance or gift tax.

> CONTESTED POINT
>
> **the Greek seven-year naturalisation claim**
>
> Almost every published comparison, including those produced by firms that compete with us, gives Greece a seven-year citizenship timeline for financially independent persons. On the face of the Nationality Code that is wrong: article 5(1)(ε) lists the qualifying titles exhaustively, the I.8 permit is not on it, and article 5(3) then imposes twelve years. Article 5(2) lets the Minister add titles by decision, and we could not establish that no such decision exists. We would not advise a client on the seven-year basis without written confirmation from the Γενική Γραμματεία Ιθαγένειας.

## Italy, elective residence visa

- **Income threshold.** No euro figure in the decree, only a formula: about **EUR 31,159 a year** single ("approximately EUR 31,000" per consulates). **No primary source supports EUR 38,000 for a couple or "+20% per child".**
- **Savings or insurance.** Health insurance at permit stage; registered lease or deed in the applicant's name, not hospitality or a hotel booking.
- **Work.** None. Pensions, annuities, property or stable economic interests; self-employment excluded.
- **Duration.** Visa 365 days, permit within 8 days of entry; the 1-then-2-year cycle is inferred from fee tiers.
- **Presence.** Conditions re-verified annually by the Questura.
- **Permanent residence.** EU long-term permit at 5 years, A2.
- **Citizenship. 10 years** plus B1; the June 2025 referendum to halve it failed for want of quorum.
- **Special tax regime. Article 24-ter: 7% on foreign-source income for 10 tax periods**, 8 southern regions and specified earthquake municipalities, population **not exceeding 30,000** since 7 April 2026.

> CONTESTED POINT
>
> as drafted, Italy's 30,000-inhabitant threshold reverts to 20,000 on 1 January 2027
>
> Legge 34/2026 raised the population cap from 20,000 to 30,000 with effect from 7 April 2026. The new consolidated income tax code, D.Lgs 117/2026, re-enacts the regime at article 247 and carries forward "20.000 abitanti", because the draft was approved before Legge 34/2026 came into force and the final text did not pick up the amendment. The code applies from 1 January 2027. This is almost certainly a coordination failure that a corrective decree will fix, but the black-letter position today is a reversion, and anyone choosing a municipality in the 20,000 to 30,000 band is exposed to it.

## France, VLS-TS "visiteur"

- **Income threshold.** Annual net SMIC: **EUR 17,735.19 a year**, EUR 1,477.93 a month, as published by Service-Public on the gross hourly SMIC of EUR 12.31 set by the arrêté of 22 May 2026.
- **Savings or insurance.** Sickness insurance for the stay; PUMa cover follows stable residence, tested at 6 months in France over the last 12.
- **Work.** Prohibited, on a written undertaking.
- **Duration.** VLS-TS 4 to 12 months, validated online within 3 months, then a **1-year carte de séjour temporaire, renewable annually. No multi-year card.**
- **Presence.** No express minimum; PUMa and the 185-day residence test sit in their own contexts.
- **Permanent residence.** Carte de résident at 5 years, B1, civic examination waived over 65.
- **Citizenship. 5 years**, the shortest of the seven, but French **at B2** from 1 January 2026, up from B1.
- **Special tax regime. None.** Instead: CSG, CRDS and CASA exemption for those not on a French health scheme (S1 holders qualify), and 5-year limitation of property wealth tax to French real estate.

## Cyprus, Category F

- **Income threshold.** Secured income **EUR 9,568.17** a year plus **EUR 4,613.22** per dependant (2002 schedule at the irrevocable rate); higher circulating figures are practice, not law.
- **Savings or insurance.** Not specified in the Regulations.
- **Work.** No express prohibition; practice, plus the power to cancel for leaving the permitted occupation.
- **Duration. Indefinite**, no expiry in the Regulations; residence within 1 year, lost after 2 years outside the Republic.
- **Presence.** That 2-year absence rule.
- **Permanent residence.** The permit is itself permanent; EU long-term status separately at 5 years, Greek A2.
- **Citizenship. 7 years within the 10 preceding the 12 continuous months** before application, so an eleven-year look-back, Greek B1.
- **Special tax regime.** Foreign pension for services outside Cyprus at **5% above EUR 5,000**, annual election into the ordinary scale; non-dom removes SDC. About 7.65% all-in with the health levy.

> CANDOUR
>
> we cannot verify most Cypriot administrative requirements from a live official source
>
> When the Deputy Ministry of Migration and International Protection was created in June 2024, the Civil Registry and Migration Department website was decommissioned and every legacy guidance page now returns a 404. Category F checklists, processing times, form numbers, and the pink slip's duration, bank account, insurance and tenancy conditions appear on no live primary source and are not in the Regulations. The legislation is verifiable; the administration is not. Firms quoting confident Cypriot processing times in 2026 are quoting their own file notes.

## Malta, ordinary residence

Self-sufficiency is an **EU and EEA route** under S.L. 460.17, with Swiss nationals covered instead by the EU-Switzerland free movement agreement: a third-country national qualifies only as the family member of a Union citizen, leaving the Malta Retirement Programme (MRP), the Global Residence Programme or the MPRP. "Not published" below means the point is not sourceable from Identità or the legislation, and we do not fill gaps with estimates.

- Income threshold. Not published: resources equivalent to the minimum means for social assistance, no euro amount from Identità. Circulating figures are historic and unsourced.
- Savings or insurance. Not published. MRP imposes property instead: EUR 275,000 to buy (EUR 220,000 Gozo or the south) or EUR 9,600 a year to rent (EUR 8,750), plus a EUR 2,500 application fee.
- Work. Not published.
- Duration. Not published; MRP status continues while conditions are met.
- Presence. MRP lost below an average 90 days a year in Malta over 5 years, or above 183 days in another jurisdiction.
- Permanent residence. Not published.
- Citizenship. 12 months before application plus 4 years aggregate in the preceding 6, an effective 7-year lookback, Maltese or English.
- Special tax regime. MRP: 15% on foreign income received in Malta, minimum tax EUR 7,500 plus EUR 500 per dependant, other income 35%; pension received in Malta, at least 75% of chargeable income.

Weigh against it: Malta refused 38.4% of Schengen visa applications in 2025, and out-of-pocket health spending is 30.9%, twice the EU average.

## The comparison that actually fits on a page

| ROUTE | INCOME THRESHOLD, SINGLE APPLICANT | CITIZENSHIP TIMELINE | HEADLINE TAX REGIME FOR A RETIREE |
|---|---|---|---|
| Portugal D7 | EUR 11,040 a year | 10 years (7 for CPLP and EU) | None; ordinary IRS to 48% plus surcharge |
| Spain NLV | EUR 28,800 a year | 10 years (2 for a closed list) | None; Beckham excludes pensioners |
| Greece I.8 | EUR 3,500 a month (EUR 42,000, derived) | 7 years claimed; 12 on the face of the Code | Article 5B, 7% on foreign income, 15 years |
| Italy ERV | c. EUR 31,159 a year (formula) | 10 years | Article 24-ter, 7%, 10 tax periods, qualifying municipalities only |
| France VLS-TS visiteur | EUR 17,735.19 a year | 5 years, B2 from 2026 | None; CSG exemption for S1 holders |
| Cyprus Category F | EUR 9,568.17 a year | 7 in 10, plus 12 months continuous (11-year look-back) | 5% on foreign pension above EUR 5,000 |
| Malta ordinary residence | Not published | 7-year lookback | MRP: 15%, minimum tax EUR 7,500 |

Read the first and third columns together: Portugal has the lowest income threshold of the seven and, for a pensioner, the worst tax outcome and the longest citizenship timeline of the four principal destinations. That is what happens when the entry test and the tax test are set by different departments in different decades.

CHAPTER 5

# Portugal: the country that changed its mind

The default answer for a decade, and the country that changed the most. The D7 still works. What sits behind it does not work as it did.

For a decade the D7 was easy to qualify for, the tax regime was generous, and citizenship came after five years. Two of those three have gone.

## The D7 and what it actually is

There is no D7 article in the Immigration Act. The route sits at Decreto Regulamentar n.º 84/2007, article 24.º, alíneas (b), (c) and (d), read with articles 58.º and 52.º(1)(d) of Lei n.º 23/2007. Article 77.º sets the conditions: residence visa, presence in Portugal, means of subsistence, accommodation, no conviction for an offence punishable in Portugal by more than one year, no re-entry ban, no SIS alert. The "article 58(1)(f)" of much guidance does not exist.

## The income arithmetic for 2026

Portaria n.º 1563/2007, article 2.º(2), fixes the multipliers: 100 per cent of the minimum wage for the first adult, 50 per cent for each further adult, 30 per cent for children under 18 and dependent adult children, indexed automatically by article 13.º. The 2026 retribuição mínima mensal garantida is EUR 920 per month (Decreto-Lei n.º 139/2025, article 2.º, from 1 January 2026). That figure is for mainland Portugal; the Azores and Madeira set higher regional minima, so a D7 calculation in the autonomous regions starts from a different number.

| HOUSEHOLD | MONTHLY | ANNUAL |
|---|---|---|
| Single applicant | EUR 920 | EUR 11,040 |
| Couple | EUR 1,380 | EUR 16,560 |
| Couple plus one child | EUR 1,656 | EUR 19,872 |
| Couple plus two children | EUR 1,932 | EUR 23,184 |

Article 5.º(6) requires means assured for at least twelve months and, for property, intellectual property or financial income, evidence that it is available in Portugal. A Portuguese bank account is not a legal condition; availability is.

> CONTESTED POINT
>
> ### The threshold may be lower than anyone applies it
>
> Portaria n.º 1563/2007 refers to the minimum wage "líquida de quotizações para a segurança social". Read literally, the 2026 reference figure would be EUR 818.80 rather than EUR 920. Neither AIMA nor the Ministry of Foreign Affairs computes it that way; both work from the gross figure. Plan on the gross figure. But no adviser should tell you the statute is unambiguous, because it is not. Note separately that AIMA's own means-of-subsistence page still showed the 2025 figure of EUR 870 as at 12 August 2026; where the two official pages disagree, the Ministry page is current.

## The D8, briefly, and how it differs

The D8 (Lei n.º 18/2022, articles 54.º(1)(i) and 61.º-B) tests average monthly income over three months of four times the minimum wage: EUR 3,680 per month, EUR 44,160 annualised, with the same add-ons (EUR 460 and EUR 276). It permits work, which the D7 does not. The "savings equal to twelve times the minimum wage" attributed to it has no primary source.

## Two stages: the consulate, then AIMA

The consular stage produces a residence visa valid four months and two entries (article 58.º(2)), decided within 60 days (article 58.º(4)) and issued with a pré-autorização de residência carrying provisional tax, social security and health service numbers (article 58.º(6)). Reception is outsourced in 25 countries and 89 cities to VFS Global, TLScontact or BLS, whose charges sit outside the State fee tables.

At AIMA the deadlines are 60 days for a grant and 30 for a renewal (article 82.º), and a renewal not decided in time is deemed granted: tacit approval, where Spain has tacit refusal. A Ministry notice of 3 December 2025 confirmed that where no appointment is available the vignette issues without the scheduling link.

## The fees

Consular fee for a national (D) residence visa (Portaria n.º 229/2021 as amended by Portaria n.º 91/2025/1): **EUR 110**; administrative appeal EUR 75. Children under six, family-reunification descendants and State scholarship holders are exempt. AIMA fees are set by Portaria n.º 307/2023, uprated by CPI each 1 March; the table below is the one in force from 1 March 2026.

| ITEM | PRESENTIAL | DIGITAL CHANNEL |
|---|---|---|
| Receipt and analysis (grant or renewal) | EUR 133.00 | EUR 99.80 |

| ITEM | PRESENTIAL | DIGITAL CHANNEL |
|---|---|---|
| Emission of the temporary residence title | EUR 114.30 | EUR 85.80 |
| Change of registered elements | EUR 53.30 | EUR 40.00 |
| Renewal of a permanent permit | EUR 61.90 | not available |
| In-person collection of the title | EUR 29.90 | EUR 29.90 |
| Urgent issue | plus EUR 47.80 | plus EUR 47.80 |

AIMA's table scopes the receipt-and-analysis fee to enumerated subsecções of Lei 23/2007 that do not include the D7 route; these are nevertheless the amounts charged in practice. A first permit costs EUR 247.30 presentially or EUR 185.60 digitally, plus EUR 29.90 for in-person collection; renewal carries the same two principal charges. Naturalisation is **EUR 250**, payable in full under item 2.4 of the Regulamento Emolumentar even where the application is summarily rejected.

## The card cycle, and how much time you must spend there

Two years initially, then successive three-year renewals (article 75.º(1), in the text as amended by Lei n.º 61/2025, de 22 de outubro, which left the substance unchanged); the "1 plus 2 plus 2" pattern still circulating is the obsolete 2007 wording. Under article 85.º(2) a temporary permit may be cancelled for absence without acceptable reason of six consecutive or eight non-consecutive months; a permanent permit, 24 consecutive or 30 non-consecutive months in three years. Longer absences must be justified to AIMA before departure. This is an absence ceiling, not a residence floor.

Automatic extension has ended (Decreto-Lei n.º 85-B/2025): documents expiring between 22 February 2020 and 30 June 2025 were accepted only until 15 October 2025, and an expired card now needs an AIMA renewal-payment receipt, valid 180 days.

## The backlog, as lived rather than as described

The Estrutura de Missão created in July 2024 closed on 31 December 2025. It opened on over one million pending files: roughly 450,000 expressions of interest, 215,000 CPLP cases, 80,000 transitional-regime cases, 375,000 renewals and 25,000 family reunifications. On 1 July 2026 the Secretary of State for the Presidency and Immigration told the Assembleia da República that approximately 30,000 remained pending, a ministerial statement reported by Lusa rather than published AIMA data.

Less discussed is the litigation. CSTAF data reported by Lusa put pending intimações against AIMA at 133,429 in October 2025, and at 23 February 2026 put AIMA-related cases pending in the Lisbon administrative court at 130,946, of which 129,239 were intimações; 28 additional judges, appointed by communiqué of 4 March 2026, took up duties on 7 April 2026, and the Provedor de Justiça received 3,389 AIMA-related complaints in 2024. The worst of it sat in the legalisation streams, not the visa-led routes.

## Permanent residence

Article 80.º sets cumulative conditions: five years' holding of a temporary permit; no sentence or sentences exceeding one year's imprisonment in the last five; means of subsistence; accommodation; basic Portuguese. The title is valid five years, renewable. The statute says only "português básico", and DR 84/2007 article 64.º(1)(e) accepts a school certificate, an IEFP course pass or a test at a recognised centre; "A2" and "CIPLE" appear nowhere in it.

## Citizenship: what changed on 19 May 2026

Lei Orgânica n.º 1/2026 of 18 May 2026 came into force on 19 May 2026. The residence period at article 6.º(1)(b) of Lei 37/81 is now **seven years for nationals of Portuguese-speaking countries and for citizens of European Union Member States, and ten years for nationals of all other countries**; British, American and South African nationals are in the ten-year band. The inclusion of EU citizens in the seven-year band is widely missed in commentary and confirmed by the Ministry of Justice.

In Acórdão n.º 1133/2025 of 15 December 2025 the Constitutional Court struck four limbs of the original decree, including paragraphs 3 and 4 of the draft article 7.º, which is why the enacted transitional provision has only two paragraphs. The ten-year and seven-year periods were never challenged and were left standing, and the revocation of article 15.º(4) was challenged and survived.

**Article 5.º revokes article 15.º(4)**, the 2024 provision that let the clock run from the date the residence permit was *applied for*. Residence now counts only from the date of legal residence, so time spent inside the AIMA backlog is deleted from the count, on top of the jump from five years to ten. The replacement rule at article 15.º(3) allows legal residence, continuous or broken, to be aggregated within a window of six, nine or twelve years for stateless persons, CPLP and EU nationals, and other nationals respectively.

Conditions have expanded: knowledge, by test or certificate, of the language and of culture, history and national symbols; knowledge of the rights and duties of nationality and the organisation of the State; a solemn declaration of adherence to the democratic rule of law; and capacity to support oneself. The criminal bar was narrowed rather than widened, to enumerated serious offences with an *effective* sentence exceeding three years, as a rebuttable presumption assessed by the Ministério Público. The Sephardic-descendant route is abolished, and nationality for children born in Portugal moves to opt-in, with the parental residence threshold rising to five years.

> CANDOUR
>
> **The grandfathering people believe in does not exist**
>
> The whole transitional regime is article 7.º of Lei Orgânica n.º 1/2026, and it is two sentences long. Article 7.º(2) preserves the old law only for administrative procedures pending at the date the law entered into force, 19 May 2026. In practice that means a nationality application already lodged with the IRN or the Conservatória dos Registos Centrais; what is not settled is the administrative test for when a procedure counts as pendente, meaning submission as against acceptance or payment. Holding residence before that date buys nothing. A third-country national resident since 2019, who satisfied the old five-year test in 2024 but had not filed, must now show ten years. There is no acquired-right protection and no cut-off keyed to the date residence was granted. Three petitions attached to the parliamentary file seek precisely the grandfathering that does not exist; as at 12 August 2026 none has produced a change in the law. The position is unfavourable, and on the ten-year requirement it is clear. What is open is the administrative test for pendente, not the existence of grandfathering, and any adviser presenting the old five-year rule as surviving is selling hope.

## The Regulamento that has not arrived

Article 4.º gives the Government 90 days from publication to amend the Regulamento da Nacionalidade Portuguesa annexed to Decreto-Lei n.º 237-A/2006. Ninety days from 18 May 2026 expires **in mid-August 2026**: 16 August on a raw count, but article 279.º of the Civil Code excludes the day of publication and transfers a deadline falling on a Sunday, so 17 August. As at 12 August 2026 it has not been published. Until it lands, the new tests and the solemn declaration have no prescribed form, syllabus, CEFR level or examining body, and nothing defines when a procedure counts as "pending": submission, acceptance or payment. That question decides live files. The deadline is directory rather than preclusive; treat this as the item most likely to change before edition 2.0.

> OBSERVATION
>
> **Where files actually fail**
>
> "The refusals I see on Portuguese files are rarely about income. They are about the criminal record certificate: issued by the wrong authority, apostilled after the certificate had already expired under its own domestic validity rules, or covering the country of nationality when the applicant had been living somewhere else for four years and the post wanted both. The second most common failure is proving the income is available *in Portugal* rather than merely existing. People show a beautifully evidenced UK pension and no mechanism by which any of it reaches a Portuguese account. Both are cheaper to fix before the appointment than after it." Tom Purdy, founder, Citizenship360
>
> TOM PURDY, FOUNDER, CITIZENSHIP360

## The tax position, in outline

The non-habitual resident regime is closed to new entrants and its replacement, IFICI, excludes pension income by exhaustive enumeration. A retiree arriving in 2026 pays ordinary IRS on a worldwide basis at rates reaching 48 per cent, plus a solidarity surcharge. There is no general net wealth tax, though AIMI surcharges Portuguese residential property above a per-person deduction. Portugal is a good place to obtain residence and a slow, expensive place to obtain citizenship.

CHAPTER 6

# Spain: the passive-income route, now the only route

The passive-income route is now the only route into Spain for a retiree with capital. What it requires, and the tax question most people miss.

Spain has lost the investment route. What most people miss is the wealth tax.

## The threshold: IPREM and the multipliers

The income requirement is a multiple of the IPREM. There is no General State Budget for 2026 and neither prórroga instrument mentions the IPREM, so the operative figure remains that set by Ley 31/2022: **EUR 600 per month, EUR 7,200 per year on twelve payments**. Any other "IPREM 2026" figure is wrong on the primary sources. Real Decreto 557/2011 was repealed by Real Decreto 1155/2024, in force 20 May 2025; the non-lucrative route now sits at articles 61 to 64, and article 62.1 carries the threshold over verbatim: 400 per cent of IPREM for the main applicant plus 100 per cent per dependent.

| APPLICANT | MONTHLY | ANNUAL |
|---|---|---|
| Main applicant (400 per cent) | EUR 2,400 | EUR 28,800 |
| Each dependent family member (100 per cent) | EUR 600 | EUR 7,200 |
| Couple | EUR 3,000 | EUR 36,000 |
| Couple plus one child | EUR 3,600 | EUR 43,200 |

Article 62.3 sets a new evidential standard for foreign accounts: entity name and address, full account identification, opening and cancellation dates, the balance at 31 December of the prior year and the average balance over the last year. Article 61.3 defines the family as spouse; registered or proven stable partner, including one year's cohabitation; unmarried minor children; and adult children with a disability or objectively unable to provide for themselves. Dependent ascendants are not on that list, although several consulate pages say they are.

## Health insurance, and why a policy with co-payments is refused

The old article 46(e) required insurance from an entity authorised to operate in Spain; the new article 61.2(b) says only "Contar con un seguro de enfermedad". "Sin copagos" and "sin carencias" appear nowhere.

> CONTESTED POINT
>
> ### The insurance rule is consular, not regulatory
>
> The requirement that a policy carry no deductible, no co-payment, no waiting period and no coverage cap is instruction issued by consulates, not text in Real Decreto 1155/2024. The Consulate General in Chicago, on a page dated after the new reglamento took effect, states that the insurance "must not have a deductible, copayment, or coverage limit", must cover 100 per cent of medical, hospital and out-of-hospital expenses, and that an insurance card will not be accepted as proof and travel insurance will not be accepted at all. São Paulo says the same in Spanish. The gap between text and practice does not help an applicant: a policy with a EUR 50 excess is refused at the counter regardless of what the reglamento says. Buy full cover from a Spain-authorised insurer with no co-payment, no waiting period and no cap, and confirm authorisation on the DGSFP register before paying a premium.

## The no-work rule: what it does and does not prohibit

Article 61.1 defines the status as residence "sin realizar actividades laborales o profesionales": not a prohibition on working for a Spanish employer but on economic activity, wherever the counterparty sits, so remote work for a foreign employer is caught. Consular instruction is explicit where the reglamento is silent: Chicago requires a notarised letter committing not to work while in Spain, "not even online". Receiving income is not prohibited, though where means derive from shareholdings in Spanish companies article 62.3 requires certification that the applicant exercises no labour activity in them. Anyone keeping remote work should use the digital nomad authorisation under Ley 14/2013, article 74 bis.

## Duration, renewals and the silence rules

The initial authorisation is one year (article 61.4) and renewals are for two (article 64.7), then long-term residence at five years; the claim that RD 1155/2024 moved renewals to four years is false for this route. The renewal window is two months before expiry plus three months' grace. On an initial application the administration has one month and **silence is negative** (article 63.4); on renewal, three months and **silence is positive** (article 64.8).

## Presence: the 183-day rule is now black-letter law

Article 64.2(f) makes it a condition of renewal to have resided "de forma real y efectiva" in Spain for more than 183 days in the calendar year. Under the old reglamento the test was administrative practice; since 20 May 2025 it is written law, and it is also the tax residence threshold in chapter 10.

## Long-term residence, and the absences that break it

Long-term residence follows five continuous years (article 32.2 of the Immigration Act, articles 182 to 185 of RD 1155/2024); continuity survives absences of up to six continuous months provided the total does not exceed ten months across the five years (article 183.2), with a cumulative cap of 18 months for work-related absences. Once held, the status is lost under article 201 on absence from EU territory for twelve consecutive months, on acquisition of EU long-term residence in another Member State, or, for the EU variant, on absence from Spain for six years.

Card renewal is separate: the first TIE renewal falls at five years and every five thereafter until 30, then every ten.

## Nationality: ten years, or two

Article 22.1 of the Civil Code requires ten years' residence for naturalisation. Five years suffices for recognised refugees, and **two years** for nationals of origin of Ibero-American countries, Andorra, the Philippines, Equatorial Guinea or Portugal, and for Sephardic Jews. That list is closed; British, American and South African nationals are on the ten-year clock.

Residence must be legal, continuous and immediately prior to the application (article 22.3), with good civic conduct and sufficient integration (article 22.4), tested by two Cervantes Institute examinations under Real Decreto 1004/2015: the CCSE constitutional and sociocultural test (EUR 85, which includes a second sitting only where the candidate fails the first or was absent) and DELE A2 (EUR 138 in Spain in 2026). The DELE exemption list covers twenty Latin American states plus Equatorial Guinea; Portugal, Andorra and the Philippines are not exempt, and there is no exemption from the CCSE. The Ministry of Justice fee (modelo 790, código 026) is set at EUR 100 by disposición final séptima.4 of Ley 19/2015 and updated annually; neither the Ministry page nor the blank form states a current amount, so confirm it on the sede before paying.

Article 23(b) requires a declaration renouncing the previous nationality, and British, American and South African nationals are not exempt; article 24.1 deals with loss of Spanish nationality, and it is the carve-out in its second paragraph that preserves nationality of origin for those acquiring Ibero-American, Andorran, Filipino, Equatorial Guinean or Portuguese nationality. What that declaration does under the law of the prior state is not addressed in any Spanish primary source, and we do not assert an answer.

## The golden visa is gone

Ley Orgánica 1/2025 of 2 January 2025 abolished Spain's investor residence route with effect from **3 April 2025**, by disposición final vigesimoprimera, apartado Uno, which leaves articles 63 to 67 of Ley 14/2013 "sin contenido". Applications filed before that date are decided under the law then in force; authorisations valid on 3 April 2025 keep their stated term, and renewals follow the law in force when the initial authorisation was granted. Other Ley 14/2013 routes are untouched, but for new applicants the non-lucrative visa is the only passive-income route into Spain.

## The fees

Reciprocity surcharges are nationality-based, not post-based, and replace the general fee rather than adding to it. The base fee for a long-stay national visa is EUR 90 under Orden AUC/891/2024, but few readers of this guide pay it.

| APPLICANT | FEE IN FORCE AT 12 AUGUST 2026 |
|---|---|
| UK nationals applying in London (non-lucrative) | GBP 516.00 |
| UK nationals, general type D in London | GBP 79.00 |
| US nationals applying in the US | USD 140 |
| Other nationalities applying in the US | USD 106 |
| South African nationals (general type D) | EUR 90, ZAR 1,689.00 at Pretoria (list of 1 January 2025; no 2026 list published) |
| UK nationals applying at Pretoria | ZAR 11,676.00 (list of 1 January 2025) |
| Initial residence authorisation (modelo 790-052) | USD 13 / GBP 9.60 / ZAR 205.00 |

The Pretoria post has published no 2026 price list; the ZAR amounts are those in force from 1 January 2025, and local-currency amounts are revised with exchange rates.

OBSERVATION

### The scale of the numbers, and the one that surprises people

"Spain issued 61,352 non-lucrative documents in 2025, down 18.0 per cent on 2024's 74,837, but that series counts renewals and modifications as well as initial grants: the initial-class count for 2025 was 30,325. The stock in force was 88,891 at 31 March 2026, down from a peak of 101,410 at 30 June 2025. That is still the best country-level retiree number that exists anywhere in Europe, and it tells you this route is ordinary administration rather than a boutique product. What clients are unprepared for is not the visa. It is the December conversation, when we work out that their portfolio, which was invisible in the UK, now sits inside a wealth tax base and a separate solidarity tax base, and that the answer varies by which autonomous community they chose to live in. Choose the region before you choose the house." Tom Purdy, founder, Citizenship360

TOM PURDY, FOUNDER, CITIZENSHIP360

## The wealth tax, which chapter 10 handles and you should read

Spain is the only one of the four principal destinations in this guide that levies a general net wealth tax, and it levies two: the Impuesto sobre el Patrimonio under Ley 19/1991, a regional tax with a state default scale, and the state Solidarity Tax on Large Fortunes under Ley 38/2022, which bites on net wealth above EUR 3,000,000 and was confirmed as still in force by an instrument published in June 2026. The two interact by credit, and the regional rebates now largely change which government receives the money rather than whether it is paid. If your net worth is concentrated in liquid investments rather than pension income, this single difference can outweigh every other factor in the comparison. It is modelled in chapter 12.

CHAPTER 7

# Greece

A seven per cent flat tax on foreign pensions for fifteen years, and the counterweight nobody puts in the brochure.

Greece offers the lowest headline tax rate on a foreign pension in this guide, and one of the harder paths to citizenship. The second is what most published guidance gets wrong.

## The residence route: the "financially independent person" permit

The category most people still call the FIP visa is now residence permit type I.8, under Article 163(8) of Law 5038/2023, the Immigration Code. Its threshold is set by joint ministerial decision 225679, ΦΕΚ B' 5223 of 17 September 2024: at least EUR 3,500 net per month, increased by 20 per cent for a spouse and 15 per cent for each child, so EUR 4,200 for a couple and EUR 4,725 for a couple with one child. The annual figures widely quoted (EUR 42,000 single, EUR 50,400 couple) do not appear in the ΦΕΚ at all. They are arithmetic, and we present them as such.

The permit is granted for three years and renews for equal three-year periods, the most generous initial cycle in this guide. Article 163(8)(c) removes the right to both dependent employment and independent economic activity of any form in Greece, for the principal, the spouse or partner and the family members, which on the Article 4 definition catches freelancing too. Health cover is private under Article 8(e), and Article 18(6) allows absences of up to six months a year. The fee is a παράβολο of EUR 1,000 on grant and on renewal, EUR 150 for a pension from a Greek principal insurance fund; the D visa fee is EUR 180 as published by the Greek Embassy in the United Kingdom, the underlying joint ministerial decision not being retrievable.

## Naturalisation: the finding that changes the plan

Article 5(1)(δ) of the Greek Nationality Code requires seven continuous years of lawful residence before an application. That is the figure everybody quotes. It is incomplete.

Article 5(1)(ε) sets out an exhaustive list of the titles that qualify for the seven-year route: the long-term resident permit, EU registration documents, family-member cards, the ten-year permit and the investor permit. The I.8 sufficient-resources permit is not on that list, and anyone holding a valid non-temporary title outside the list falls under Article 5(3), which requires twelve continuous years.

The practical route out is to convert first. Long-term resident status under Article 144 is available after five years of lawful and continuous residence, subject to an income test, sickness insurance and an integration requirement, and it sits on the seven-year list. But Article 144(1)(a) asks for regularity of income, proven through insurance as well as tax obligations, which is difficult to evidence for someone forbidden to work in Greece, and no primary guidance on how that is applied to I.8 holders was located. Article 5(2) permits the Minister to add titles to the list by decision, and no decision adding I.8 was found. Anyone planning a Greek passport on a ten-year horizon should verify this with the General Secretariat for Citizenship before committing.

Naturalisation also requires the ΠΕΓΠ examination (EUR 150, Greek at B1 level, 70 per cent overall pass mark subject to statutory floors of 66 per cent on language and 50 per cent on the other subjects) and a EUR 550 fee, not the EUR 700 still circulating in secondary sources.

## Article 5B: the 7 per cent regime, in full

Article 5B of the Greek Income Tax Code was inserted by Law 4714/2020 and implemented by joint decision A.1217/2020. It charges 7 per cent, assessed separately each tax year, on the whole of the income acquired abroad, not merely the pension. Greek-source income remains taxable under the general provisions, which for 2026 means a scale rising from 9 per cent to 44 per cent.

The regime expires after fifteen tax years; the words "not extendable" appear in article 5A rather than 5B. To qualify you must not have been a Greek tax resident for five of the six years preceding the transfer; you must transfer tax residence from a state with which Greece has an agreement on administrative cooperation in tax matters, a wider test than a double tax treaty and one the tax office checks of its own motion; and you must receive pension income arising abroad, evidenced by a document from a social security body, public authority, occupational fund or insurer.

Article 5B is mutually exclusive with the Article 5A lump-sum regime but compatible with Article 5C. Unlike 5A it has no family-member extension, and unlike 5A it gives no exemption from Greek inheritance or gift tax on foreign-situs property. Payment exhausts the liability on the foreign income, but both domestic and foreign income must still be declared on the return. Failure to pay the full amount for a year removes you from the regime from that year onwards, with no retroactive clawback of earlier years. Voluntary withdrawal is possible, but re-entry is prohibited outright.

Under Article 5B you are a Greek tax resident for treaty purposes, Article 5B(8) preserves Greece's conventions, and foreign tax paid on income covered by the regime is deducted from the 7 per cent charge; under 5A it is expressly not set off.

## The two 2026 changes

Most published guidance on Article 5B, including material updated during 2026, is now wrong on procedure in two respects. Both stem from Article 94 of Law 5313/2026, ΦΕΚ A' 102 of 25 June 2026.

First, the payment date has moved: the 7 per cent was payable in a single instalment in July and is now payable by the last working day of December. The same change was made to the Article 5A lump sum.

Second, the 31 March application deadline has been repealed, along with the 60-day decision deadline, and is now to be fixed by decision of the AADE Governor alone. For Article 5A the replacement decision has issued, A.1147/2026, setting 30 September with documents by 31 October. No equivalent decision for Article 5B could be located as at 12 August 2026: A.1217/2020 appears still formally in force for 5B procedure, but its 31 March deadline no longer has statutory backing. Treat the 5B window as unresolved and confirm it with the tax office for residents abroad before relying on any date.

CANDOUR

### A cheap tax rate bought with an expensive health system

Greece charges 7 per cent on foreign income. It also has the highest household out-of-pocket share of current health spending of the seven countries in this guide, at 34.3 per cent in 2023 against an EU27 average of 15.0 per cent (provisional), and the lowest total health spending per inhabitant of the group. The consequence shows in the survey data: 27.8 per cent of Greeks aged 65 and over reported an unmet need for medical examination or treatment in 2025, and 21.2 of those percentage points are cost rather than waiting lists. An S1 buys entry to the Greek system on the same terms as a Greek national, not better terms. Someone saving five figures a year in tax should set a material and rising private medical bill against it, and should do that arithmetic before moving rather than after.

27.8 per cent

Share of Greeks aged 65 and over reporting an unmet need for medical examination or treatment in 2025, more than eight times the EU average of 3.3 per cent.

*Eurostat EU-SILC, hlth_silc_08, accessed 12 August 2026.*

CHAPTER 8

# Italy

A seven per cent rate in the south, a discretionary visa in the north, and a tax code that ceases to exist on 1 January 2027.

Italy has the most discretionary front door in this guide and the smallest special tax regime. Both are documented, and both are usually left out.

## The elective residence visa, and why outcomes are uneven

The elective residence visa is governed by Decreto interministeriale 850 of 11 May 2011, Allegato A, item 13. It admits a foreigner who intends to settle in Italy and can maintain himself "without carrying on any work activity", on documented guarantees of a dwelling and of "ample autonomous, stable and regular economic resources, of which continuity into the future may reasonably be supposed", from sources other than subordinate employment.

The decree states no euro figure. It sets a formula: not less than three times the annual amount in Table A of the Ministry of the Interior directive of 1 March 2000, which produces EUR 31,159.29 for a single applicant and EUR 38,030.34 for two. Paris calls EUR 31,000 "only one of the parameters" and "a starting point"; the couple figure is a practitioner convention resting only on that arithmetic. The "plus 20 per cent per dependent child" uplift in wide circulation has no primary source at all; it is imported from the family reunification means test, a different rule, and we do not publish it. Note the statutory wording: sources other than *subordinate employment*. The decree does not itself exclude self-employment income; that exclusion comes from consular practice, applied firmly, with Paris excluding self-employment expressly and New York requiring that income "cannot be derived from ANY FORM OF EMPLOYMENT".

Allegato A item 13 requires only that the resources be "giudicate adeguate", and it is the post that judges: the assessment is made by the diplomatic or consular representation under articles 2 and 5 of DPR 394/1999, and London and New York both state that submitting all required documentation does not guarantee issue. Two applicants with identical finances can receive different answers at different posts, which is the system as drafted rather than a failure of it. Accommodation is the most common point of failure: New York requires a contract in the applicant's name registered with the Agenzia delle Entrate, and San Francisco a twelve-month lease.

The visa is valid for exactly 365 days, and the type D consular fee is EUR 116. The permesso di soggiorno must be applied for within eight days of entry, with a EUR 16.00 marca da bollo and a bollettino of EUR 70.46 on first issue or EUR 80.46 on renewal, a split indicating a first permit of up to one year and renewals of up to two. Long-term resident status follows at five years, with a bollettino of EUR 130.46 and Italian at A2. Naturalisation by residence remains at ten years for non-EU nationals, with Italian at B1; neither the 2025 citizenship legislation nor the June 2025 referendum changed that.

## Article 24-ter TUIR: the 7 per cent regime

Article 24-ter, introduced by Law 145/2018, charges a 7 per cent substitute tax on income of any category produced abroad, for a holder of foreign-paid pension income of the kind described in Article 49(2)(a) TUIR who transfers tax residence to Italy.

The option is valid for the year of transfer plus the nine following tax periods, so ten tax periods in total. "Nine years" and "ten years" are two descriptions of the same rule. To qualify you must not have been tax resident in Italy in the five preceding tax periods, and you must transfer from a country with which administrative cooperation arrangements are in force. The option is exercised in the tax return, with no advance ruling required. The tax is paid in a single instalment by the income tax balance deadline and is not deductible.

Two features are worth planning around. The taxpayer may elect not to apply the substitute tax to income produced in specified foreign states, ordinary IRPEF then applying with foreign tax credit available. And the exemption from Quadro RW reporting, IVIE and IVAFE is not in Article 24-ter at all; it sits in Article 1, comma 274 of Law 145/2018.

The geographical condition is the binding one. The municipality must be in Sicilia, Calabria, Sardegna, Campania, Basilicata, Abruzzo, Molise or Puglia, or listed in the central Italy earthquake annexes, or affected by the 2009 L'Aquila earthquake, and in any case have a population not exceeding 30,000. There is no separate 3,000-inhabitant earthquake rule in the current text.

933

The number of people in the whole of Italy on the Article 24-ter 7 per cent regime in tax year 2024, declaring EUR 4.0m of substitute tax.

*MEF, Dipartimento delle Finanze, Analisi dei dati IRPEF, Anno d'imposta 2024, accessed 12 August 2026.*

That number deserves an honest reading. It is not evidence that the regime fails; the same official series shows steady growth from 159 taxpayers in 2020, with average foreign pension income of EUR 40,262 in 2024. What it shows is how narrow the trade is. You must live in a qualifying municipality, the benefit lasts ten years with no extension, and for a British retiree whose main income is a government service pension the regime may add nothing at all, because that pension is outside the Italian tax base under the treaty in any event. Against Portugal's 128,958 registered non-habitual residents at the 2024 peak, 933 is the measure of a regime that asks a great deal about where you live.

CONTESTED POINT

### 20,000 or 30,000 inhabitants

Law 34 of 11 March 2026, article 26, raised the population cap in Article 24-ter from 20,000 to 30,000 with effect from 7 April 2026, with no transitional clause. That is the operative law today. But Article 247 of the new consolidated income tax code, which applies from 1 January 2027, was drafted before the amendment and still says 20,000. On the black-letter position as at 12 August 2026 the threshold reverts on 1 January 2027. That it is a coordination failure rather than a policy choice is supported by article 246, which carries the current EUR 300,000 figure for the ex-24-bis regime: the new code is up to date on one regime and stale on the other. A corrective decree will very likely fix it, but it is not fixed yet. Anyone contemplating a municipality between 20,000 and 30,000 inhabitants should treat their eligibility beyond 2026 as unresolved.

## A dating warning on every article reference in this chapter

D.Lgs 117 of 19 June 2026, the new consolidated income tax code, entered into force on 4 July 2026 and applies from 1 January 2027. Article 376 repeals Articles 1 to 191 of the 1986 TUIR from that date, which includes Articles 24-bis and 24-ter.

The substance survives. Article 24-bis is re-enacted as Article 246 and Article 24-ter as Article 247, with the 7 per cent rate, the same regions and annexes, the same five-year non-residence test and the same nine following tax periods: the pensioner regime is retained, not repealed.

But every TUIR article number used in this chapter is correct only through 31 December 2026, and must be rechecked against the new code after that date. One consequence that is often assumed and should not be: the RW, IVIE and IVAFE exemptions in Law 145/2018 comma 274 are not repealed, and article 376, comma 2 of the new code provides that references to repealed provisions are to be read as references to the corresponding provisions of the consolidated code, so the cross-references survive. What that clause does not do is import the Legge 34/2026 amendment into article 247, which is the point that remains unresolved.

CHAPTER 9

# France, Cyprus and Malta

The three most people do not consider, and the circumstances in which each of them is the right answer.

These three are the ones most people do not consider. Each is occasionally the right answer, for reasons unrelated to the headline rate.

## France

The residence route is the VLS-TS bearing the mention "visiteur", founded on Article L426-20 CESEDA. The test is that you can live on your sole resources, at least equal to the annual net SMIC. On the level set by the arrêté of 22 May 2026 that is EUR 1,477.93 net per month, and Service-Public asks for documentary proof of EUR 17,735.19 per year: the lowest income threshold of any route in this guide. You must justify sickness insurance and undertake to carry on no professional activity in France. The carte de séjour temporaire "visiteur" runs one year and renews annually, with no multi-year card available on this route; fees are EUR 99 for the long-stay visa, EUR 350 for the first card and EUR 250 on renewal. Naturalisation is available at five years, with French at B2 from 1 January 2026.

Two tax points matter more than the scale. CSG, CRDS and CASA are charged on old-age benefits only where the person is both fiscally domiciled in France and dependent on a French compulsory health insurance scheme. A British retiree covered by an S1 is insured at UK cost, is not dependent on a French scheme, and so falls outside the charge on pension income. That turns on affiliation, not nationality. Investment income is different: for 2026 income the total rate of social levies rose to 18.6 per cent (CSG 10.6, CRDS 0.5 and prélèvement de solidarité 7.5), by article 12 of loi n° 2025-1403 of 30 December 2025, taking the flat tax to 31.4 per cent in the general case. Assurance-vie, revenus fonciers, property gains, PEL, CEL and PER keep the 9.2 per cent CSG rate and so stay at 30 per cent. Second, the IFI bites above EUR 1,300,000 of net taxable property wealth at 1 January, but under Article 964 CGI someone who transfers fiscal domicile to France after five calendar years abroad is taxed to IFI only on French real estate, including shares to the extent they represent French real estate, until 31 December of the fifth year following arrival, so up to six calendar years.

9.3 per cent

Household out-of-pocket payments as a share of current health spending in France in 2023, the lowest of the seven countries in this guide and against an EU27 average of 15.0 per cent (provisional).

*Eurostat hlth_sha11_hf, accessed 12 August 2026.*

France is also the only country here above the EU average price level, at 111.2 on Eurostat's 2024 index for household final consumption expenditure. The out-of-pocket figure is what the difference buys.

## Cyprus

Cyprus offers the most favourable pension arithmetic in this guide and the least verifiable process: the Civil Registry and Migration Department's guidance is no longer served, competence moved in June 2024 to a new Deputy Ministry, and Category F guidance notes, pink-slip checklists and processing times are not verifiable from any live primary source.

The legislation is verifiable. Category F sits in Regulation 5(στ) of the Aliens and Immigration Regulations 1972, requiring a secured annual income of the amount in the First Schedule. That Schedule, last substituted in 2002, sets CY£5,600 for the applicant and CY£2,700 for a spouse and each dependant: EUR 9,568.17 and EUR 4,613.22 at the irrevocable conversion rate. Those remain the operative legal thresholds, and higher figures in circulation reflect administrative practice. The permit has no expiry date in the Regulations, so it is best described as indefinite, though it is lost after two years outside the Republic. Regulation 5 contains no express employment prohibition, and Regulation 6(4)'s cancellation power is drafted for the occupation-based categories rather than for Category F, so the no-work rule rests on administrative practice with no clean statutory anchor.

The tax position is the attraction. Article 20 of the Income Tax Law taxes a foreign pension for services rendered outside Cyprus at 5 per cent on the amount exceeding EUR 5,000, not aggregated with other income, with an annual election to use the ordinary scale instead. The 2026 threshold change is real: EUR 5,000 replaced the historic EUR 3,420 by Law 244(I)/2025, in force 1 January 2026, and the same law lifted the ordinary nil-rate band to EUR 22,000. The EUR 20,500 figure that circulated was a proposal-stage number, not law. A person whose domicile of origin is outside Cyprus is outside the special defence contribution unless Cyprus tax resident for at least 17 of the last 20 years, and from 1 January 2026 the SDC rate on dividends fell from 17 to 5 per cent, subject to a proviso in Law 245(I)/2025 keeping 17 per cent for six years on dividends paid out of pre-2026 profits of a Cyprus-resident company; interest SDC remains at 17 per cent and rent at 3 per cent. GESY is 2.65 per cent on pensions and investment income, capped by reference to EUR 180,000. So a non-dom retiree electing Article 20 is looking at roughly 7.65 per cent all-in, with no tax on securities gains, no inheritance tax and no wealth tax. One warning belongs in every Cyprus file: the 60-day tax residence rule requires a Cyprus business, employment or office, so a passive retiree must satisfy the 183-day test.

## Malta

Malta's route for a retiree from outside the EU is not the "economic self-sufficiency" ordinary residence most articles describe: that is an EU and EEA route under Article 11 of S.L. 460.17, with Swiss nationals covered instead by the EU-Switzerland free movement agreement, and open to third-country nationals only as family members.

The programme that matters is the Malta Retirement Programme, S.L. 123.134. It charges 15 per cent on foreign income received in Malta by the beneficiary, spouse and children, subject to a minimum tax of EUR 7,500 per year of assessment for the beneficiary plus EUR 500 per dependant and per special carer, payable in full in both the first and the last year of status. Other income is charged at 35 per cent. The minimum tax is due by 30 April of the year preceding the year of assessment and is not refundable; the application fee is EUR 2,500. The pension must be received in full in Malta and constitute at least 75 per cent of chargeable income. Qualifying property must be the worldwide primary residence: purchase at EUR 275,000 in Malta or EUR 220,000 in Gozo or the south, or rent at EUR 9,600 or EUR 8,750 a year. Status ceases below 90 days a year in Malta averaged over five years, or above 183 days in any other single jurisdiction. Underneath sits the remittance basis: foreign income is taxed only on the amount received in Malta and foreign capital gains are not taxable at all. There is no wealth tax and no tax called inheritance tax, but death transfers of Maltese immovable property attract 5 per cent duty under the Duty on Documents and Transfers Act, Cap. 364 (article 32(1)), and shares in Maltese companies 2 per cent, 5 per cent for property companies (article 42(1)(c)), with family-home reliefs. Note also that article 56(27) of the Income Tax Act imposes a EUR 5,000 minimum tax on non-doms with at least EUR 35,000 of unremitted foreign income.

**38.4 per cent**

Malta's Schengen short-stay visa refusal rate in 2025, the highest of any member state consular network and more than three times Italy's 10.8 per cent.

*European Commission, DG HOME, 2025 visa statistics, published 28 May 2026, accessed 12 August 2026.*

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### What that refusal rate does and does not tell you

The 38.4 per cent figure covers uniform short-stay Schengen visas, not the Malta Retirement Programme or any national residence route, and no official refusal statistics are published for the programme itself. It is not a prediction of your outcome. It is, however, the only published measure of how this consular network exercises judgement, it is more than double the Schengen-wide average of 14.7 per cent, and it has been stable at that level for two years. A reader choosing between Malta and a network that refuses one application in ten is entitled to know it, with that qualification attached rather than omitted.

CHAPTER 10

# How you will actually be taxed

Treaties, wealth taxes, reporting obligations and the American problem.
This is the chapter your adviser will read first.

Most people ask which country has the lowest rate. The prior question is which country may tax the income at all, and that is settled by treaty, not by the destination's tax code.

## The two articles that decide everything

Every modern convention follows the OECD Model. Two articles do almost all the work.

**Article 18 (Pensions).** Pensions "paid to a resident of a Contracting State in consideration of past employment shall be taxable only in that State", subject to article 19(2). Private and occupational pensions follow residence, exclusively.

**Article 19(2) (Government Service).** Pensions paid by, or out of funds created by, a State, a political subdivision or a local authority for services rendered to that State "shall be taxable only in that State".

The carve-out in 19(2)(b) is where commentary goes wrong: the pension moves only if the services were rendered in the new state **and** the individual "is a resident of, and a national of, that other State". Both are required. Residence in Spain does not move a UK Crown pension; you would have to become Spanish. A household with one government and one private pension is taxed in two countries at once, permanently, and files in both.

## Teachers versus the NHS

Our most commonly misunderstood point. HMRC treats teachers employed by a local authority, or by the board of governors of a public sector school, as "paid by the state for services rendered to that state": their pensions sit inside article 19 and stay taxable in the UK. Private and independent school service does not.

The NHS is different. On the same page HMRC says "employment with a statutory body set up by a state etc. is not usually regarded as involving payment by, or the rendering of services to, that state etc., even if the body is set up and funded by the state". DT1927 flags an Area Health Authority as a doubtful case for the Tax Treaty Team.

> CONTESTED POINT
>
> ### NHS pensions are not settled
>
> The widespread assertion that all NHS pensions are government service pensions is not HMRC's stated position. HMRC has no published page addressing NHS pensions by name. The position above is derived from INTM163190 read with DT1927, not stated in terms. It turns on the identity of the employing body. We present it as unresolved because it is.

## The four UK treaties that matter

| DESTINATION | INSTRUMENT | PENSIONS | GOVERNMENT SERVICE | NOTE |
|---|---|---|---|---|
| Portugal | Convention signed London 15 September 2025, **in force 29 December 2025** | Art. 17, residence only | Art. 18 | Effective in the UK from 6 April 2026 for income tax and CGT; in Portugal from 1 January 2026 |
| Spain | Signed London 14 March 2013, in force 12 June 2014 | Art. 17, residence only | Art. 18 | MLI-modified; Spain applies exemption with progression under art. 22.1(b) |
| Greece | Signed Athens 25 June 1953, in force 15 January 1954 | Art. X(2) | Art. VIII | Exemption from UK tax is conditional on being "subject to Greek tax in respect thereof"; note also the remittance restriction in art. II(2) |
| Italy | Signed Pallanza 21 October 1988, in force 31 December 1990 | Art. 18, residence only | Art. 19 | No dedicated social security article |

Three points. **The 1968 UK-Portugal convention is no longer operative**, so advice citing it works from a dead text. Greece is not a modern treaty: the article X(2) subject-to-tax condition must be handled alongside article 5B, which taxes rather than exempts and treats the taxpayer as a Greek resident for treaty purposes. And a UK Crown pension is not taxed in Spain, but under article 22.1(b) it fixes the rate on everything else. Exempt does not mean invisible.

## Getting the UK pension paid gross

Treaty relief is not automatic: until HMRC acts the provider deducts UK tax and you pay twice while reclaiming. File form DT-Individual with a certificate of residence from the destination tax authority; on acceptance HMRC issues code NT and payments run gross. The PAYE Manual lists double taxation agreements among the limited cases for code NT, applied by pension providers as well as employers.

OBSERVATION

**Start the gross-payment paperwork the month you register locally, not the month you arrive**

"The bottleneck is never HMRC. It is the certificate of tax residence from the destination authority, which most of them will not issue until you have a local tax number, a local address on file and, in several cases, a first return behind you. That is why people who move in September so often spend the whole of the following year taxed twice on the same pension and reclaiming the difference. Get the tax number, register locally, request the certificate, then file DT-Individual. In that order, and immediately." Tom Purdy, founder, Citizenship360

TOM PURDY, FOUNDER, CITIZENSHIP360

## Spain: wealth tax, the Solidarity Tax and the Madrid rebate

Spain alone of the four principal destinations has a general annual net wealth tax. The state scale (article 30, Ley 19/1991) runs from 0.2 per cent to 3.5 per cent above EUR 10,695,996.06. The state mínimo exento is **EUR 700,000** per person where the region has not set its own; the main residence is exempt up to **EUR 300,000**. Regional mínimos: Cataluña and Extremadura EUR 500,000; Comunitat Valenciana EUR 1,000,000; Illes Balears EUR 3,000,000.

On top sits the **Solidarity Tax on Large Fortunes (ITSGF)**, article 3 of Ley 38/2022:

| BASE LIQUIDABLE TO (EUR) | RATE |
|---|---|
| 3,000,000 | 0.00% |
| 5,347,998.03 | 1.7% |
| 10,695,996.06 | 2.1% |
| above 10,695,996.06 | 3.5% |

Its own EUR 700,000 mínimo exento applies, but the charge engages only above EUR 3,000,000 of net wealth. It remains in force at 12 August 2026: the BOE consolidation note records its extension under disposición adicional 5.2 of Real Decreto-ley 8/2023, and Orden HAC/652/2026 of 26 June 2026 amends the modelo 718 order for filings from 1 July 2026.

Madrid is widely misdescribed. Ley 12/2023 of the Comunidad de Madrid overrode the 100 per cent rebate, substituting a rebate equal to the difference between the wealth tax charge and the ITSGF charge: wealth tax is reinstated exactly to the extent the state Solidarity Tax would otherwise have bitten, so the money goes to Madrid rather than central government. **The net cost to the taxpayer is unchanged; only the recipient changes.** Andalucía did the same from 2024. Net wealth up to EUR 3,000,000 stays free of both; above it, Madrid is no haven relative to the ITSGF floor. Note also the article 31 joint cap: combined income and wealth tax limited to 60 per cent of the income tax base, the reduction itself capped at 80 per cent of the wealth tax charge.

## Modelo 720 after C-788/19

Spain's foreign asset declaration survived; its penalty regime did not. In **C-788/19, Commission v Spain, 27 January 2022**, the CJEU struck down all three heads: undeclared assets treated as unjustified capital gains with no effective limitation period, the 150 per cent proportional fine, and the uncapped flat-rate fines. **Ley 5/2022 of 9 March** repealed the 150 per cent fine and the EUR 5,000 per item / EUR 10,000 minimum fines, deleted the imprescriptibility rule in article 39 LIRPF and stripped the penalties from DA 18ª LGT.

The obligation remains: **EUR 50,000 per category** (accounts; securities, insurance and annuities; immovable property), filed 1 January to 31 March, re-reported only where a category has grown by more than EUR 20,000 against the last declaration actually filed. Penalties are now the ordinary LGT regime: EUR 20 per data item, minimum EUR 300, maximum EUR 20,000, halved for unprompted late filing, four-year prescription. Crypto goes on modelo 721.

## Italy: IVIE, IVAFE and Quadro RW

Italy has no general wealth tax but charges two asset taxes on foreign holdings and requires an annual disclosure.

- IVIE: 1.06 per cent of the value of foreign real estate (raised from 0.76 per cent from 2024). Not due where the amount does not exceed EUR 200. Credit for foreign property wealth tax.
- IVAFE: 0.2 per cent of the value of foreign financial products, rising to 0.4 per cent for products held in privileged tax regime states identified by DM 4 maggio 1999.
- Quadro RW: disclosure under article 4 of DL 167/1990. Penalties of 3 to 15 per cent of undeclared amounts, doubled to 6 to 30 per cent for privileged-regime jurisdictions.

The relief for 7 per cent optants is not in article 24-ter but in **article 1 comma 274 of L. 145/2018**, which relieves them of Quadro RW and exempts them from IVIE and IVAFE for the years of validity, removing the penalty exposure with it. Those cross-references survive the repeal of the old TUIR on 1 January 2027, because article 376(2) of the new code reads references to repealed provisions as references to the corresponding new ones; see chapter 12.

## The US citizen problem

A US citizen who moves to Europe does not stop being taxed by the United States.

1. Citizenship-based taxation. Worldwide income stays taxable regardless of residence, and the Foreign Earned Income Exclusion does not assist: the IRS excludes pensions and annuities, social security benefits, dividends, interest, capital gains and IRA distributions from foreign earned income.
2. The saving clause. Article 1(4) of the 2016 US Model provides that the convention "shall not affect the taxation by a Contracting State of its residents ... and its citizens", bar a listed set of provisions. The pension articles of the US treaties with Portugal, Spain and Italy are not among those preserved for citizens. There is no treaty route out.
3. Basket limitation. The foreign tax credit under IRC ss. 901 and 904 is computed separately for each limitation category, so foreign tax on passive income cannot shelter US tax on general-basket income or US-source investment income. Excess credits carry back one year and forward ten, and may expire unused.
4. NIIT is not creditable. The 3.8 per cent net investment income tax applies to the lesser of net investment income or modified AGI above USD 200,000 for a single filer, and foreign tax credits "may not be used to reduce your NIIT liability".

## Leaving the UK properly

**The statutory residence test (FA 2013 Sch 45).** The automatic overseas tests are the clean exits: fewer than 16 UK days if resident in any of the three preceding tax years; fewer than 46 if not; or full-time work overseas. Otherwise the sufficient ties table applies to someone previously resident:

| UK DAYS IN THE TAX YEAR | TIES THAT MAKE YOU UK RESIDENT |
|---|---|
| 16 to 45 | 4 |
| 46 to 90 | 3 |
| 91 to 120 | 2 |
| over 120 | 1 |

Split-year treatment has eight cases; 1 to 3 are departure cases. Case 3, ceasing to have a UK home, requires no UK home from a day in the year, fewer than 16 UK days in the remainder, non-residence the following year, and a sufficient link with an overseas country within six months. Sourcing note: RDRM11000, RDRM12600 and RDRM12700 are dead pages; the live manual is the Residence and FIG Regime Manual.

**Temporary non-residence (Sch 45 Part 4, para 110).** If at least four of the seven tax years before departure were years of sole UK residence and non-residence lasts five years or less, pension income including lump sums, remitted foreign income, distributions from closely controlled companies, chargeable event gains and gains on assets held before departure are all brought back into UK charge on return. Returning at four years and eleven months undoes the planning entirely.

## The QROPS overseas transfer charge

A **25 per cent charge** applies to QROPS transfers requested on or after 9 March 2017. The EEA and Gibraltar exclusion has gone, surviving only for transfers requested before 30 October 2024 and completed before 30 April 2025 (s.32 FA 2025). The exclusion that matters to a retiree is now residence in the same country as the scheme, and the charge can arise later if circumstances change within the five-year relevant period. So a UK retiree moving to Portugal, Spain, Greece or Italy and transferring to an EEA QROPS faces 25 per cent unless resident where the scheme is. That has changed more plans in our office than any tax rate in this chapter.

CHAPTER 11

# What it costs

Government fees, exactly as published. Comparative price levels, from Eurostat. What we will not publish, and why.

This chapter deals only with figures set by governments and published by statistical offices. It does not deal with what advice costs, for reasons set out at the end.

## Government and consular fees

Statutory or officially published amounts, limited to the items a retiree actually pays. Service provider charges (VFS, TLS, BLS and equivalents) are set by the contractor rather than the state and are excluded.

| COUNTRY | ITEM | AMOUNT |
|---|---|---|
| Portugal | National (D) residence visa, consular fee | EUR 110 |
| Portugal | AIMA receipt and analysis (grant or renewal), in force from 1 March 2026 | EUR 133.00 presential / EUR 99.80 digital |
| Portugal | AIMA emission of temporary residence title | EUR 114.30 presential / EUR 85.80 digital |
| Portugal | First residence permit, practical total | EUR 247.30 presential / EUR 185.60 digital |
| Portugal | Naturalisation | EUR 250 |
| Spain | Long-stay (type D) visa, statutory base fee | EUR 90 |
| Spain | Non-lucrative visa, UK nationals applying in London | GBP 516.00 |
| Spain | Type D visa, US nationals (reciprocity rate) | USD 140 |
| Spain | Initial temporary residence authorisation (modelo 790-052) | GBP 9.60 (London) / USD 13 (US) |
| Greece | National (D) visa, as published by the Greek Embassy in the UK (underlying joint decision not retrievable) | EUR 180 |
| Greece | Residence permit παράβολο, I.8 permit, grant and renewal | EUR 1,000 |
| Italy | National (D) visa | EUR 116 |
| Italy | Permesso di soggiorno, bollettino total, up to 1 year | EUR 70.46 |
| Italy | Permesso di soggiorno, over 1 and up to 2 years | EUR 80.46 |
| Italy | EU long-term residence permit | EUR 130.46 |
| France | Long-stay visa | EUR 99 |
| France | First carte de séjour "visiteur" (EUR 300 tax plus EUR 50 stamp) | EUR 350 |
| France | Renewal | EUR 250 |
| France | Naturalisation stamp | EUR 255 |
| Cyprus | Category F immigration permit, including accompanying dependants | EUR 500 |
| Cyprus | Alien Registration Certificate | EUR 70 |
| Cyprus | Naturalisation (Form M127) | EUR 500 on submission plus EUR 500 on issue |
| Malta | Malta Retirement Programme application fee | EUR 2,500 |

Three qualifications. Spain's reciprocity surcharges are nationality-based, not post-based, and replace rather than supplement the general fee: a British applicant in London pays GBP 516, a South African applicant the standard EUR 90. Greek children under 12 are exempt from the visa fee and minors from the residence permit παράβολο. Portugal's AIMA table uprates with the consumer price index each 1 March.

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### Two Greek and Italian fee points we cannot close

No primary text states whether each accompanying adult family member on a Greek I.8 permit pays the full EUR 1,000 παράβολο. On the face of the statute a παράβολο accompanies each application and family members receive individual permits, but we have not been able to confirm it. Separately, the Italian permit fee is published as three bollettino totals; the underlying contributo tiers are widely reported as EUR 70 / 80 / 100 and are in fact EUR 40 / 50 / 100, but the amending decree itself was not retrieved. We publish the bollettino totals because those are directly quoted from a police source.

## Comparative price levels

Eurostat dataset prc_ppp_ind, price level indices for final consumption by private households, indicator PLI_EU27_2020, on the base stated in the dataset itself: **EU27_2020 = 100**. Reference year **2024**, which is the latest year present in the series. This is the only cost of living measure used in this guide; crowd-sourced sites are excluded.

| COUNTRY | HOUSEHOLD FINAL CONSUMPTION (E011) | ACTUAL INDIVIDUAL CONSUMPTION (A01) |
|---|---|---|
| Greece | 86.0 | 83.0 |
| Portugal | 87.0 | 85.0 |
| Spain | 90.9 | 90.7 |
| Malta | 91.6 | 93.1 |
| Cyprus | 92.8 | 95.1 |
| Italy | 97.5 | 98.1 |
| EU27 | 100.0 | 100.0 |
| France | 111.2 | 107.9 |
| United Kingdom | 124.7 | 129.1 |
| United States | 138.7 | 149.2 |

The sub-indices are more instructive than the headline. Food is cheap nowhere: the seven destinations sit between 95.2 (Spain) and 112.2 (Malta) against the EU average, Greece above it at 105.8. The saving is in services: Portuguese restaurants and hotels at 75.5, some 24.5 per cent below the EU average, against Italy at 106.9 and France at 110.0. Housing, water and energy runs from Greece at 70.5, and Malta and Portugal both at 80.1, up to France at 122.5.

Eurostat's own caution deserves reproducing: "Price level indices are not intended to rank countries strictly ... they only provide an indication of the order of magnitude."

## House prices and rents

Eurostat house price index, 2015 = 100.

| COUNTRY | 2025 ANNUAL AVERAGE | 2026 Q1 |
|---|---|---|
| Portugal | 263.85 | 290.98 |
| Spain | 180.60 | 194.06 |
| Malta | 173.55 | 180.81 |
| EU27 | 161.93 | 166.63 |
| Cyprus | 150.89 | 155.34 |
| France | 127.26 | 126.67 |
| Italy | 116.20 | 119.20 |

Portugal is the outlier by a distance: 263.9 per cent of its 2015 level in 2025, 291.0 by the first quarter of 2026, that is cumulative rises of 163.9 and 191.0 per cent, calculated from the published index rather than published as such. Italy over the same period rose 16.2 per cent. Annual rates in 2025 were 17.6 per cent in Portugal and 12.7 per cent in Spain, against 4.0 per cent in Italy and 0.7 per cent in France.

Eurostat publishes no house price index for Greece; every observation from 2005 to 2025 is null. The OECD analytical series puts Greece at 177.89 in 2025 on a 2015 base, roughly plus 78 per cent, but it is a nominal house price index on a different methodology, so it does not belong in the table above.

Rents, annual rate of change to June 2026: Greece 7.1 per cent, Portugal 5.2, Cyprus 4.2, Italy 3.6, Malta 3.5, EU27 3.0, Spain 2.5, France 1.6. Greek rents have risen fastest of the seven for at least seven consecutive months.

## What you pay at the point of care

Household out-of-pocket payments as a share of current health expenditure, 2023, the latest year with an EU27 aggregate, as published in Eurostat hlth_sha11_hf (unit PC_CHE, financing scheme HF3). The per-inhabitant figures are as published.

| COUNTRY | OUT-OF-POCKET, EUR PER INHABITANT | SHARE OF CURRENT HEALTH SPENDING |
|---|---|---|

| COUNTRY | OUT-OF-POCKET, EUR PER INHABITANT | SHARE OF CURRENT HEALTH SPENDING |
|---|---|---|
| Greece | 624.14 | 34.3% |
| Malta | 1,016.30 | 30.9% |
| Portugal | 748.52 | 29.4% |
| Italy | 720.19 | 23.7% |
| Spain | 595.89 | 20.9% |
| Cyprus | 458.79 | 17.4% |
| EU27 | 575.32 | 15.0% (p) |
| France | 439.21 | 9.3% |

Greece, Portugal and Malta run out-of-pocket shares roughly double the EU average; France roughly half. The EU27 figure carries Eurostat's provisional flag. Read this against the price level table: Greece is the cheapest of the seven on general prices and the most expensive of the seven on the share of healthcare the household funds directly. A guide that presents the first figure without the second is not being straight with you.

## What advice costs

We publish government fees exactly, because they are public, fixed and knowable. We do not publish professional, legal or tax-advisory fee levels, not even as a range: every case differs in the jurisdictions in play, the applicants, the treaty questions to be resolved and the reporting that follows, and a guess about your money is worse than no figure. Our fees are quoted individually, in writing, before any work begins. If you would like a personalised quote, please get in touch.

CHAPTER 12

# Two worked scenarios

A British couple and a single American, worked through band by band, with the arithmetic shown rather than asserted.

Illustrative computations demonstrating mechanism, not advice for any actual taxpayer. The working rates are GBP 1 = EUR 1.15 and USD 1 = EUR 0.92, chosen for legibility rather than taken from a market source, and flagged as such. Both spouses in Scenario A are over 65. No property is held in the destination country, so AIMI, IFI, ENFIA and the Spanish main-residence exemption are set aside. Portfolio yield is assumed at 3 per cent, taken entirely as dividends. No UK government service pension is in issue.

## Scenario A: a British couple

A couple with **GBP 60,000 of combined pension income and GBP 900,000 invested**: at the working rate, **EUR 69,000 of pension** (EUR 34,500 each), **EUR 1,035,000 invested** and dividend income of **EUR 31,050** (EUR 15,525 each).

*Note on framing: the outline used round euro terms. We keep the pack's original sterling and the euro amounts that follow from it, because every total below derives from EUR 69,000 and EUR 1,035,000. Restating a total against a different input would be tidier and wrong.*

**Portugal, ordinary regime.** NHR is closed and IFICI does not cover pensions, so category H is aggregated at ordinary rates. Per spouse, EUR 34,500 less the article 53 specific deduction of EUR 4,587.09 gives EUR 29,912.91 taxable.

| SLICE (EUR) | RATE | TAX (EUR) |
|---|---|---|
| 8,342.00 | 12.50% | 1,042.75 |
| 4,245.00 | 15.70% | 666.47 |
| 5,251.00 | 21.20% | 1,113.21 |
| 5,251.00 | 24.10% | 1,265.49 |
| 6,308.00 | 31.10% | 1,961.79 |
| 515.91 | 34.90% | 180.05 |
| **29,912.91** | | **6,229.76** |

Couple: EUR 12,459.52. Dividends at the 28 per cent autonomous rate: EUR 31,050 × 0.28 = EUR 8,694.00. No solidarity surcharge, taxable income per spouse being below EUR 80,000. **Portugal total: EUR 21,153.52.**

**Spain, Andalucía.** Per spouse, EUR 34,500 less the article 19.2.f) deduction of EUR 2,000 gives a general base of EUR 32,500. The article 20 reducción is unavailable above EUR 19,747.50.

| COMPONENT | EUR |
|---|---|
| State half-scale on 32,500 | 3,957.75 |
| Andalusian half-scale on 32,500 | 3,917.00 |
| Gross | 7,874.75 |
| Less mínimo (5,550 + 1,150 over-65) run through both first bands at 9.5% | (1,273.00) |
| Net general, per spouse | 6,601.75 |

Couple: EUR 13,203.50. Savings income per spouse on EUR 15,525: EUR 6,000 at 19 per cent plus EUR 9,525 at 21 per cent = EUR 3,140.25, so EUR 6,280.50 for the couple. **Andalucía total: EUR 19,484.00.**

**Spain, Madrid.** The Madrid scale gives EUR 3,466.94 on the same base, less the mínimo at 8.5 per cent (EUR 569.50) = EUR 2,897.44. State net is EUR 3,957.75 less EUR 636.50 = EUR 3,321.25. Per spouse EUR 6,218.69; couple EUR 12,437.38. Savings income is identical, both halves of the savings scale being set by state law. **Madrid total: EUR 18,717.88**, roughly EUR 766 a year less than Andalucía.

Wealth taxes are nil in both regions: held jointly, each spouse's net wealth is EUR 517,500, below the EUR 700,000 mínimo exento. Modelo 720 is still required, foreign accounts and securities each exceeding EUR 50,000.

**Greece, article 5B.** Seven per cent on the whole of foreign-source income, assessed separately per individual. Per spouse, EUR 50,025 at 7 per cent = EUR 3,501.75. **Greece total: EUR 7,003.50**, payable in one instalment by the last working day of December.

**Italy, article 24-ter.** Seven per cent on income of any category produced abroad: EUR 100,050 at 7 per cent. **Italy total: EUR 7,003.50**, plus relief from IVIE, IVAFE and Quadro RW for the ten tax periods.

**Cyprus, article 20 plus non-dom.** Per spouse: (EUR 34,500 less EUR 5,000) at 5 per cent = EUR 1,475.00; GESY at 2.65 per cent on the pension = EUR 914.25; no SDC on dividends while non-domiciled, but GESY at 2.65 per cent on EUR 15,525 = EUR 411.41. Per spouse EUR 2,800.66. **Cyprus total: EUR 5,601.32.**

| DESTINATION | ANNUAL TAX (EUR) | APPROX GBP |
|---|---|---|

| DESTINATION | ANNUAL TAX (EUR) | APPROX GBP |
|---|---|---|
| Cyprus (art. 20 plus non-dom) | 5,601 | 4,871 |
| Greece (art. 5B) | 7,004 | 6,090 |
| Italy (art. 24-ter) | 7,004 | 6,090 |
| Spain (Madrid) | 18,718 | 16,276 |
| Spain (Andalucía) | 19,484 | 16,943 |
| Portugal (no regime) | 21,154 | 18,395 |

For this profile Portugal is now the most expensive of the four principal destinations, not the cheapest, attributable entirely to the closure of NHR and the deliberate exclusion of category H pension income from the IFICI exemption in article 81(4) CIRS.

For scale, the ordinary Greek rules would produce roughly EUR 6,703 per spouse before the dividend treatment, about EUR 13,400 for the couple, after the article 16 credit of EUR 777 tapered to EUR 327 at this income; the ordinary Italian rules produce roughly EUR 25,000 including dividends at 26 per cent and before local surcharges. The special regimes roughly halve the Greek bill and transform the Italian one.

**Three qualifications that must accompany that table.**

1. Greece and Italy require **both** spouses to hold a foreign pension. Where only one does, the other is taxed on ordinary rules and the arithmetic changes materially.
2. Italy requires residence in a qualifying small municipality: a lifestyle constraint, not a paperwork one.
3. None of these figures includes the 25 per cent Overseas Transfer Charge if a UK pension is transferred to an EEA QROPS, nor the UK temporary non-residence rule if the couple returns within five years.

CONTESTED POINT

### Italy's population threshold may revert on 1 January 2027

L. 34/2026 raised the article 24-ter municipality cap from 20,000 to 30,000 inhabitants with effect from 7 April 2026. But article 247 of the new consolidated income tax code (D.Lgs 117/2026), which applies from 1 January 2027 and repeals the old TUIR articles, says 20,000. The chronology explains it: the draft was approved before L. 34/2026 came into force and the final text did not pick up the amendment. As drafted, the threshold reverts. This is very probably a coordination failure that a corrective decree will fix, but the black-letter position at 12 August 2026 is a reversion, and anyone contemplating a municipality between 20,000 and 30,000 inhabitants must be told so. The exemption from Quadro RW, IVIE and IVAFE is carried across by the general renvoi in article 376(2) of the new code, so that point is resolved; the population threshold is not.

## Scenario B: a single American

A single US citizen, aged 67, with **USD 200,000 a year**: USD 120,000 of traditional IRA distributions and USD 80,000 of qualified dividends. At the working rate, EUR 184,000 in total (IRA EUR 110,400, dividends EUR 73,600).

**Step 1: the irreducible US floor**, which exists before any destination is chosen.

| ITEM | USD |
|---|---|
| Gross income | 200,000 |
| Standard deduction 16,100 plus 65-plus allowance 2,050 | (18,150) |
| Taxable income | 181,850 |
| of which qualified dividends | 80,000 |
| of which ordinary income | 101,850 |
| Ordinary tax: 12,400 at 10%, 38,000 at 12%, 51,450 at 22% | 17,119 |
| Qualified dividends: 0% band fully consumed by ordinary income, so 80,000 at 15% | 12,000 |
| NIIT | nil |
| **US federal floor** | **29,119** |

The OBBBA senior deduction of USD 6,000 is fully phased out at this income. The NIIT escape is narrower than it looks: net investment income is USD 80,000 (IRA distributions are not net investment income), but modified AGI does not exceed the USD 200,000 threshold. One further dollar starts the 3.8 per cent charge, and no foreign tax credit can touch it.

**Step 2: the destination overlay.**

*Portugal, no special regime.* Under article 20(1)(a) of the US-Portugal treaty the IRA is taxable in the state of residence, so Portugal taxes it as category H: EUR 105,812.91 after the specific deduction. The 2026 bands give EUR 30,197.06 up to EUR 86,634, plus EUR 19,178.91 at 48 per cent = EUR 9,205.88, so income tax of **EUR 39,402.94**. The solidarity surcharge adds 2.5 per cent on EUR 25,812.91 = **EUR 645.32**. Dividends at 28 per cent add **EUR 20,608.00**. **Portugal total: EUR 60,656.26**, roughly USD 65,931.

*Spain, region mirroring the state scale.* General base EUR 108,400 produces EUR 39,681.50, less the mínimo at 19 per cent (EUR 1,273.00) = **EUR 38,408.50**. Savings income of EUR 73,600 produces **EUR 15,808.00**. **Spain total: EUR 54,216.50**, roughly USD 58,931. Spain alone of the four has an express treaty provision, new article 20(5) inserted by the 2013 Protocol, protecting the inside build-up of a US pension fund until distribution.

*Greece, article 5B, and Italy, article 24-ter.* Seven per cent on EUR 184,000 = **EUR 12,880**, roughly USD 14,000 in each case.

**Step 3: what that actually means.**

| DESTINATION | LOCAL TAX (USD EQUIV.) | US FLOOR | COMBINED OUTCOME |
|---|---|---|---|
| Greece (art. 5B) | ~14,000 | 29,119 | **~29,119** |
| Italy (art. 24-ter) | ~14,000 | 29,119 | **~29,119** |
| Spain | ~58,931 | 29,119 | **~58,931**, with roughly 29,119 of foreign tax credited or stranded, subject to basket limits |
| Portugal | ~65,931 | 29,119 | **~65,931**, likewise |

For the British couple, the Greek and Italian regimes reduce the total bill to 7 per cent, full stop. For the American, the 7 per cent is credited against a US liability that does not go away, so the floor stays at roughly USD 29,119. The regimes convert a US retiree's position from "US plus a lot" to "US, roughly": a genuine saving against Spain or Portugal, but not the headline number the marketing implies.

**Three compounding traps.**

1. Basket limitation. Foreign tax on the dividends sits in the passive basket and cannot shelter US tax on the IRA distributions in the general basket, or the reverse. Excess credits carry back one year and forward ten and may never be used. Whether traditional IRA distributions fall in the passive or the general basket for s.904 purposes we could not resolve from a primary source, and we flag it as unresolved rather than assume it.
2. NIIT is not creditable. Any planning that pushes modified AGI above USD 200,000 triggers 3.8 per cent that no foreign tax credit can reach.
3. The saving clause. Under all three treaties it preserves US taxing rights over citizens, and the pension articles are not among the provisions excepted for them. There is no treaty route out.

CANDOUR

### The Italy-US treaty says nothing about IRAs

The 1999 convention has no express IRA provision. A traditional IRA funded by rollover from an employer plan sits comfortably in article 18(1); a contributory IRA is more naturally an article 18(4) annuity if paid in fixed periodic sums; irregular drawdown fits neither. The connected question of whether Italy respects the deferral inside the IRA rather than taxing internal growth annually is live and unanswered by the treaty text. This is a genuine gap, not a matter on which we have a quiet view. Anyone moving to Italy with a substantial IRA should treat it as the first question to resolve, not the last.

OBSERVATION

### Rank on the second question, not the first

"Both of these scenarios rank six destinations by annual tax, and that table is the least useful thing in the chapter if you read it alone. The American case shows why: the ranking barely moves, because the binding constraint is a US floor that no European regime touches. The British couple's ranking is real, but it is contingent on both spouses holding a foreign pension, on an Italian municipality small enough to qualify, and on nobody going home inside five years. When a client sends me a spreadsheet, the first thing I do is delete the totals column and look at the conditions column. That is where the money actually is." Tom Purdy, founder, Citizenship360

TOM PURDY, FOUNDER, CITIZENSHIP360

CHAPTER 13

# Healthcare and growing old there

The S1, the systems it does and does not open, and the part of this decision almost nobody plans for.

Most people plan the move at sixty-five and live with the consequences at eighty-five. This chapter is about the second date.

## The S1: what it is, and the two agreements behind it

A UK State Pensioner living lawfully in an EU state can have state healthcare there funded by the UK, through the S1 certificate. The legal basis is Part Two of the EU-UK Withdrawal Agreement for those resident before 1 January 2021, and the Protocol on Social Security Coordination annexed to the EU-UK Trade and Cooperation Agreement for later arrivals, whose annexes the Specialised Committee on Social Security Coordination amends over time.

Three eligibility points do most of the damage. First, you must be **in receipt**, not merely entitled: the NHS asks you to wait until payments have started, so an early retiree of fifty-eight has no S1 for years. Second, if you receive a state pension from your new country as well as a UK State Pension you cannot get an S1, and where contributions were paid in several countries the country of longest insurance carries the cost. Third, the other qualifying exportable benefits are a short list: contribution-based ESA, Maternity Allowance, Widow's Benefit and Widowed Parent's Allowance. DLA, PIP, Carer's Allowance and Attendance Allowance ceased to confer new S1 entitlement from 1 January 2021, though legacy holders keep theirs.

Apply to NHS Overseas Healthcare Services at the NHS Business Services Authority (+44 (0)191 218 1999, s1applications@nhsbsa.nhs.uk), requesting the form by telephone, up to ninety days before moving; cover runs from the move date.

## What the S1 buys, precisely

State healthcare where you live **on the same basis as an insured resident of that country**. Not better, and not a private policy: local co-payments still apply, including Portuguese taxas moderadoras, the French ticket modérateur and Greek and Italian tickets, and locally excluded services, which mostly means adult dentistry, stay excluded.

A registered S1 also brings a UK-issued GHIC or EHIC for necessary treatment on temporary visits to other eligible countries, access to the S2 planned-treatment route, and, since 1 January 2024, NHS treatment in England as a UK resident when visiting. Scotland, Wales and Northern Ireland charge separately, and the card does not cover where you live.

Registration is your duty and the gap is your risk. Portugal: Segurança Social, then your centro de saúde, which issues a número de utente. Spain: the INSS, then your health centre. France: your CPAM, where a temporary number typically takes one to three months and the carte vitale often six months or more, with a feuille de soins meanwhile. Italy: your ASL, with passport, codice fiscale and residency evidence. Greece: an AMKA at a KEP, then the S1 with EOPYY. Cyprus: GESY. Malta: the Entitlement Unit at St Luke's. Several gov.uk country guides date from 2021 and 2022, so confirm locally.

## Where the S1 does not work

Spain shows the edges most clearly. An S1 holder cannot instead register as a permanent resident, and cannot join the Convenio Especial, which requires at least one year on the padrón, so a couple arriving before state pension age must hold private insurance for that first year at minimum. Spanish residents usually pay 10 to 60 per cent of prescription costs; Convenio members pay the full cost, plus non-urgent transport, orthopaedic supplies, prostheses and dietary supplies.

There is also a dependant cliff-edge: a spouse covered as a dependant loses that cover the moment they claim their own UK State Pension, and a fresh S1 is issued and must be registered again. "Dependant" is defined by the host state, so cover in France may not be cover on the same terms in Italy.

## The out-of-pocket number nobody quotes

Out-of-pocket spending as a share of current health expenditure is the best official proxy for what a retiree pays at the point of use. Eurostat, 2023 reference year: EU27 15.0 per cent (provisional); France 9.3; Cyprus 17.4; Spain 20.9; Italy 23.7; Portugal 29.4; Malta 30.9; Greece 34.3. Where 2024 figures are published they barely move: Greece 34.24, Portugal 28.67, Italy 22.98, France 9.23, Cyprus 16.95.

Greece and Malta are more than double the EU average and Portugal is close behind. Presenting Greece as cheap without this figure alongside is misleading, and we return to it in chapter 15.

## Long-term and residential care, which almost nobody plans for

The S1 covers healthcare, not social care, and the boundary is drawn differently in every country: domiciliary help, day care and residential nursing homes sit largely outside it, and are means-tested or privately paid in most of the seven.

CANDOUR

### We cannot give you a care cost table

Our verified source set contains no comparable, primary-source figures for residential and long-term care costs across these seven countries. Eurostat's health accounts do not isolate the retiree-relevant long-term care basket in a form we are willing to publish as a comparison. We would rather say so than reprint an aggregator's numbers. If long-term care cost is decisive for you, it should be priced locally, in the specific town, before you commit.

The literature in chapter 14 is blunt: some frail older British migrants in Spain fall through the gap between two welfare systems.

## If a spouse dies, or loses capacity

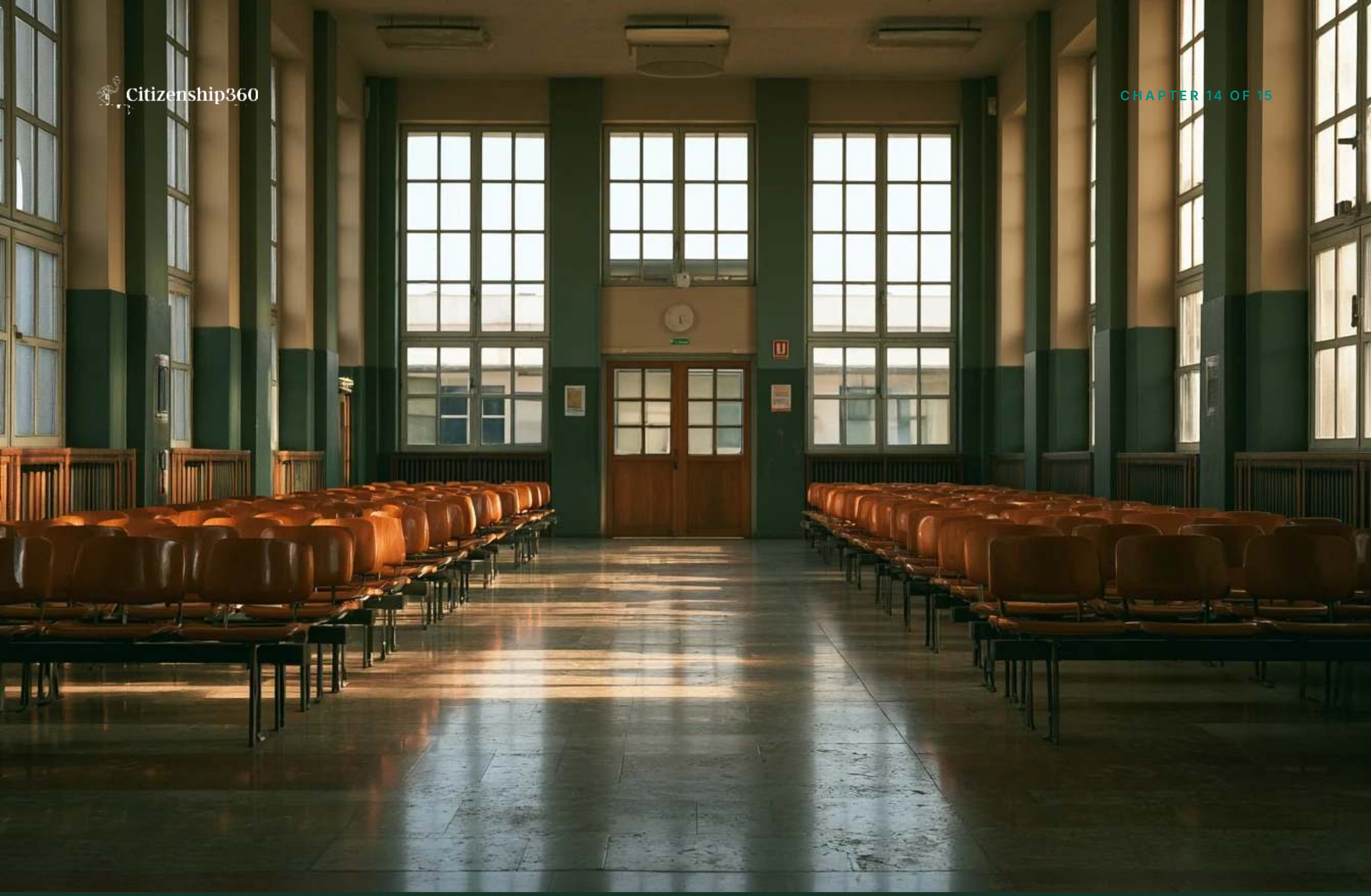
An English or Welsh Lasting Power of Attorney is a domestic instrument, not an EU one, and its recognition by a Portuguese bank, a Spanish notary or an Italian ASL is not automatic. Regulation (EU) No 650/2012 governs succession on death and says nothing about incapacity during life.

CONTESTED POINT

### Powers of attorney across borders

We have not been able to verify, from primary sources, a single instrument that guarantees recognition of a UK power of attorney in all seven destination countries. Treat this as unresolved. The practical answer we take on files is to put a locally drafted mandate or procuração in place alongside the UK document, executed before a local notary, rather than to rely on the UK instrument travelling. Do not accept an assurance that it "will be fine" without a named local notary confirming it.

The same applies to the survivor. If the S1 was in the deceased spouse's name, the survivor's cover derives from a benefit that has stopped: with their own State Pension they apply for their own S1, and without one they may face a period with no state cover. Decide who holds the bank mandate, who is registered at the centro de saúde or ASL, and whose name is on the tenancy or deed, while both of you are well.





CHAPTER 14

# What goes wrong

Refusals, backlogs, litigation, return migration and death abroad. The evidence on how this goes when it goes badly.

This chapter is the one an adviser reads first.

## Refusal, and the statistic that is not about you

The European Commission's 2025 visa statistics, published 28 May 2026, record an overall refusal rate of 14.65 per cent across 12,201,026 uniform Schengen applications, against 14.75 in 2024.

| MEMBER STATE | APPLICATIONS 2025 | NOT ISSUED | REFUSAL RATE 2025 | 2024 |
|---|---|---|---|---|
| Malta | 54,037 | 20,655 | 38.37% | 38.48% |
| Portugal | 253,108 | 59,254 | 23.35% | 11.31% |
| Spain | 1,713,550 | 238,993 | 14.55% | 15.69% |
| Greece | 704,973 | 101,237 | 14.48% | 13.23% |
| France | 3,105,356 | 440,758 | 14.25% | 15.83% |
| Italy | 1,326,876 | 144,181 | 10.82% | 10.89% |
| All Schengen | 12,201,026 | 1,768,605 | 14.65% | 14.75% |

The Commission computes the not-issued rate on decisions taken in the year, not on applications lodged, so the rate does not equal the second column divided by the first. Portugal's rate roughly doubled in a year while applications rose from 206,420, and Malta is the hardest consular network in Schengen, more than three times Italy's rate.

> CONTESTED POINT
>
> **These are short-stay figures, not retirement-visa figures**
>
> The Commission publishes refusal rates for uniform short-stay visas. It does not publish them for national long-stay D visas, which is what a D7, an NLV, a Greek I.8 and an Italian elective residence visa actually are. No official refusal rate exists for any of the four principal retirement routes. We use the short-stay data as evidence of how a consular network behaves, not as a probability that your application will fail. Anyone quoting you a percentage chance of D7 refusal is quoting something that has never been published.

## Silence, and the deadline you did not know was running

**Spain.** Real Decreto 1155/2024, in force 20 May 2025, art. 63.4: the competent body decides within one month of the consular communication, and once that month passes the application is **refused**. On renewal it reverses, art. 64.8 giving three months with **positive** silence, filed two months before expiry with three months' grace. Day thirty-one on an initial application is a refusal nobody told you about.

**Portugal.** Lei 23/2007 art. 82: sixty days for a grant, thirty for a renewal, and under art. 82(3), where the deadline passes for reasons not attributable to the applicant, the application is deemed granted, which is the engine behind the litigation below.

**Italy.** D.Lgs 286/1998 art. 5(9): sixty days to issue, renew or convert, with art. 5(9-bis) letting the holder remain lawfully on the filing receipt where that term is missed. **Greece.** No general statutory deadline could be verified; what is verifiable is that a rejection is appealed within two months of service, for a EUR 50 fee, and decided within thirty days.

## AIMA: the backlog, and the litigation behind it

Portugal's Estrutura de Missão inherited, on the Government's own account, more than one million pending files, and its closing balance of 18 December 2025 records 386,791 decisions: 327,597 grants and 59,194 refusals, with completion uneven by stream (manifestações de interesse 93 per cent, CPLP 72, regime transitório 52, renewals **10**). On 1 July 2026 the Secretary of State for the Presidency and Immigration told the Assembleia da República that roughly 30,000 files remain undecided, a ministerial statement reported by Lusa rather than published AIMA data.

Tacit approval invites litigation, and this is the part usually left out. CSTAF figures reported by Lusa put pending intimações, heard only in the Tribunal Administrativo de Círculo de Lisboa, at 133,429 in October 2025, and 130,946 AIMA-related cases in February 2026, of which 129,239 were intimações. CSTAF appointed 28 judges in national accumulation by communiqué of 4 March 2026, and they took up duties on 7 April 2026, a competition for 50 posts having yielded only 28, and the Provedor de Justiça received 3,389 complaints about AIMA in 2024.

CANDOUR

### What that means for you

Those numbers are not a reason to avoid Portugal. They are a reason to price the possibility of litigation into your expectations of time, and to be sceptical of any timeline given to you without a range. We treat the CSTAF figures as reported rather than published, because they were supplied to a news agency and we could not locate a consolidated CSTAF or DGPJ bulletin quantifying them.

## Who leaves, and why

Eurostat records 20,870 UK citizens emigrating from Spain in 2024, 6,375 of them aged 65 and over on the REACH age definition; the 55-and-over share of 49.5 per cent is our derivation, Eurostat publishing no such aggregate. The British population of Spain reached 291,365 on 1 January 2022, its highest level since 2015, and fell to 266,462 by 1 January 2025; Portugal publishes no equivalent figure.

The rest is academic. Giner-Monfort and Hall (2024), in *Population, Space and Place*, pair Spanish registry microdata for 2003 to 2021 with a survey of 643 Britons aged 55 and over which we would characterise as self-selected and non-randomised, though the authors describe it as a representative sample with an estimated error of 3.9 per cent. The registry work finds 236,315 leaving the register in that period, 113,469 of them aged 55 or over, and a potential-returnee rate peaking at 12.06 per cent in 2017 and 32.26 per cent for the over-85s in 2016.

Their nine-event "stay or leave" battery, run across four surveys from 1999 to 2020 and scored from minus one (leave) to plus one (remain), turns negative for one event only, and in two samples: "unable to run the home", at minus 0.18 in the 2014 Costa Blanca sample and minus 0.01 in the 1999 four-area sample. The other eight, death of a spouse and declining health among them, score positive. Warnes and colleagues (1999: 717): "The onset of severe incapacity, sufficient to prevent the continued running of a home, is the event most likely to cause people to leave their adopted areas of residence."

Not Brexit. Not money. Incapacity.

## Consular and property data, and what they do not say

FCDO consular data for 2024, which are management information rather than official statistics, record 1,769 deaths of British nationals in Spain out of 6,521 worldwide: two and a half times the next country (Thailand, 691) and more than six times the next European country (France, 279). Spain also had 706 Medical Care Facility cases, 809 social welfare cases and 369 of the 1,170 repatriations, 31.5 per cent of the world total; Portugal recorded 114 deaths and 185 social welfare cases. These are counts, not rates: no denominator is published, so nothing here supports a statement about individual risk, and the FCDO changed case management system on 16 October 2023, making earlier-year comparison unsafe.

On property, Colegio de Registradores data for 2025 show British buyers leading all foreign nationalities with 7,665 transactions, 1.10 per cent of all Spanish housing purchases. Of the 4,962 repossession certifications in Q2 2026, up 10.1 per cent on the quarter, foreign nationals accounted for 9.19 per cent, with Britons the second largest single foreign nationality at 11.01 per cent of the foreign total behind Ecuador at 11.24 per cent: not a crisis, but not nothing, and a position that has moved within a year.

## Succession: the single most common expensive omission

Regulation (EU) No 650/2012 applies to deaths on or after 17 August 2015: article 4 gives jurisdiction to the courts of the deceased's habitual residence at death, and article 21(1) makes that state's law govern the succession as a whole, subject to the article 21(2) exception for a manifestly closer connection. Article 23(2) defines "as a whole" expansively, covering beneficiaries and shares, spousal rights, disinheritance, debts and, critically, **the disposable part and reserved shares**, so forced heirship is squarely within scope.

Article 22(1) lets you displace all of that by electing the law of a state of your nationality at the time of the choice or at death, expressly or by the terms of the disposition under article 22(2); article 20 makes the Regulation universal, and article 34(2) excludes renvoi where the law is designated under article 22 or under article 21(2), so renvoi survives only under article 21(1). The election is one clause and costs nothing, yet its absence is the failure we see most often: a couple move, keep an English will drafted beforehand, and forced heirship applies. Two limits: article 1(1) and recital 10 put revenue matters out of scope, so the election does **not** move the inheritance tax; and the UK, Ireland and Denmark do not participate, which is why British testators must think about this rather than assume it.

CONTESTED POINT

### The Commission's own review is missing

Article 82 required the Commission to report on the application of the Regulation by 18 August 2025. As at 12 August 2026 no such report has been published; the Commission has missed the deadline by almost a year. Treat the question of amendment as open. We also decline to use the widely circulated figure of 450,000 cross-border successions a year worth over EUR 120 billion; it traces to impact assessment material from around 2009 and we could not verify it against a primary document.

CHAPTER 15

# Choosing well

The four questions in the right order, why the cheapest tax answer is often the wrong one, and where a guide stops being useful.

## The four questions, in the right order

Most people arrive with question two and never reach question three.

**One. Where do you actually want to live?** Not which country has the best regime, but which town, which street, how far from an airport and a hospital, in what language, near whom. If you cannot answer this, no tax analysis will rescue you.

**Two. What will you be taxed on, and by whom?** Residence, treaty allocation, the special regime if any, and the wealth and reporting regimes behind the headline rate.

**Three. What happens to you at eighty?** Healthcare access, out-of-pocket cost, the care the S1 does not buy, and who holds the mandate if one of you loses capacity.

**Four. What do your heirs inherit?** Habitual residence, forced heirship, the article 22 election, and the tax the election does not touch.

Answering them in that order occasionally produces a worse tax outcome and almost always a better decision.

## Why the cheapest tax answer is often the wrong answer

Greece is the clean illustration. Article 5B of the Greek income tax code taxes the whole of a qualifying newcomer's foreign income at 7 per cent, assessed separately, for fifteen tax years: the most generous headline offer of the seven.

Now put it beside the health number. Out-of-pocket spending was **34.3 per cent** of current health expenditure in Greece in 2023 and 34.24 per cent in 2024, against an EU27 average of 15.0 per cent (provisional) and 9.3 per cent in France. Greece asks the least tax and hands back the most cost at the point of use, over exactly the decades when use rises.

That is not an argument against Greece, and plenty of clients should go there. It is an argument against choosing a country on one number, and the discipline applies elsewhere: Italy's celebrated 7 per cent regime had 933 users nationwide in tax year 2024; the UK-Greece treaty is still the 1953 convention, whose subject-to-tax condition behaves quite differently from a modern residence-only article; and it is unresolved whether a Greek I.8 permit counts towards naturalisation at all.

## What we would want to know before advising anyone

Not "what is your budget". These:

- Your ages, and both of your health positions, honestly stated.
- Whether either of you is yet in receipt of a UK State Pension, and if not, in how many years.
- Whether either of you is a US citizen or green card holder, because that changes almost everything.
- What the money actually is: state pension, occupational pension, drawdown pot, portfolio, property, business.
- Whether any pension is a government service pension, because the treaty treats it differently and the teachers-versus-NHS distinction is not what most people assume.
- Whether you intend to sell the UK house, and when relative to the move.
- Whether you might come back inside five years, because temporary non-residence undoes the planning.
- Who your heirs are, whether any is estranged, disabled or a minor, and what your will says.
- Whether citizenship is genuinely an objective, or a comfort you have not costed.
- Who would sign for whom if one of you could not sign.

If an adviser does not ask most of these before recommending a jurisdiction, they are selling a product, not advice.

> OBSERVATION
>
> **The document that fails most files**
>
> "The single most common reason a Spanish non-lucrative file comes back refused is the health insurance certificate, and it is refused for a reason that is not in the regulation. Real Decreto 1155/2024 art. 61.2(b) now says only 'contar con un seguro de enfermedad'. The old 'authorised to operate in Spain' wording was dropped. But the consulates never changed their instruction: no copayment, no waiting period, no coverage limit, full medical and hospital cover, with a Spain-authorised insurer, and an insurance card is not accepted as proof. Clients read the reglamento, buy sensibly against it, and are refused on an instruction that has no regulatory basis. We buy to the consular instruction every time, and we check the insurer against the DGSFP register before the policy is paid for, not after." Tom Purdy, founder, Citizenship360
>
> TOM PURDY, FOUNDER, CITIZENSHIP360

## Where a guide stops being useful

A guide can tell you what the rule is. It cannot tell you which of two rules bites first on your facts, and that is where the money is: the Spanish silence rule is negative at one month on an initial application and positive at three on renewal, and the article 22 election is one clause whose absence is only discovered by people who cannot fix it.

We have tried to be honest about what is unresolved: the outstanding Portuguese Regulamento, the Greek naturalisation question, the absence of any published refusal rate for the retirement routes or of comparable long-term care data, and the recognition of powers of attorney across borders. Where we do not know, we have said so.

CANDOUR

### How we are paid, and why you should ask

We do not earn the same on every route. Some structures carry a larger and longer engagement than others, and an adviser who is paid more for one answer has an interest in that answer. That is true of us. Ask us, in writing, how we are remunerated on the route we recommend, whether we receive anything from any third party involved in it, and what we would earn if you chose a different route instead. Then ask the same three questions of every other adviser you speak to, and compare the answers rather than the brochures. An adviser who will not answer them in writing has told you something useful.

## Getting in touch

If you have read this far, you probably have a specific set of facts rather than a general question, and that is where a conversation is worth more than another chapter.

We quote professional fees individually and do not publish fee levels, because a published number is either meaningless or misleading. Government and consular fees are exact and sourced throughout, and they are yours to check.

Get in touch with Citizenship360 for a personalised quote.

REFERENCE

# Glossary

**AIMA** (Agência para a Integração, Migrações e Asilo). The Portuguese agency that replaced SEF and decides residence permit applications and renewals, whose inherited backlog and resulting litigation are discussed in chapter 14.

**Article 5B**. The provision of the Greek income tax code taxing the whole of a qualifying foreign pensioner's foreign income at 7 per cent, assessed separately, for fifteen tax years.

**Article 24-ter TUIR**. Italy's 7 per cent substitute tax for foreign pensioners settling in qualifying southern and earthquake-affected municipalities, for the year of transfer plus nine further tax periods, under the consolidated income tax code that is itself being replaced, so citations should be dated.

**Convenio Especial**. Spain's paid buy-in to the public health system for residents without other cover, requiring at least one year on the padrón and closed to S1 holders.

**CPLP** (Comunidade dos Países de Língua Portuguesa). The Portuguese-speaking countries community, whose nationals, and now EU citizens, sit in Portugal's seven-year naturalisation band rather than the ten-year one.

**D7**. Portugal's residence visa for people living on pensions or other passive income, whose legal home is article 24 of Decreto Regulamentar 84/2007, not, as often claimed, an article of Lei 23/2007.

**Elective residence visa**. Italy's route for people supporting themselves on passive income, with an express consular discretion to assess the adequacy of that income.

**ENFIA**. Greece's annual property tax on rights in rem over Greek real estate held at 1 January, with an additional charge where an individual's total property value exceeds EUR 500,000.

**EU long-term resident status**. Permanent status under Directive 2003/109/EC after five years of continuous legal residence, subject to the loss provisions in article 9, and not extinguished by the expiry of the card.

**FIP** (financially independent person). The common name for the Greek residence permit for third-country nationals with sufficient resources, now type I.8 under article 163(8) of Law 5038/2023.

**Forced heirship**. Rules reserving a fixed share of an estate to specified relatives, brought within the scope of the applicable succession law by article 23(2) of Regulation 650/2012.

**GESY**. Cyprus's General Healthcare System, funded partly by a contribution on pensions and other income, subject to an annual cap.

**GHIC** (Global Health Insurance Card). The UK card giving access to medically necessary state healthcare during temporary visits, which is not residence cover and does not refund local co-payments or cover private treatment or repatriation.

**Habitual residence**. The connecting factor for both jurisdiction and applicable law under Regulation 650/2012, a factual test rather than a tax residence test, so the two can diverge.

**IFI** (impôt sur la fortune immobilière). France's property wealth tax, charged above EUR 1,300,000 of net taxable property wealth, with a five-year limitation to French real estate only for those arriving after five years of foreign domicile.

**IFICI**. Portugal's replacement for NHR, giving a 20 per cent rate on certain Portuguese employment and self-employment income and a foreign-income exemption that expressly excludes category H, so it does nothing for a pensioner.

**Intimação**. The urgent Portuguese administrative court application for the protection of rights, freedoms and guarantees, used in very large numbers against AIMA.

**IPREM**. Spain's public income indicator, used to set the non-lucrative visa income threshold at 400 per cent for the main applicant and 100 per cent per dependant.

**IRS** (Portuguese). Portugal's personal income tax, under which a foreign pension is category H income, aggregated and taxed at progressive rates unless a special regime applies.

**Modelo 720**. Spain's annual information return on foreign assets, reportable at EUR 50,000 per category, whose punitive penalty regime was struck down by the CJEU in C-788/19 and replaced by the ordinary penalties in the general tax law.

**NHR** (residente não habitual). Portugal's former ten-year regime, closed to new entrants from 1 January 2024 with limited grandfathering, under which later cohorts were taxed at 10 per cent on pensions rather than nil.

**NIF**. The Portuguese tax identification number, for which fiscal representation is not required at the moment of obtaining it and can be avoided by adhering to electronic notifications.

**NLV** (non-lucrative visa). Spain's residence route for people supporting themselves without working, in a one plus two plus two cycle, with an express prohibition on any labour or professional activity.

**Non-dom**. A person resident but not domiciled in a jurisdiction and taxed there on a restricted basis, used in this guide chiefly of Cyprus, where a non-domiciled resident is outside the Special Defence Contribution, and of Malta's remittance basis.

**Padrón**. The Spanish municipal register, registration on which is a precondition for the Convenio Especial and is relevant to the emigration statistics discussed in chapter 14.

**Regulation 650/2012**. The EU succession regulation, applying to deaths on or after 17 August 2015, which determines jurisdiction and applicable law, permits an election of the law of nationality, and expressly excludes tax.

**RMMG**. Portugal's guaranteed monthly minimum wage, EUR 920 for 2026, the reference figure from which the D7 income thresholds are calculated by statutory multipliers.

**S1 form**. The certificate under which the UK funds state healthcare for its State Pensioners resident in an EU state, on the same basis as an insured local resident, and only where the qualifying benefit is in receipt rather than merely entitlement.

**Saving clause**. The provision in US tax treaties preserving the United States' right to tax its own citizens as if the treaty did not exist, which is why a US citizen cannot use a treaty pension article to escape US tax on their pension.

**SDC** (Special Defence Contribution). The Cypriot charge on dividends, interest and formerly rents, from which a non-domiciled resident is exempt until deemed domiciled under the seventeen-of-twenty-years rule.

**Statutory residence test**. The UK's day-count and ties test in Schedule 45 to the Finance Act 2013, determining whether you remain UK resident after leaving, together with the split-year cases.

**Wealth tax**. A tax on net assets rather than income: Spain has both a state wealth tax and a solidarity tax on large fortunes, France taxes property wealth only, and Portugal, Italy, Greece, Cyprus and Malta have no general net wealth tax, though the first three each tax property holdings in other ways.

REFERENCE

# Frequently asked questions

**1. Can I get an S1 if I retire early?** Not until you are actually receiving a UK State Pension or another eligible exportable benefit, because entitlement is not enough. Early retirees generally need private cover, and in Spain the Convenio Especial is closed to them for the first year because it requires twelve months on the padrón.

**2. Does the S1 mean I pay nothing for healthcare?** No. It buys you into the state system on the same terms as an insured local resident, so local co-payments apply, and in Spain residents usually pay between 10 and 60 per cent of prescription costs. Out-of-pocket spending was 29.4 per cent of current health expenditure in Portugal and 34.3 per cent in Greece in 2023, against an EU27 average of 15.0 per cent.

**3. Can I keep using my GHIC once I live abroad?** No, because eligibility for a UK GHIC requires that you are ordinarily and legally resident in the UK, and the NHS warns that misuse may make you liable for the full cost of treatment or expose you to prosecution. A registered S1 holder does get a UK-issued card, but it covers other countries, not the country you live in.

**4. What happens to my spouse's healthcare when they start drawing their own pension?** Their cover as a dependant on your S1 is cancelled, and a fresh S1 is issued in their own name which must be registered again with the local authority. This is a documented cliff-edge, not a glitch, and the gap during re-registration is your risk.

**5. Does the S1 pay for a care home?** No: the S1 covers healthcare, not social care, and the boundary is drawn differently in each country, with residential and domiciliary care generally means-tested or privately funded. We do not publish a comparative care cost table because we have no primary source we are willing to stand behind.

**6. Will my UK power of attorney work in Spain or Portugal?** Do not assume so, because an English Lasting Power of Attorney is a domestic instrument and its recognition is not automatic. We were unable to verify any instrument guaranteeing recognition across all seven countries, so we treat it as unresolved and put a locally executed mandate in place alongside the UK document.

**7. How likely is my retirement visa to be refused?** Nobody knows, because no official refusal rate is published for national long-stay retirement visas and the Commission's published figures are for short-stay Schengen visas. Those show Malta at 38.37 per cent and Portugal at 23.35 per cent in 2025, which tells you something about consular behaviour but is not a probability for your file.

**8. Why did Portugal's refusal rate double?** The Commission's 2025 statistics show Portugal moving from 11.31 per cent to 23.35 per cent while applications rose from 206,420 to 253,108. The dataset records the outcome, not the reason, and we are not going to speculate about a cause the data does not contain.

**9. If the authorities miss their deadline, is my application approved?** In Portugal, yes for residence permits: under article 82(3) of Lei 23/2007, where the sixty-day or thirty-day deadline passes for reasons not attributable to you, the application is deemed granted. In Spain the opposite applies on an initial non-lucrative application, where one month of silence means refusal, though on a Spanish renewal three months of silence means approval.

**10. Is the AIMA backlog over?** Largely, but not entirely, and its consequences are not: the mission structure closed on 31 December 2025 having taken about 386,791 decisions, with renewals only 10 per cent complete, and a minister told parliament in July 2026 that roughly 30,000 files remain. Separately, more than 130,000 AIMA-related cases were pending in the Lisbon administrative court in February 2026.

**11. Do I have to sue AIMA to get a decision?** Many people have, and that is what the intimação figures represent. It is not a step we would present as routine or as inevitable, but it is a real feature of the Portuguese route and you should hear about it before you commit, not afterwards.

**12. Do British retirees actually come back?** Some do, and the driver is not what most people expect: Eurostat records 20,870 UK citizens leaving Spain in 2024, of whom 30.5 per cent were 65 or over. The academic evidence, from a non-randomised survey, finds that the one event that tips people towards leaving is becoming unable to run their own home, not Brexit, not tax and not the cost of living.

**13. Why are the Spanish consular death figures so high?** Because Spain has by far the largest resident British population of the seven, and because these are raw counts: the FCDO recorded 1,769 deaths of British nationals in Spain in 2024 out of 6,521 worldwide. There is no published denominator, so the figure says nothing about individual risk.

**14. Does my English will still work if I move to Portugal or Spain?** It works, but it may not do what you intend, because under Regulation 650/2012 the law of your habitual residence at death governs the succession as a whole, including reserved shares. Unless your will expressly elects the law of your nationality under article 22, forced heirship rules can override the distribution you wrote.

**15. Does electing English law save inheritance tax?** No, because article 1(1) of the Regulation and recital 10 put revenue matters entirely out of scope. The election changes who inherits and in what shares; it does not change which country taxes the estate or at what rate, and those two exercises need to be done together.

**16. Is a Portuguese residence permit still worth it now that citizenship takes ten years?** That depends entirely on whether citizenship was the objective, because if you want to live in Portugal the residence permit does that job. If the plan was a second passport in five years, the arithmetic changed on 19 May 2026 and you should reprice the decision rather than carry on with the old plan.

**17. Which country is cheapest?** On Eurostat's 2024 price level indices for household final consumption expenditure (dataset prc_ppp_ind, EU27_2020 = 100), Greece at 86.0 and Portugal at 87.0 are the lowest of the seven and France the highest at 111.2, though France remains around 11 per cent below the UK at 124.7. But price level is not cost of retirement: Greece's low prices sit alongside the highest out-of-pocket health spending in the group, and that trade runs in the wrong direction as you age.

**18. Can I work, or do a bit of consulting, on a retirement visa?** Generally no, and the prohibitions are wider than people expect. Spain's non-lucrative permit prohibits any labour or professional activity, with consulates requiring a notarised undertaking not to work, expressly including online, and the Greek I.8 permit prohibits both dependent employment and independent economic activity of any form in Greece, for the holder and for family members.

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# About the adviser

Tom Purdy is the founder of Citizenship360, a residency and citizenship advisory based in Dubai. The firm advises private clients on residence, relocation and naturalisation routes in Europe and elsewhere, and prepares and manages the resulting applications.

This guide was written and verified in-house. Government and consular fees are quoted exactly and sourced; professional fees are quoted individually and are not published. Where the position is unresolved, the guide says so rather than choosing a convenient answer.

To discuss your own circumstances, or for a personalised quote, get in touch with Citizenship360.

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# Edition and change log

| EDITION | DATE | CHANGE |
|---|---|---|
| **1.0** | 12 August 2026 | First edition. All figures verified against primary sources on 12 August 2026. Portuguese nationality position stated as at Lei Orgânica n.º 1/2026, in force 19 May 2026, with the implementing Regulamento still unpublished at the date of writing. |

**Next scheduled refresh: February 2027.** Three things are expected to change before then and will be revisited in edition 2.0: the Portuguese Regulamento da Nacionalidade, due on 16 August 2026 and unpublished at the date of this edition; the repeal of the Italian TUIR by D.Lgs 117/2026 with effect from 1 January 2027, which re-enacts the articles cited in chapter 8 under new numbers; and the Greek application procedure under article 5B following the repeal of the 31 March deadline.

If you are reading this after February 2027, check the current edition before relying on any figure in it.

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