

THE COMPLETE GUIDE

Valletta · Malta

Malta Residence and Citizenship.

Malta no longer sells citizenship. This guide sets out what remains: permanent residence, the tax programmes that change on 1 January 2027, and the slow, genuine road to a Maltese passport.

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BEFORE YOU START

How to use this guide

This guide answers one question: what can a foreign national still obtain from Malta, now that the country no longer grants citizenship in exchange for investment, and what will it cost, in government charges and in tax, to obtain it.

The short answer is that Malta no longer sells citizenship. The Court of Justice of the European Union ended the investment route on 29 April 2025, and Parliament replaced it with a discretionary merit provision that the government itself says is not a programme and may not be marketed. What remains is a strong permanent residence offer, a set of tax statuses built on Malta's remittance basis of taxation, which change on 1 January 2027, and ordinary naturalisation for people who genuinely live in Malta for years. That is still a great deal. It is not what much of the market is still selling.

Read it in three ways. To decide whether Malta is right for you at all, read chapter 1 and go where the self-assessment sends you. If you want permanent residence as a European plan B, read chapters 3 to 5, then chapter 8 on property and chapter 11 on cost. If your interest is tax residence, read chapters 6 and 7 first, then chapter 10 on your home country, before you choose an immigration route. If you were promised a Maltese passport, or already hold one, start with chapters 2 and 9.

Every figure, date, regulation and article number is traceable to a primary source: the consolidated legislation, the Government Gazette, the judgment of the Court, reports laid before Parliament and the published pages of the Maltese agencies. The sources are listed at the back. Where the law is unsettled or the sources conflict, we say so in a marked callout rather than choosing the reading that suits us. Government fees and contributions are given exactly; professional fees are not, because they depend on your facts. Where Malta is the wrong answer, chapter 14 says so plainly.

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CHAPTER 01

Is Malta still the right answer?

Who this guide is for, why the answer changed in 2025, and a twelve-question assessment that sends you to the chapters that matter to you.

IN THIS CHAPTER

Who this guide is for

Why the answer changed in 2025

The twelve-question assessment

Band A, 32 to 48 points. Malta works, and the question is which route

Band B, 17 to 31 points. Conditional, and tax and timing decide it

Band C, 0 to 16 points. Malta is probably the wrong answer for what you want

Who this guide is for

This guide is for private clients with substantial assets who are considering Malta as a place of residence, as a tax base or as a route to a second citizenship, and for the lawyers, accountants and wealth managers who advise them. Most readers will be nationals of a country outside the European Union, the European Economic Area and Switzerland, because that is who the Malta Permanent Residence Programme is built for; EU, EEA and Swiss nationals are excluded from it by reg. 3 and reg. 15(1)(a) of S.L. 217.26. They will find the tax chapters as relevant as anyone, and chapter 3 explains where they sit.

It is also written for advisers deciding whether a firm is safe to refer clients to.

Why the answer changed in 2025

Until 29 April 2025, Malta had an answer that was easy to give, and a large industry gave it. An applicant paid a contribution of EUR 600,000 after 36 months of legal residence, or EUR 750,000 after 12 months, bought a home for at least EUR 700,000 or leased one for at least EUR 16,000 a year, donated at least EUR 10,000, and passed due diligence (C-181/23, paras 102 and 109). At the end was a Maltese passport, and with it citizenship of the Union.

That answer is gone. The Grand Chamber of the Court of Justice held on 29 April 2025 that the scheme breached art. 20 TFEU and art. 4(3) TEU, and Act XXI of 2025 and L.N. 159 of 2025 removed the investment route from Maltese law. Chapter 2 sets out exactly how.

Three things remain, and none of them is a passport for money. The first is the Malta Permanent Residence Programme, a right to reside in Malta indefinitely against government charges from EUR 99,000, a capital test and a qualifying property; it is a residence permit and nothing more. The second is a group of tax statuses, chiefly the Global Residence Programme and the Malta Retirement Programme, that tax remitted foreign income at a flat 15 per cent, and which become a single, markedly more expensive Individual Tax Programme from 1 January 2027 (L.N. 195 of 2026). The third is ordinary naturalisation under art. 10(1) of the Maltese Citizenship Act, Cap. 188, which requires actual residence of at least five years in the last seven and remains at the Minister's discretion.

One 2026 change alters the arithmetic further: from income year 2026, pension income of a person aged 61 or over, foreign pensions included, is exempt up to EUR 37,104 a year (S.L. 123.204, as amended by L.N. 53 of 2026).

So the honest answer is conditional, and it depends on what you want. For secure European residence as a plan B, Malta remains one of the strongest offers in the Union. For a tax base, it suits people whose wealth sits in foreign capital, but the timing now matters to the month. For a passport, the only reliable route is to move to Malta and live there.

29 April 2025

The Court of Justice held Malta's investor citizenship scheme unlawful in Case C-181/23. The route is closed.

6,152

People naturalised under the two investor schemes to the end of 2024, our sum of the Regulator's published totals.

31 December 2026

The date by which an application must be received to obtain a flat-rate tax status on the current terms.

The twelve-question assessment

Answer each question as your circumstances actually are, not as you would like them to be. Score each answer 0, 2 or 4 points. If your position sits between two answers, take the lower score. The maximum is 48.

#	Question	0 points	2 points	4 points
1	What you most want from Malta	An EU passport within a few years	A lower-tax base inside the EU	Secure permanent residence as a European plan B
2	Your nationality	A country Residency Malta treats as sanctioned	EU, EEA or Swiss (the MPRP is closed to you)	Any other non-EU nationality
3	Your total assets	Under EUR 500,000	EUR 500,000 to 650,000, or more but little of it financial	Over EUR 650,000, with at least EUR 150,000 in financial assets
4	About EUR 99,000 of non-refundable government charges, plus capital and a property held for five years	Not possible	Possible, but it would strain liquidity	Comfortably affordable
5	Whether a Maltese passport is essential	Essential, and I cannot move to Malta	Desirable; relocation uncertain	Not essential, or I would live in Malta for five years or more
6	Where your income and gains would arise	Maltese business or employment income	Foreign income you must bring to Malta to live on	Foreign capital gains, foreign pensions from age 61, or income you can leave abroad
7	Your long-term intention	Malta will be my permanent home for life	Undecided	I expect to return home or move on eventually
8	Family to be included	Siblings, or children who are married or aged 29 or over	Unmarried children aged 18 to 28, or dependent parents or grandparents	A spouse and children under 18 only, or nobody
9	If you want a flat-rate tax status, when you can file	Need one, and cannot file before 31 December 2026	Could file in 2026, but not with confidence	Can file a complete application in 2026, or do not need one
10	Need to live or work in other EU states	Yes, that is the main point	It would be useful	No; visits of 90 days in any 180 are enough
11	Your due diligence profile	A prior refusal, a sanctions listing or pending charges	Something that will need careful explanation	Clean, with a documented source of wealth
12	What you want to do with Maltese property	Buy several, or let the home you qualify with	Buy one home to live in	Rent, or buy in a Special Designated Area

Band A, 32 to 48 points. Malta works, and the question is which route

You want European residence rights more than a passport, you meet the capital test with room to spare, your family fits the programme's definition of dependants, and your due diligence file is clean. The main decisions are whether to rent or buy, and whether to live in Malta or hold the permit at a distance.

Read chapter 3 to confirm the route, then chapters 4 and 5, chapter 8 on property and chapter 11 on cost. If you intend to live in Malta, read chapter 7 before you arrive, because the remittance basis rewards planning done before residence begins.

Band B, 17 to 31 points. Conditional, and tax and timing decide it

This is where most readers land. Something pulls against the move: a passport you want but cannot earn without relocating, family members the programme charges for or does not cover, income that would have to be brought into Malta, or a flat-rate tax status you may not be able to apply for in 2026.

Do not choose a route yet. Read chapters 6 and 7, then chapter 10 on your home country and the scenarios in chapter 12. If you scored 0 or 2 on question 9, read the Individual Tax Programme section of chapter 6 today: for a non-EU applicant, an application received in December 2026 rather than January 2027 can mean a minimum tax of EUR 15,000 a year rather than EUR 35,000. If you scored 0 on question 5, read chapter 9 first.

Band C, 0 to 16 points. Malta is probably the wrong answer for what you want

A low score usually means one of three things. You want a passport and cannot live in Malta to earn one, which no lawful Maltese route now provides. Or you do not meet the programme's capital and due diligence tests, which the Agency applies at its absolute discretion and without appeal. Or you need rights Malta cannot give, such as the right to live and work elsewhere in the Union.

Read chapter 2, which explains why the passport route is closed and will not reopen in its old form, chapter 9 on what citizenship now requires, and chapter 14, which sets out when Malta is the wrong answer.

CANDOUR

A self-assessment cannot see your actual facts, and this one is built around the permanent residence programme and the remittance basis, because that is where most of our readers' questions sit. An EU national scores lower on question 2 and may still be an excellent candidate for Malta as a tax base. A family with a 29-year-old child scores badly on question 8, and the right answer for that child may simply be a separate application in the child's own right, if the child can meet the capital test. Treat the score as a way of finding the chapter you most need, not as a verdict. And if it says Malta does not suit you, give that more weight than the opinion of anyone who is paid only if you apply.



CHAPTER 02

What ended, and exactly how

How the Court of Justice ended citizenship by investment on 29 April 2025, what Parliament put in its place, and what it means for people who already hold a Maltese passport.

IN THIS CHAPTER

The Individual Investor Programme, 2014 to 2020

The 2020 replacement

How the Commission built its case

What the Court decided, and why

Act XXI of 2025 and the new article 10(9)

L.N. 159 of 2025: what was removed

The transitional rule, and why the cut-off is the judgment date

If you already hold Maltese citizenship

The notice of 5 February 2026

The Individual Investor Programme, 2014 to 2020

Malta’s investor citizenship began with Act XV of 2013, which amended Cap. 188 to allow naturalisation through an “individual investor programme” alongside ordinary naturalisation (C-181/23, para. 18). The rules were S.L. 188.03, made by L.N. 47 of 2014 and in force from 4 February 2014. The main applicant paid EUR 650,000 (Schedule, para. 1(a)), with EUR 25,000 to EUR 50,000 for each dependant, bought a home for at least EUR 350,000 or leased one for at least EUR 16,000 a year for five years (reg. 7(5)), held EUR 150,000 in approved investments for five years (reg. 7(6)), and needed twelve months’ residence before the certificate issued (reg. 7(12)). The programme was capped at 1,800 successful main applicants (reg. 12) and run and promoted by a private concessionaire (regs 2 and 3(2)). It closed to applications received after 15 August 2020 (C-181/23, para. 33).

The Office of the Regulator’s report for 2024, laid before Parliament on 13 April 2026, records the outcome: 1,555 main applicants and 3,768 dependants naturalised, 5,323 people in all, the 1,555 being 86 per cent of the quota. Contributions collected from 2014 to 2024 totalled EUR 1,150,300,000.

The 2020 replacement

In 2020 Malta replaced the programme rather than ending it. Act XXXVIII of 2020 substituted a new art. 10(9) into Cap. 188, and the Granting of Citizenship for Exceptional Services Regulations, S.L. 188.06, made by L.N. 437 of 2020, came into force on 20 November 2020. The investment route was Part IV, regs 15 to 19: the contribution, property and donation terms set out in chapter 1, a further EUR 50,000 for each spouse and child (C-181/23, para. 25), caps of 400 certificates a year and 1,500 in total excluding dependants (para. 26), and applications only through licensed agents (para. 119). It was suspended for Russian and Belarusian nationals from 2 March 2022 (para. 36).

By the end of 2024 it had naturalised 275 main applicants and 554 dependants, 829 people, and collected EUR 282,660,000 in contributions in 2022 to 2024 alone, our sum of the annual figures in the Regulator’s reports. Across both schemes that is 6,152 people naturalised by investment to the end of 2024, our sum of the Regulator’s totals.

How the Commission built its case

TABLE 1: THE INFRINGEMENT PROCEDURE AGAINST MALTA, 2020 TO 2025.

Date	Step	Reference
1 April 2020	Commission writes that selling Union citizenship could breach sincere cooperation	C-181/23, para. 30
20 October 2020	Letter of formal notice	para. 32
9 June 2021	Additional letter of formal notice on the 2020 scheme	para. 34
28 March 2022	Recommendation C(2022) 2028 calls for repeal of investor citizenship schemes	para. 37
6 April 2022	Reasoned opinion	para. 38
29 September 2022	Decision to refer Malta to the Court	Press release IP/22/5422
21 March 2023	Action lodged as Case C-181/23	Judgment
4 October 2024	Opinion of Advocate General Collins	Judgment
29 April 2025	Grand Chamber judgment against Malta	Operative part

The action concerned the 2020 scheme only, though the Commission said it reproduced the 2014 scheme’s defects (para. 40). The Maltese government said on the day of judgment that the Advocate General had found no case against Malta; the Court did not follow him.

What the Court decided, and why

The Court began from ground Malta relied on. Nationality is a matter for each Member State, with broad discretion, but that discretion must be exercised with due regard to EU law (paras 81 and 98). Union citizenship is the fundamental status of Member State nationals and part of the Union's constitutional framework (paras 84 to 93), so the power to grant nationality rests on mutual trust that no State will exercise it in a way manifestly incompatible with the nature of that citizenship (para. 95). The bedrock of nationality is a special relationship of solidarity and good faith, and the reciprocity of rights and duties (para. 96).

A Member State therefore breaches art. 20 TFEU and art. 4(3) TEU when it runs a naturalisation scheme based on a transactional procedure, under which nationality is essentially granted in exchange for predetermined payments or investments (para. 99). That is commercialisation of nationality and, by extension, of Union citizenship (para. 100), and it undermines the mutual trust by which Member States recognise each other's nationals (para. 101).

Applied to Malta, the contribution, property and donation conditions put predetermined payments in a key position (paras 102 and 103). The residence condition was legal residence, not actual residence: presence was needed only for biometrics and the oath (para. 106), and paying EUR 150,000 more to cut residence from three years to one tied residence itself to the transaction (paras 105 to 111), in contrast with the twelve months plus four of six years required for ordinary naturalisation (para. 110). Due diligence limited who could use the scheme but did not change its nature (paras 112 to 114). There was no examination of genuine links (paras 115 to 118). And agents had marketed the right to live, study and work anywhere in the Union, with applications possible only through them (paras 119 and 120). The operative part describes the scheme as “the commercialisation of the grant of the nationality of a Member State”.

Three limits are regularly misstated. The judgment does not annul or order the withdrawal of any certificate already granted. It does not adopt the Commission's proposed prior genuine link test as such; it decided on the narrower transactional ground. And it concerns citizenship, not residence by investment: the permanent residence programme was not before the Court and remains lawful.

Act XXI of 2025 and the new article 10(9)

The Maltese Citizenship (Amendment) Act, 2025, Act XXI of 2025, was published in Gazette No. 21,474 and entered into force on 24 July 2025. It deletes the definition of “individual investor programme” (s. 2), deletes the regulation-making power tied to the investor route at art. 24(1)(i) (s. 7), and substitutes a new art. 10(9) (s. 5). It also moves the descent-registration dates in arts 3 and 5 to 1 August 2028 (ss. 3 and 4), covered in chapter 9.

The new art. 10(9) allows the Minister to grant naturalisation by merit to a person who renders exceptional services or makes an exceptional contribution, including through job creation, to Malta or to humanity, or whose naturalisation is of exceptional interest to Malta. Exceptional means manifestly superior or adding value. The categories named are scientists, researchers, athletes, sports persons, artists, cultural performers, entrepreneurs, philanthropists and technologists, among others. The oath must be taken in Malta. The words “investors” and “through investment”, in the 2020 text the Court quoted at para. 21, are gone.

The machinery around it is strict. The Minister need give no reasons, and decisions are not subject to appeal or review in any court (art. 19). A Regulator reports annually to the House (art. 25) and may investigate complaints by refused merit applicants (art. 25A); a Monitoring Committee including the Leader of the Opposition oversees grants (art. 25B). And art. 23(3) makes it an offence, with a fine of up to EUR 20,000, for anyone to advertise or publicly disseminate information about naturalisation under art. 10(9) for gain and without authorisation.

L.N. 159 of 2025: what was removed

L.N. 159 of 2025, published in Gazette No. 21,478 on 29 July 2025, renamed S.L. 188.06 the Granting of Citizenship by Naturalisation on the basis of Merit Regulations (reg. 2). It deleted regs 15 to 19 and 21, containing the investment route, the caps and the non-refundable fees and investment rule (reg. 16), the old eligibility stage in regs 8 to 10

(reg. 9), the fees regulation (reg. 22), and the Schedules: the First Schedule, which set the investment contributions and fees, was replaced by an oath form for the Evaluation Board (reg. 23), and the Second to Fourth Schedules were deleted (reg. 24). In their place is a two-stage merit procedure under regs 11A and 11B, with fees set by the Agency and none published; chapter 9 covers it.

The agents went too. L.N. 58 of 2026 repealed the Agents (Licences) Regulations, S.L. 188.05, from 13 March 2026, keeping licences held on 29 April 2025 alive only to finish legacy matters (reg. 2). The merit route has no agents; an applicant may act alone or through a competent professional approved by the Agency (S.L. 188.06, reg. 7(4)).

The transitional rule, and why the cut-off is the judgment date

The transitional provision is reg. 25 of L.N. 159 of 2025, the amending notice, not reg. 25 of the consolidated S.L. 188.06, which now concerns good faith and professional standards. Citations in circulation often confuse the two.

Reg. 25 preserves the past: acquisition, deprivation or retention of citizenship under the earlier law continues to be regulated by, and remains valid under, that law. And it closes the pipeline by reference to an earlier date: any Part IV application not approved for naturalisation by the Minister before 29 April 2025 ceases to have effect. The cut-off is the date of the judgment, not of the Legal Notice. A file approved on 28 April 2025 is protected; a file waiting for a decision on 30 April 2025 lapsed, by reference to a date that had already passed when the rule was made.

The text does not say whether an approval in principle was enough, and it sits awkwardly beside art. 27(4) of Cap. 188, which says Act XXI does not apply to art. 10(9) applications filed before 24 July 2025, subject to any regulations. Anyone caught in that gap needs Maltese advice on the specific file, knowing that art. 19 shields the Minister's decisions from review. If such a person now turns to the residence programme, note that reg. 13(1)(i) of S.L. 217.26 excludes an applicant whose citizenship application was refused, and the regulations do not say whether a lapsed application counts. Raise it before filing.

If you already hold Maltese citizenship

Your citizenship stands. Reg. 25 says so, the government stated on 29 April 2025 that decisions under both the current and the previous framework remain valid, and the judgment touched no certificate. Malta has permitted dual citizenship since 10 February 2000 (Cap. 188, art. 7).

What reg. 25 also preserves is deprivation, under art. 14 of Cap. 188 and the grounds in the rules under which citizenship was granted: for programme citizens, reg. 10 of S.L. 188.03, covering failure to keep the property or investments, threats to national security and seriously prejudicial conduct, with equivalent grounds in the 2020 regulations (C-181/23, para. 117). Art. 14(2)(c) adds a custodial sentence of twelve months or more within seven years of naturalisation, and art. 14(4) gives a right to a committee of inquiry before any order. In March 2024 the government began proceedings against a person named in a United States sanctions statement.

The published numbers count different things. The Regulator's 2024 report, signed on 29 October 2025, records 6 investor citizens deprived since the schemes began and 4 more in progress. A ministerial answer to parliamentary question 28199 of 26 May 2025 gives 15 deprived since the investment provisions were introduced, with 4 under way, and says those 15 acquired citizenship under all provisions of the law, not only through investment; PQ 28978 of 10 June 2025 adds that 6 of the 15, and all 4 in progress, had acquired it by investment, which matches the Regulator. PQ 30635 of 28 October 2025 gives deprivations by all routes: 7 in 2020, 3 in 2021, none in 2022 or 2023, 1 in 2024 and 1 in 2025 to 15 October. The figures measure different populations and should not be read as conflicting counts of the same thing.

CONTESTED POINT

Whether existing investor citizenships are safe in the long run is not settled, and anyone who tells you it is, in either direction, is overstating. For safety: Maltese law says they remain valid, the judgment annulled nothing, and the Court's case law on loss of nationality, cited in the judgment at paras 81 and 92, subjects any withdrawal to an

individual proportionality review under EU law, which cuts hard against mass revocation. Against complacency: the Court held that the scheme itself breached the Treaties, grounding that in the mutual trust by which Member States recognise each other's nationals (para. 101), and no rule addresses how other Member States should treat these nationals. We found no Commission follow-up after July 2025 and no proceedings challenging existing certificates. Our reading: mass revocation is unlikely; individual deprivation is a real but narrow risk, concentrated on sanctions, serious crime and broken commitments.

The notice of 5 February 2026

On 5 February 2026 the Community Malta Agency published a notice saying it had become aware of communications inaccurately portraying citizenship by merit; that it does not permit any marketing or promotion of the legislation; that citizenship by merit is “neither a programme nor a scheme”, nor a pathway to, continuation of or alternative to the repealed investment framework; and that decisions are discretionary and assessed strictly case by case.

There are no official numbers to plan against. Asked in PQ 31995 of 12 November 2025 how many people had obtained citizenship by merit under the new law, the government gave no figure. Under the earlier merit category the Regulator recorded 7 applications in 2022, 13 in 2023 and 4 in 2024, mainly from sport and science. Those are not the numbers of a programme.

ADVISER'S OBSERVATION

I am asked about the merit route more than about anything else in Malta, usually by someone who has been told it is the investment programme under a new name. It is not, and in my view it should not be treated as a planning route at all. A route with no published criteria beyond the statute, no published fees, no statistics, no reasons for refusal and no appeal cannot be planned for; it can only be hoped for. The people it is written for, a scientist of international standing or an athlete who will compete for Malta, are identified by what they have already done, not by what they will pay. The honest role for an adviser is narrow: explain the law, make sure a genuine case is not damaged by being treated as a transaction, and tell everyone else plainly that the money set aside for a passport is better spent on secure residence and on a life in Malta that may, after years of actually living there, support an ordinary application.

TOM PURDY

CANDOUR

Anyone still offering to sell you a Maltese passport, whether they call it citizenship by investment, by merit, by exceptional services or by contribution, is either out of date or not telling you the truth. The investment route ended on 29 April 2025. Files not approved before that date lapsed. The merit route may not lawfully be marketed, and there is no fee schedule, quota or processing time for it that anyone could honestly quote. If a firm still describes a Maltese passport as something you can buy, apply the same caution to everything else it tells you.

03

CHAPTER 03

The map of what remains

Every residence and citizenship route still open, compared on what it gives, what it asks, what it does to your tax and where it leads.

IN THIS CHAPTER

Three bodies of law

There is no free-standing self-sufficiency route

Every route, compared

What the tables show

Where EU, EEA and Swiss nationals fit

Three bodies of law

Malta's routes sit in three places, and knowing which applies tells you who decides your file. Residence permits are immigration law: art. 7A of the Immigration Act, Cap. 217, and S.L. 217.26 create the permanent residence programme, run by the Residency Malta Agency, which also runs the Nomad permit; other permits and residence cards come from Identità. Tax statuses are rules under the Income Tax Act, Cap. 123, run by the Malta Tax and Customs Administration. Citizenship is Cap. 188, run by the Community Malta Agency.

A tax status is not a residence permit, and a residence permit is not a tax status. Neither leads to citizenship except through the ordinary rules of Cap. 188.

There is no free-standing self-sufficiency route

Many European countries let a wealthy non-EU person live there on private means. Malta's economic self-sufficiency permit costs EUR 100 (L.N. 164 of 2025, reg. 2, item 2(a)), but Identità accepts applications for it only from beneficiaries of a local residence investment or tax programme, such as the Global Residence Programme or the Malta Retirement Programme. In practice a non-EU national who wants to live in Malta without working there needs the permanent residence programme, a tax programme, or, for remote workers, the Nomad permit. That is why the tax programmes matter to immigration planning as much as to tax, and why their replacement on 1 January 2027 matters to both.

Every route, compared

Figures are government figures only; the legal references are in chapters 4 to 7 and 9.

TABLE 2: WHAT EACH ROUTE GIVES, AND WHAT IT ASKS.

Route	What it gives	Capital or income test	Main government cost
Permanent Residence Programme (S.L. 217.26)	Indefinite residence; Schengen travel 90 days in 180	Assets EUR 500,000 (150,000 financial) or 650,000 (75,000 financial); buy EUR 375,000 or rent EUR 14,000 a year	EUR 99,000, plus EUR 7,500 per adult child or parent
Global Residence Programme (S.L. 123.148), to 2026	Flat-rate tax status; permit from Identità	Buy EUR 275,000 (220,000 south or Gozo) or rent EUR 9,600 (8,750)	EUR 6,000 fee; EUR 15,000 minimum tax a year
Malta Retirement Programme (S.L. 123.134), to 2026	Flat-rate tax status for pensioners	Pension at least 75 per cent of chargeable income; property as above	EUR 2,500 fee; EUR 7,500 minimum tax plus EUR 500 per dependant
Individual Tax Programme (S.L. 123.221), from 2027	Five-year flat-rate tax status	Buy EUR 700,000 or rent EUR 14,000	EUR 8,500 fee; minimum tax EUR 35,000, or EUR 15,000 for retired pensioners
Nomad Residence Permit	One-year permit, renewable to four years	Gross income EUR 42,000	EUR 300 per applicant, plus EUR 100 card
Key Employee permit and Highly Skilled Individuals (S.L. 123.219)	Residence to work in Malta; 15 per cent on qualifying salary	Salary EUR 45,000 for the permit; EUR 65,000 for the tax regime	EUR 600, then EUR 150 a year
EU long-term residence (S.L. 217.05)	Permanent status, five-year document	Five years' legal residence; resources declared in Malta; integration tests	EUR 500

TABLE 3: TAX EFFECT, PRESENCE AND WHERE EACH ROUTE LEADS.

Route	Tax effect	Presence required	Path to citizenship
Permanent Residence Programme	None by itself	None	Only by ordinary naturalisation, with actual residence
Global Residence Programme	15 per cent on remitted foreign income	No more than 183 days in any other jurisdiction	Ordinary naturalisation
Malta Retirement Programme	15 per cent; all pension remitted	90 days a year averaged over five years; no more than 183 elsewhere	Ordinary naturalisation

CONTINUED

Route	Tax effect	Presence required	Path to citizenship
Individual Tax Programme	15 per cent on remitted foreign income	No more than 183 days elsewhere	Ordinary naturalisation
Nomad Residence Permit	10 per cent on remote-work income after 12 months	Five months in the last 12 to renew	None; stated not to lead to settlement
Key Employee and Highly Skilled Individuals	15 per cent on qualifying salary	Employment in Malta	Ordinary naturalisation
EU long-term residence	Ends the remittance basis	Absences limited	Ordinary naturalisation

TABLE 4: THE THREE CITIZENSHIP ROUTES.

Route	Legal basis	Residence test	Government fee	Decision
Ordinary naturalisation	Cap. 188, art. 10(1)	12 months immediately before, plus 4 of the 6 years before that	EUR 450, plus EUR 50 on grant	Discretionary; no reasons, no appeal
Marriage	Cap. 188, art. 6	None stated; five years married and living together	EUR 150, plus EUR 50 on grant	Entitlement, subject to public interest
Merit	Cap. 188, art. 10(9); S.L. 188.06	At least eight months before applying	None published	Discretionary; no reasons

What the tables show

Four points are easy to miss. First, the permanent residence programme gives the most secure status for the least presence, but costs the most in charges never recovered, and says nothing about tax.

Second, the permanent residence programme and the Global Residence Programme are not mutually exclusive on the text. The schemes whose beneficiaries cannot hold a permanent residence certificate include the Malta Retirement Programme, the Highly Qualified Persons Rules and the Residence Programme, but not the Global Residence Programme (S.L. 217.26, reg. 3 and reg. 15(1)(b)). Confirm the agencies' practice on the combination before filing either application.

Third, the residence and tax routes pull in opposite directions at the five-year mark. After five years of legal and continuous residence a non-EU resident may qualify for EU long-term resident status, with equal treatment in employment, education and social security (S.L. 217.05, reg. 11). But that status ends Global Residence Programme and Malta Retirement Programme status and moves a non-domiciled person to worldwide taxation (Cap. 123, art. 4(1), proviso). Chapter 7 returns to this.

Fourth, only three routes lead to citizenship, and each needs years of actual life in Malta or a five-year marriage to a Maltese citizen. Nothing in the residence or tax routes shortens that.

Where EU, EEA and Swiss nationals fit

EU, EEA and Swiss nationals cannot use the permanent residence programme and do not need it: they reside under the free movement rules, implemented by S.L. 460.17. Their tax equivalent of the Global Residence Programme is the Residence Programme, S.L. 123.160, on the same terms until the end of 2026, then the EU category of the Individual Tax Programme. Outside a programme, a non-domiciled EU national is on the remittance basis like anyone else until he obtains a permanent residence certificate or card under S.L. 460.17, from which year it no longer applies (Cap. 123, art. 4(1), proviso). Chapter 8 covers property purchase by EU citizens.

The government charges above are the only costs this guide states exactly. Chapter 11 brings them together route by route, with professional costs explained as ranges; for the figures on your own family, get in touch and we will prepare a personalised quote.

CHAPTER 04

The Malta Permanent Residence Programme in detail

The legal basis, the capital and property tests, dependants, every government charge, and what the certificate does and does not give you.

IN THIS CHAPTER

The legal basis

Who may apply

The capital test

The property condition

Dependants, and the EUR 7,500 rule

Government charges, exactly

What the certificate gives

What it does not give

No days in Malta, and why that cuts both ways

How the certificate is lost

No appeal

The legal basis

The programme rests on art. 7A of the Immigration Act, Cap. 217. The rules are S.L. 217.26, made by L.N. 121 of 2021, in force from 29 March 2021, and amended by L.N. 57 of 2024, by L.N. 310 of 2024 from 1 January 2025, and by L.N. 146 of 2025, published on 22 July 2025. Cite it as S.L. 217.26 as amended by L.N. 146 of 2025; L.N. 146 is the amending notice, not the regulations. It replaced the Malta Residence and Visa Programme, S.L. 217.18, which still governs its existing holders (reg. 26).

Who may apply

The main applicant must be at least 18 (reg. 9(1)) and a third-country national, which excludes Maltese, EEA and Swiss nationals (reg. 3; reg. 15(1)(a)). Residency Malta adds, as policy rather than regulation, that applicants must not come from sanctioned countries as it announces them.

He may not be a beneficiary of the Residents Scheme, the Highly Qualified Persons Rules, the High Net Worth Individuals rules for non-EU nationals, the Malta Retirement Programme, the innovation and creativity employment rules or the Residence Programme (reg. 3; reg. 15(1)(b)). Reg. 13(1) disqualifies the applicant and every dependant for, among other things, an Interpol or Europol listing, a threat to security or public policy, pending charges or convictions for terrorism, money laundering or similar crimes, any offence punishable by more than a year, a sanctions listing, or conduct bringing Malta into disrepute. A previous refused programme application, or a refused application for Maltese citizenship, disqualifies the whole family (reg. 13(1)(i)).

The capital test

At application the main applicant must show assets of at least EUR 500,000, of which at least EUR 150,000 are financial assets, or at least EUR 650,000, of which at least EUR 75,000 are financial assets, as the Agency considers appropriate in its sole discretion (reg. 9(2), as substituted by L.N. 310 of 2024). A qualifying property bought for the programme may count towards the evidence (reg. 12(1)(c), proviso). The capital must be held for five years from the appointed day, the date the certificate is issued (reg. 15(1)(g); reg. 3). He must also have stable and regular resources to support the family without social assistance (reg. 15(1)(d)).

The property condition

The applicant must buy a residential property, or acquire it by emphyteusis, for at least EUR 375,000, or lease one for at least EUR 14,000 a year, in Malta or Gozo (reg. 3). There is no regional discount any longer: L.N. 310 of 2024 removed the lower thresholds for the south of Malta and Gozo from 1 January 2025. The property must meet health and safety standards and be normal for a comparable family in Malta.

The qualifying property must be held for five years from the appointed day. After that, the holder must still hold a residential property in Malta or Gozo, owned, leased or held by emphyteusis, with no minimum value (reg. 15(1)(c)). A property can be replaced with the Agency's consent, and the Agency may carry out spot checks.

The regulations are silent on letting, but Residency Malta lists as benefits the option to sub-lease after five years and to lease out purchased property in Special Designated Areas. That matters because a non-EU buyer outside those areas needs a permit under Cap. 246, is limited to one property and may not let it. Chapter 8 deals with that, and with duty on purchase.

Dependants, and the EUR 7,500 rule

A dependant under reg. 3, as amended in 2024 and 2025, is (a) a spouse or partner in a relationship of similar status, gender neutral; (b) a child of the main applicant or spouse, including an adopted child, under 18 at application; (c) such a child aged 18 to under 29, unmarried at application and principally dependent on the main

applicant; (d) a parent or grandparent of either spouse, principally dependent and, since L.N. 146 of 2025, not in full-time employment; or (e) an adult child certified as having a disability under Cap. 413.

The fee rule is the part most often misquoted. The EUR 7,500 administration fee per dependant is payable only for groups (c) and (d): unmarried adult children aged 18 to 28, and parents and grandparents. A spouse, children under 18 and adult children with a disability pay nothing (First Schedule, para. (i), proviso). Since L.N. 146 of 2025 there is no contribution for dependants at all (reg. 11). Dependants within the definition, and the spouses and minor children of approved dependent children, can be added after the certificate issues, subject to due diligence and the fee where payable (reg. 11(2) to (5)).

Government charges, exactly

TABLE 5: GOVERNMENT CHARGES UNDER THE PERMANENT RESIDENCE PROGRAMME.

Item	Amount	When payable	Reference
Administration fee, main applicant	EUR 60,000	EUR 15,000 within one month of applying; EUR 45,000 within two months of approval in principle	First Schedule (i); reg. 9(1), 9(4)
Administration fee, adult child 18 to 28, parent or grandparent	EUR 7,500 each	Within two months of approval in principle	First Schedule (i), proviso
Contribution, owned or rented property	EUR 37,000	Within eight months of approval in principle	First Schedule (ii)
Donation to a registered Maltese NGO	EUR 2,000	Before the certificate, within eight months of approval in principle	reg. 3; reg. 9(4)(c)
Residence card	EUR 500 per person, five years	On issue	Residency Malta

The minimum for a single applicant, or a couple with children under 18, is therefore EUR 99,000, whether the family rents or buys; with the card fee, a family of four pays EUR 101,000. Each adult child or dependent parent adds EUR 7,500 and a card. Rent or purchase price is on top.

One caveat: the EUR 500 card fee comes from Residency Malta's current page and brochure, not from the fee regulations, L.N. 164 of 2025, and an Agency FAQ of September 2024 gave lower figures. Confirm it when you apply.

These charges apply to every application submitted after 1 January 2025 and not concluded when L.N. 146 of 2025 took effect (L.N. 146, reg. 16). Against the regime they replaced, on fee and contribution alone and by our arithmetic, they made the programme dearer for a single buyer (EUR 97,000 against EUR 80,000), cheaper for a single renter (against EUR 110,000), and cheaper for a family of four either way.

Professional fees, legal costs on a purchase and health insurance come on top and vary with the file. Chapter 11 sets them out as honest ranges; get in touch for a personalised quote for your own family.

What the certificate gives

The certificate entitles the holder and the dependants named on it to reside, settle or stay indefinitely in Malta, as long as the programme's obligations are met, and it is deemed a permit under art. 7A of Cap. 217 (reg. 10(1) and (4)). Residency Malta states that holders may travel visa-free in the Schengen Area for 90 days in any 180. For most readers that is the product: a permanent right for the whole family to live in an EU Member State, not tied to employment or presence, in place before anyone needs it.

What it does not give

It is not tax residence. The regulations contain no tax provisions beyond requiring the Agency to give the tax authority each beneficiary's identifying details and tax number (reg. 21(5)). Whether you pay Maltese tax depends on whether you live in Malta, under chapter 7.

It is not a route to a passport. Residency Malta states that the programme grants permanent residence and is distinct from the legislation governing citizenship, and S.L. 217.26 contains no citizenship provision.

It is not a right to live or work elsewhere in the Union; Schengen travel is travel. And the certificate does not by itself confer other rights under the Immigration Regulations, S.L. 217.04 (reg. 10(1)), so anyone who plans to work in Malta should establish the position for that activity first.

CONTESTED POINT

Whether a certificate holder can also obtain EU long-term resident status is not settled by any text we have read. S.L. 217.26 refers to long-term residents and allows information exchange with the authority that grants the status (reg. 18(2)), but does not say whether a holder can acquire it. The rules in S.L. 217.05 require five years of legal and continuous residence with limited absences, two years of resources declared to the Maltese tax authorities, a 100-hour integration course attended in the preceding twelve months and passed at 75 per cent, and Maltese assessed at MQF Level 2 (regs 4 and 5). A holder living outside Malta is unlikely to meet them; one living in Malta may meet them, and should weigh the cost, because the status that brings mobility rights also ends the remittance basis. Until the agencies publish a position, treat it as a separate decision.

No days in Malta, and why that cuts both ways

There is no minimum presence requirement anywhere in S.L. 217.26; we have read the full consolidated text. That is the programme's great strength as a plan B: the right does not erode if the family stays in Dubai, Hong Kong or New York. It is also why the programme cannot lead to citizenship. The Court drew the line between legal and actual residence (C-181/23, paras 105 to 111), and ordinary naturalisation requires actual residence. A holder who later wants a passport must live in Malta, and the clock runs from the years actually lived there, not from the date on the certificate.

CANDOUR

The programme is not a payment made once and forgotten. The capital must be held for five years, the qualifying property for five years, and after that a Maltese residential property for as long as the certificate is kept. Health insurance covering the risks normally covered for Maltese nationals must be maintained for everyone on the certificate, and dependants receive no residence card without it (reg. 15(3)). The Agency monitors compliance annually for five years, then when it sees fit (reg. 10(3)). Budget for a Maltese home and for the insurance for as long as you want the right.

How the certificate is lost

The conditions of reg. 15(1) apply throughout. The certificate ends automatically if the holder becomes a Maltese, EEA or Swiss national (reg. 17(1)). Otherwise the Agency may determine that it has ceased, for everyone on it, if a condition is not met, if he is no longer eligible under reg. 13, if information given was false or materially inaccurate, if a commitment was not fulfilled, if his stay is not in the public interest, or for disloyalty towards the President or the Republic by act or speech (reg. 17(2)). Dependants can be removed individually (reg. 17(4)). The holder must notify the Agency within four weeks of an event that could cause cessation (reg. 17(6)), and the Agency may condone a failure caused by unforeseen circumstances if it was notified and remedied (reg. 17(7)). On the main beneficiary's death it may, exceptionally, reissue the certificate to an approved dependant (reg. 16).

No appeal

Every decision of the Agency under the regulations is made at its absolute discretion, is final and is not subject to appeal (reg. 19(1)). The application must therefore be right the first time, because a refusal cannot be challenged on the merits and bars a later application. Chapter 5 explains how the process is run to reduce that risk.

05

CHAPTER 05

The MPRP process, step by step

Licensed agents, the stages and when you pay, due diligence, realistic timing, refusals and what happens when your circumstances change.

IN THIS CHAPTER

You must use a licensed agent

The stages and when you pay

Documents and due diligence

How long it takes

Refusals

When circumstances change

You must use a licensed agent

An applicant cannot file alone: reg. 4(1) of S.L. 217.26 requires every applicant to use an agent licensed by the Residency Malta Agency, one at a time, with the right to change (reg. 4(4) and (5)). Since L.N. 146 of 2025 the Agency licenses agents itself; those licensed under the old citizenship regime could act for programme applicants only until 31 December 2025 (reg. 5(1), proviso).

An agent must be a public accountant or auditor, a lawyer, or a licensed financial adviser (reg. 6A), with a clean conduct certificate, professional indemnity insurance of at least EUR 500,000 and access to a recognised due diligence database (reg. 6B). Licences are renewed annually with fresh due diligence (reg. 5) and cost the agent EUR 5,000 a year (Third Schedule). Only agents on the Agency's public register may act (reg. 6), and their duties include acting openly with the Agency, following codes on marketing and avoiding conflicts of interest (reg. 7).

CANDOUR

Your agent may be paid twice. The agent's own fee is agreed with you and is not capped by the regulations. Separately, reg. 25 allows the Agency to pay agents for promotional support, based on each successful application for which a certificate is issued, under criteria approved by the Minister and notified annually. The amounts are not published. A payment the law provides for is not improper, but it depends on your application succeeding, and you are entitled to ask any agent, before you sign, whether it receives such payments and how much.

The stages and when you pay

The process runs through fixed windows measured from two dates: the application, and the Letter of Approval in Principle.

TABLE 6: THE PERMANENT RESIDENCE PROGRAMME, STAGE BY STAGE.

Stage	What happens	Payment	Reference
1. Application	Capital evidence, conduct certificates, KYC evidence, medical confirmation, undertakings to buy or lease, contribute and donate	None on filing	reg. 9(1), 9(2), 12(1)
2. Within one month	First part of the administration fee; without it the Agency may refuse the file	EUR 15,000	reg. 9(1); First Schedule
3. Optional	Temporary residence permit for one year, renewable, if all documents are in within six months	Permit fee	reg. 9(6)
4. Due diligence	Agency, law-enforcement and AML checks; findings to the Approvals Board	None	reg. 14
5. Approval in principle	Letter of Approval in Principle	None	reg. 9(3)
6. Within two months	Balance of administration fee; fees for adult children and parents	EUR 45,000; EUR 7,500 each	reg. 9(4)
7. Within eight months	Contribution, title to property, donation, health insurance	EUR 37,000; EUR 2,000	reg. 9(4)(a) to (e)
8. Certificate	Issued; this is the appointed day	None	reg. 9(5), 10
9. Residence cards	Five-year cards; none without health insurance	EUR 500 each	Residency Malta; reg. 15(3)
10. Monitoring	Annually for five years, then as the Agency sees fit	None	reg. 10(3)

The Agency may extend the eight-month window for good cause (reg. 9(4); reg. 19(5)); if a payment or document is late, it may reject the application or revoke the approval (reg. 9(4), first proviso).

Documents and due diligence

Reg. 12(1) sets out the core file: police conduct certificates for the main applicant and every dependant over 14, from the country of origin and every country of more than six months' residence in the last ten years; the agent's

know-your-client evidence; the undertakings; and medical confirmation that no one is seriously ill, contagious or likely to be an unreasonable burden on the health system. Documents must be in English or carry an authenticated translation (reg. 12(3)), and each dependant over 18 other than the spouse needs an affidavit of support (reg. 12(4)).

The Agency runs due diligence on everyone on the application (reg. 14(1)), using internationally recognised specialist providers, possible law-enforcement checks and anti-money laundering checks (reg. 14(2)); Residency Malta says its checks extend to donors, benefactors and business associates. Findings go to the Approvals Board, whose authorisation is needed before a certificate issues (reg. 14(3)). The Agency may share information with the tax authority, the Financial Intelligence Analysis Unit, the police and foreign enforcement authorities (reg. 21). A false statement or omission can justify refusal by itself (reg. 12(6)). The most important document is the evidence of where the capital came from: disclose everything, including matters you consider closed.

How long it takes

There is no statutory deadline for a decision; Residency Malta says only that decisions are communicated within a reasonable timeframe, commensurate with the due diligence. The hard time limits bind the applicant: one, two and eight months. Any overall timeline quoted to you in months is an estimate, not an official figure. Plan the eight months after approval with room to spare, because that is when the property must be secured and the contribution paid.

Refusals

A refusal is final, cannot be appealed (reg. 19(1)) and bars a later application by the family (reg. 13(1)(i)). Administration fees are non-refundable (reg. 3). On the contribution, L.N. 310 of 2024 had added a rule that it is non-refundable and L.N. 146 of 2025 deleted it, so the current text says nothing either way; in practice it falls due only after approval in principle. Because a refusal cannot be undone, the time to test a difficult file is before it is filed.

When circumstances change

A new spouse or child, or a parent who becomes dependent, can be added under reg. 11 with due diligence and, where payable, the EUR 7,500 fee. A child who marries or passes the age limit may be removed as no longer eligible for inclusion (reg. 17(4)(a)); the Agency has published nothing on how it applies that to a child who qualified when the certificate issued, so raise it before it happens. A move of house needs the Agency's consent under reg. 15(1)(c). And any event that could cause cessation, from a lapse in health insurance to a criminal charge, must be notified within four weeks (reg. 17(6)).

The professional work is concentrated in building the file before submission and managing the eight months after approval. Its cost depends on the size of the family, the number of countries in its history and the complexity of its wealth; chapter 11 explains how it is charged, and we will give you a personalised quote once we have seen the facts.

06

CHAPTER 06

The tax-status programmes

The flat-rate programmes as they stand today, the Individual Tax Programme that replaces them on 1 January 2027, and the deadline that matters.

IN THIS CHAPTER

Start with the deadline: 31 December 2026

The Global Residence Programme

The Malta Retirement Programme

The Nomad Residence Permit

Highly Qualified Persons, now Highly Skilled Individuals

Who each programme suits

Start with the deadline: 31 December 2026

The Global Residence Programme, the Residence Programme, the Malta Retirement Programme and the UN Pensions Programme are being folded into a single Individual Tax Programme from 1 January 2027, on much harsher terms for new entrants. To obtain a flat-rate status on the current terms, a complete application must be received by 31 December 2026, and assembling one through an authorised registered mandatary takes time, so the practical deadline is earlier.

The Individual Tax Programme Rules were made by L.N. 195 of 2026, published in Gazette No. 21,686 on 14 July 2026, and come into force as S.L. 123.221 on 1 January 2027 (r. 1(2)). They create four categories, of which a beneficiary may hold only one: global resident status for third-country nationals, EU, EEA and Swiss resident status, retired pensioner status and UN pensioner status (r. 3(1); r. 4(d), proviso).

TABLE 7: THE GLOBAL RESIDENCE PROGRAMME AGAINST ITS REPLACEMENT.

Item	Global Residence Programme (applications to 2026)	Individual Tax Programme (from 2027)
Application fee	EUR 6,000; EUR 5,500 if owned in the south of Malta	EUR 8,500; EUR 2,500 to renew every five years
Qualifying purchase	EUR 275,000; EUR 220,000 in the south or Gozo	EUR 700,000, Malta or Gozo
Qualifying rent	EUR 9,600 a year; EUR 8,750 in the south or Gozo	EUR 14,000 a year, Malta or Gozo
Minimum tax a year	EUR 15,000	EUR 35,000 global or EU; EUR 15,000 retired pensioner

The new status lasts five years and renewal shall not be unreasonably withheld (r. 3(3)). Tax is 15 per cent on remitted foreign income and 35 per cent on other income; UN pensions are exempt, with a EUR 20,000 minimum on other foreign income (r. 5). Retired pensioner status requires a pension all received in Malta and at least 75 per cent of chargeable income (r. 4(g)), and every category requires non-domicile (r. 4(k)). Status ends on letting or losing the property, becoming a long-term or permanent resident, spending over 183 days in another jurisdiction in a calendar year, or not paying the minimum tax (r. 6).

CONTESTED POINT

The transitional rule is one sentence, and it does not answer the questions that matter. The second proviso to r. 3(3) says any grant of special tax status made up to 31 December 2026, including applications received by that date, shall continue to apply until 31 December 2031. It does not say whether a Global Residence Programme or Malta Retirement Programme status continues on its own terms, with its own minimum tax, until 2031, or as a status under the new rules. It does not say how an application received in December 2026 but decided in 2027 is treated in practice, or what happens on 1 January 2032, though the natural reading is that the beneficiary must then qualify under the new rules. And at the time of writing we had found no legal notice revoking the existing rules. File a complete application well before the end of the year, keep proof of the date it was received, and have the mandatary obtain written confirmation of the terms of the grant.

The Global Residence Programme

The rules are S.L. 123.148, made by L.N. 167 of 2013 and amended by L.N. 267 of 2014 and L.N. 69 of 2020. The programme is for third-country nationals, excluding anyone who also holds EU, EEA or Swiss nationality (r. 2; r. 4(a)); British citizens are eligible. It is a tax status, not a permit: beneficiaries obtain an economic self-sufficiency permit from Identità, at EUR 100.

The fee and property thresholds are in Table 7 (r. 3(1); r. 2). The EUR 5,500 fee applies only to property owned in one of 23 scheduled localities in the south of Malta, not to Gozo or to rented property. The property must be the beneficiary's principal residence worldwide, occupied only by the family and notified household staff, and letting it ends the status (r. 6(1)(b)). Foreign income remitted by the beneficiary, spouse and minor or disabled children is taxed at 15 per cent with double tax relief, subject to a minimum tax of EUR 15,000 a year, payable in full in the first and last years (r. 5(1) and (3)); other income is taxed at 35 per cent (r. 5(2)). The status ends on becoming a long-term resident or spending more than 183 days in any other jurisdiction in a calendar year (r. 6(1)(c) and (f)).

The Malta Retirement Programme

The rules are S.L. 123.134, made by L.N. 317 of 2012 and amended by L.N. 269 of 2014 and L.N. 69 of 2020; they are sometimes wrongly cited as S.L. 123.160, which is the Residence Programme. The fee is EUR 2,500 (r. 3(1)). The beneficiary must not be in employment, though a non-executive board post and public-character philanthropic or educational work are allowed (r. 2). He must hold qualifying property on the Global Residence Programme thresholds, receive a pension all of which is received in Malta and which is at least 75 per cent of his chargeable income, hold health insurance, and be neither domiciled in Malta nor intending to become so within five years (r. 4). Tax is 15 per cent on remitted foreign income, with a minimum of EUR 7,500 plus EUR 500 for each dependant and special carer (r. 5(1)). The status ends if he resides in Malta for less than 90 days a year averaged over any five years, or stays over 183 days in another jurisdiction in a calendar year (r. 6(1)(h) and (i)). A beneficiary cannot hold a permanent residence certificate (S.L. 217.26, reg. 15(1)(b)).

CONTESTED POINT

Whether a British or other non-EU national can use the Malta Retirement Programme today is genuinely unclear. The tax authority's page describes it as designed for EU and non-EU nationals alike. But r. 6(1)(b), as amended by L.N. 69 of 2020, ends the status if the individual becomes a Maltese national or a third-country national, which on its face implies a beneficiary must not be one, while the authority's 2020 guidelines mention only becoming Maltese. A non-EU applicant should obtain the tax authority's confirmation before relying on the programme, and file before 31 December 2026 in any event.

The Nomad Residence Permit

Run by Residency Malta, the permit is for third-country nationals aged 18 or over who work remotely for a foreign employer or company, or as a freelancer with foreign clients, on gross income of at least EUR 42,000 a year; several nationalities are excluded, and Russian and Belarusian nationals are currently ineligible. The fee is EUR 300 per applicant plus EUR 100 per card, with processing expected in 30 working days. The permit lasts a year, renewable three times, on evidence of at least five months' residence in the previous twelve. There is no appeal against refusal, and Residency Malta states that it leads neither to long-term residence nor to citizenship.

For tax, S.L. 123.210 taxes income from authorised remote work at 10 per cent (r. 3(1)), but not until twelve months after the permit is issued unless the nomad declares that his residence is not casual (r. 3(3)); other income is taxed under the general rules (r. 3(4)). The tax authority's guidelines of 12 March 2026 state that acceptance as a nomad does not grant tax residency.

Highly Qualified Persons, now Highly Skilled Individuals

The Highly Qualified Persons Rules, S.L. 123.126, taxed qualifying employment income at 15 per cent, but no determination may issue after 31 December 2025 and benefits end by 31 December 2030 (r. 14). For existing beneficiaries one trap survives: a third-country national who acquires real rights over Maltese property loses the benefit retrospectively (r. 6(4)).

The replacement, S.L. 123.219, made by L.N. 20 of 2026, applies from 1 January 2026. It taxes qualifying employment income from an eligible office at 15 per cent, on emoluments up to EUR 7,000,000, above a minimum income of EUR 65,000 that rises by EUR 10,000 every five years. It runs five years with two five-year extensions, ends for income earned after 31 December 2040, and requires non-domicile. The usual immigration route is the Key Employee Initiative, a fast-tracked single permit for managerial or highly technical roles paying at least EUR 45,000, at EUR 600 for the first permit and EUR 150 a year on renewal (L.N. 164 of 2025).

Who each programme suits

The Global Residence Programme suits a non-EU individual with substantial foreign income that must be remitted, who can file in 2026; the Malta Retirement Programme, a pensioner whose pension is large enough that 15 per cent beats the ordinary tax on it, if his nationality allows. None suits a person whose wealth is mainly foreign capital gains and who can live on capital: the ordinary remittance basis already taxes those gains at nothing, as chapter 7 explains, and a programme only adds a minimum tax. The fees above are the government's; the mandatory's work is priced on the facts, and we will give you a personalised quote.

07

CHAPTER 07

How Malta taxes you

Residence and domicile, the remittance basis, the minimum tax, the 2026 rates, pensions and the taxes Malta does not have.

IN THIS CHAPTER

Resident, ordinarily resident and domiciled

The remittance basis, and foreign gains

When the remittance basis is lost

The EUR 5,000 minimum tax

Rates for 2026

Pensions from age 61

Social security

Rent, sales, and what Malta does not tax

Resident, ordinarily resident and domiciled

A person is resident if he resides in Malta, except for temporary absences the Commissioner considers reasonable (Cap. 123, art. 2(1)). Ordinary residence and domicile are undefined common-law concepts, and the tax authority's guidance on the remittance basis states its practice: more than 183 days in a year makes a person resident, and someone who comes to establish residence is resident from arrival; a person living in Malta on a permanent or indefinite basis is ordinarily resident; and a Maltese domicile of choice requires residence plus an intention to make Malta your permanent home, which an intention to return home or move on prevents.

The remittance basis, and foreign gains

Proviso (i) to art. 4(1) taxes income arising outside Malta to a person who is not ordinarily resident or not domiciled in Malta only on the amount received in Malta. Note the "or": most readers will be resident, ordinarily resident and not domiciled, and so taxed on Maltese income and on foreign income remitted. Proviso (ii) states that no tax is payable on capital gains arising outside Malta to such a person, and the tax authority's guidance confirms this holds even if the gains are received in Malta. A non-domiciled resident who sells foreign shares, a foreign business or foreign property owes Malta nothing on the gain. This, more than any programme, is why Malta appeals to people whose wealth is in capital. Chapter 10 explains why your home country may still have a claim.

The guidance also sets the working rules. Income paid abroad and later transferred to Malta counts as received. Capital, such as an inheritance or sale proceeds, is not income, but money remitted for living expenses is presumed to be income unless the contrary is proved, whatever account it comes from; money remitted for a capital purpose, such as buying Maltese property, is capital if you can show it was. Dividends arise where the paying company is incorporated, and interest where the debtor is resident.

When the remittance basis is lost

Three things end it. Neither proviso applies to a long-term resident under S.L. 217.05, or to the holder of a permanent residence certificate or card under S.L. 460.17, from the year that status is granted. Neither applies to someone whose spouse is ordinarily resident and domiciled in Malta. And both fall away if you acquire a Maltese domicile of choice. The first is the one most easily triggered by accident: long-term residence looks like an upgrade, and for tax it is the opposite.

The EUR 5,000 minimum tax

Art. 56(27), applicable since the 2019 year of assessment, sets a floor. It applies where an individual is ordinarily resident but not domiciled in Malta, is on the remittance basis, is not taxed under a scheme with its own minimum, and has foreign income of at least EUR 35,000 not fully received in Malta. His Maltese tax must then be at least EUR 5,000 a year; if the computation gives less, he is deemed to have remitted enough to reach it.

Three limits make it gentler than it looks. For a married couple the EUR 35,000 test counts both spouses' foreign income, and the EUR 5,000 applies once to the couple, not to each spouse (tax authority guidance, para. 6.3). If the individual proves that his tax on a worldwide basis would be less than EUR 5,000, the liability is capped at that lower amount (art. 56(27), second proviso). And it does not apply to beneficiaries of the Global Residence Programme, the Malta Retirement Programme and other schemes with their own minimum (guidance, para. 6.5). A retired couple, both over 61, each with EUR 30,000 of foreign pension, would owe nil on a worldwide basis under the pension exemption below, so the minimum falls away.

Rates for 2026

Income earned in 2026 is assessed in 2027, at the rates in art. 56(1) as substituted by Act III of 2026. Tax is chargeable income multiplied by the rate, less the deduction shown.

TABLE 8: SINGLE AND MARRIED RATES, INCOME EARNED IN 2026.

Chargeable income, single (EUR)	Chargeable income, married (EUR)	Rate	Subtract, single (EUR)	Subtract, married (EUR)
0 to 12,000	0 to 15,000	0%	0	0
12,001 to 16,000	15,001 to 23,000	15%	1,800	2,250
16,001 to 60,000	23,001 to 60,000	25%	3,400	4,550
Over 60,000	Over 60,000	35%	9,400	10,550

The single table is art. 56(1)(b)(i); the married table, for a joint computation, is art. 56(1)(a)(i). The more generous tables for married couples with children, and the enhanced parent tables, apply only where at least one spouse or the parent is a Maltese, EU or EEA national, or holds long-term resident status and the child was born and resides in Malta (art. 56(1)(a)(ii) and (iii), (b)(iv) and (v)). A non-EU family on the permanent residence programme, with children born abroad, uses the standard married table on a joint computation. The basic parent table for an individual computation, which starts tax at EUR 13,000, carries no nationality condition (art. 56(1)(b)(ii)).

Pensions from age 61

From income year 2026, pension income of an individual aged at least 61 is fully exempt up to EUR 37,104 a year (S.L. 123.204, r. 3, as amended by L.N. 53 of 2026). The tax authority states that this covers social security, service, occupational, private and foreign pensions combined. The cap is per individual. A pensioner taxed at the standard married rates also receives a rebate of 15 per cent of chargeable income above EUR 15,000, capped at EUR 540 (r. 4).

The result is that a retired couple on ordinary residence can pay a small fraction of the minimum tax the flat-rate programmes charge; chapter 12 works the figures. One caveat changes the picture for non-EU retirees: ordinary residence needs an immigration basis, and because *Identità* grants self-sufficiency permits only to programme beneficiaries, for most non-EU pensioners that basis is the permanent residence programme, with its EUR 99,000 of charges.

CONTESTED POINT

Three questions that matter to incoming retirees are not answered by the texts we have read. Whether the pension exemption applies inside the flat-rate programmes before the 15 per cent is charged; the rules are silent, though for most beneficiaries the minimum tax governs anyway. Whether the EUR 540 rebate applies once to a couple's joint computation or to each spouse; the tax authority's wording suggests once, and that is how we compute it. And whether Class 2 social security contributions are payable by programme beneficiaries, by non-domiciled residents on remitted investment income, and by pensioners above Maltese pension age or covered by their home country's system. Treat each as open, and have it confirmed on your facts.

Social security

Class 2 contributions are payable by non-employed individuals with income above EUR 910 from an economic activity, which includes rents, investments and capital gains. The 2026 rates, based on the previous year's net income, rise to 15 per cent of income, capped at EUR 83.89 a week for those born from 1962 or EUR 73.56 for those born earlier: EUR 4,362.28 and EUR 3,825.12 a year, our arithmetic.

Rent, sales, and what Malta does not tax

Maltese rental income may, at the landlord's option, bear a final tax of 15 per cent of gross rent (art. 31D(2)); undeclared rent is charged at 35 per cent (art. 31D(5)). A qualifying programme property cannot be let while it qualifies. A sale of Maltese property bears property transfer tax, generally 8 per cent of the transfer value, or 5 per cent within five years of acquisition (art. 5A(5)); chapter 8 covers property taxes in full.

Malta levies no wealth tax and no annual property tax under the statutes we reviewed, and no inheritance tax as such. It charges duty on documents on transfers causa mortis under Cap. 364: 5 per cent on Maltese immovable property (art. 32(1)) and 2 per cent on Maltese marketable securities, rising to 5 per cent for companies whose assets are at least 75 per cent immovable property (art. 42). The first EUR 35,000 of the deceased's ordinary residence is disregarded, a usufruct left to a surviving spouse is not counted, and heirs who make the home their own pay 3.5 per cent on the slice from EUR 35,000 to EUR 200,000 (art. 35). There is no general exemption for spouses or children. We identified no Maltese duty on foreign assets passing on death, but your home country may still tax your estate; chapter 10 explains.

ADVISER'S OBSERVATION

The remittance basis is the most valuable thing Malta offers a mobile family, and I believe it is lost far more often through untidy banking than through any change in the law. Because the tax authority presumes that money spent on living is income, a family that pays for its Maltese life from one foreign account holding dividends, sale proceeds and an inheritance may find everything it spends treated as taxable. My firm view is that the account structure should be settled before the first day of residence, not repaired afterwards: capital that existed before arrival in one place, gains realised afterwards in another, income in a third, and Maltese living costs paid only from what you can prove. The second view I hold, after the 2026 changes, is that the flat-rate programmes are no longer the automatic answer for retirees. With the first EUR 37,104 of each spouse's pension exempt, ordinary residence can cost a couple a fraction of the EUR 15,000 minimum, and the comparison has to be run on the actual figures, including the cost of the permit that ordinary residence requires, every time.

TOM PURDY

CHAPTER 08

Property in Malta

Buying as a non-resident, Special Designated Areas, duty on documents, and the rent-or-buy decision for programme holders.

IN THIS CHAPTER

The statute and what it forbids

The AIP permit

Special Designated Areas

Duty on the purchase

What the qualifying levels buy

Rent or buy

Property transfer tax on a later sale

The statute and what it forbids

Property ownership by foreigners is governed by the Immovable Property (Acquisition by Non-Residents) Act, Cap. 246, Act XXXVII of 1974, as consolidated to 16 January 2026. It is often miscalled the “Acquisition of Immovable Property Act”; AIP is simply the colloquial name for the permit it requires.

Under article 4(1), save as the Act provides, a non-resident person may not acquire immovable property in Malta by any title, and an act in breach is null and void. Article 2 treats as non-resident any individual who is not a citizen of Malta or another Member State, unless he is a third-country national with long-term resident status; a Maltese or EU citizen without five continuous years’ residence in Malta at some time before the acquisition; a body formed or registered, or with its seat, outside Malta and the other Member States, or one in which non-residents hold 25 per cent or more of the capital or which they control; and certain trustees.

So an MPRP certificate does not make you a resident for Cap. 246; for a non-EU national only long-term resident status does. And buying through a company does not escape the Act, because article 9 treats an acquisition of shares designed to circumvent the permit requirement as an acquisition of the property itself.

The AIP permit

Under article 6(1)(b) the Minister must not withhold a permit where the property is a building worth not less than EUR 18,500, adjusted by an index the National Statistics Office publishes annually in the Gazette, to be used as a residence by the buyer and his family, and he owns no other Maltese property apart from exempt property. Permits granted are published quarterly in the Gazette (art. 6(5)).

The working figures are the indexed ones. The Malta Tax and Customs Administration publishes them as EUR 174,274 for a flat or maisonette and EUR 300,619 for any other property, citing L.N. 174 of 2024, on a page last updated on 29 August 2025. The index has moved since: L.N. 202 of 2026 records it at 287.89 on 1 April 2026 (2004 equals 100), provisionally 6.7 per cent above 2025, and we found no recalculated thresholds. Treat the published figures as the last confirmed values, not the figures in force on the day you sign, and have the current Gazette figure checked before a promise of sale.

The fee is EUR 232 in the Second Schedule to Cap. 246 and EUR 233 on the MTCA’s own pages. The MTCA commits to issue within 35 days of a complete application. Under paragraph 3A of the Second Schedule the property must be used solely as a residence by the buyer and family, bought within six months of the permit, and not divided or sold in part. The MTCA draws the practical conclusions: outside the Special Designated Areas a non-resident may own only one property in Malta, and a property bought under an AIP permit cannot be rented out. Article 7 punishes other use without consent with fines of up to EUR 23,000 or double the market value.

Special Designated Areas

Among the acquisitions article 5 exempts from the permit, the one that matters commercially is acquisition “by any person, wherever resident” in a Special Designated Area (art. 5(1)(b)). Inside an SDA there is no permit and no one-property limit; the MTCA’s phrase is “absolutely no restrictions to acquisition”. The First Schedule held 27 entries at 16 January 2026, mostly large master-planned residential and resort developments, concentrated around St Julian’s and Tigné, with others elsewhere on Malta and Gozo. We do not name them, because a name in a guide like this reads as a recommendation.

CANDOUR

The SDA label solves a legal problem, not an economic one. It removes the permit, the one-property rule and the ban on letting; it says nothing about whether the price is fair, and SDA stock is by construction a narrow market with few sellers. A buyer paying for the freedom to let should model the rent he will actually achieve against the premium he pays for the label, and should know that no duty relief becomes available by buying inside one.

Duty on the purchase

Article 32(1) of the Duty on Documents and Transfers Act, Cap. 364, charges the buyer 5 per cent of the price or the value, whichever is higher. The promise of sale, the *konvenju*, must be notified with a provisional payment of 20 per cent of the duty (art. 3(6)), so 1 per cent of the price, credited against the 5 per cent due on the deed; the MTCA’s

guidance sets the notification period at 21 days. If the Commissioner assesses a higher value, duty is due on the difference, and where the declared value falls short by more than 15 per cent of the assessed value, additional duty and interest are charged as well (art. 10(2)).

The familiar reliefs are closed to most readers. The 3.5 per cent rate on the first EUR 200,000 for a sole ordinary residence (art. 32(4)(a)) excludes a buyer who requires an AIP permit, or would require one but for an SDA, and the relief for long-vacant and conservation-area property under S.L. 364.19 carries the same exclusion. For a non-EU MPRP buyer the working assumption is the full 5 per cent.

What the qualifying levels buy

The MPRP requires a purchase of at least EUR 375,000 or a lease of at least EUR 14,000 a year anywhere in Malta or Gozo (S.L. 217.26 reg. 3); the lower south of Malta and Gozo thresholds were deleted by L.N. 310 of 2024 from 1 January 2025. The property must be held for five years from the appointed day, the date the certificate issues, after which the holder must still hold some residential property in Malta or Gozo, of any value (reg. 15(1)(c)).

No official source publishes rents or prices by locality in a form we can cite, so we do not say what those sums buy street by street. Official data gives the direction: the National Statistics Office's residential property price index stood at 104.19 in the first quarter of 2026 (2025 equals 100), up 6.7 per cent on the year, and Eurostat shows annual average rises of 3.4 to 6.7 per cent in every year from 2019 to 2025 (the 2025 figure provisional). The one official record of how wealthy programme applicants housed themselves, the Regulator's 2024 report on the last citizenship-by-investment cohort, shows 169 of 173 qualifying properties leased and 4 bought, at an average rent of EUR 19,191 against a EUR 16,000 minimum.

Rent or buy

Since L.N. 146 of 2025 the MPRP contribution is EUR 37,000 whether the property is owned or rented. Earlier in 2025 it was EUR 30,000 for owners and EUR 60,000 for tenants, and that gap was the main reason MPRP families bought. It has gone.

Renting at the minimum for five years costs EUR 70,000, with no permit and no duty, and the lease may be replaced by another qualifying property with the Agency's consent (reg. 15(1)(c) proviso); Residency Malta states that a leased property may be sub-leased after five years. Buying at the minimum costs EUR 18,750 in duty plus the permit fee, ties up EUR 375,000, confines you to one property outside an SDA and bars letting it, while inside an SDA Residency Malta's published position is that purchased property may be let. The capital test in reg. 9(2) must be met for five years regardless (reg. 15(1)(g)), so buying does not reduce what you must hold, and the property obligation outlives year five. For a family that will live in Malta and wants a home, buying can make sense. For a family holding the MPRP from abroad as a plan B, it rarely does. Chapter 12 puts figures on both.

Property transfer tax on a later sale

The seller pays property transfer tax under article 5A of the Income Tax Act, Cap. 123, on the transfer value rather than the gain: 8 per cent for transfers from 1 January 2015 (art. 5A(5)(a) proviso); 5 per cent for property outside a project sold within five years of acquisition (art. 5A(5)(e)), subject to anti-avoidance provisos; and, in defined transitional cases, 10 per cent where the property was acquired before 1 January 2004 (art. 5A(5)(f)). Because the MPRP holding period runs from the certificate, which usually post-dates the purchase, an MPRP owner selling after it will normally pay 8 per cent.

Two exemptions matter. Donations to a spouse, descendants or ascendants are outside the tax (art. 5A(4)(a)). And a dwelling not forming part of a project, owned and occupied as the seller's own residence for at least three consecutive years immediately before the transfer, and sold within twelve months of vacating it, is exempt (art. 5A(4)(c)): a family that genuinely lived in its home may sell free of the tax, while one that used it for occasional visits will not. Property transfer tax does not count towards the EUR 5,000 minimum tax in chapter 7 (art. 56(27) proviso).

09

CHAPTER 09

Citizenship now

Ordinary naturalisation, marriage, descent and the discretionary merit route: what each requires, and why residence alone does not buy a passport.

IN THIS CHAPTER

Three routes, none of them for sale

Ordinary naturalisation under article 10(1)

Marriage

Descent and registration

Dual citizenship

The merit route as now in force

Why MPRP residence does not buy a passport

Three routes, none of them for sale

An adult foreign national without Maltese ancestry now has three ways to become Maltese: naturalisation after residence, registration after five years of marriage to a citizen, and naturalisation by merit under the new article 10(9) of the Maltese Citizenship Act, Cap. 188. None can be bought; chapter 2 explains how the one that could be came to an end.

Ordinary naturalisation under article 10(1)

Article 10(1) of Cap. 188 provides that an alien or stateless person of full age and capacity may be granted a certificate of naturalisation if he satisfies the Minister that he has resided in Malta throughout the twelve months immediately preceding the application; that in the six years before those twelve months he resided in Malta for periods amounting to not less than four years; that he has an adequate knowledge of Maltese or English; that he is of good character; and that he would be a suitable citizen. The minimum is five years' residence in the last seven, the final twelve months continuous. The Minister may, in special circumstances, count earlier residence.

The route is discretionary: the Act says "may be granted", and the Community Malta Agency says plainly that the Minister may grant or refuse. It is unreviewable: under article 19 no reasons need be given and there is no appeal to or review by any court. And it is built on presence. Before applying you book an appointment for the Agency to compile a residence certificate, bringing your current passport and every expired passport covering your time in Malta.

The application needs two sponsors who are not relatives and not themselves naturalised, one from a listed class such as advocates, notaries, doctors and senior public officers; it is verified by affidavit (art. 21(2)(d)), a false statement is an offence (art. 23(1)), and the oath of allegiance precedes the certificate (art. 10(5)). The fees, in the Third Schedule to S.L. 188.01 as substituted by L.N. 214 of 2019, are EUR 450 on application and EUR 50 on grant, with EUR 10 for each oath or affidavit sworn at the Agency. No civics test and no processing time are published.

CONTESTED POINT

Two questions are open, and anyone answering them confidently is guessing. The first is whether years holding an MPRP certificate count as residence. The MPRP imposes no days in Malta; article 10(1) requires residence "throughout" twelve months and for four of the six years before; the Agency builds its residence certificate from passports; and the Court of Justice in C-181/23 (paras 105 to 111) treated legal residence without actual presence as insufficient, contrasting the 2020 investor scheme with article 10(1) itself. Everything points to actual presence being required, but no published decision practice confirms it. The second is the timetable. Market commentary often asserts that Malta expects ten years or more in practice; we have found no primary source for any such policy. What is known is the statutory minimum, the Minister's discretion, and the absence of reasons or appeal. Plan on the statute and expect the discretion.

Marriage

Marriage leads to registration, not naturalisation. Under article 6 a person married to a Maltese citizen is entitled, on application and oath, to be registered, provided registration is not contrary to the public interest and, on the dates of application and registration, the applicant is still married to and living with the citizen and had been for at least five years when applying. Surviving spouses qualify on parallel terms. There is no requirement of residence in Malta. The Agency asks for a joint affidavit, and the fee is EUR 150 on application and EUR 50 on collection.

Descent and registration

A person born abroad on or after 1 August 1989 to a parent who is Maltese other than by descent or registration under the descent provisions is a citizen (art. 5(2)(b)), and a person born abroad who descends in the direct line from an ascendant born in Malta of a parent likewise born in Malta is entitled to be registered (art. 5(3); art. 3(3) for births before independence), subject to a public interest bar. Act XXI of 2025 substituted 1 August 2028 for the older 2007 and 2010 cut-off dates in the rules on a "relevant parent" in the chain (arts 3(4) to (6) and 5(4) to (7)), so families who assumed they had missed a deadline should look again. Most registrations cost EUR 150 plus EUR 50.

Dual citizenship

Article 7 makes it lawful to be a citizen of Malta and of another country at once, and since 10 February 2000 naturalised and registered citizens may keep their existing nationality. The question to check is your own country's law.

The merit route as now in force

Article 10(9), substituted by Act XXI of 2025 from 24 July 2025, lets the Minister naturalise by merit a person who renders exceptional services or makes an exceptional contribution, including through job creation, to Malta or to humanity, or whose naturalisation is of exceptional interest to Malta. "Exceptional" means "manifestly superior or adding value", and the classes named are scientists, researchers, athletes, sports persons, artists, cultural performers, entrepreneurs, philanthropists and technologists, among others. The word "investors", present in the 2020 text, has gone.

S.L. 188.06, renamed by L.N. 159 of 2025, sets two stages. First, the applicant, or a competent professional approved by the Agency (reg. 7(4)), submits a proposal letter setting out his achievements, the exceptional service, contribution or interest, and a plan for continuing it (reg. 11A(1)). Due diligence of a "four (4) tier nature or more" follows, with non-refundable fees "as may be established by the Agency" (reg. 11A(2)); an Evaluation Board chaired by an advocate of at least seven years' practice recommends; the Minister decides without reasons, and approval yields a letter of approval in principle. Second, its holder applies, and must show at least eight months' residence in Malta before applying, title to adequate residential property in Malta, an endorsement by a designated competent body where the Board asks, adequate Maltese or English, and the ties proposed (reg. 11B(1)). Further due diligence and fees follow; the Minister again decides without reasons; the oath must be taken within six months of approval (reg. 14); and a merit citizen who fails a material commitment may be deprived (reg. 24). Dependants are a spouse or partner, children under 18, unmarried children under 29 largely supported, and adult children with a disability, but not parents or grandparents.

Four things are absent by design. There is no fee schedule, and we will not quote one. There is no public list of designated competent bodies. There is no appeal (art. 19), though a refused applicant may complain to the Regulator (art. 25A). And there is no marketing: the Agency's notice of 5 February 2026 calls merit citizenship "neither a programme nor a scheme" and permits no promotion of it, and article 23(3) of Cap. 188 makes it an offence for anyone, for gain and without authorisation, to advertise or publicly disseminate information about article 10(9) naturalisation, with a fine of up to EUR 20,000. We describe the route because the law is public. We do not offer it, and nobody else should.

Why MPRP residence does not buy a passport

The MPRP certificate is a residence permit under article 7A of the Immigration Act, Cap. 217, and Residency Malta itself calls the programme "distinct from the separate legislative provisions governing citizenship". S.L. 217.26 contains no citizenship provision, and because it sets no days in Malta, a holder living elsewhere accumulates a valid permit but not the residence article 10(1) requires. An MPRP holder who wants to be Maltese must live in Malta for five years in seven and satisfy the Minister like anyone else. The Nomad Residence Permit is clearer still: Residency Malta's FAQ says it does not lead to any permanent or long-term residence or citizenship, nor to the MPRP.

CANDOUR

We are often asked whether there is a way around this. There is not, and a firm implying otherwise is out of date or not telling the truth. What remains is honest and still valuable: a permanent residence right that asks nothing of your calendar, and a citizenship route that asks for your life. The MPRP can be the permit you live on while you earn citizenship, but you earn it by living in Malta, and the decision at the end remains the Minister's.

10

CHAPTER 10

Your home country: treaties and leaving

The UK, US and UAE treaties with Malta, the United Kingdom's temporary non-residence rule, and what to plan before you leave.

IN THIS CHAPTER

Why the treaty matters more than the programme
The United Kingdom
The United States

The United Arab Emirates
The UK rule on temporary non-residence
Leaving Malta

Why the treaty matters more than the programme

Malta's remittance basis decides what Malta taxes, not what your home country taxes, and each treaty below contains a clause that reaches back across the border.

The United Kingdom

The 1994 UK/Malta convention, given effect by SI 1995/763, is modified by the Multilateral Instrument, effective for UK income tax and capital gains tax from 6 April 2020 and in Malta from 1 January 2020; its principal purpose test now covers the whole convention.

On gains, article 13(5) gives gains not otherwise covered to the state of residence alone, but only "provided that such income or gains are subject to tax" there. A non-domiciled Maltese resident is not taxed on foreign capital gains (Cap. 123 art. 4(1) proviso (ii)), so the condition fails and the exclusive allocation to Malta does not operate. Article 13(6) then preserves each state's right to tax, under its own law, an individual who was resident in it at any time in the five years before the disposal, with no subject-to-tax condition. Together they mean the treaty will not stop the United Kingdom charging a recent former resident whom UK law chooses to charge.

On pensions, article 18(1) makes pensions for past employment, and annuities, taxable only in the state of residence, while article 19(2) keeps a pension paid by or out of funds created by a state, for services to that state, taxable only in that state unless the recipient is both resident in and a national of the other. A British national's government service pension therefore stays taxable only in the United Kingdom; civil service and armed forces pensions are the clear cases, and other public-sector schemes should be checked one by one. The MTCA's guidance states that other UK pensions are taxable only in Malta, that UK tax withheld on them cannot be credited in Malta, and that it should be reclaimed from HMRC. A British national abroad keeps the UK personal allowance of GBP 12,570 for 2026 to 2027 (ITA 2007 s.56(3)(za)), which exceeds the full new State Pension of GBP 12,547.60 a year, so a full State Pension alone produces no UK tax whichever article governs it.

Article 23(1) is the clause most often missed. Where one state relieves income and the other taxes it by reference to the amount remitted rather than the full amount, the relief extends only to the income actually taxed in the other state. So the UK's treaty exemption for a private pension reaches only the part a non-domiciled resident remits to Malta.

CANDOUR

"Remit only what you need" is standard advice to non-domiciled residents of Malta, and for a British pensioner it is usually wrong. The unremitted part of a UK private pension falls outside the treaty relief and can be taxed in the United Kingdom, while, as chapter 12 shows, the EUR 5,000 minimum tax and its cap mean that remitting less rarely lowers the Maltese bill. The advice is sound for capital. For pensions, remit the pension and keep the capital abroad.

The United States

The 2008 US/Malta convention opens with a saving clause. Article 1(4) preserves each state's right to tax its residents and citizens, and former citizens and long-term residents for ten years after losing that status, subject to the exceptions in article 1(5). Malta's remittance basis therefore brings a US citizen no US benefit: the United States taxes worldwide income and credits foreign tax. Social security is taxable only in the paying state (art. 17(2)), a foreign pension fund's income is taxed to the individual only when paid out (art. 18), and article 22(7) repeats the UK treaty's remittance limitation. The definition of a pension fund in article 3(1)(k) is the source of a well-known controversy over Maltese personal retirement schemes used by US persons; treat any such offer as a risk area and take US advice first.

The United Arab Emirates

The Malta/UAE treaty, signed on 13 March 2006 and in force from 18 May 2007, is given effect by S.L. 123.106 as modified by the MLI order S.L. 123.183, whose detail we do not set out. Article 4(1) defines a UAE resident as an individual resident of the UAE "including" a national or a person domiciled there, wording that is inclusive rather than restrictive. Other gains are taxable only in the state of residence (art. 13(5)), with no express subject-to-tax proviso and no former-resident clause, though the Protocol (para. 8(a)) defines gains as gains chargeable to tax under the laws of the two states; gains on property-rich shares may be taxed where the property is (art. 13(2)); private pensions are taxable only in the state of residence, social security pensions only in the paying state (art. 18). For a Dubai family holding the MPRP as a plan B the treaty is academic, because the certificate does not make anyone tax resident in Malta. It matters from the day they move.

The UK rule on temporary non-residence

A Briton who leaves, sells and returns too soon pays UK capital gains tax anyway. Under section 1M of the Taxation of Chargeable Gains Act 1992, gains accruing during a temporary period of non-residence are treated as accruing in the period of return (s.1M(1)), assets acquired while away excepted (s.1N), and no double taxation arrangement prevents the charge (s.1M(4)). Under paragraph 110 of Schedule 45 to the Finance Act 2013 you are temporarily non-resident if you had sole UK residence, were UK resident in at least four of the seven tax years before the year of departure, and return within five years. Residence itself follows the statutory residence test in the same Schedule. A section 1M gain is taxed at the rates of the year of return, from 6 April 2026 18 and 24 per cent, with Business Asset Disposal Relief at 18 per cent. Our companion guide, *Liquidity-Event Tax Planning for Founders*, treats this in depth.

Inheritance tax follows for longer. Under section 6A of the Inheritance Tax Act 1984, from 6 April 2025, anyone UK resident for 10 of the previous 20 tax years is a long-term UK resident, and after a lifetime in the United Kingdom the status lasts for ten tax years after leaving. Malta levies no inheritance tax as such, which makes the UK tail the one that counts.

Leaving Malta

An MPRP holder must notify the Agency within four weeks of becoming aware of any event ending the certificate (S.L. 217.26 reg. 17(6)) and may surrender it voluntarily (reg. 17(8)); one who keeps it while living elsewhere must go on meeting every condition, including a Maltese residence after year five. Under the Global Residence Programme and the Malta Retirement Programme the minimum tax is payable in full in the final year as in the first, and status ends after more than 183 days in any other jurisdiction in a calendar year.

After departure, gains on shares in a Maltese company that is not a property company are exempt for a non-resident not owned and controlled by, nor acting on behalf of, individuals ordinarily resident and domiciled in Malta (Cap. 123 art. 12(1)(c)(ii)). Maltese property stays within Maltese tax wherever its owner lives: property transfer tax on sale, and 5 per cent duty on the declaration causa mortis on death (Cap. 364 art. 32(1)). And a naturalised citizen who moves away does not lose citizenship through absence alone: deprivation after seven years' ordinary residence abroad requires seriously prejudicial conduct or a threat to public security or policy (Cap. 188 art. 14(2)(d) and (3)).

11

CHAPTER 11

What it costs, route by route

Every government charge, exactly and with its source, the recurring costs, and how intermediaries in this market are paid.

IN THIS CHAPTER

The Malta Permanent Residence Programme
The tax programmes, and 2027
Nomad, permits and citizenship

What recurs, and what we do not price
How intermediaries are paid
A quotation for your own facts

The Malta Permanent Residence Programme

Government figures here are exact and referenced as at 30 September 2026; professional fees are not.

Item	EUR	When payable	Reference
Administration fee, main applicant	60,000	15,000 within a month of applying; balance within two months of approval in principle	S.L. 217.26 First Schedule (i); reg. 9
Administration fee per fee-paying dependant	7,500	Within two months of approval	First Schedule (i) proviso
Contribution, owned or rented	37,000	Within eight months of approval	First Schedule (ii)
Donation to a Maltese NGO	2,000	Before the certificate	reg. 3; reg. 9(4)
Residence card, per person, five years	500	On issue	Residency Malta

The EUR 7,500 applies only to unmarried dependent children aged 18 to 28 and to dependent parents or grandparents; a spouse, children under 18 and adult children with a disability pay nothing, and there is no longer any dependant contribution. The floor for a single applicant or a couple with minor children is EUR 99,000 plus EUR 500 a head for cards, before the property. The applicant must also hold assets of EUR 500,000 including EUR 150,000 financial, or EUR 650,000 including EUR 75,000, for five years (regs 9(2), 15(1)(g)).

These figures apply to every application submitted after 1 January 2025 and not concluded when L.N. 146 of 2025 came into force (L.N. 146 reg. 16). An adviser quoting a EUR 50,000 administration fee, a EUR 60,000 contribution for tenants or EUR 5,000 per dependant (charged under that regime both as administration fee and as contribution) is quoting the superseded L.N. 310 of 2024 regime.

CONTESTED POINT

Three MPRP cost points are not settled by the published sources. The card fee of EUR 500 per person for five years is Residency Malta's current figure, on its programme page and in its September 2025 brochure, but its September 2024 FAQ gave EUR 137.50 for five years and EUR 27.50 a year on renewal, and the national fee regulations, L.N. 164 of 2025, have no MPRP line; we use EUR 500 as the latest official statement. The regulations allow a temporary permit while an application is pending (reg. 9(6)), and L.N. 164 prices a temporary residence permit at EUR 50, without saying that line covers the MPRP. And the 2024 amendments added a rule that the contribution was non-refundable (reg. 11(8)), only for the 2025 amendments to delete it, so the current text is silent on whether it is returned if no certificate issues. Administration fees are expressly non-refundable. Ask in writing before paying anything.

The tax programmes, and 2027

Programme	Application fee (EUR)	Minimum tax a year (EUR)	Reference
Global Residence Programme	6,000 (5,500 owned in the south)	15,000	S.L. 123.148 r. 3, 5
Residence Programme (EU, EEA, Swiss)	6,000 (5,500 owned in the south)	15,000	S.L. 123.160
Malta Retirement Programme	2,500	7,500, plus 500 per dependant	S.L. 123.134 r. 3, 5
UN Pensions Programme	4,000 (3,500 owned in the south or Gozo)	10,000 (15,000 if both spouses receive a UN pension)	S.L. 123.165
Individual Tax Programme, from 2027	8,500; 2,500 per renewal	35,000 global or EU; 15,000 retired	S.L. 123.221 r. 3, 5

The current programmes share qualifying property levels of EUR 275,000 to buy or EUR 9,600 a year to rent, or EUR 220,000 and EUR 8,750 in Gozo or the south of Malta; the Individual Tax Programme requires EUR 700,000 or EUR

14,000 anywhere. A GRP beneficiary obtains the residence permit itself from Identità as an economically self-sufficient person, at EUR 100 per grant or renewal (L.N. 164 of 2025, item 2(a)).

The Individual Tax Programme Rules, L.N. 195 of 2026, fold the four programmes into one from 1 January 2027, and state that grants made, and applications received, by 31 December 2026 continue to apply until 31 December 2031; how that sits with the existing rules, none yet revoked, is the contested point in chapter 6. The cost consequence is not contested. A retired couple entering in 2027 pays EUR 8,500 rather than EUR 2,500 or EUR 6,000 and must buy at EUR 700,000 or rent at EUR 14,000. For some readers the three months to 31 December 2026 are the most valuable period in this guide.

Nomad, permits and citizenship

Item	EUR	Reference
Nomad permit, per applicant; card, per person	300; 100	Residency Malta Nomad FAQs
Long-term residence document, five years	500	L.N. 164 of 2025, item 2(g)
Single permit, first year; renewal per year	600; 150	L.N. 164 of 2025, item 1
Naturalisation, on application; on grant	450; 50	S.L. 188.01 Third Schedule items 2, 3
Registration, on application; on grant	150; 50	items 1, 3
Oath; affidavit	10; 10	items 9, 8
Merit route	No schedule published	S.L. 188.06 regs 11A, 11B

Property costs, from duty to transfer tax, are set out in chapter 8.

What recurs, and what we do not price

The one-off figures are the smaller part of the story. The MPRP requires property, health insurance and capital to be kept up, cards renewed, and annual monitoring for five years (reg. 10(3)). The tax programmes charge a minimum tax every year. An ordinary non-domiciled resident couple with EUR 35,000 or more of foreign income pays at least EUR 5,000 a year under article 56(27), capped at worldwide liability. Class 2 social security reaches income from rents, investments and gains as well as self-employment, capped in 2026 at EUR 4,362.28 a year for those born from 1962; whether a given programme holder or pensioner is liable depends on age, activity and coordination rules, and should be checked rather than assumed.

We do not price the professional work in print: the agent's MPRP file, legal and notarial work on a property, tax advice on the move, and the mandatory's filing for a tax programme. Cost turns on the size of the family, the number of countries, the depth of the source-of-wealth evidence, whether you buy, and whether a structure or transaction must be dealt with first. Any number in a guide is too high for the simple file or too low for the difficult one.

How intermediaries are paid

An MPRP application must go through a licensed agent (S.L. 217.26 reg. 4(1)). Agents are licensed by the Residency Malta Agency and must be lawyers, accountants or auditors, or licensed financial advisers, with indemnity cover of at least EUR 500,000, annual due diligence, a EUR 5,000 annual licence fee and a place on a public register (regs 5 to 6B; Third Schedule). The agent's fee is agreed with and paid by the client; the regulations neither fix nor cap it. The agent may also be paid by the State: regulation 25 allows the Agency to make "payments for promotional support to agents" for each successful application in respect of which a certificate issues, under criteria approved by the Minister and notified annually. The criteria and amounts are not published in the regulations.

CANDOUR

An MPRP agent may therefore be paid twice for one file, by you and by the Maltese State, and the second payment arises only if your application succeeds. That is lawful and not necessarily sinister, but it is a financial interest in your file you are entitled to know about. Ask any agent in writing whether it receives promotional support and how much, and whether it receives anything from a landlord, developer or estate agent connected with your property. An agent who will not answer has answered.

Tax programme applications go through an authorised registered mandatary, restricted under the 2027 rules to advocates, legal procurators, notaries and warranted accountants; their fees are private. Estate agents are governed by the Property Market Agency Act 2024, which requires fees to be disclosed in advance (art. 28), requires every sale or lease contract concluded after 1 December 2024 to declare whether an agent was engaged and to whom brokerage is due, on pain of a penalty of up to EUR 10,000 (art. 29), and fixes no commission rates; we found no official source for customary levels. The merit route has no agents, only a "competent professional" approved by the Agency (S.L. 188.06 reg. 7(4)), and the old citizenship agents' licences were repealed by L.N. 58 of 2026, surviving only for legacy files.

A quotation for your own facts

Government costs are the fixed floor, and this chapter states them exactly. What sits above the floor depends on your family, your assets and your plans. If you would like a quotation built on your own facts, please get in touch: we quote in ranges once we have seen the facts, and we tell you at the outset if Malta is the wrong answer.

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CHAPTER 12

Worked scenarios

A Dubai-based family on the permanent residence programme, a retired British couple choosing a tax status, and a founder on the nomad permit.

IN THIS CHAPTER

How the scenarios are built

Scenario A: a Dubai-based family of four seeking an EU plan B

Scenario B: a retired British couple

Scenario C: a remote-working founder on the Nomad permit

How the scenarios are built

Each scenario uses only figures stated elsewhere in this guide, with references, and states its assumptions first. Sterling is converted at the ECB reference rate for 29 September 2026, EUR 1 equals GBP 0.85718. Professional fees appear as a placeholder, never as a number.

Scenario A: a Dubai-based family of four seeking an EU plan B

Assumptions: two married adults, both non-EU nationals, and two children under 18 at application; living in Dubai and staying there; assets meeting the reg. 9(2) test for five years; the minimum rent or price; cards at EUR 500 a head.

Line (EUR)	Rent	Buy	Reference
Administration fee, main applicant	60,000	60,000	S.L. 217.26 First Schedule (i)
Spouse and two minor children	0	0	First Schedule (i) proviso
Contribution	37,000	37,000	First Schedule (ii)
Donation	2,000	2,000	reg. 3
Residence cards, 4 × 500	2,000	2,000	Residency Malta
Rent, 5 × 14,000	70,000	0	reg. 3
Duty, 5% of 375,000 (1% on the promise, 4% on the deed)	0	18,750	Cap. 364 arts 3(6), 32(1)
AIP permit, outside an SDA	0	232	Cap. 246 Second Schedule
Five-year government and rent cost	171,000	119,982	
Capital in the property	0	375,000	reg. 3
Transfer tax on a later sale at cost, 8%	0	30,000	Cap. 123 art. 5A

Professional fees, both options: agent, legal and notarial, documents and due diligence, and health insurance, quoted as a range on the facts.

Renting costs about EUR 51,000 more over five years than buying's government costs, but it leaves EUR 375,000 free, avoids the one-property rule and the ban on letting, and avoids a EUR 30,000 tax on exit even if the property sells for what it cost (EUR 18,750 at 5 per cent if within five years of purchase). Buying wins only for a family that will use the home, expects appreciation above the duty and transfer tax, and accepts that outside an SDA it cannot let. Neither option ends at year five: a Maltese residence, cards and health insurance continue.

While the family stays in Dubai there is no Maltese tax. If they move, they are taxed as non-domiciled residents only on foreign income remitted (Cap. 123 art. 4(1) proviso (i)) and not on foreign capital gains even if remitted (proviso (ii)); once ordinarily resident with EUR 35,000 or more of foreign income, the couple pays at least EUR 5,000 (art. 56(27)). They use the standard married rates, because the new family rates require a spouse who is an EU or EEA national, or a spouse with long-term resident status and a child born and resident in Malta (art. 56(1)(a)(ii) and (iii)). If a spouse later obtains EU long-term resident status, both provisos cease to apply to that spouse from that year, and Malta taxes his worldwide income.

Scenario B: a retired British couple

Assumptions: married, both over 66, British nationals only and so third-country nationals; not domiciled in Malta and not intending to be; GBP 60,000 a year of private and occupational pensions, none a government service pension; each on the full new State Pension of GBP 241.30 a week; pensions split equally; no other income; income earned in 2026; the pensioner rebate applied once to the joint computation.

Income	GBP	EUR
Private and occupational pensions	60,000.00	69,996.97
State Pensions, 2 × 12,547.60	25,095.20	29,276.46
Total (per spouse EUR 49,636.72)	85,095.20	99,273.43

B1. Ordinary residence on the remittance basis, all pensions remitted.

Step	EUR	Reference
Pension remitted, per spouse	49,636.72	Cap. 123 art. 4(1)(d), proviso (i)
Less exemption at 61 or over, per spouse	(37,104.00)	S.L. 123.204 r. 3
Joint chargeable income	25,065.43	art. 49
Tax at married rates, 25% less 4,550	1,716.36	art. 56(1)(a)(i)
Less pensioner rebate, capped	(540.00)	S.L. 123.204 r. 4
Tax on ordinary computation	1,176.36	
Minimum tax, foreign income over 35,000	5,000.00	art. 56(27)
Minimum capped at worldwide-basis liability	1,176.36	art. 56(27) proviso
UK tax on the pensions	0	treaty art. 18; ITA 2007 s.56

Maltese tax of EUR 1,176.36 is about 1.2 per cent of pension income; without the pension exemption the same income would bear EUR 24,195.70. Had they remitted only EUR 50,000, the Maltese bill would be the same capped minimum, while the EUR 49,273.43 (GBP 42,236.20) left abroad would fall outside the treaty relief under article 23(1) and, at 20 per cent above a full personal allowance each, could cost GBP 3,419.24 a year in UK tax for no Maltese saving.

B1 needs an immigration basis, and here is the catch. Identità accepts self-sufficiency permit applications only from beneficiaries of a residence investment or tax programme, so a non-EU couple wanting ordinary non-domiciled taxation will in practice hold the MPRP: EUR 100,000 in government costs for the two of them, and a EUR 375,000 purchase or EUR 14,000 a year in rent.

B2, the Global Residence Programme, and B3, the Malta Retirement Programme, must be applied for by 31 December 2026. Under both, 15 per cent of the EUR 99,273.43 remitted is EUR 14,891.01. The GRP's minimum of EUR 15,000 governs (S.L. 123.148 r. 5(1)); the MRP's is EUR 8,000 (EUR 7,500 plus EUR 500 for the spouse), all pension must be remitted, and at least 90 days a year must be spent in Malta on a five-year average (S.L. 123.134 r. 4, 5(1), 6(1)(h)). Both need property from EUR 275,000 or EUR 9,600 a year, and a EUR 100 permit.

Route	One-off government cost (EUR)	Maltese tax a year (EUR)	Five years, tax and one-off (EUR)
B1, MPRP and ordinary residence	100,000	1,176.36	105,881.79
B2, GRP	6,000	15,000.00	81,000.00
B3, MRP	2,500	8,000.00 to 14,891.01	42,500.00 to 76,955.07

The B2 and B3 rows exclude Identità's EUR 100 permit fee per person per grant or renewal; the B1 row includes the two MPRP cards.

Over five years the programmes cost less; over a longer horizon the MPRP route's low annual tax closes the gap, and it alone gives a permanent residence right. From 1 January 2027 the Individual Tax Programme's retired pensioner status is worse than B2: a EUR 8,500 fee, the same EUR 15,000 minimum, and property at EUR 700,000 or EUR 14,000 a year. The UK inheritance tax tail of up to ten years applies on every route.

CONTESTED POINT

Three open questions sit inside Scenario B. The MTCA describes the MRP as open to non-EU nationals, but consolidated r. 6(1)(b) of S.L. 123.134, as amended in 2020, ends the status if the individual becomes a Maltese

national “or a third country national”, which on its face excludes a British beneficiary; confirm eligibility with the MTCA before relying on B3. Whether the EUR 37,104 pension exemption applies inside the GRP and MRP flat rates is not addressed by the texts, which is why B3 is a range: EUR 8,000 if it does, EUR 14,891.01 if not. And the B1 variant’s UK figure depends on which pension HMRC treats as unremitted and how it applies article 23(1) in practice, on which we found no published guidance. Each affects the figures above; none changes the conclusion that ordinary residence produces the lowest annual Maltese tax.

Scenario C: a remote-working founder on the Nomad permit

Assumptions: a non-EU national, for example Canadian or Indian, UK resident for at least four of the seven tax years before leaving; now living in Malta on a Nomad Residence Permit; not domiciled in Malta; selling shares in a UK trading company that is not property-rich, for a gain of GBP 5,000,000.

Line	Result	Reference
Maltese income tax on the gain	EUR 0	Cap. 123 art. 4(1) proviso (ii)
Maltese tax on authorised remote-work income	10% after twelve months	S.L. 123.210 r. 3
UK tax if he stays non-resident for more than five years	GBP 0	UK law; treaty art. 13(5), 13(6)
UK tax if he returns within five years: 1,000,000 at 18% plus 4,000,000 at 24%	GBP 1,140,000	TCGA 1992 s.1M

The gain arises outside Malta because the shares are situated outside it, and a non-domiciled resident is outside the charge on such gains even if remitted, unless he holds EU long-term resident status or his spouse is ordinarily resident and domiciled in Malta. The treaty does not help: article 13(5) gives Malta nothing because the gain is not subject to tax there, and article 13(6) preserves UK rights for five years. What protects him is UK domestic law, which does not charge a non-resident on UK trading company shares, unless he returns within five years, when section 1M taxes the gain in the year of return at that year’s rates. The UK figure assumes Business Asset Disposal Relief on the first GBP 1,000,000 and ignores the annual exempt amount. The Nomad permit lasts at most four years and leads nowhere, so the founder’s next status needs planning before the sale.

CONTESTED POINT

Two Maltese questions in Scenario C are unsettled. Article 42(1)(a)(iii) of Cap. 364 charges 2 per cent duty on a document transferring foreign marketable securities to or by a person resident in Malta, unless effected through a Maltese bank or licensed investment firm; whether a share purchase agreement for a foreign private company is caught depends on where it is executed, meaning last signed, or used (arts 4 and 5(3)(a)), and the MTCA has published no view. Take Maltese advice on where the agreement is signed. Separately, whether a Nomad holder with EUR 35,000 or more of other foreign income is within the article 56(27) minimum tax has not been addressed by the MTCA.

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CHAPTER 13

The evidence

What the official record shows about the investor schemes, residence permits, naturalisations and property, and what nobody publishes.

IN THIS CHAPTER

What the official record covers

Citizenship by investment, 2014 to 2024

The residence programmes

Who comes to Malta, and who becomes Maltese

What is not published

What the official record covers

Malta publishes a good deal about the citizenship route it has closed and very little about the residence routes it still runs. This chapter gives the official figures, labels the one proxy we use, and says plainly what is not published. We do not cite private wealth-migration estimates, or outlets repeating them: they are modelled rather than measured, and no official source exists to check them against.

Citizenship by investment, 2014 to 2024

The authoritative source is the Office of the Regulator under article 25 of Cap. 188, now the Office of the Regulator, Granting of Citizenship by Exceptional Merit. Its Eleventh Annual Report, for 2024, was signed on 29 October 2025 and laid before the House on 13 April 2026. There is no report for 2025 yet; on past timing it is due around April 2027.

Scheme	Main applicants naturalised	Dependants naturalised	Persons	Contributions collected (EUR)
Individual Investor Programme, 2014 to 2024	1,555	3,768	5,323	1,150,300,000
Exceptional Services by Direct Investment, to 2024	275	554	829	282,660,000 (2022 to 2024)
Both	1,830	4,322	6,152	at least 1,432,960,000

By year, IIP naturalisations peaked at 1,340 persons in 2017 and IIP contributions at EUR 279.9 million in 2016, tailing off to 20 persons in 2024. The 2020 scheme naturalised 49 persons in 2022, 259 in 2023 and 521 in 2024, collecting EUR 36.31 million, EUR 80.55 million and EUR 165.8 million.

Source: the Regulator’s reports for 2022 to 2024. Cross-scheme totals are our sums and, because the 2020 scheme’s 2021 deposits and all 2025 figures are unpublished, lower bounds. They are consistent with the government’s own claim, on the day of the judgment, of over EUR 1.4 billion in revenue since 2015.

The IIP capped successful main applicants at 1,800; the Regulator records 1,555, 86 per cent of the quota. For the 2020 scheme in 2024, 49 of 213 eligibility decisions (23 per cent) were refusals or withdrawals; 169 of the 173 properties used for the residence condition were leased and 4 bought, at an average price of EUR 2,321,250 against a EUR 700,000 minimum and an average rent of EUR 19,191 against EUR 16,000; EUR 91.39 million went to the National Development and Social Fund, EUR 39.17 million to the Consolidated Fund and EUR 23.04 million to the Community Malta Agency; and 88 agents were licensed, 57 of them lawyers.

The same numbers support two readings. On one, the route was small and vetted: 6,152 people in eleven years, and 23 per cent of eligibility decisions refused or withdrawn in its last full year. On the other, it was what the Court of Justice found it to be: 97.7 per cent of the properties used for the residence condition in 2024 were leased, and predetermined payments held the key position. We put both before the reader.

Nationality is published by region only; asked twice in Parliament for a country breakdown (PQs 18296 and 20840, 2024), the Ministry pointed to the Regulator’s reports, which do not give one. Country-level shares quoted in the market have no official source, and nor do estimates built by counting names in the annual Gazette list of new citizens, which covers every route without labelling any.

Under the old merit category the Regulator recorded 7 applications in 2022, 13 reaching the final stage in 2023 and 4 in 2024. For the new route there are no figures: asked in November 2025, the Ministry gave no number (PQ 31995).

CONTESTED POINT

How many people have lost Maltese citizenship? The official answers differ, but they are not in conflict, because they count different populations. The Regulator’s 2024 report says 6 investor citizens have been deprived and 4 more cases are in progress. The Minister, answering PQ 28199 on 26 May 2025, gave 15 deprivations since the investment

provisions were introduced, with 4 in progress, and said expressly that those people acquired citizenship under all the provisions of the law, not only through investment; answering PQ 28978 on 10 June 2025, he added that 6 of the 15, and the 4 in progress, had acquired citizenship by investment, which matches the Regulator. A third answer, PQ 30635 of 28 October 2025, gives deprivations on all routes by year: 7 in 2020, 3 in 2021, none in 2022 or 2023, 1 in 2024 and 1 in 2025 to 15 October. What can be said safely is that deprivation of investor citizens is real, individual and rare; what cannot is any single total presented as the count.

The residence programmes

The only official MPRP figure is a ministerial answer. PQ 25116, of 3 February 2025, says the programme received about 1,500 applications in 2024 and generated EUR 46 million for the Consolidated Fund, EUR 50 million in five-year leases and EUR 36 million in property purchases. The same answer mentions 4,073 residence permits linked to the MPRP, its predecessor and the Nomad scheme, describing the figure first as an increase following a Residency Malta process and later as part of the 33,455 first permits *Identità* issued. It has been widely reported as 4,073 MPRP approvals, or as first permits; on the answer's own terms it is neither. The honest wording is about 4,073 permits linked to Residency Malta programmes in 2024, according to a ministerial answer.

For a series, the nearest public proxy is Eurostat's first permits issued for "residence only" (dataset *migr_resoth*, reason RES). It takes in the MPRP, but also other permits granted for residence without work, study or family as the ground, so it is not an MPRP count.

Year	Residence-only first permits, Malta	China	United States	United Kingdom
2019	644	127	58	0
2020	262	29	27	not returned
2021	601	36	84	44
2022	966	229	143	109
2023	1,880	960	159	74
2024	3,181	2,079	250	118
2025	4,621	3,364	271	164

The category grew sevenfold from 2019 to 2025, and Chinese nationals received 73 per cent of it in 2025. That is consistent with the MPRP's reported growth; it is not proof of it.

For the Nomad permit, PQ 12601 (30 October 2023) reported 686 main applicants and 282 dependants approved in its first two years, and PQ 25116 reported 1,031 applications in 2024 and around 542 nomads resident. For the Global Residence Programme and the Malta Retirement Programme we found no official beneficiary count anywhere.

Who comes to Malta, and who becomes Maltese

All first permits issued by Malta (*migr_resfirst*) rose from 21,165 in 2019 to 32,693 in 2025, of which 16,289 were for employment, 8,095 for education and 2,856 for family. Valid permits of all kinds at 31 December 2025 numbered 132,067 (*migr_resvalid*). Eurostat's 29,433 first permits for 2024 and the ministerial 33,455 use different definitions and should not be mixed.

Acquisitions of Maltese citizenship on all routes (*migr_acq*) were 314 in 2014, 1,973 at the 2017 peak, 770 in 2019 and 1,145 in 2024, when 1,059 of the new citizens were former non-EU nationals and the largest former nationalities were Chinese (161), American (142) and British (97). Eurostat does not say whether Malta's return includes investor naturalisations, so we do not compute an investor share, though the two series peak in the same year.

Malta's population was 588,254 at the end of 2025, up 2.4 per cent, and 31.1 per cent were not Maltese citizens (NSO NR 120/2026); net migration was 13,906 and natural increase 98. Eurostat puts foreign citizens at 168,938 of 574,250 on 1 January 2025, against 90,470 of 492,968 in 2019. House prices are in chapter 8; note only that the

2020 scheme's 4 purchases in 2024 compare with about 1,400 transactions a quarter in the NSO index, so claims that the programmes drive prices need care.

What is not published

Figure	Published?
Investor naturalisations by year	Yes, Regulator's reports
Investor naturalisations by country	No; regions only
Merit naturalisations since Act XXI of 2025	No
MPRP applications	Once, for 2024 (about 1,500)
MPRP approvals by year or nationality	No
GRP and MRP beneficiaries	No
Nomad permits	Occasionally, in parliamentary answers

An adviser quoting MPRP approval rates, typical processing times, or the number of GRP beneficiaries is quoting something no official source publishes. Ask where the figure comes from.

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CHAPTER 14

Honest counsel

Who Malta suits and who it does not, the questions to ask any firm, and the red flags.

IN THIS CHAPTER

Who Malta suits

Who it does not suit

Five questions to ask any firm

Red flags

Closing counsel

Who Malta suits

Malta suits a non-EU family that wants a permanent EU residence right with Schengen travel and does not intend to live there: the MPRP asks for money but none of your days, which for a plan B is the point. It suits pensioners over 61 who will actually live on the island, because the EUR 37,104 pension exemption per person makes ordinary residence cheaper than any programme. It suits mobile people whose wealth is foreign capital, because a non-domiciled resident pays nothing on foreign gains even if remitted; remote workers for up to four years; people prepared to spend five genuine years in seven earning citizenship, with dual nationality allowed; and families with Maltese descent.

Who it does not suit

It does not suit anyone who wants a passport for money or quickly, because neither exists. It does not suit someone who needs to live or work elsewhere in the European Union: the MPRP gives Schengen travel of 90 days in 180, not residence rights in other Member States. It gives a US citizen no tax advantage, and a buyer outside an SDA no right to let. It sits awkwardly with a family that wants EU long-term resident status and the remittance basis at once, because the first ends the second. It does not suit anyone who needs appeal rights: MPRP decisions are final (S.L. 217.26 reg. 19(1)), and so are the Minister's on citizenship. And it does not suit a British founder who expects to be back in the United Kingdom within five years of leaving.

Five questions to ask any firm

First, are you on the Residency Malta Agency's public register of licensed agents, and who in your firm holds the licence? Second, will you receive anything for my file besides my fee: promotional support from the Agency, or payment from a landlord, developer or estate agent, and how much? Third, which of the payments you are asking me to make are refundable if I am refused, and where does the regulation say so? Fourth, what legal reference supports each figure in your proposal, and on what date did you last check it? Fifth, what is your view of the merit route? The right answer is that it is not a product, cannot lawfully be marketed, and is not for sale.

Red flags

Anyone still selling Maltese citizenship, or presenting the merit route as a programme, a pathway or the successor to the investor schemes, is either out of date or not telling the truth, and may be committing an offence under article 23(3) of Cap. 188. Treat as red flags, too, a guaranteed timetable, when no processing times are published; superseded figures, such as a EUR 60,000 contribution for renters or a south of Malta discount for the MPRP; any claim that the MPRP makes you tax resident or gives you EU work rights; a Global Residence Programme quoted for 2027 at 2026 prices; "remit only what you need" said to a British pensioner; unsourced statistics; and reluctance to disclose how the firm is paid.

ADVISER'S OBSERVATION

The hardest conversation in Maltese work now is the first one, because so many people arrive asking for a product that no longer exists. They have read that Malta sells passports, or that a residence permit becomes citizenship after a year or two, and my job is to tell them early that neither is true. I have come to think that moment is the real test of an adviser. The firm that calls the merit route "available for the right profile", or the MPRP "the first step to an EU passport", keeps the conversation going and the fee in view; the firm that tells the truth may lose both. My own judgement is that Malta remains an excellent answer for a narrower group than it once was: families who want a permanent European residence right without living on the island, pensioners who will actually live there, and people willing to spend five real years earning a Maltese passport. For everyone else I would rather say so on the first call than the fifth.

TOM PURDY

Closing counsel

Malta's offer in 2026 is clearer than at any time in the last decade, because the part that could not survive scrutiny has gone. What remains is a well-defined residence right, a tax system that rewards people whose wealth is abroad and who bring income in deliberately, and a citizenship that has to be lived for. The decisions that matter are about timing and honesty with yourself: whether to file a tax programme application before 31 December 2026, whether you will really live on the island, and whether you want residence, tax status or a passport. Malta offers the first for a price, the second on conditions, and the third only to people who stay.

REFERENCE

Glossary

AIP permit. The ministerial permit a non-resident needs to buy Maltese property outside a Special Designated Area, under Cap. 246.

Appointed day. The date an MPRP certificate issues; the five-year property and capital periods run from it.

Approval in principle. The letter that opens the MPRP's two-month and eight-month payment windows; also the first-stage outcome on the merit route.

Authorised registered mandatary. The professional registered with the MTCA through whom tax programme applications are filed.

Cap. A chapter of the Laws of Malta; Cap. 188 is the Maltese Citizenship Act, Cap. 123 the Income Tax Act.

Community Malta Agency. The agency processing citizenship applications on behalf of the Minister.

Domicile. The common-law concept of a permanent home; non-domiciled residents are taxed on the remittance basis.

Duty on documents. Duty under Cap. 364: 5 per cent on property purchases and on Maltese property passing on death.

Global Residence Programme. A tax status for non-EU nationals, S.L. 123.148: 15 per cent on remitted foreign income, EUR 15,000 minimum.

Identità. The agency issuing residence cards and ordinary residence permits.

Individual Investor Programme. The 2014 citizenship-by-investment scheme, closed to applications in August 2020.

Individual Tax Programme. The single programme replacing the four tax programmes from 1 January 2027, S.L. 123.221.

Konvenju. The promise of sale, on which 1 per cent provisional duty is paid.

L.N. Legal Notice, the instrument by which subsidiary legislation is made or amended.

Long-term resident status. EU status after five years' legal residence; it ends the remittance basis and the programme tax statuses.

Minimum tax. A floor on annual tax: EUR 5,000 per couple under art. 56(27), or each programme's own figure.

MPRP. The Malta Permanent Residence Programme, S.L. 217.26.

MRP. The Malta Retirement Programme, S.L. 123.134.

MTCA. The Malta Tax and Customs Administration, the tax authority.

Nomad Residence Permit. A permit for remote workers, renewable to a maximum of four years, leading to no settlement.

Ordinarily resident. Resident on a settled basis; with non-domicile, it brings the EUR 5,000 minimum tax into play.

Promotional support. Payments the Residency Malta Agency may make to MPRP agents for each successful application.

Property transfer tax. The seller's tax on Maltese property, generally 8 per cent of the transfer value.

Regulator. The office created by article 25 of Cap. 188, reporting annually to Parliament on citizenship grants.

Remittance basis. Taxation of foreign income only when received in Malta.

Residency Malta Agency. The agency running the MPRP and the Nomad permit and licensing MPRP agents.

S.L. Subsidiary Legislation, the consolidated form of legal notices.

Special Designated Area. A scheduled development in which anyone may buy without an AIP permit.

Temporary non-residence. The UK rule taxing a returning former resident's gains in the year of return.

REFERENCE

Frequently asked questions

Can I still buy Maltese citizenship?

No. The investment route ended with the judgment of 29 April 2025 in C-181/23, and investor applications not approved by then lapsed. The merit route is discretionary, has no published fees, and may not be marketed.

Does the MPRP lead to citizenship?

Not by itself. Naturalisation requires five years' actual residence in seven under article 10(1) of Cap. 188, and the MPRP requires none.

Do I have to live in Malta to keep the MPRP?

No. There is no days requirement, but the property, capital, health insurance and resources conditions must be kept.

Does the MPRP make me tax resident in Malta?

No. Tax residence depends on where you actually live.

Can I live or work elsewhere in the EU with the MPRP?

No. Residency Malta describes visa-free Schengen travel of 90 days in any 180, not residence or work rights in other Member States.

Should I rent or buy for the MPRP?

The contribution is EUR 37,000 either way. For a family living elsewhere renting is usually cheaper and more flexible; chapter 12 compares the two.

Can I let the property I buy?

Not if bought under an AIP permit outside a Special Designated Area. Residency Malta's position is that purchased property inside one may be let.

Can my parents be included in the MPRP?

Yes, parents and grandparents of either spouse who are principally dependent and not in full-time employment, at EUR 7,500 each.

How long until I can apply for Maltese citizenship?

At least five years' actual residence in the last seven, the last twelve months continuous. Marriage allows registration after five years of marriage and cohabitation.

Will Malta tax my foreign capital gains?

Not if you are non-domiciled, even if remitted, unless you hold EU long-term resident status or your spouse is ordinarily resident and domiciled in Malta.

Will I pay Maltese tax on my UK pension?

On the amount remitted, if you are non-domiciled; but from 61, up to EUR 37,104 of pension a year per person is exempt. UK government service pensions stay taxable in the UK.

What happens to the Global Residence Programme in 2027?

It is folded into the Individual Tax Programme: EUR 8,500 fee, EUR 35,000 minimum, property at EUR 700,000 or EUR 14,000 a year. Grants and applications by 31 December 2026 are stated to continue until 31 December 2031.

Does Malta have inheritance or wealth tax?

Neither as such in the statutes we reviewed. Duty of 5 per cent is charged on Maltese property passing on death, and 2 per cent on Maltese shares (5 per cent for property-rich companies).

Does the Nomad permit lead to permanent residence?

No. It lasts at most four years and leads to no permanent residence, citizenship or MPRP.

How many people hold the MPRP?

Nobody publishes it. The only official figure is about 1,500 applications in 2024.

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