Portugal

A. Progress in the implementation of the minimum standard

Portugal has 78 tax agreements in force, as reported in its response to the Peer Review questionnaire. One of those agreements, the agreement with Angola, complies with the minimum standard.

Portugal signed the MLI in 2017 and deposited its instrument of ratification on 28 February 2020. The MLI entered into force for Portugal on 1 June 2020.

Portugal is implementing the minimum standard through the inclusion of the preamble statement and the PPT. 113

The agreements that will be modified by the MLI will come into compliance with the minimum standard once the provisions of the MLI take effect.

B. Implementation issues

No jurisdiction has raised any concerns about their agreements with Portugal.

Summary of the jurisdiction response - Portugal

	Treaty partners	Compliance with the standard	If compliant, the alternative implemented	Signature of a complying instrument	The alternative implemented through the complying instrument (if not the MLI)	Comments
1	Algeria*	No	N/A	Yes	N/A	
2	Andorra	No	N/A	Yes	N/A	
3	Angola	Yes	PPT alone	N/A	N/A	
4	Austria	No	N/A	Yes	N/A	
5	Bahrain	No	N/A	Yes	N/A	
6	Barbados	No	N/A	Yes	N/A	
7	Belgium	No	N/A	Yes	N/A	
8	Brazil	No	N/A	Yes	N/A	
9	Bulgaria	No	N/A	Yes	N/A	
10	Cabo Verde	No	N/A	Yes	N/A	
11	Canada	No	N/A	Yes	N/A	
12	Chile	No	N/A	Yes	N/A	
13	China (People's Republic of)	No	N/A	Yes	N/A	
14	Colombia	No	N/A	Yes	N/A	
15	Côte d'Ivoire	No	N/A	Yes	N/A	
16	Croatia	No	N/A	Yes	N/A	
17	Cuba*	No	N/A	Yes	N/A	
18	Cyprus*	No	N/A	Yes	N/A	
19	Czech Republic	No	N/A	Yes	N/A	
20	Denmark	No	N/A	Yes	N/A	

¹¹³ For its agreements listed under the MLI, Portugal is implementing the preamble statement (Article 6 of the MLI) and the PPT (Article 7 of the MLI).

Estonia Ethiopia* France Georgia	No No	N/A N/A	Yes Yes	N/A N/A	
France		N/A	VAC		
Georgia	No	N/A	Yes	N/A	
-	No	N/A	Yes	N/A	
Germany	No	N/A	Yes	N/A	
Greece	No	N/A	Yes	N/A	
Guinea-Bissau*	No	N/A	Yes	N/A	
Hong Kong (China)	No				
Hungary	No				
Iceland	No	N/A	Yes	N/A	
India	No	N/A	Yes	N/A	
Indonesia	No	N/A	Yes	N/A	
Ireland	No	N/A	Yes	N/A	
Israel	No	N/A	Yes	N/A	
Italy	No	N/A	Yes	N/A	
Japan	No	N/A	Yes	N/A	
Korea	No	N/A	Yes	N/A	
Kuwait*	No	N/A	Yes	N/A	
-					
-					
Sao Tome and Principe*	No	N/A	Yes		
Saudi Arabia	No	N/A	Yes	N/A	
Senegal	No	N/A	Yes	N/A	
Singapore	No	N/A	Yes	N/A	
Slovak Republic	No	N/A	Yes	N/A	
Slovenia	No	N/A	Yes	N/A	
South Africa	No	N/A	Yes	N/A	
Spain	No	N/A	Yes	N/A	
Sweden	No		Yes		
	Iceland India Indonesia Ireland Israel Italy Japan Korea Kuwait* Latvia Lithuania Luxembourg Macau (China) Malta Mexico Moldova* Montenegro Morocco Mozambique* Netherlands Norway Oman Pakistan Panama Peru Poland Qatar Romania Russia San Marino Sao Tome and Principe* Saudi Arabia Senegal Singapore Slovak Republic Slovenia South Africa Spain	Hungary No Iceland No India No India No Indonesia No Ireland No Israel No Israel No Israel No Korea No Korea No Kuwait* No Latvia No Lithuania No Macau (China) No Macau (China) No Montenegro No Montenegro No Mozambique* No Notherlands No Norway No Oman No Pakistan No Panama No Peru No Poland No Russia No Romania No Russia No San Marino No San Marino No San Tome and Principe* Saudi Arabia No South Africa No Syain No Sweden No Switzerland No Cyatarina No South Africa No Syain No Sweden No Switzerland No Switzerland No Cyatarina No Switzerland No Cyatarina No Switzerland No Switzerland No Switzerland No Switzerland No Cyatar No Switzerland No Switzerland No Switzerland No Cyatar No Cya	Hungary	Hungary No	Hungary No

	Emirates					
74	United Kingdom	No	N/A	Yes	N/A	
75	United States	No	N/A	Yes	N/A	
76	Uruguay	No	N/A	Yes	N/A	
77	Venezuela*	No	N/A	Yes	N/A	
78	Viet Nam	No	N/A	Yes	N/A	



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