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# First 90 Days After Closing — Your Portuguese Property Checklist

Buyers who just signed the Escritura

- **TL;DR:** Most expensive mistakes happen **after** the *Escritura*, not before. The three most-missed items are the IMT refund window (if you switch residency status), the utilities title-transfer (which keeps the seller billing you for months), and the Finanças address change (which causes the previous owner's IMI bill to land on your doormat).
- **TL;DR:** You have a usable 90-day window where the notary, the seller and your lawyer are still actively engaged. After day 90, every missing document costs ten times more to fix.
- **TL;DR:** Non-EU/EEA buyers must appoint a **fiscal representative** within 15 days of acquiring tax obligations in Portugal. Fines for non-compliance run from **€75 to €7,500**. Cost of compliance: **€150–€400/year**.

#### Key stat — the silent cost of post-closing inaction (Portugal 2026)

- **IMT refund window** for non-residents who become tax resident after closing: **24 months** from the *Escritura* date. Average refund on a €500,000 HPP-eligible purchase: **€8,000–€19,000** (the difference between 7.5% non-resident flat and progressive HPP scale).
- **IMT Jovem partial-exemption refund** (if you turned 35 within 30 days of closing or registration delays push you past the cap): you have **30 days** to file the *requerimento* with Finanças or the relief is forfeit.
- **Land registry (Registo Predial) provisional entry:** the notary lodges within **two business days**, but converting *provisório* → *definitivo* requires your IMT and Stamp Duty receipts and signed deed. Owners who let this lapse have lost title chains over notary archive disputes — twice in the Algarve in 2024, both reported by the *Ordem dos Notários*.
- **Utilities title-transfer:** the average delay reported by EDP and Águas do Algarve is **34 days** between *Escritura* and account migration. Until migration completes, the seller's direct debit keeps running — and the seller may dispute the bills with their bank.

## I. Introduction: you signed the deed, the work is just beginning

Every buyer-side guide ends at the *Escritura*. The notary reads the deed, you sign, keys change hands, and the long email thread that has consumed the last four months finally goes quiet. It feels like the finish line.

It is not. It is the start of the most expensive 90-day window of the entire transaction. I have watched 50+ buyers walk out of a notary office in Faro, Loulé, Tavira and Portimão genuinely believing the hard part is done. Three weeks later they are calling because the IMI bill arrived in the seller's name, EDP is invoicing both seller and buyer, the *Caderneta Predial* still shows the previous owner, and the *Conservatória do Registo Predial* has flagged a missing document.

None of these are catastrophes on day one. All of them become catastrophes on day 100, because by then the notary's clerk has moved on, the seller has stopped answering, the lawyer's mandate has expired, and the only person left holding the problem is you — usually in another country, in another language, with a Portuguese tax authority that does not believe in email.

This guide treats the 90 days after closing as the operational mandate it actually is. It is checklist-heavy on purpose. Read it the week before your *Escritura*. Print the checklist. Tick items as you go. Most of these tasks take 15 to 90 minutes individually. The cost of skipping any of them is measured in thousands of euros and, occasionally, in years of title-chain anxiety.

One more caveat: Portuguese administrative processes do not reward patience. The buyer who books their *Conservatória* conversion the week of the *Escritura* clears it in 10 working days. The buyer who books it three months later sits behind 600 people.

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## 2. Day of *Escritura* — the four-hour window

Before you leave the notary's office, before you celebrate, before you drive away with the keys:

- **Collect the certified copies.** Ask the notary for **two certified copies of the deed** (*certidão da escritura*), not just the original. One stays with you, one goes with your lawyer/accountant. Cost: ~€20–€40 each. Asking later costs more and takes weeks.
- **Confirm IMT and Stamp Duty receipts are in the notary file.** The notary must have *originals* of the *DUC* (Documento Único de Cobrança) payments. Photograph them with your phone before you leave. You will need them for the *Registo Predial* conversion.
- **Confirm the *pedido de registo* number.** The notary lodges a provisional entry at the *Registo Predial* on the same day, electronically. They will give you a *número de apresentação* and a *prazo* (usually 30 days) to make it definitive. Write this number on the inside cover of your deed copy.
- **Keys, fobs, garage remotes, alarm codes.** Inventory in writing, signed by both parties. The most common dispute on day three is a missing pool-key or alarm code, and without a signed inventory you have no leverage.
- **Meter readings.** Walk the property with the seller (or seller's agent) and photograph **every meter** — electricity (with the *CPE* code on the side), water (*CIL* code), and gas (*CUI* if piped). Email the photos to yourself, the seller and your lawyer the same day. This is the only evidence that will get the utilities companies to close the seller's contract at the right date.
- **Letterbox and intercom.** If the property is in a condominium, get the keys to the **mailbox**, photograph the **intercom panel**, and ask the seller to send the *administração do condomínio* an email confirming the change of owner. Do this on the day. We have had clients receive IMI demands four months late because Finanças sent everything to a mailbox they could not open.
- **Neighbours introduction.** Walk next door, ring the bell, leave a note if no one answers. In a condominium, the neighbours are your eyes when you are abroad. The cost of a 90-second introduction now is incalculable in goodwill terms.
- **Post-redirect.** Ask the seller to file a *reencaminhamento de correio* with **CTT** (the Portuguese postal service) for 6 months. Cost: **€33.86 for 6 months, national**. The seller's IMI, AIMI,

*condomínio* and insurance correspondence will keep arriving at the property for months. CTT redirection is the cheapest disaster-prevention you can buy.

Total day-one time: **3–4 hours**, ideally with your lawyer present for the meter walk.

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## 3. Week 1 — the documentary spine

This is where the IMT money lives. Get it wrong in week one and the refund window starts to close.

### 3.1 IMT exemption / refund applications

- **HPP exemption (own-and-only home, first bracket)**. If your purchase price (or VPT, whichever higher) is at or below **€106,346** and the property is destined exclusively to your own permanent residence, IMT is **0%**. The exemption is **declared before the *Escritura*** — but if you discover after closing that you qualified and paid in error, you have **four years** to file a *pedido de reembolso* with Finanças.
- **IMT Jovem (under-35 first-time buyer)**. Total exemption up to **€330,539**; partial exemption (only the excess taxed at 8% marginal) between **€330,539 and €660,982**. If you qualified but paid full IMT — typically because the notary was uncertain about your residency status or your "no other dwelling in last 3 years" certificate had not arrived — you have **30 days from the *Escritura*** to file the *requerimento de isenção a posteriori*. After 30 days the relief is *much* harder to recover (you can still claim, but the burden of proof shifts and Finanças routinely denies).
- **Non-resident → resident IMT refund (Lei 9-A/2026)**. The new flat 7.5% IMT for non-resident residential buyers (once the *decreto-lei autorizado* is published — expected mid-2026) carries an explicit refund route: if you become Portuguese tax resident within **24 months** of the *Escritura*, you can claim the difference between 7.5% and what you would have paid under the progressive HPP scale. On a €500,000 HPP-eligible purchase that gap is roughly **€8,000–€11,000**; on a €1,000,000 purchase it can exceed **€19,000**. **Diary the deadline now**, because the application requires the AT registration certificate dated *within* the 24-month window.
- **Rented-at-moderate-rent IMT exemption**. Same Lei 9-A/2026: if you rent the property at ≤ **€2,300/month** within **6 months** of acquisition and keep it rented for at least **36 months** in the first 5 years, the non-resident 7.5% flat is refundable. The clock starts on the *Escritura* day, not on the listing day. Long-term rental contracts must be **registered with AT** (*Modelo 2 do Imposto do Selo*) within 30 days of signing.

### 3.2 Land Registry — make the provisional definitive

The notary lodges *Registo Provisório por Natureza* electronically on the day. You have **30 days** (extendable by 30 more on request) to convert it to *definitivo*. The conversion needs:

- The original deed (or certified copy).
- IMT and Imposto do Selo payment receipts.
- Mortgage deed if applicable (the bank's lawyer usually files this in parallel, but verify).

- *Documento Único Automóvel* — not relevant here, but the same office handles it; do not get distracted.

**Cost:** €250 standard fee at *Conservatória*, or €225 online via [predialonline.pt](https://predialonline.pt). Add €50 per additional registo (e.g. for a *hipoteca*).

**Verification:** seven working days after submission, pull a fresh *Certidão Permanente do Registo Predial* (€15 online, valid 6 months) and confirm:

- *Descrição* number unchanged.
- *Inscrição de aquisição* in your name, dated correctly.
- *Cancelamentos* of any previous mortgages, easements or *penhoras* (seizures) that the seller was supposed to clear.
- No new *encargos* lodged after your *aquisição*.

If anything is missing, your lawyer files an *exposição* the same week. After three months it becomes a *processo*, which means months of correspondence.

### 3.3 Mortgage registration

If you financed the purchase, the bank files its *hipoteca* registration in parallel. The bank's lawyer is paid for this — but the bank's lawyer is paid by the bank, not by you, and their incentive is to file *eventually*, not to file *correctly*. **Verify the *hipoteca* appears in the *Certidão Permanente* by day 30.** We have had two cases in 2025 where the bank's filing was rejected on a technicality and the buyer only discovered six months later when they tried to sell.

## 4. Weeks 2–4 — utilities, insurance, condominium

### 4.1 Utilities title-transfer

The seller almost never closes their accounts cleanly. The seller's direct debit keeps running; EDP and Águas keep billing the seller's IBAN; eventually the seller's bank rejects a charge and the supplier disconnects the property — usually two weeks before you arrive for the first time.

#### The correct sequence:

1. Same-day meter reading (done at *Escritura*).
2. File *adesão por mudança de titular* with each supplier within **5 working days**. EDP accepts online via *Área Cliente*; Águas concessions (Águas do Algarve, Águas do Tejo) usually require a physical form and certified deed copy. MEO/NOS/Vodafone accept online or by phone.
3. Documentation pack: deed copy, NIF, *Caderneta Predial*, Portuguese IBAN, meter readings, ID.
4. Confirm the seller's *factura de fecho* is issued. Until then, your contract is in *standby* and bills accumulate unissued.
5. Direct debit on a **Portuguese IBAN**. Foreign IBANs are accepted by EDP and MEO under SEPA, but Águas concessions and *Câmara* tax bills frequently reject them.

**Typical timeline:** 14–34 days from request to confirmation. **Cost:** zero for the transfer itself; suppliers occasionally charge a €15–€30 *taxa de adesão* on first contract.

## 4.2 Home insurance

**Mandatory** if you have a Portuguese mortgage (*seguro multirriscos habitação*) — the bank insists on a *seguro de incêndio* at minimum, and most banks bundle it with their own broker. Read the *condições particulares* before signing the bank's default: bank policies cost 20–40% more than equivalent independent policies and rarely match the genuine replacement cost.

**Non-mortgaged buyers** are not legally obliged to insure — but a coastal Algarve villa exposed to storm surge, lightning and theft without insurance is a meaningful financial risk. **Typical 2026 cost** for a 200 m<sup>2</sup> villa with pool: **€450–€900/year multirriscos, €150–€300/year recheio** (contents).

**Holiday-home / second-home** policies are a separate product (Howden, Schofields, MAPFRE, Tranquilidade *Casas de Férias*) — they cover periods of vacancy that standard policies exclude. If the property will be empty more than 60 days a year, the standard *multirriscos* may void on a claim. Switch within the 90-day window, not after the first storm.

## 4.3 Condominium

If the property is in a condominium (apartment, gated community, *aldeamento turístico*):

- **Notify the *administração*** in writing of the change of ownership, with deed copy and your contact details. The seller usually does this, but verify.
- **Get the *acta da última assembleia*** (minutes of the last general meeting), the *regulamento do condomínio*, and the current-year *orçamento*. These tell you what is being spent on the building and what reserve fund exists.
- **Set up direct debit for *quotas*** on a Portuguese IBAN.
- **Proxy form (*procuração*)**. If you live abroad and will not attend the AGM (*assembleia ordinária* — usually March/April), file a permanent proxy with your property manager or lawyer. Without a proxy, the AGM votes without you, and the AGM votes on things that affect your asset (façade works, lift modernisation, swimming-pool refurbishment, *fundo comum de reserva* increases).
- **Request the last *contas aprovadas***. Any unpaid *quotas* by the previous owner are a *encargo real* on the fraction — i.e. they follow the property, not the seller. You may be legally pursued for the seller's arrears. The *Caderneta de Condomínio* is the document that proves the seller was up to date.

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# 5. Month 1 — Finanças, NIF and address

By day 30 you need the Portuguese tax authority (AT) to *know* about the change of ownership, *know* where you live, and *know* how to bill you.

## 5.1 IMI registration confirmation

When the *Registo Predial* converts to *definitivo*, the *Conservatória* notifies AT electronically. AT updates the **Matriz Predial** — the tax register — and issues a new **Caderneta Predial Urbana** with you as *titular*. **Verify this by day 30**: pull a fresh *Caderneta Predial* (free on the Portal das Finanças, Login → Património → Consultar Cadernetas).

The most common failure: the *Caderneta* still shows the seller as *titular* 60 days after closing. Cause is almost always a missing document at the *Conservatória* (often the IMT receipt mismatched against a typo in the buyer's name). Fixing it on day 30: one phone call to the *Conservatória*, document re-sent, two weeks. Fixing it on day 120: written *exposição*, two months minimum, plus you have just received the IMI bill for the property in the seller's name.

## 5.2 NIF address update

If you obtained your Portuguese NIF as a non-resident (with a *representante fiscal*), the NIF is registered to your **fiscal representative's address** — not yours. After closing, AT correspondence about the new property will go to your representative, who may or may not forward it promptly.

If you intend to become tax resident in Portugal — or even if you simply want AT to communicate directly with you — file a **change of address** (*alteração de morada fiscal*) on the Portal das Finanças. If you are moving to your new property as HPP, file the change to the property's address.

**Critical: moving your *morada fiscal* to the property is what triggers HPP status for IMI and IMT purposes.** Without that change, AT treats the property as non-HPP and the AIMI deduction, IMI exemption and HPP IMT scale do not apply.

## 5.3 Câmara Municipal address (council services)

The *Câmara* bills *Taxa de Resíduos Sólidos* (rubbish), occasionally *Taxa Municipal Turística* (tourist tax, where applicable), and certain water concessions. Most *Câmaras* automatically pick up the new owner from AT — but not all, and the lag is 60–90 days. A direct visit to the *Espaço Cidadão* (or online via *ePortugal*) with deed copy and NIF takes 15 minutes and prevents the rubbish bill arriving in the seller's name for the next 18 months.

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# 6. Month 2 — short-term let licensing, if relevant

If you bought intending to operate the property as **Alojamento Local** (short-term rental):

- **Containment zone check.** Since DL 76/2024 (in force 1 November 2024), AL containment is **municipal**. Lisbon, Porto, Sintra, Vila Nova de Gaia and increasingly Algarve municipalities (Loulé and Albufeira have draft regulations under consultation in 2026) operate containment zones. **Verify before assuming:** query the *Câmara Municipal* of the *freguesia* directly, or check the municipal *Plano Diretor Municipal* (PDM). A containment-zone refusal is the most common reason new owners discover *post-closing* that their investment thesis is dead.

- **RNAL registration.** File *comunicação prévia* with the *Câmara Municipal* via the Balcão do Empreendedor. The municipality has **60 days** (or **90 days** in containment zones) to oppose. Silence = tacit approval. **Cost:** typically €60–€220 municipal fee.
- **EU Reg 2024/1028 — applies from 20 May 2026.** Every AL listing on Airbnb, Booking, Vrbo and equivalent platforms must display a valid RNAL number. Listings without RNAL after 20 May 2026 will be delisted by the platforms; Portugal's transposition has not been fully published as of 15 May 2026, so penalties remain to be confirmed. Plan for the registration to be live before your first listing.
- **AT activity registration.** Open a *categoria B* activity for *Alojamento Local* (CAE 55201 *Alojamento mobilado para turistas*). This unlocks the simplified regime or organised-accounting regime for the income.
- **Existing AL on the property.** Since DL 76/2024, AL licences no longer auto-expire on transfer. The seller's existing AL *can* transfer to you — but only if you file a *comunicação de alteração de titularidade* within **60 days** of acquisition. Miss the 60 days and the licence lapses; you must re-register from scratch, *and* the new registration is subject to current containment rules (which may have tightened since the seller registered).

If you do **not** intend to operate AL: file nothing. AL licences carry obligations (declaration of stays via SEF/AIMA's *SIBA*, accommodation tax remittances, fire-safety inspections) that you do not want without revenue.

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## 7. Months 2–3 — fiscal infrastructure

### 7.1 Fiscal representative

**Mandatory** for tax residents of **non-EU/non-EEA jurisdictions** holding any Portuguese tax obligation. As of 2026 this includes the **UK, US, Canada, Switzerland, Australia, all of Latin America except as EU citizens**, and every other non-EU jurisdiction.

- **Cost:** €150–€400/year standalone, often bundled free or at €60–€90/year with a Portuguese accountant.
- **Deadline:** technically *before* you acquire any tax obligation. In practice: within **15 days** of becoming subject to AT correspondence (acquisition of NIF, purchase of property, opening of bank account). Most non-EU buyers will already have one from the NIF stage.
- **Penalty for non-compliance:** €75 to €7,500 fine, plus AT refusal to process refunds, exemptions or *requerimentos* until a representative is on file.
- **EU/EEA residents: NOT required** to appoint one. France, Germany, Ireland, Netherlands, Spain — no representative needed. Many buyers from these jurisdictions are mis-sold representation by aggressive providers. Decline politely.

### 7.2 Accountant engagement

If you intend to:

- declare rental income (long-term or AL);
- claim the **non-resident → resident IMT refund** within the 24-month window;
- claim **IMT Jovem** retroactively;
- operate any *categoria B* activity;
- benefit from **IFICI** (20% flat on Portuguese-source qualifying employment/self-employment income);

...engage a Portuguese accountant by month 2. The IRS *Modelo 3* submission window is **April–June** of the year following income. Do not arrive at the accountant in May with no records and three months to file.

#### Typical 2026 costs:

- Non-resident with rental income only: **€300–€600/year** for *Modelo 3* + IMI handling.
- Resident with employment + property: **€600–€1,500/year**.
- AL operator with simplified regime: **€800–€1,800/year**.
- AL operator with organised accounting: **€2,400–€6,000/year**.

### 7.3 *Modelo 3* IRS timeline

If you closed in 2026, your first *Modelo 3* covering this property will be **April–June 2027**. The accountant will need:

- Deed copy and IMT/Stamp Duty receipts (for cost-base calculation on any future sale).
- IMI bills paid.
- *Caderneta Predial* current.
- All rental contracts and receipts (if let).
- *Recibos Verdes* issued (if AL).
- Foreign income summary (for rate-determination if non-resident, or full disclosure if resident).

## 8. Month 3 — HPP, IMI exemption, property management

### 8.1 HPP designation

If you bought as your **own and permanent home**, file the *afetação a habitação própria e permanente* with AT within **6 months** of acquisition. This unlocks:

- The IMI HPP exemption (see 8.2).
- The AIMI HPP deduction (€600,000 individual, €1,200,000 couple).
- HPP capital-gains roll-over on a future sale.
- Confirmation for the IMT non-resident → resident refund route.

The filing is via Portal das Finanças (or by *requerimento* at the local Serviço de Finanças). Bring: deed, *Caderneta*, address-change confirmation, residence certificate from the *junta de freguesia* (issued in 24 hours, free).

## 8.2 IMI exemption — own and only home

Properties used as HPP, with VPT up to **€125,000**, and with household income below **€153,300**, qualify for a **3-year IMI exemption** (extendable to 5 years for properties up to €125,000 VPT in certain conditions). Application: *Modelo 1 do IMI* with the *afetação* documentation, filed at the *Serviço de Finanças* within **60 days of taking up residence**. Average saving on a typical Algarve apartment: **€450–€900/year**.

Note: this exemption is per household, lifetime — you can only use it once. If you used it on a previous property, it does not reset.

## 8.3 Property manager engagement

For non-resident owners, a property manager is the difference between a functioning asset and a slow disaster. Engage by month 3 — earlier if you are returning abroad immediately after closing.

**Minimum scope** (caretaker level): key custody, weekly walkthrough, mail collection, contractor access, emergency response. **Cost: €80–€250/month**.

**Full scope** (full management, no AL): caretaker + bill payments, maintenance coordination, garden/pool oversight, insurance claim handling, *condomínio* representation. **Cost: €250–€600/month** depending on property complexity.

**Full scope with AL:** see the [Hands-Off Property Ownership](#) guide — **18%–28% of net revenue** plus the caretaker base.

Whoever you engage, sign a **written mandate** that lists exactly what they do, what they don't, what their decision authority is (e.g. spend up to €300 without approval), and who their backup is during their own holidays. Verbal arrangements with "the agent who sold me the property" survive about six months.

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# 9. Always — the documents to refresh annually

Three documents tell the truth about your property. They go stale fast.

- **Caderneta Predial Urbana** — free on Portal das Finanças. Reflects the tax-register state (VPT, owner, *afetação*). **Refresh annually** and after any change (works, *afetação* change, VPT revision).
- **Certidão Permanente do Registo Predial** — €15, valid 6 months. Reflects the legal title state (owner, mortgages, easements, *penhoras*). **Refresh whenever you transact, refinance, or suspect a problem.**
- **Licença de Utilização** — issued by the *Câmara Municipal*. Confirms the property is legally usable for its stated purpose. **Refresh before any sale, refinancing, or AL registration.**

Owners who keep these three current can sell, refinance or remortgage in days. Owners who let them lapse spend months reconstructing the chain.

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## 10. Real cases — the cost of missed deadlines

**Case 1 — The €11,200 IMT Jovem refund that wasn't.** A 34-year-old British buyer closed on a €420,000 apartment in Lagos in March 2025. He qualified for IMT Jovem partial exemption (total on first €330,539, 8% marginal above) — worth roughly €11,200 vs full IMT. The notary, uncertain about the "no other dwelling in last 3 years" HMRC certificate, applied full IMT and told him to file a *requerimento de isenção a posteriori* "within a month or so". The HMRC certificate took 6 weeks to translate and *apostilhar*, by the time the *requerimento* landed at Finanças it was day 47. AT denied on the 30-day window. Still in *recurso hierárquico* a year later. **Fix in week 1: file a holding *requerimento* on day 5 with the documents you have, supplemented later.**

**Case 2 — The neighbour who disputed the title chain.** A Dutch couple closed on a rural property near São Brás de Alportel in October 2024. The notary lodged the *Registo Provisório* on the day. The couple assumed "the lawyer handles registration" and did not follow up; the *prazo* lapsed in mid-November. In January 2025, a neighbour filed an *acção de demarcação* claiming an old verbal easement. With *Registo Definitivo* still pending and the *Provisório* expired, the *Conservatória* asked for fresh documentation — and the IMT receipt the notary's clerk had lodged turned out to have a typo in the buyer's NIF. Six months and €4,800 in legal fees to clear, the easement claim ultimately dismissed but the buyers' insurance refusing to cover the period of unclear title. **Fix in week 2: verify conversion to *definitivo* by day 30.**

**Case 3 — The summer the AL didn't register in time.** A US buyer closed on a 2-bed apartment in Albufeira in February 2026, intending AL for the 2026 summer. He started platform marketing in March, took bookings from April, and only filed the RNAL *comunicação prévia* in late April. Albufeira's *Câmara* had introduced a containment-zone consultation in March; the *comunicação* sat in the queue under the draft rules. By the time the 60-day tacit-approval window expired (late June), Booking.com's compliance team had suppressed the listing as RNAL-pending — costing €18,400 in confirmed-then-cancelled summer bookings. **Fix in month 2: file the RNAL *comunicação* in week 1 if AL is the plan, before marketing begins.**

**Case 4 — Three months of the seller's IMI.** A French buyer closed on a Tavira townhouse in September 2024. Finanças address was never updated. In April 2025 the IMI bill for full-year 2024 (8 months seller, 4 months buyer) arrived at the property in the seller's name. The seller, by then moved to Brazil, ignored it. The buyer paid the entire €1,680 to avoid a *certidão de dívida* against his property, then spent three months and a €350 lawyer's letter recovering €1,120 from the seller. **Fix in month 1: change *morada fiscal* and verify *Caderneta* shows you as *titular* by day 45.**

**Case 5 — The buyer who saved €4,200 by doing it right.** A German buyer closed on a €680,000 Vilamoura villa in January 2026. Within 90 days he changed *morada fiscal* (day 12), engaged a Portuguese accountant for €420 setup (day 18), declined the unnecessary *representante fiscal* service his buying agent pushed for €380/year (Germany is EU — not required), transferred utilities

(day 22), verified *Caderneta* and *Certidão Permanente* (day 40), filed *afetação a HPP* (day 60), and recovered €870 of overpaid Stamp Duty via a *requerimento* on day 25. Total saved vs the average buyer in his price band: **€4,200. Lesson: the checklist itself is the saving.**

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## II. FAQ

**Q1. Do I really need to change my *morada fiscal* if I'm not moving to Portugal?** If you want AT to bill you directly (rather than your fiscal representative), yes. If you want the property treated as HPP for IMI / AIMI / future capital-gains roll-over, yes. If you are content to receive everything via your representative and are not claiming HPP benefits, you can leave the *morada* as is. But verify with your accountant: most buyers benefit from at least making the property's address visible in the system.

**Q2. The notary said the *Registo Predial* "happens automatically". Is that true?** The *Registo Provisório* happens automatically, on the day. The conversion to *definitivo* requires documents (IMT, IS, deed) that must be present and correct. It is *processed* by the *Conservatória*, but it is your duty to confirm completion. Notaries lodge thousands of these a year; mismatches happen monthly. Verify by day 30.

**Q3. I bought as a non-resident with the 7.5% IMT flat. If I become resident next year, do I really get a refund?** Yes — under Lei 9-A/2026, once the *decreto-lei autorizado* is published (expected mid-2026). Conditions: become Portuguese tax resident within 24 months of the *Escritura*; have the property as your HPP; file the *requerimento de reembolso* with documentary proof of residency. The refund is the difference between 7.5% and the progressive HPP scale you would have paid. Diary the 24-month deadline.

**Q4. Can I transfer utilities online without going to Portugal?** Mostly. EDP, MEO, NOS and Vodafone accept online title-transfer with a Portuguese IBAN and scanned documents. Águas concessions vary — Águas do Algarve, Águas de Cascais and EPAL (Lisbon) accept email submissions; many smaller municipal water companies still require a physical visit or a notarised proxy. Plan for one *procuração* in favour of your lawyer or property manager.

**Q5. The seller is asking me to keep the *condomínio* direct debit running "to make it simple". Should I?** No. Sign your own direct-debit mandate with the *administração* on a Portuguese IBAN in your name. The seller's bank could reject the debit at any time, leaving you in arrears with the condominium — and condominium arrears are a *encargo real* on your property.

**Q6. When does the seller's home insurance end?** On the day of the *Escritura*, in theory. In practice, the seller's annual policy is paid in advance and refunded *pro rata* by the insurer, which takes 30–60 days. There is a documented gap of 1–3 days between the seller's cancellation and your new policy starting — bind your *multirriscos* effective from the *Escritura* date, ideally signed 24–48 hours before.

**Q7. I want to operate AL but didn't bring the property under the deed as such. Does it matter?** For AL purposes, no — the licence is issued to the *fração* by the *Câmara*, not derived from the deed. For tax purposes, however, you must register a *categoria B* activity with AT (*Alojamento Local*, CAE 55201) before issuing the first invoice. For *condomínio* purposes, check the *regulamento*: some condominium

charters prohibit AL, in which case the *Câmara* licence is granted but neighbours can sue and the *Câmara* will eventually revoke.

**Q8. Do I need a fiscal representative if I'm a UK citizen but live in Spain?** No. Fiscal representative requirement follows **tax residency, not citizenship**. A UK citizen tax-resident in Spain (EU member state) does not need one for Portuguese property. A US citizen tax-resident in France (EU member state) also does not need one. A Portuguese citizen tax-resident in the UK (post-Brexit, non-EU) does. The rule is the country of your *tax residency*.

**Q9. The bank said they'd handle the mortgage registration. Should I trust them?** The bank's lawyer files the *hipoteca*. They are competent. They are not infallible. Verify the *hipoteca* appears in your *Certidão Permanente* by day 30. Cost of verification: €15. Cost of discovering six months later that the bank's filing was rejected and your mortgage is unsecured (or, more commonly, that a paperwork error blocks a future remortgage): months of correspondence.

**Q10. How much should the first 90 days realistically cost in fees and outlays beyond the *Escritura*?** For a typical €500k Algarve purchase:

- *Certidão Permanente* registo: €225–€275.
- Certified copies of deed: €40–€80.
- Refresh *Certidões* during checklist: €30–€45.
- Home insurance year 1: €500–€900.
- Property manager month 1–3: €240–€750.
- Fiscal representative (non-EU): €150–€400 (year, prepaid).
- Accountant setup: €200–€500.
- AL registration (if applicable): €60–€220.
- Utility deposits / *taxas de adesão*: €30–€90.
- Total realistic 90-day operational outlay: €1,500–€3,200, excluding any AL setup costs (deep clean, photography, platform onboarding).

**Q11. I missed the 30-day IMT Jovem window. Is it over?** Not necessarily. Filing later is allowed but the burden of proof shifts to you, and AT's first response is usually denial. With a qualified accountant and clean documentation (the under-35 age proof, the "no prior dwelling" certificate, the HPP *afetação*), recovery is possible within 4 years of the *Escritura*. Allow 6–18 months of correspondence. Engage a *jurista tributário* (tax lawyer) if the amount exceeds €5,000.

**Q12. What about wills and inheritance?** Portuguese property held by foreign owners defaults to *forced heirship* rules of Portuguese civil law unless the will explicitly elects the law of the owner's nationality (EU Reg 650/2012). Without a Portuguese will, spouse and children inherit by *legítima*. To, for example, leave the property outright to a spouse (common in UK/US planning), you need a Portuguese will electing home-country law. Engage a Portuguese estate lawyer in months 2–3.

## 12. Conclusion

The *Escritura* is not the finish line. It is the start of a 90-day operational window that determines whether the asset you just paid for is genuinely yours — legally, fiscally, and operationally — or a slow administrative wound that bleeds for years.

The work is unglamorous. It is also entirely binary: each item on this checklist either gets done in the window, or it costs you 5–50× more to fix outside it. There is no middle ground. There is no benefit from delay.

If you have closed in the last 90 days: print this guide, tick what you have done, and book Portuguese-time slots in your calendar for the rest. If you closed more than 90 days ago and recognised yourself in the case studies: every day later is more expensive, but none of the deadlines beyond the IMT Jovem 30-day are completely irrecoverable. Start tomorrow.

The buyers who treat the first 90 days as a project — with the same discipline they brought to negotiation — are the buyers who never appear in our "case 1 to case 4" lists. They appear, two years later, as the buyers who sold cleanly, refinanced cheaply, and never had a single *Finanças* letter forwarded from a previous address.

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## Related reading

- [Taxes and Costs of Buying Property in Portugal](#) — the full IMT / IS / IMI / AIMI map you need before, during and after closing.
- [The Real Cost of Owning a Property in the Algarve](#) — annual running costs benchmarked across four worked examples.
- [Hands-Off Property Ownership and Management](#) — what to outsource, what to keep, and who runs the property when you go home.
- [Mistakes to Avoid with Property Legalisation and Documentation](#) — the document chain from *Caderneta* to *Licença de Utilização*, and the failure modes.
- [First Home in Portugal](#) — the broader first-time buyer roadmap, including IMT Jovem, public guarantee, and HPP IMI exemption strategy.

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## How 2nd Haus can help

2nd Haus runs **full remote-buyer mandates** including a **post-closing operational module** that covers exactly this 90-day window for clients who cannot or will not stay in Portugal long enough to manage it themselves. We are buyer-side, independent of agent or developer, and act under your power of attorney when needed.

Two ways to start:

- **Free 30-minute call** — talk through your closing date, your residency status, your AL or HPP intentions, and we will tell you which of the items above will bite you first.
- **Full remote-buyer mandate (retainer + capped success fee)** — vetting, viewings, negotiation, CPCV, due diligence, *Escritura*, and the 90-day post-closing checklist run by our team locally on your behalf. Typically 8–14 weeks from instruction to keys, plus 90 days of operational handholding.

Direct: [paulovogel@2ndhaus.pt](mailto:paulovogel@2ndhaus.pt) · [+351 963 639 042](tel:+351963639042) (WhatsApp).

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### Primary sources

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- EU Regulation 2024/1028 — EUR-Lex — short-term rental data sharing, applies from 20 May 2026.
- Portal das Finanças — IMT Jovem — eligibility, thresholds, *requerimento a posteriori*.
- Portal das Finanças — IFICI FAQ.
- PredialOnline — *Certidão Permanente* and online registration.
- ePortugal — *Pedir uma Certidão Permanente do Registo Predial*.
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### Practitioner references

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- Airnest REIM — Complete 2026 AL Guide.

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*Last updated: May 2026. Verified against CANONICAL\_FACTS.md 2026-05-15. We refresh this guide quarterly, or whenever the IMT non-resident regime, the AL containment landscape, or the*

*Conservatória/AT electronic processes change materially.*

## Want a buyer-side advisor on your specific case?

2nd Haus is a buyer-side real-estate consultancy specialised in the Algarve. We will tell you not to buy if that is the honest answer.

[Talk to 2nd Haus](#)

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