Legal Snapshot

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Highly-anticipated Clarifications on the Greek Golden Visa Program

- Specific Documentation by Investment Type for initial application
- Specific Documentation for Renewal application

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Highly-anticipated Clarifications on the Greek Golden Visa Program

On 11 November 2025, the Joint Ministerial Decision No. 214926/2025 was published in the Government Gazette (FEK 6014/B/11.11.2025), introducing new instructions pursuant to Article 100 of Law 5038/2023, bringing greater clarity and compliance to property-based investments in Greece, most importantly on how to certify the conditions set out in cases of investment in real estate in the context of change of use and in listed buildings, which have caused great uncertainty to investors until now.

Key Clarifications

- The required supporting documents for granting or renewing the Permanent Residence Permit for Investors under Article 100 of Law 5038/2023 (Migration Code).
- The methods of certification for compliance with cases of change of use and investment in preserved buildings.

I. Specific Documentation by Investment Type for initial application

a. Property Purchase

- Notarial deed confirming ownership, price, payment method, and proof of full payment with specific mention to the **minimum property size: 120 m² for main spaces.**
- Property registration certificate (or lawyer's verification of submission). By way of exception, within the framework of the initial granting of the permit, it is permissible to submit either the proof of submission of the application for registration or entry of the registrable act, or lawyer's declaration. The proof of registration or entry of the registrable act shall be submitted at the time of filing the application for the renewal of the investor's permanent residence permit.
- E9 property declaration.

b. Purchase of Land / Plot and Construction

- Building permit issued in the name of the third-country national investor, or in the name of the legal entity established in Greece or in another EU Member State, of which the investor is the sole owner of all corporate shares, holdings, or stocks, and which is in force.
- Digital certificate of a technical project contract, in accordance with the provisions of Article 19 of Law 820/1978, in cases where the construction is carried out under a technical project agreement. In this case, the corresponding receipts evidencing full payment of the total construction cost must be submitted together. The payment of the total expenses, as mentioned above, must be proven to meet the requirements of paragraph 5 of Article 100 of Law 5038/2023.

- In the case of constructing a building on a plot or piece of land, for the purpose of submitting an application for a permanent investor residence permit, either the combined value of the purchase of the plot or land and the construction of the building, or only the value of the building's construction, shall be taken into account, provided that the required supporting documents, as mentioned above, are submitted.
- In the case of construction carried out under the system of consideration in kind ('antiparochi'), on a plot of land for which the applicant has already obtained a permanent investor residence permit, an additional valuation report by a sworn auditor from the register of certified valuers is required.
- E9 property declaration.

c. Investment through Change of Use

- Notarial deed;
- Property registration certificate (or lawyer's verification of submission). By way of exception, within the framework of the initial granting of the permit, it is permissible to submit either the proof of submission of the application for registration or entry of the registrable act, or lawyer's declaration. The proof of registration or entry of the registrable act shall be submitted at the time of filing the application for the renewal of the investor's permanent residence permit.
- **Engineer's Technical Report** confirming the change of use of main areas to residential, based on:
  - Building permit update or small-scale construction approval after 5 April 2024 (Law 5100/2024).
  - For former industrial buildings, additional proof that no industrial activity has occurred in the past 5 years (via DEDDIE electricity cutoff or tax forms).
- The requirement that the change of use be completed after the

entry into force of Article 64 of Law 5100/2024 shall be certified by the date of issuance of the relevant act, such as, indicatively, the building permit, the approval of small-scale construction works, the file update, or the revision of the building permit.

- <u>This requirement shall also be deemed fulfilled in cases where the change-of-use permit was issued before the publication of the law but was updated or revised for any reason after its publication, that is, from 5 April 2024 onwards.</u>
- In cases where the investment concerns properties resulting from vertical and/or horizontal extensions or alterations to industrial buildings, provided that their use has been changed to residential, or from the addition of independent buildings on plots or land where industrial buildings exist whose use (of the industrial buildings) has been changed to 'residential,' the engineer's technical report shall also certify that in detail.
- This **technical report serves as official certification** under **investment through Change of Use.**
- E9 property declaration.

d. Investment in Preserved (Listed) Buildings

- Notarial deed indicating the number of the Government Gazette **(FEK)** in which it is stated that the property has been designated as a listed (preserved) building, regardless of the extent of the restoration or reconstruction works required, so that the investment may fall under the provisions of Article 100 of Law 5038/2023.
- In cases where the investment concerns properties resulting from vertical and/or horizontal extensions or alterations to preserved buildings under restoration or reconstruction, or from the addition of new independent buildings on plots or land where preserved buildings under restoration or

reconstruction exist, the notary's certificate shall confirm it.

- Property registration certificate (or lawyer's verification of submission). By way of exception, within the framework of the initial granting of the permit, it is permissible to submit either the proof of submission of the application for registration or entry of the registrable act, or lawyer's declaration. The proof of registration or entry of the registrable act shall be submitted at the time of filing the application for the renewal of the investor's permanent residence permit.
- This **notarial certificate constitutes official proof of inclusion under Investment in Preserved (Listed) Buildings.**
- E9 property declaration.

II. Specific Documentation for Renewal application

- Proof of ownership;
- Evidence that the real estate property remains in the ownership of the investor;
- Private insurance policy;
- Administrative fees;
- E9 property declaration;
- Proof of registration: Certificate of registration from the competent Land Registry Office or Cadastre, or a lawyer's declaration under paragraph 2(b) of Article 36 of the Lawyers' Code (Law 4194/2023), if such proof was not submitted during the initial residence permit application.
- For properties acquired **after the entry into force of Article 64 of Law 5100/2024,** and not completed within the transitional period of paragraph 4 of the same article, a **solemn declaration** must be submitted confirming that the property has **not been leased or subleased on a short-term basis under the sharing economy framework** (Article 111 of Law 4446/2016).
- For renewal of residence permits issued under case **of investment through change of use, a declaration by the applicant** confirming that the **main areas of the property remain for residential use** and that the property is **not used as a business headquarters or branch.**
- Properties under **case of investment** in preserved buildings under restoration or reconstruction — at the **first renewal**, the investor must submit an **engineer's technical report**.
- If the construction was carried out under the **consideration in kind** system **(antiparochi)** on a plot for which the applicant has already received an investor residence permit, an **additional valuation report by a sworn auditor from the register of certified valuers** is required, assessing the **value of the property remaining in the applicant's ownership**, according to the zone where the property is located.

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