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**Simplified direct a
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to publication?**

On August 18, 2025, Regulation No. 1000/2025 was published, prepared by the Institute of Public Markets, Real Estate and Construction, I.P. (IMPIC, I.P.), under the supervision of the Presidency of the Council of Ministers. This regulatory act aims to establish the rules for the transmission of data relating to simplified direct adjustments, in aggregated form, by entity, until the end of the calendar year in which the contracts were concluded.

This Regulation seeks to implement the provisions of Article 5(2) of Ordinance No. 318-B/2023, of October 25, which established that the method for collecting this information should be defined by regulation approved by IMPIC, I.P., and published in the Official Gazette and on the BASE Portal.

The **entry into force** of the regulation under analysis will take place on **October 1, 2025**, and it applies to:

- i. Contracts concluded within the scope of simplified direct adjustments provided for in Article 128 of the Public Contracts Code (CCP); and
- ii. Contracts resulting from simplified direct adjustments provided for in point (c) of Article 2 of Law No. 30/2021, of May 21.

Although the scope is common, the regimes vary depending on the applicable legal basis.

In the case of simplified direct adjustments concluded under Article 128 of the CCP, the resulting contracts must be registered on the BASE Portal for the collection of statistical information. This information will be accessible only to the contracting authority that published the contract and to public entities with auditing, supervisory, and regulatory functions — available in the private area of the Portal.

In cases of **simplified direct adjustments** concluded under Law No. 30/2021, the resulting contracts must be registered and disclosed as a condition for the contract's validity. The information is made publicly available on the BASE Portal.



The Regulation provides for three methods of communicating data to the BASE Portal — applicable to both legal regimes, except for restrictions relating to validity in the cases of Law No. 30/2021, namely:

- i. An individual online form, available in the restricted area of the Portal, with specific options according to the regime (CCP or Law No. 30/2021);
- ii. Aggregated communication, through the import of files in the restricted area — useful for multiple registrations at once; and
- iii. Transmission via web service, available for electronic public procurement platforms or integrated management software.

As for communication deadlines, in the case of simplified direct adjustments concluded under Article 128 of the CCP, the contracts must be reported by the end of the calendar year in which they were concluded. If the contract has an execution period longer than one year, the communication may be made in the final calendar year of execution.



As for the others (Law No. 30/2021), communication must **take place within 20 working days** after the closing of the contract (the date of payment of the last accepted invoice or material execution in cases of full advance payment). This communication is a condition for the contract's validity.

In conclusion, Regulation No. 1000/2025 **aims to promote transparency and oversight of contracts concluded through simplified direct adjustment**, by imposing clear rules on the scope of application depending on the legal basis (CCP or Law No. 30/2021), with the expectation of significant gains in terms of consistency in data collection and compliance with legal obligations by contracting authorities.

Nevertheless, considering the provisions of Article 128(3) of the CCP, which states that direct adjustments are exempt from the formalities set out in that legal framework, are we not, in fact, facing a potential illegality in Regulation No. 1000/2025 of August 18? Time will tell.



Raquel Soares Mendes
rsm@dower.pt