

Main measures provided for by Royal Decree-Law 8/2020, of 17 March, on urgent extraordinary measures to deal with the economic and social impact of COVID-19

On 18 March 2020, Royal Decree-Law 8/2020 of 17 March on extraordinary urgent measures to deal with the economic and social impact of COVID-19 (the "RDL") came into force. This regulation has been adopted by the Spanish government in the context of the state of alarm in which the country finds itself, following the entry into force of Royal Decree 463/2020 of 14 March, which declared the state of alarm for the management of the health crisis situation caused by the coronavirus COVID-19 (the "RD 463/2020"). The RDL complements the socioeconomic measures that already entered into force on 13 March following the publication in the Official State Gazette of Royal Decree Law 7/2020 of 12 March, adopting urgent measures to respond to the economic impact of COVID-19 ("RDL 7/2020").

Royal Decree-Law 8/2020, of 17 March, on urgent extraordinary measures to deal with the economic and social impact of COVID-19 contains a series of socioeconomic measures that seek to mitigate the damage being caused by the health crisis and the temporary cessation of activity in many economic sectors.

The following are the most relevant groups of measures provided for in the RDL and whose implementation is the responsibility of the government and the competent ministries, which are empowered to issue, within their respective areas of responsibility, the necessary provisions for the development and implementation of the measures:

1. Measures related to employment

In order to deal with the effects caused by COVID-19, the government has decided to implement the following measures:

- ***Remote working***

Remote working is the preferred way of working, so companies should take appropriate measures if this is technically and reasonably possible and if the necessary adaptation effort is proportionate. This alternative must be given priority over temporary cessation or reduction of activity. By way of exception, the obligation to carry out an occupational risk assessment of the job by means of a self-assessment carried out voluntarily by the worker him/herself shall be deemed to have been fulfilled.

- ***Adaptation of working conditions to care for family members***

Workers who can prove that they have a duty of care towards their spouse or partner and/or blood relatives up to the second degree ("Relatives" or "Relative"), will be entitled to adapt their working hours, when exceptional circumstances arise in relation to the actions necessary to prevent the community transmission of COVID-19. These exceptional circumstances are understood to exist when:

- The presence of the worker is necessary for the care of the Relative who, for reasons of age, illness or disability, needs personal and direct care as a direct consequence of COVID-19.

- The decisions adopted by the governmental authorities related to COVID-19 imply the closure of centres that provide care or attention to the Relative that needs it.
- The person who has until now been responsible for the direct care or assistance of the Relative cannot continue to do so for justifiable reasons related to COVID-19.

The implementation of this right is the responsibility of the working person (both in scope and content) and must be justified, reasonable and proportionate. The right to adapt may relate to the distribution of working time or to any other working condition, change of shift, split or continuous working day, change of workplace or functions, etc.

- ***Reduced workday for care of family members***

The RDL recognises the right to a reduction in working hours for the care of Relatives, with a proportional reduction in salary. It is governed by the general rules for the reduction of the working day, except for the following particularities: (i) the company must be notified 24 hours in advance and (ii) the working day may reach a 100% reduction if necessary. In cases where the reduction in working hours reaches 100% of the working day, the worker's right must be justified and reasonable and proportionate to the situation of the company.

In addition, if the worker has already arranged an adaptation or reduction of the working day or some other right of conciliation, he or she may temporarily renounce it or modify the terms of its arrangement. This waiver or modification must be justified in the presence of exceptional circumstances, which must be duly accredited. In addition, it must always be justified and its duration limited to the situation of alarm. This request will be presumed to be justified, reasonable and proportionate unless there is evidence to the contrary.

- ***Self-employed and cooperative members***

The self-employed and cooperative members classified as self-employed will be entitled to the extraordinary benefit for cessation of activity when (i) their activity has ceased as a result of RDL 7/2020 or (ii) when their turnover in the month prior to that for which the benefit is requested is reduced by at least 75% in relation to the average turnover for the previous six-month period. The receipt of the extraordinary benefit is conditional on compliance with the following requirements:

- To be affiliated and registered, on the date of the declaration of the state of alarm, in the corresponding Special Regime.
- Be up to date with the payment of Social Security contributions.

- ***Suspension of contracts and reduction of working hours due to force majeure***

Exceptional measures are introduced in the procedures for the suspension of contracts and reduction of working hours due to force majeure. Specifically, force majeure will be understood to apply to the suspension of contracts and reductions in working hours that are directly caused by losses in activity as a result of COVID-19:

- Suspension or cancellation of activities.
- Temporary closure of public places.
- Restrictions on public transport and, in general, on the mobility of persons and/or goods.
- Lack of supplies that seriously impede the continuation of the regular development of the activity.

- Urgent and extraordinary situations due to staff contagion or the adoption of preventive isolation measures decreed by the health authority, which are duly accredited.

In these cases, the employment authority is not obliged to obtain a report from the labour inspectorate.

- ***Social Security contributions in the event of suspension of contracts and reduction of working hours due to force majeure***

In cases of suspension of contracts and reduction of the working day due to force majeure, there is provision for exemption (at the employer's request) from payment of the company's contribution, as well as from contributions for joint collection, if the company has fewer than 50 employees registered with the Social Security authorities. If the company has 50 or more employees registered for social security, the exemption from the obligation to pay contributions will be 75% of the company contribution. For employees this period is considered as effectively contributing for all purposes.

- ***Suspension of contracts and reduction of working hours for economic, technical, organizational and production reasons related to COVID-19***

Exceptional measures are introduced in the procedures for suspending contracts and reducing working hours for economic, technical, organizational and production reasons related to COVID-19. In particular:

- If there is no legal representation of the workers in the company, a representative commission will be formed, made up of the most representative unions at the sector level and with legitimacy to be part of the negotiating commission for the applicable collective agreement (one person per union). Alternatively, the committee will be made up of three company employees.
- The time limit for the constitution of this representative commission is reduced to a maximum of five days.
- The duration of the consultation period cannot exceed seven days.
- The labour authority is no longer obliged to obtain a report from the labour inspectorate (if it does obtain a report, the time limit for issuing it is reduced to seven days).

- ***Unemployment protection***

Unemployment protection measures are agreed in situations of contract suspension and reduction of working hours related to COVID-19:

- All workers affected by these measures will be eligible for unemployment, whether or not they have completed the minimum contribution period.
- The unemployment amounts received by workers during the suspension of their contracts or the reduction of their working hours will not count for the purpose of consuming the ordinary contributory unemployment benefit.
- Changes are made to the regulatory base calculation system.

- ***Safeguarding of employment***

These extraordinary measures in the field of employment shall be subject to a commitment by the company to maintain employment for a period of six months from the date of resumption of activity.

- ***Scope of the public entities that make up the Spanish Science, Technology and Innovation System***

Finally, exceptional employment measures are agreed upon within the scope of the public entities that make up the Spanish Science, Technology and Innovation System: (i) to allow for extraordinary working days to be compensated economically, or (ii) to contract for the execution of public plans and programmes for scientific and technical research or innovation related to COVID-19. Likewise, the granting of extraordinary credits in the budget of the Ministry of Science and Innovation in relation to scientific research in the field of COVID-19 has been approved.

2. Provision of essential public services

The RDL seeks to temporarily guarantee the supply of water and energy to vulnerable consumers (according to the regulations of the electricity sector). In this sense, the following exceptional measures have been adopted, essentially:

- Prohibition of cutting off the home supply of drinking water for human consumption, energy and natural gas for breach of contract.
- Automatic extension of the validity of the social electricity bond until 15 September 2020.
- Temporary suspension of the mechanisms for the revision of regulated prices for the following products: bottled liquefied petroleum gases (e.g. butane canisters), piped liquefied petroleum gases and natural gas.

3. Measures related to the real estate sector

In relation to real estate matters, the RDL adopts the following measures:

- ***Suspension of the time limit for entries in the Land Register***

The period of expiry of presentation for entries, precautionary notes, mentions, marginal notes and any other registration entries that may be cancelled due to the passage of time is suspended. The calculation of the periods shall be resumed on the day following the end of the state of alert or its extension, as the case may be.

- ***Suspension of limitation and prescription periods***

The periods of limitation and expiration of any actions and rights will be suspended during the period of validity of the state of alarm and, if applicable, of any extensions adopted (e.g. the period for exercising purchase options will be suspended during the state of alarm).

- ***Mortgage debtor protection***

The RDL adopts urgent measures aimed at ensuring the protection of vulnerable mortgage holders, as determined by the RDL, in order to avoid eviction for non-payment of mortgage instalments.

The measures are intended to seek a moratorium on mortgage debt for the purchase of the habitual residence of those who are experiencing extraordinary difficulties in meeting their payments as a result of the COVID-19 crisis. These measures will be applied under the same conditions as for mortgage debtors, guarantors and guarantors of the principal debtor.

Debtors who meet the above requirements and prove their vulnerability may request from the creditor a moratorium on the payment of the mortgage loan until fifteen days after the end of the RDL. The request for the moratorium will lead to the suspension of the mortgage debt during

the period stipulated, with the early maturity clause in the mortgage loan contract not being applied during the period of the moratorium.

During the period of validity of the moratorium, the creditor entity may not demand the payment of the mortgage quota, nor of any of the concepts that integrate it (amortization of the capital or payment of interests), neither completely nor in a percentage. Nor will interest be accrued.

The debtor of a credit or loan guaranteed by a mortgage who has benefited from the moratorium measures of the RDL without meeting the requirements described above, will be responsible for any damages that may have occurred, as well as for all the expenses generated by the application of the aforementioned measures.

4. Measures related to the telecommunications market

In relation to this matter, the RDL contemplates the following actions:

- ***Guarantee the maintenance of electronic communications services to consumers***

During the period of the state of alarm, the service provider may only interrupt the service for reasons related to integrity and security, even if the contract provides otherwise.

- ***Guarantee in the provision of universal telecommunications service***

The provider designated to provide universal telecommunications service must guarantee the continuity of conditions and quality of service, without any reduction in the number of beneficiaries as of the date of entry into force of the RDL.

- ***Suspension of portability***

During the validity of the state of alarm, no commercial campaigns may be carried out to contract electronic communications services that require number portability. Likewise, all fixed and mobile number portability operations that were not in progress are suspended for the same period, except for force majeure.

5. Consumers

Furthermore, it should be noted that during the validity of the state of alarm (or its possible extensions) the periods for the return of products purchased by any mode (in person or online) are interrupted. This provision is applicable, according to the preamble of the RDL, to the 14-day period corresponding to the right of withdrawal.

6. Instruments to promote liquidity for companies and self-employed

The RDL also contains measures to try to mitigate the serious economic impact of the health crisis on businesses and the self-employed. In this sense, it should be noted that this type of action has been regulated in the RDL in a generic way, so that subsequent regulatory development will be necessary for its effective implementation. Among the measures adopted are the following:

- ***Guarantees for companies and self-employed workers***

It is envisaged that the Ministry of Economic Affairs and Digital Conversion may provide guarantees in favour of financial institutions (credit institutions, financial credit establishments, electronic money institutions and payment institutions) that are corporate lenders and self-employed.

Financing granted by financial institutions to companies and self-employed workers must be aimed at meeting liquidity needs (e.g. invoice management, working capital requirements, maturities of financial or tax obligations).

The conditions relating to the granting of the guarantee (e.g. interest), the requirements to be met by the applicants and the maximum period of application will be established by agreement of the Council of Ministers.

Finally, it should be noted that this type of "State" guarantees are subject to European regulations on state aid, so compliance with them is necessary to avoid potential sanctions by the European Commission against the Spanish State.

- ***ICO lines of financing for companies and the self-employed***

The financial capacity of the Official Credit Institute (ICO) is "made more flexible" in order to improve access to credit for SMEs and the self-employed through the so-called "ICO lines".

However, the RDL has not set out the requirements, conditions and characteristics of access to credit by businesses, so further regulatory development of this measure could be expected.

7. Tax measures

With regards to taxation, it should be noted that the RDL contains few measures of significance in this area. Specifically, Article 33 of the RDL attempts to clarify the doubts that were raised regarding the suspension of tax deadlines in the additional provisions of RD 463/2020.

In this regard, the following should be noted:

- ***Deadlines for the filing and payment of self-assessments and for the submission of information statements***

Although the RDL makes no express mention of this, the truth is that Royal Decree 465/2020 of 17 March amending RD 463/2020 confirms that the deadlines for filing tax returns and self-assessments are not interrupted.

Therefore, self-assessments and information statements should continue to be filed within the usual time limits (e.g. VAT, withholdings, payments on account of corporate income tax, form 720).

- ***Deadlines for payment of debts already settled, deferrals and instalments granted***

- The deadline for payment of debts whose payment terms are pending on the entry into force of the RDL (18 March 2020), arising from:
 - Settlement procedures (e.g. DME, depending on the Autonomous Regions, settlements arising from inspection procedures).
 - Deferrals or fractions granted.
 - Executive procedures.
- The deadlines for payment of these debts starting from the entry into force of the RDL will be extended until 20 May 2020 (unless the ordinary legal deadline is longer, in which case the latter will prevail).
- Extensions are also foreseen for the procedures of auctions, awarding of goods and execution of guarantees in the tax field.

- ***Deadlines in tax proceedings***

- The deadlines that have not yet expired on 18 March 2020 are extended to 30 April:
 - Meeting requirements, seizure proceedings and requests for information with tax implications.
 - Formulate allegations before acts of opening or hearing procedures of (i) application of taxes; (ii) sanctions; and (iii) special review in administrative proceedings (e.g. refund of undue income, correction of material errors).
- The deadlines communicated from 18 March 2020 onwards are extended until 20 May (unless the ordinary legal deadline is longer, in which case the latter will prevail), in order to comply:
 - Injunctions, seizure proceedings, requests for information.
 - Acts of opening of proceedings of allegations or hearing.
- As regards the filing of claims or appeals (replacement or economic-administrative), the period for filing will not commence until the period between 18 March and 30 April 2020 (or when notification of the tax act is deemed to have taken place in accordance with the ordinary legal rules if this notification is later).

- ***Customs regulations***

In terms of deadlines for making claims and responding to requests, the specialities provided for by customs regulations are maintained.

- ***Limitation and expiration of tax proceedings***

The period from 18 March 2020 to 30 April 2020 shall not count:

- For the purposes of the maximum duration of the procedures for the application of taxes (e.g. inspections), penalties and revisions processed by the AEAT (although the latter may promote, order and carry out the essential procedures during the aforementioned period).
- For the purposes of the limitation periods for the rights of the administration and the taxpayer, and for the purposes of the time limits.
- For the purposes of the time limits.

8. Public procurement

The RDL also contains a number of provisions to prevent the termination of public contracts. In this respect, a specific suspension regime has been foreseen for certain public contracts:

- Supply and service contracts of a successive nature whose execution becomes impossible as a result of COVID-19 or the measures adopted by the government, Autonomous Regions or local entities to combat it:
 - They shall be automatically suspended, from the date on which the event which made them impossible occurred, until such time as it can be resumed (the resumption shall be notified by the contracting authority).

- The general rules for the suspension of contracts provided for in Law 9/2017 of 8 November on Public Sector Contracts do not apply, nor will the suspension be a cause for termination of contracts.
- The contract may be suspended only if the contractor requests it and the contracting authority is satisfied that it cannot be performed.
 - The contracting authority shall decide on the suspension of the contract within five calendar days of the request submitted by the contractor. Failure by the contracting authority to respond within this period shall have the effect of rejecting the application.
 - The application must contain (i) the reasons why the execution of the contract has become impossible; (ii) the personnel, premises, vehicles, machinery, installations and equipment assigned to the execution; and (iii) the reasons why these means cannot be used in another contract.
- The procuring entity shall be required to pay the contractor the actual damages suffered during the suspension, upon request and on production of evidence. The damages are limited to the following:
 - Salary expenses paid during the suspension period.
 - Expenses for maintenance of the final guarantee.
 - Expenditure on rent or maintenance costs for machinery, installations and equipment, directly linked to the execution of the contract, when the contractor can prove that these means could not be used for other purposes during the suspension.
 - Costs corresponding to the insurance policies provided for in the specifications and linked to the object of the contract, which have been taken out by the contractor and are in force at the time of suspension.
- Likewise, service and supply contracts for successive supplies that have been completed shall be deemed to have been compulsorily extended, where no new contract has been concluded, and regardless of the date on which the tender for the new procurement file has been published.
- Supply and service contracts that are not successive and have not lost their purpose as a result of COVID-19 or measures adopted by the government, Autonomous Regions and local authorities, and where the contractor is late in meeting deadlines, it is expected that the contractor will be able to offer compliance if the initial deadline or the current extension is extended. In these cases:
 - The contracting authority shall extend the deadline, which shall be equal to the time lost, unless the contractor requests a shorter one, following a report from the contract manager, which establishes that the delay is not attributable to the contractor but to COVID-19.
 - In these cases the contractor will be entitled to the payment of the additional salary expenses incurred as a result of the lost time, up to a limit of 10% of the initial contract price, upon request and reliable proof of the expenses.
- Works contracts, which have not lost their purpose as a result of COVID-19 or the measures taken by the State, and where it is impossible to continue the execution of the contract, may be suspended from the date on which the impediment occurred, and until it can be resumed (the resumption will be notified by the contracting authority):

- The contract may be suspended only if the contractor so requests and the contracting authority is satisfied that it cannot be performed.
 - The contracting authority shall take a decision within five calendar days of the request submitted by the contractor. Failure by the contracting authority to respond within that period shall have the effect of rejecting the application.
 - The application must contain (i) the reasons why the execution of the contract has become impossible; (ii) the personnel, premises, vehicles, machinery, installations and equipment assigned to the execution; and (iii) the reasons why these means cannot be used in another contract.
- The procuring entity shall pay the main contractor any damages effectively incurred during the suspension or extension of the period, upon request and on production of evidence. The damages are limited to the following:
 - Salary expenses paid during the suspension period.
 - Expenses for maintenance of the final guarantee.
 - Expenditure on rent or maintenance costs for machinery, installations and equipment, directly linked to the execution of the contract, when the contractor can prove that these means could not be used for other purposes during the suspension.
 - Costs corresponding to the insurance policies provided for in the specifications and linked to the object of the contract, which have been taken out by the contractor and are in force at the time of suspension.
- Lastly, for the works concession and service concession contracts in force at the date of entry into force of the RDL, it is envisaged that the de facto situation caused by COVID-19 and the measures adopted by the government, the Autonomous Communities and local authorities to mitigate it will entitle the concession-holder to restore the economic equilibrium of the contract by (i) extending its initial term by up to 15%, or (ii) amending the economic clauses included in the contract.

9. Measures concerning limited liability companies

Given the exceptional nature of the state of alarm, the RDL has also included measures related to limited liability companies in general:

- ***Meetings via videoconference and/or by written resolution***

During the alarm period, board of directors may hold meetings by videoconference and/or written resolution, even if such possibility is not provided for in the articles of association (the meeting is understood to be held at the registered office).

- ***Suspension of the term to prepare the annual accounts***

The term to prepare the annual accounts is suspended until the end of the state of alarm, resuming for another 3 months from that date.

- ***Extension of the deadline for issuing the audit report***

A 2-month extension is set to issue the audit report, once the state of alarm has ended.

- ***Approval of annual accounts***

The directors' approval of the annual accounts shall take place within three months of the end of the period for drawing up the annual accounts.

- ***Holding of general shareholders meetings***

RDL contemplates the possibility of modifying the place and time where the general shareholders meeting is meant to be held and to call off meetings that were called before the declaration of the state of alarm. This will be done through an announcement on the corporate website, at least 48 hours in advance, or in the Official State Gazette.

In a meeting is called off, the directors must reconvene the meeting within one month of the end of the state of alarm.

- ***Notarial minutes***

The notary required to take minutes at the general shareholders meeting may use means of remote communication.

- ***Suspension of shareholders' right of withdrawal***

Any shareholders' right to withdraw from the company under the law or the articles of association will be suspended for the duration of the state of alarm.

- ***Extension of duration of the company***

In the event that the term foreseen in the company's by-laws is reached during the state of alarm, RDL establishes a 2-month extension of such duration, starting from when the state of alarm concludes,

- ***Suspension of the obligation to call a general shareholders meeting in the event of the dissolution of the company***

It also establishes the suspension of the obligation to call the general shareholders meeting in the event that there is a legal or statutory cause for the dissolution of the company while the state of alarm persists.

If the dissolution cause arises during the state of alarm, the directors will not be liable for the social debts incurred during that period.

10. Measures relating to listed companies

Measures have also been adopted in relation to listed companies, including most notably the following:

- ***Extension of the deadline for publication and submission of the financial and audit report***

The obligation to publish and submit its annual financial report to the National Securities Market Commission (CNMV) and the audit report is extended to 6 months following the end of the financial year. This period will be extended to 4 months for the publication of the interim management statement and the half-year financial report.

- ***General shareholders meeting***

The ordinary general shareholders meeting may be held within the first 10 months of the financial year.

- ***Use of telematic means and remote voting***

When calling the general shareholders' meeting, the board of directors may establish the possibility of attendance by telematic means and distance voting, as well as holding the meeting anywhere in the national territory, even if this is not foreseen in the by-laws.

If the measures imposed by public authorities prevent the meeting from being held in the place and physical venue set out in the meeting notice and the authority described above cannot be used:

- If the meeting has been validly convened in that place and venue, the general shareholders meeting may agree to hold the meeting on the same day, but in a different place and different premises within the same province, allowing for a reasonable period of time to transfer the attendees.
- If the meeting cannot be held, the holding of the meeting at a later date may be announced with the same agenda and publicity requirements as the meeting that was not held, at least 5 days before the date set for the meeting. In this case the directors may provide in the supplementary announcement for attendance exclusively by telematic means (without physical attendance).

11. Filings with the Commercial Registry

The RDL provides for the suspension of the expiration periods of the deeds filed with the Commercial Registry during the validity of the state of alarm. The calculation of periods will be resumed the day after the end of the state of alarm.

12. Measures relating to foreign investments in Spain

The RDL amends Law 19/2003 of 4 July 2003 on the legal regime of capital movements and economic transactions abroad.

Foreign direct investments are considered to be those made by residents of countries outside the EU and the European Free Trade Association (Switzerland, Norway, Liechtenstein and Iceland), when the investor holds a stake equal to or greater than 10% of the capital of the company in which the investment is made or has an effective participation in the management or control of that company.

The RDL provides for the suspension of the regime of liberalization of foreign direct investment, which affects public order, public security and public health (among others), and is carried out in the following sectors:

- Critical infrastructure (including energy, transport, water, health, communications, media, data processing or storage, aerospace, defence, electoral or financial infrastructure and sensitive facilities), as well as land and buildings which are key to the use of such infrastructure.
- Critical technologies and dual-use items (including artificial intelligence, robotics, semiconductors, cyber-security, aerospace, defence, energy storage, quantum and nuclear technologies), as well as nanotechnologies and biotechnologies.
- Supply of essential inputs, in particular energy, or those relating to raw materials, as well as food security.
- Sectors with access to sensitive information, in particular personal data, or with the ability to control such information.

Submission to authorization also, among others, if the foreign investor has made investments or participated in activities in the sectors that affect security, public order and public health in another EU Member State, and especially those listed in the previous paragraphs.

The government reserves the right to suspend other investments in sectors that may affect public order, security and health.

Investment operations carried out without the required prior authorisation will be invalid and without legal effect, until they are legalised.

The suspension will last until an agreement of the Council of Ministers determines its lifting.

13. Bankruptcy measures

The RDL includes the following provisions in relation to insolvency regulations:

- ***Suspension of the deadline for applying for a declaration of insolvency***

The two-month period to apply for the declaration of bankruptcy is suspended, for the duration of the state of alarm, in all cases (i) individuals or legal entities in a situation of insolvency; and (ii) individuals or legal entities that have submitted the application for so-called "pre-bankruptcy" to the Court.

- ***Non-admission by the Commercial Courts of insolvency applications, whether voluntary or necessary, while the state of alarm lasts.***

- ***Preference in the processing of applications for voluntary insolvency***

Once the situation created by the state of alarm is over, and with respect to the applications for insolvency that have already been submitted, preference will be given to the applications for voluntary insolvency over those for necessary insolvency - in respect of the same debtor - even if the latter were submitted first.

14. Measures concerning administrative deadlines

The time limits provided for by the RDL will not be subject to the suspension of administrative time limits provided for under RD 463/2020.

15. Other measures

Finally, other measures established through the RDL would be the following:

- A special regime is established for the signing of agreements of Law 40/2015, of 1 October, on the legal regime of the public sector, related to the management of the health emergency of COVID-19.
- The granting of a credit supplement for the Ministry of Social Rights and Agenda 2030 is authorised, amounting to 300 million euros, to finance an extraordinary social fund aimed at mitigating the socioeconomic consequences caused by COVID-19 (e.g. strengthening mechanisms for the care of the homeless, the elderly, the disabled and the dependent).
- Local authorities are authorised to use the 2019 budget surplus to finance expenditure on social services and social promotion.
- Measures are foreseen to support COVID-19 research (e.g. flexibility in the working hours of research staff).

The RDL came into force on 18 March 2020, the date on which it was published in the Official State Gazette. The duration of the planned measures will be one month from the entry into force of the regulation (i.e. until 18 April 2020), although the government may extend its duration. Measures with a fixed duration will be subject to this.

This publication constitutes the individual opinion of Osborne Clarke. It is based on a particular interpretation of the existing laws. It should be used with caution since it is intended for information purposes only and should not be construed as legal advice.