

Wealth Taxation, Including Net Wealth, Capital and Exit Taxes

Executive Summary



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Acknowledgments

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Context and Study Objectives

The study “Wealth Taxation, Including Net Wealth, Capital and Exit Taxes” was prepared for the European Commission, Directorate-General for Taxation and Customs Union (DG TAXUD). The report is split into two separate volumes. The first volume examines wealth-related taxes, while the second volume provides an in-depth analysis of selected countries, both in Europe and worldwide, to present examples of net wealth taxation.

The report is set against a backdrop of rising concern about the distribution of wealth in Europe, the erosion of taxes on wealth and wealth transfers over recent decades, and renewed fiscal needs in the wake of multiple crises. Over the past three decades, private wealth in the EU has grown substantially and has become more concentrated among households at the top of the wealth distribution. Figure 1 illustrates this long-run trend, showing a rise in the share of wealth held by the richest and especially the top 10%. This pattern is visible across most Member States, although levels and trajectories differ significantly, reflecting institutional, demographic and market structures that shape wealth accumulation.

The comparative perspective in Figure 2 highlights that the top 1% in the EU have increased their share of total household wealth faster than their counterparts globally. This trend is notable because global top-wealth shares have stabilised in recent years, while the EU continues to witness an upward drift. These patterns underscore the broader economic context for the present study: wealth concentration is becoming a structural feature of the European economic landscape, raising questions about how existing tax frameworks can ensure fairness.

Figure 1 – Distribution of wealth in the EU, 1995–2023

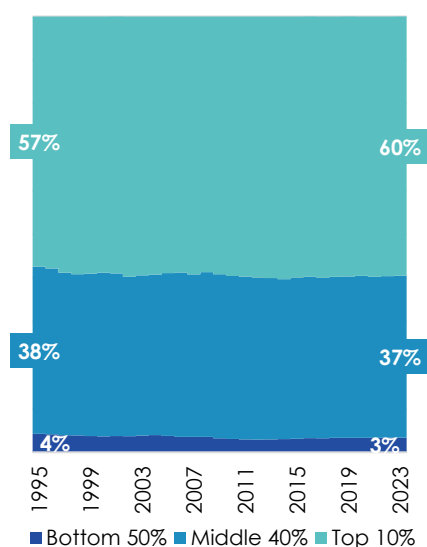
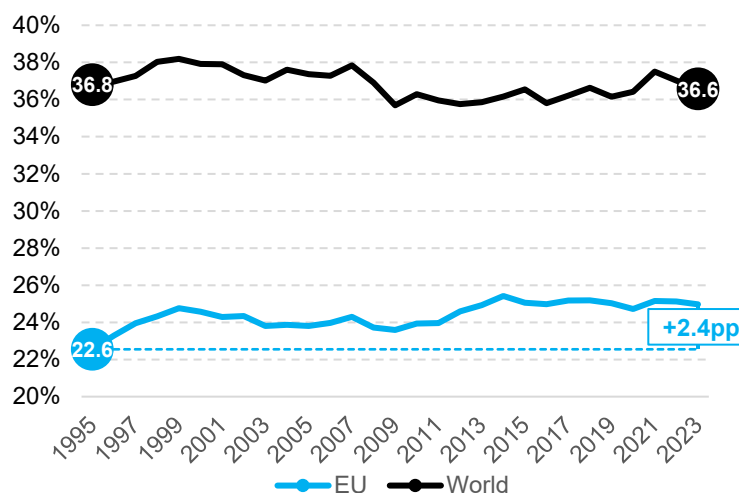


Figure 2 – Top 1% wealth share in the EU and worldwide, 1995–2023



Note: Share of total household wealth of adults; World includes the EU;
 Source: Own elaboration based on World Inequality Database.

Recent evidence shows that the evolution in Europe’s distribution of wealth stem not only from a widening gap between the median and the top, but also from divergent trends within top-wealth groups. Across Member States, the top 1% have steadily increased their share of total wealth over the past two decades, driven by rising asset prices and expanding pension and financial portfolios, while middle-class households have seen slower gains. The very top – the top 0.01% – have grown less rapidly than their peers in some non-EU countries, reflecting a smaller role for high-growth firms and more redistributive systems. These features temper the emergence of extreme fortunes, even as the top 1% continue to pull away from the rest.

The study’s overarching objective is to provide DG TAXUD with an integrated assessment of recurrent and non-recurrent taxes on wealth and capital. This includes an analysis of how such instruments can contribute to revenue mobilisation and a fairer distribution of the tax burden, while limiting adverse effects on investment, entrepreneurship and growth.

The report examines five categories of wealth-related taxes: net wealth taxes, recurrent (unrealised) capital gains taxes, non-recurrent (realised) capital gains taxes, inheritance and gift taxes, and exit taxes. For each of these, it analyses economic rationales, design features, behavioural responses and revenue performance, and explores their interrelations within broader systems of capital taxation.

Analysing the current tax regimes also serves a forward-looking purpose. The study does not advocate a specific reform blueprint, but rather identifies the

conditions under which wealth-related taxes can be made more effective and equitable in EU Member States. It pays particular attention to the role of tax design, institutional capacity, information exchange and enforcement, and to the political economy constraints that have historically shaped both the introduction and repeal of such taxes.

Methodological approach

The analysis rests on a mixed-methods approach that combines four main building blocks. First, an extensive review of the theoretical and empirical literature on each of the wealth-related taxes. This literature review covers the equity and efficiency properties of different tax instruments, their impact on savings, investment and entrepreneurship, and evidence on avoidance, evasion and mobility responses, with a particular focus on high-net-worth individuals (HNWIs).

Second, the report develops a comparative mapping of existing systems of wealth-related taxation in the EU Member States complemented where relevant by examples from non-EU OECD and other countries. For each tax type, the mapping covers key design elements, including tax base definitions, thresholds, rate structures, valuation rules, exemptions and reliefs, and specific provisions targeting business assets, housing, pension entitlements, or cross-border situations. This mapping is based on national legislation, policy documentation, OECD Revenue Statistics and Commission sources, as well as specialised databases and secondary literature.

Third, the study undertakes an in-depth case study analysis of selected countries for net wealth taxation. For net wealth taxes, the case studies cover Austria, Germany, France, Norway, Switzerland, Spain and Colombia. They reconstruct the historical development of the tax, its main design features, revenue performance, behavioural responses and, where applicable, the reasons for repeal or major restructuring. For inheritance and gift taxes, the report assembles a detailed set of country tables on tax bases, rate structures and reliefs, as well as a synthesis of empirical studies on behavioural responses in EU Member States.

Fourth, the report draws together cross-cutting findings in a synthetic manner, linking the empirical and institutional evidence to a set of main take-aways. This synthesis looks across tax instruments to examine common challenges, complementarities and trade-offs, with a focus on the equity-efficiency balance, the interaction with capital income taxation, and the role of exit taxes and international cooperation in safeguarding tax bases. It also takes into account constraints stemming from EU law and national constitutions.

Key findings by tax type

Net wealth taxes

Net wealth taxes play a prominent role in current debates but remain uncommon. Only a few European countries levy broad-based recurrent taxes on individual net wealth, while others that once applied them have repealed the tax. The report shows that their performance depends less on the instrument itself than on its design, administrative capacity and integration within the broader fiscal framework. In countries where net wealth taxes were abolished, such as Germany and Sweden, narrow and uneven tax bases, extensive exemptions, inconsistent valuation rules and reliance on self-assessment contributed to low revenues, perceptions of unfairness and weakening political support.

Country experience demonstrates that net wealth taxes function best when they target only the very wealthy, rely on high thresholds, and apply broad, coherent bases supported by standardised and enforceable valuation rules. Switzerland illustrates how predictable assessment practices, strong administrative capacity, comprehensive registers and long-standing fiscal arrangements can maintain political acceptance. Cantons with simpler rules perform more effectively than those with complex or concessionary systems. Spain's experience underscores the importance of coordination across government levels: regional tax cuts have eroded the national base, prompting the solidarity tax to restore consistency and strengthen fairness.

Administrative capacity emerges as a central determinant of effectiveness. Successful regimes depend on reliable information on asset holdings, regular valuation procedures and the ability to counter avoidance strategies such as debt shifting or movement of assets into preferential categories. Comprehensive asset registers, third-party reporting, digitalisation and strong enforcement are essential complements to a net wealth tax.

Although behavioural responses exist, particularly among high-wealth individuals with flexible portfolios, evidence suggests they are modest when taxes are well targeted. International mobility responses are often overstated, while intra-national mobility is more likely where sub-national variation in rates is large.

Overall, country experiences show that net wealth taxes can support revenue mobilisation and progressivity when they feature broad, coherent bases, high thresholds, strong administrative foundations and effective enforcement. Fragmented or concessionary designs with weak institutional capacity generate low revenues, limited redistributive effects and declining political legitimacy. Their feasibility in the EU ultimately depends on the coherence of the broader

system of wealth taxation, the strength of administrations and the extent to which design choices limit avoidance and preserve fairness.

In order to provide a better understanding of the conditions and design features, which can contribute to the success (or failure) of net wealth taxes, the study includes seven in-depth case studies of countries which have (had) a net wealth tax: France, Germany, Austria, Norway, Switzerland, Colombia and Spain. The analysis showcases the crucial role of tax design features, some of which can inadvertently undermine revenue and distributional goals), and enforcement mechanisms in shaping the ultimate outcome of the tax. It also highlights the importance of constitutionality concerns and political economy factors, which can play a decisive role, regardless of measurable outcomes of the tax.

Recurrent taxes on unrealised capital gains

Recurrent taxes on unrealised capital gains offer a conceptually coherent response to distortions created by realisation-based capital taxation, particularly the lock-in effect, and can enhance horizontal equity between labour and capital income. However, the report's mapping confirms that no EU Member State operates a broad-based accrual tax, and existing regimes apply only to specific financial assets or institutional arrangements where valuations are readily observable.

Country experiences help explain this limited use. Implementing an accrual system requires frequent, reliable valuations across diverse assets, including non-listed businesses and real estate, where prices are difficult to establish. Volatility in asset values also creates liquidity and fairness concerns when tax liabilities arise on paper gains that may later be reversed. Jurisdictions that have experimented with accrual-type taxation rely on smoothing or deferral mechanisms, but these add complexity and administrative cost.

The report concludes that recurrent taxes on unrealised gains can be effective in narrow, well-defined contexts, especially where the aim is to reduce lock-in or equalise the treatment of capital income. For broader objectives, most countries pursue similar goals through strengthened capital gains taxation, targeted anti-deferral rules or notional return systems. The feasibility of accrual-based taxation ultimately depends on administrative capacity, asset composition and the coherence of the wider capital tax system.

Non-recurrent realised capital gains taxes

Non-recurrent taxes on realised capital gains form a core component of capital income taxation in all EU Member States, yet their design varies substantially. Differences in rates, holding-period rules, exemptions and integration with personal income taxation shape both their revenue performance and distributional effects. Many Member States provide significant relief for owner-

occupied housing, long-term holdings and business assets, which can be justified by liquidity, entrepreneurship or housing considerations, but also allow large amounts of capital income, particularly at the top, to escape full taxation.

Empirical evidence indicates that higher capital gains taxes can reinforce lock-in and capital gains tax cuts might have positive effects on certain investment transactions. Real-economic effects are generally more modest than political debates suggest and depend on broader policy settings. From a distributional perspective, the central limitation is incomplete coverage: unrealised gains are heavily concentrated among high-wealth households, and realisation-based systems enable strategic timing of sales.

The report concludes that enhancing the comprehensiveness, neutrality and enforcement of realised capital gains taxes could substantially improve both revenue and fairness. In many contexts, such reforms are more practical and administratively robust than introducing new wealth tax instruments, particularly when supported by strengthened reporting, digitalisation, and cross-border cooperation.

Inheritance and gift taxes

Inheritance and gift taxes are the wealth-related instruments most directly targeted at intergenerational transfers and equality of opportunity. The report documents that inheritances have gained in macroeconomic importance over recent decades: their share in national income and in private wealth has increased in a number of European countries, and large inheritances now play a growing role in the formation of very high net worth, including among billionaires. At the same time, inheritances and gifts are highly concentrated. High-wealth households are both more likely to receive transfers and to receive them in much larger amounts, even though inheritances and gifts can represent a larger share of total net wealth for lower-wealth households. These patterns strengthen the case for inheritance and gift taxation as a means of raising revenue from a growing tax base and of addressing both wealth inequality and unequal starting positions in life.

The mapping of current regimes shows that 17 EU Member States and a number of other European countries levy inheritance or estate taxes, while several Member States have abolished them since 2000 and a smaller group has never introduced them. Where such taxes exist, they are typically “double-progressive”, combining progressive rate schedules with tax classes differentiated by the relationship between donor and beneficiary, with more favourable treatment for spouses and direct descendants and higher rates for distant relatives and non-relatives. However, the effective tax base is often narrow. Extensive exemptions, generous personal allowances, favourable valuation rules and substantial reliefs for specific assets, particularly closely held business assets and owner-occupied housing, mean that large shares of

inherited wealth, especially at the top of the distribution, are taxed lightly or not at all. This has eroded both the progressivity and the revenue potential of inheritance taxation over time, even though in several countries revenues have begun to increase again in the past decade, largely driven by rising asset prices, demographic developments and, in some cases, policy changes such as threshold freezes or tightened valuation rules. Looking forward, simulations suggest that the revenue potential of inheritance taxation is likely to grow further as the volume of bequests increases with the “great wealth transfer” from older to younger cohorts.

Behavioural responses and institutional design are central to understanding the performance of inheritance and gift taxes. The empirical evidence, while still limited for EU countries, points to strong incentives for tax planning and avoidance, especially among high-wealth households, via inter vivos transfers, the use of legal vehicles, exploitation of reliefs, and, in some cases, the shifting of assets offshore. By contrast, effects on wealth accumulation, labour supply and entrepreneurship appear generally modest. Available studies suggest that inheritance taxation can be designed in a way that preserves its progressivity and revenue potential without triggering large real-economic distortions, provided that enforcement is effective and legal avoidance channels are curtailed. This includes adjusting provisions such as step-up in basis provisions, extensive business reliefs and incomplete integration of gifts and inheritances, which currently enable prospective bequeathers to reduce their tax burden by spreading transfers over time or by shifting into preferentially treated asset classes. International initiatives on automatic exchange of information have already reduced some forms of cross-border evasion, but continued strengthening of enforcement capacities remains important.

The study finds that well-designed inheritance and gift taxes can make a meaningful contribution to both revenue mobilisation and the progressivity of tax systems, particularly at the top of the wealth distribution. Their effectiveness hinges on coherent and sufficiently broad tax bases, on the alignment and integration of inheritance and gift taxation over the life cycle, and on institutional arrangements that limit avoidance, evasion and administrative complexity. In systems where comprehensive capital income taxation is in place, inheritance and gift taxes complement the taxation of returns by targeting large intergenerational transfers; where such taxes are weak or absent, the scope for using other wealth-related instruments to pursue equity and revenue objectives becomes correspondingly more important.

Exit taxes

Exit taxes apply to unrealised capital gains accrued during residence when taxpayers or assets move abroad, and serve primarily to protect the domestic capital gains tax base. The report shows wide variation across Member States in the scope of assets covered, thresholds, valuation rules and availability of

deferral options. EU law requires that exit taxes do not unduly restrict mobility, which has led to deferral or instalment mechanisms, often with guarantees or interest charges, to ensure proportionality. Coordination with double taxation agreements and administrative cooperation is essential to avoid double or non-taxation.

Although evidence on behavioural responses to exit taxes is limited, broader research on mobility suggests that high-wealth relocations are rare and that movements are more influenced by preferential regimes in destination countries than by exit taxation itself. Country experience indicates that exit taxes can safeguard revenue, even if the number of affected taxpayers is small, provided that valuation rules are enforceable and international cooperation is robust.

The report concludes that exit taxes work best as part of a coherent capital gains tax system, ensuring that gains accrued domestically are taxed on a fiscally fair basis. Their effectiveness depends on clear rules, administratively workable deferral arrangements and strong information exchange, rather than on high rates or broad scopes.

Cross-cutting insights

Across the five tax types considered, three broad cross-cutting insights emerge.

First, there is substantial heterogeneity across EU Member States in the use and design of wealth-related taxes. Not only do countries differ in whether they levy a particular tax, but also in the definition of the tax base, the application of thresholds and exemptions, the treatment of specific assets and family relationships, and the level of government responsible for administration and rate-setting. This heterogeneity reflects diverse legal traditions, economic structures and political preferences, but it also creates uneven patterns of taxation and opportunities for tax planning across borders.

Second, in practice none of the wealth-related taxes examined currently generates substantial revenue in most Member States. Revenues have often been declining over the long run, despite rising private wealth. The report attributes this pattern to the cumulative impact of high thresholds, extensive reliefs and exemptions, preferential regimes and, in some cases, declining rates. These design choices, frequently intended to address specific concerns about liquidity, competitiveness or family businesses, have also narrowed tax bases and limited progressivity.

Third, institutional factors play a decisive role in determining the effectiveness and feasibility of wealth-related taxes. Comprehensive asset registers, robust third-party reporting, effective use of the automatic exchange of information, digitalisation of tax administrations and specialised units dealing with HNWIs are all associated with higher compliance and better enforcement. By contrast, fragmented information systems, weak audit capacity and limited international

cooperation leave substantial scope for avoidance and evasion, particularly in connection with cross-border portfolios and complex ownership structures.

Main challenges

The main challenges identified by the report fall into several broad categories.

The first is administrative and technical. Valuing a wide variety of assets, particularly non-listed shares, closely held businesses, intellectual property and works of art, is intrinsically difficult and resource-intensive. This challenge is especially acute for recurrent taxes requiring regular valuation. Liquidity issues may arise when tax liabilities fall due without corresponding cash flows, as in the case of unrealised gains or illiquid assets, necessitating carefully designed deferral or instalment schemes.

The second is behavioural. All wealth-related taxes are exposed to avoidance and, to a lesser extent, evasion. HNWIs can restructure portfolios towards tax-favoured assets, use legal vehicles and cross-border arrangements, or exploit debt deductibility and tax caps to reduce their liabilities. While international initiatives on transparency and automatic exchange of information have significantly curtailed some traditional avenues for evasion, the report documents continuing gaps in coverage and the emergence of new avoidance strategies, for example involving assets or jurisdictions not fully covered by existing frameworks.

The third challenge is legal and constitutional. Net wealth taxes, in particular, have faced scrutiny in some jurisdictions for alleged violations of principles of equal treatment, proportionality or protection of property. Differences in valuation methods across asset classes have been challenged as discriminatory. Exit taxes must be designed in line with EU law on free movement, and inheritance and gift taxes can raise issues under national constitutional provisions on family protection and property rights. These constraints do not make wealth-related taxes impossible, but they require careful legal drafting and, in some cases, constitutional clarification.

The fourth challenge is political economy. Wealth-related taxes are among the most disputed elements of tax systems. Public perceptions are often shaped by misconceptions about who pays and by narratives about their impact on investment and job creation. In many countries, tax policy has been more responsive to the preferences of wealthier groups and proposals to strengthen wealth-related taxation have faced organised opposition. At the same time, survey evidence and recent experiments suggest that providing information about the actual distribution of wealth and the limited share of households affected by such taxes can increase public support for more progressive wealth taxation, including inheritance taxes.

Key take-aways

On the basis of the evidence assembled, the report formulates several key take-aways. First, wealth-related taxes can play a greater role in addressing high and rising wealth inequality in the EU, especially at the very top of the distribution. Given the scale and concentration of private wealth and inherited transfers, and the comparatively heavy reliance on labour taxation, there is a case to re-examine and, where appropriate, strengthen the contribution of wealth-related tax bases to the financing of European welfare states.

Second, the equity-efficiency trade-off associated with wealth-related taxes is sharply drawn up in public debate, but evidence appears less stark. While these instruments can, in principle, dampen savings, investment or entrepreneurial initiative, the empirical evidence reviewed suggests that such effects are generally modest and that well-designed taxes may even support more productive use of assets and increased labour supply, particularly in the context of inheritance taxation. The design of the overall system of capital taxation is crucial for mitigating potential adverse effects.

Third, the benefits of wealth-related taxes depend strongly on their interaction with other elements of the tax system. As a general rule, the report concludes that comprehensive taxation of returns to capital through well-functioning capital income and capital gains taxes, combined with robust inheritance and gift taxation, could form the backbone of wealth taxation. In such a system, a broad-based net wealth tax may be less necessary or may be reserved for high-wealth individuals in countries where capital income and inheritance taxes remain under-developed.

Fourth, tax design is central to achieving both revenue and distributive objectives. Narrow tax bases carved out by numerous exemptions and reliefs tend to erode progressivity, create horizontal inequities and open up avenues for avoidance, all while yielding limited revenue. By contrast, designs that limit exemptions, focus on high-wealth or large-transfer segments, and align valuation and anti-avoidance rules with other parts of the tax system are better placed to deliver meaningful revenues with fewer distortions.

Fifth, institutional and international dimensions are critical. Centralised tax design, high-quality registers, extensive third-party reporting, robust enforcement, specialist HNWI units, and continued strengthening of automatic exchange of information are necessary conditions for effective wealth taxation in open economies. Exit taxes, when carefully designed and coordinated, can serve as important tail provisions to safeguard revenue in the presence of cross-border mobility.

Sixth, political feasibility cannot be taken for granted. Any move to reinforce wealth-related taxation must be accompanied by transparent communication on who is affected, how revenues will be used and how the measures fit into a

broader strategy for fairness in taxation. Improving public understanding of wealth inequality, tax incidence and the limited number of households subject to such taxes can support more informed democratic choices.

The above findings suggest that, while there is no single model of wealth taxation suitable for all Member States, there is scope for making better use of wealth-related tax instruments in a way that supports both equity and efficiency in the EU. The report underscores the importance of continuing to monitor developments in wealth taxation, to support comparative analysis and to facilitate the exchange of good practices, particularly regarding design features that limit avoidance and evasion and institutional arrangements that enhance the effective implementation of such taxes.

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