GMS Flash Alert

Immigration

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Spain – New Salary Threshold for EU Blue Card

Spain has published Orden PJC/44/2026, de 27 de enero[1] (the "Order"), establishing a clear and objective salary threshold for the EU Blue Card (Tarjeta azul UE) under Ley 14/2013. The Order was published in the Official State Gazette (BOE) on 30 January 2026 and applies to relevant applications submitted from its entry into force on 30 January 2026.

WHY THIS MATTERS

The new framework introduces lower and more predictable salary requirements, including a reduced threshold for specific profiles, which may broaden the applicability of the highly qualified professional route for employers recruiting international talent.

The introduction of clear and, in many cases, lower salary thresholds may increase the appeal of the EU Blue Card route for employers in Spain.

Key implications include:

- Greater flexibility in structuring compensation packages for highly qualified hires.
- Improved viability of the EU Blue Card for roles that previously struggled to meet informal or inconsistent salary benchmarks.
- Enhanced access to younger or emerging talent, particularly recent graduates with high value qualifications.
- A potential alternative to other highly qualified routes under Spanish immigration law.

For many organisations, this development means that the highly qualified professional route may now align more closely with prevailing market salary levels, especially in technical, scientific, and strategic roles.

Background

The EU Blue Card regime in Spain has been updated to align with Directive (EU) 2021/1883, which seeks to facilitate the mobility of highly qualified professionals under Ley 14/2013. The Order provides greater clarity by establishing a defined reference salary threshold, linking its calculation to official statistics published by the Instituto Nacional de Estadística (INE), and introducing a reduced threshold (coeficiente reductor) for specific categories of professionals. This change provides greater legal certainty and predictability for employers and applicants alike.

New Salary Threshold Details

Based on the latest INE Annual Salary Structure Survey, the Order sets the following thresholds for 2026:

General salary threshold

- 1.4 × average annual gross salary (INE).
- Minimum annual gross salary: EUR 39,269.92.

This applies as the standard requirement for EU Blue Card applications in Spain.

Reduced salary threshold (coeficiente reductor 0.8)

In specific cases, a reduced threshold of 80 percent of the general amount may be applied:

- Reduced minimum annual gross salary: EUR 31,415.94.

The reduced threshold is available only when specific criteria are met, such as for individuals who have obtained the qualification required for the EU Blue Card within the three years prior to the application.

KPMG INSIGHTS

In light of this regulatory update, employers may wish to:

- Re-assess roles that were previously excluded from the EU Blue Card route due to salary constraints.
- Review compensation structures against the new thresholds.
- Identify candidates who may qualify under the reduced salary regime.
- Incorporate the EU Blue Card more systematically into international hiring and mobility strategies.

Early assessment can help organisations leverage this route efficiently while maintaining compliance with the new requirements.

If assignees and/or their programme managers have any questions or concerns about the scope of the update, its application and potential impacts, and appropriate next steps, they should consult with their qualified immigration professional or a member of the GMS immigration team with KPMG in Spain (see the Contacts section).

ENDNOTE:

1 Agencia Estatal Boletín Oficial del Estado, “Orden PJC/44/2026,” published on January 27, 2026.

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Contacts

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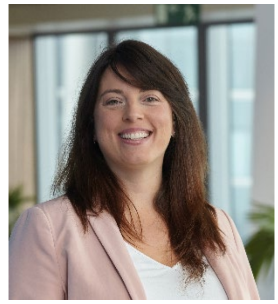

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The information contained in this newsletter was submitted by the KPMG International member firm in Spain.

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