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Vietnam Regulatory Reform: Key Recent and Proposed Amendments for Businesses



Tran Cong Quoc
Partner



Nguyen T Thu Ha
Senior Associate

Vietnam is continuing a broad regulatory reform program aimed at reducing business conditions, simplifying administrative procedures and addressing overlapping regulatory requirements.

Resolutions No. 66.17/2026/NQ-CP and 66.18/2026/NQ-CP, effective principally from 1 July 2026 until 28 February 2027, represent an important part of this reform. Resolution No. 66.17 reduces the list of conditional business lines from 198 to 142, while Resolution No. 66.18 introduces temporary reforms to administrative procedures and business conditions across a wide range of sectors.

Importantly, these reforms are not merely a roadmap for future legislative amendments. They are already being implemented during the transitional period, while the relevant sector-specific laws and regulations are being amended for the longer term.

Implementation in practice

Resolution No. 66.18 expressly provides that, during its effective period, where its provisions on administrative procedures or business conditions differ from existing legislation, the Resolution will apply. Ministries and ministerial-level agencies are also required to provide guidance for implementation and to adopt appropriate measures as regulation shifts, where appropriate, from ex-ante approval to ex-post supervision.

This is already being seen in practice.

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For example, following the removal of accounting services from the list of conditional business lines, the Department of Accounting and Auditing Management under the Ministry of Finance issued Official Letter No. 773/QLKT-DN dated 22 May 2026 providing specific implementation guidance from 1 July 2026.

Among other matters, the Official Letter confirms that accounting service providers are no longer required to follow the previous requirements relating to the certificate of eligibility for accounting services or practising registration certificates, together with various associated notification, continuing professional education and inspection requirements.

The accounting sector therefore provides a useful example of how the Resolutions are intended to operate in practice: **the reforms may be implemented immediately through the Resolutions and implementing guidance, without necessarily waiting for all underlying sector-specific legislation to be formally amended.**

The Government has nevertheless identified a substantial legislative package for permanent implementation of the reforms, including amendments to 45 laws, 72 decrees and 34 circulars, with the relevant amendments expected to take effect before 1 March 2027.

Against this background, a number of draft and recently amended decrees are particularly relevant to businesses and investors in Vietnam.

Competition: higher merger filing thresholds and proposed exemptions for intra-group restructurings

The Ministry of Industry and Trade (“MOIT”) has published a draft decree intended to replace Decree No. 35/2020/ND-CP implementing certain provisions of the Law on Competition.

The draft incorporates the increased merger-control notification thresholds introduced under Resolution No. 66.18/2026/NQ-CP. For enterprises other than credit institutions and insurance companies, the relevant thresholds include VND 6,000 billion for assets or turnover in Vietnam, VND 2,000 billion for transaction value, and a 20% combined market-share threshold.

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More notably, the draft proposes exemptions from the merger-control notification procedure for certain transactions, including where the acquiring or merging enterprise already directly or indirectly holds more than 50% of the voting capital of the target, or where the enterprises participating in the transaction are all directly or indirectly more than 50% owned by the same enterprise.

If adopted, these exemptions would be particularly relevant to **intra-group restructurings**, which may currently trigger a merger-control filing even where there is no substantive change in ultimate control.

Chemicals: proposed exclusion for certain finished products

MOIT is also preparing amendments to Decree No. 26/2026/ND-CP on chemical activities and hazardous chemicals in products and goods.

One practical issue under the current framework is that a finished product may become subject to chemical regulatory requirements because it contains a regulated chemical above an applicable threshold, even though the imported product itself is intended to be used as a finished product rather than as a chemical or input for further manufacturing.

The draft seeks to address this issue by excluding certain finished products from the relevant chemical-management requirements where they are intended for use by end users for their intended purposes and are not used as raw materials, additives or intermediates for the manufacture of other products.

In our view, the proposed approach also reflects a broader regulatory objective of avoiding overlapping regulation. Finished products should generally be regulated under the applicable product-specific regime — including relevant technical regulations, standards, conformity assessment or product-circulation requirements, as applicable — rather than being subject to an additional layer of chemical licensing solely because they contain regulated chemical substances.

For importers and manufacturers of finished products containing regulated chemicals, this could have significant practical implications for import procedures and licensing requirements.

Enterprise registration: further simplification and digitalisation

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The reform is not limited to sector-specific licensing.

Decree No. 296/2026/ND-CP, amending Decree No. 168/2025/ND-CP on enterprise registration, continues the move towards greater use of information available in national databases, reduced documentary requirements and digitalisation of enterprise-registration procedures.

These developments form part of the broader effort to reduce duplicative documentation and administrative procedures, which is particularly relevant to foreign-invested enterprises where corporate registration frequently interacts with investment registration and foreign-investor approval procedures.

Other regulatory reforms to watch

Further reforms are underway across a wide range of sectors, including consumer protection, commerce, foreign trade management and other regulated business activities.

This is consistent with the broader direction under Resolutions No. 66.17 and 66.18: removing business conditions that are no longer considered necessary, simplifying licensing and administrative procedures, replacing certain pre-approval mechanisms with technical standards and ex-post supervision, and reducing regulatory duplication.

What businesses should watch

The significance of these developments therefore goes beyond individual changes to a licence, filing threshold or application dossier.

A common direction can be seen across the recent reforms: **reducing unnecessary pre-approval requirements, eliminating overlapping regulatory regimes, making greater use of existing government data, and moving in appropriate cases from ex-ante licensing towards ex-post supervision.**

For businesses and investors, the period leading up to **1 March 2027** will therefore be important for two reasons.

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First, businesses should consider whether the Resolutions and existing implementation guidance already change the requirements applicable to their activities, rather than assuming that they must wait for amendments to the underlying laws or decrees.

Second, businesses should continue monitoring the sector-specific legislation being developed to replace the transitional regime and determine **how these reform principles will ultimately be translated into permanent regulatory requirements in practice.**

Partners / Thành Viên Luật sư



Nguyen Anh Tuan
M: +84 903404242
tuanna@bizconsult.vn



Nguyen Dang Viet
M: +84 913028222
vietnd@bizconsult.vn



Le Hong Phong
M: +84 968 695 468
phonglh@bizconsult.vn



Nguyen Trong Nghia
M: +84 936334499
nghiant@bizconsult.vn



Nguyen Thu Huyen
M: +84 912908579
huyennt@bizconsult.vn



Ha Thi Hai
M: +84 963718558
haiht@bizconsult.vn



Tran Cong Quoc
M: +84 934778119
quocct@bizconsult.vn



Nguyen T.Thu Trang
M: +84 988 604 260
trangnt@bizconsult.vn

Partners / Thành viên Tư vấn



Nguyen Bich Van
M: +84 913231019
vannb@bizconsult.vn



Trinh Hoang Lien
M: +84 904242684
lienth@bizconsult.vn

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Chúng tôi giữ quyền sửa đổi, tạm ngừng hoặc ngừng vĩnh viễn hoạt động của bản tin này hoặc bất kỳ phần nào của bản tin mà không thông báo trước. Chúng tôi không chịu bất kỳ trách nhiệm nào về các sửa đổi, tạm ngừng hoặc ngừng vĩnh viễn hoạt động của bản tin này.

Nếu bạn có vấn đề nào cần tư vấn, hãy liên hệ với chúng tôi hoặc yêu cầu luật sư của bạn tư vấn về vấn đề đó cho bạn.

Tất cả các quyền, bao gồm cả quyền sở hữu, quyền tác giả, quyền liên quan và các quyền sở hữu công nghiệp đối với nội dung thông tin, thiết kế, trình bày mỹ thuật của bản tin này thuộc chúng tôi và được bảo vệ theo Luật Sở hữu Trí tuệ Việt nam, các hiệp định, hiệp ước quốc tế mà Việt nam đã ký kết.

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Trang Vu

Mobile: +84 934551191

trangvm@bizconsult.vn

bizconsult
L A W F I R M

No. 20, Tran Hung Dao St.

Cua Nam Ward

Hanoi

Vietnam

E-mail: info-hn@bizconsult.vn

8th Floor, Sailing Tower

111A Pasteur, Sai Gon Ward

Ho Chi Minh City

Vietnam

E-mail: info-hcm@bizconsult.vn

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