

## Special Alert

# RESOLUTION NO. 66.18: MAJOR ADMINISTRATIVE REFORMS AND TRANSITION TO A SELF-COMPLIANCE FRAMEWORK

June 2026

Resolution No. 66.18/2026/NQ-CP ("**Resolution 66.18**"), issued by the Government on 18 May 2026, introduces a significant set of regulatory reforms aimed at reducing administrative procedures and simplifying business conditions across multiple sectors in Vietnam. While the Resolution will generally take effect on 1 July 2026, certain provisions came into force on 20 May 2026.

The significance of Resolution 66.18 lies not only in the removal of specific licensing and approval procedures, but also in a broader regulatory shift from ex ante control through licenses, approvals and prior registrations to a framework based on self-compliance, notification, public disclosure, reporting and post-inspection. These changes are expected to reduce compliance costs, shorten market entry timelines and ease administrative burdens for businesses. However, the simplification of procedures does not mean that all legal obligations have been removed. Businesses should continue to assess the remaining applicable requirements and update their internal compliance frameworks accordingly.

Set out below are the key highlights of Resolution 66.18.

## Key Takeaways

- **Higher economic concentration notification thresholds**, meaning that many mid-sized economic concentration transactions may no longer be subject to pre-closing notification requirements.
- **Removal of licensing requirements for labor subleasing and employment services**, reducing market entry procedures and initial compliance costs in the staffing sector.
- **Significant reduction of licensing procedures and business conditions for alcohol and tobacco**, particularly across production, distribution, wholesale, retail, and certain related trading activities.

- **Simplification of certain fire prevention and fighting, rescue, and salvage procedures**, mainly at the acceptance and restoration stages.
- **Removal of certain prior approval and registration procedures for foreign-linked education and training activities**, giving educational institutions greater autonomy in implementing international cooperation activities.

## Higher Economic Concentration Notification Thresholds: Reducing Filing Burdens for Economic Concentration Transactions

One of the most notable changes under Resolution 66.18 is the doubling of certain economic concentration notification thresholds compared with the competition law framework before 1 July 2026.

Criteria	Notification threshold before 1 July 2026	Notification threshold from 1 July 2026, under Resolution 66.18
Total assets in the Vietnamese market	3,000 billion	6,000 billion
Total sales revenue or purchase turnover in the Vietnamese market	3,000 billion	6,000 billion
Transaction value of the economic concentration	1,000 billion	2,000 billion
Combined market share	20%	20%

As a result, many mid-sized economic concentration transactions which include merger, consolidation, acquisition of enterprises, joint venture between enterprises, or other forms as prescribed by law may no longer fall within the scope of mandatory economic concentration notification before implementation. From a policy perspective, this reflects a more calibrated approach to merger control: maintaining regulatory oversight over transactions that may materially affect competition, while reducing procedural burdens for transactions that are less likely to raise significant competition concerns in Vietnam.

For investors and businesses, the higher thresholds are expected to help shorten transaction timelines, reduce filing-related costs, and facilitate investment, corporate restructuring, and M&A activities in Vietnam.

## Removal of Licensing Requirements for Labor Subleasing and Employment Services

Resolution 66.18 introduces significant changes to two conditional business lines in the labor and employment sector: **labor subleasing** and **employment services**. In both areas, businesses will no longer be required to obtain, renew or re-issue an operating license before providing the relevant services.

- For **labor subleasing**, the licensing regime will be replaced by a framework based on statutory deposit,

notification, and post-inspection. Businesses must still maintain a statutory deposit of VND2 billion, notify their operations to the Department of Home Affairs, submit quarterly reports, update changes during operation, notify the cessation of operations and ensure the rights and interests of subleased employees.

- For **employment services**, the reform is broader: both the licensing requirement and the deposit requirement will be removed. Instead, businesses must notify their operations to the Department of Home Affairs through the National Employment Exchange Platform, publicly disclose operational information, post working hours and service fees, update recruitment results, manage and protect labor data, and submit semi-annual and annual reports. Notably, from 1 July 2026, employment service businesses that currently maintain a deposit at a deposit-taking bank may withdraw such deposit without obtaining written approval from the competent authority.

Overall, these changes reduce market entry procedures and initial compliance costs for businesses in the labor and employment sector. Regulatory oversight, however, will shift toward notification, reporting, public disclosure, and post-inspection during operation.

## Alcohol and Tobacco: Significant Reduction of Licensing Requirements in Specially Regulated Sectors

Alcohol and tobacco have traditionally been subject to strict regulatory control in Vietnam due to their impact on public health, market order, and tax administration. Against this background, Resolution 66.18's reduction of licensing requirements and business conditions in these sectors is particularly relevant to businesses engaged in manufacturing, distribution, wholesale, retail.

- For **tobacco**, Resolution 66.18 will no longer apply the requirements for tobacco trading licenses, tobacco retail licenses and licenses for investment in tobacco cultivation. Such activities that previously required prior licensing will therefore move toward a compliance model based on remaining applicable legal requirements and post-inspection during operation.
- For **alcohol**, the reform is broader and covers multiple stages of the production, distribution, and trading chain. In particular:
  - ✓ **Licenses:** Resolution 66.18 removes licensing requirements for alcohol distribution, alcohol wholesale, alcohol retail, commercial production of handmade alcohol and industrial alcohol production.
  - ✓ **Business conditions:** Resolution 66.18 will no longer apply certain business conditions for alcohol distribution, wholesale, retail; on-premises alcohol sale; importation, production and trading of alcohol with an alcohol content of less than 5.5%; and production of handmade alcohol for sale to licensed alcohol producers for further processing.

As a result, certain administrative penalties linked to alcohol trading without a license or without completing the relevant registration procedures will also no longer apply.

Overall, Resolution 66.18 indicates a policy direction to reduce the “licensing layer” at the market entry stage for alcohol and tobacco, while maintaining State management through remaining business conditions, self-compliance obligations, and post-inspection.

## **Fire Prevention and Fighting, Rescue, and Salvage: Simplification of Certain Post-Design Approval Procedures**

In the field of fire prevention and fighting, rescue and salvage, Resolution 66.18 will discontinue certain procedures relating to:

- inspection of fire prevention and fighting acceptance;
- fire prevention and fighting acceptance for works and motor vehicles that have already obtained fire prevention and fighting design approval certificates from the police authority but have not yet had their acceptance results approved; and
- restoration of operations of establishments, motor vehicles, households, and individuals.

This may reduce administrative steps at the completion and operation stage of works and vehicles. However, core fire safety obligations remain in place. For works and vehicles subject to fire prevention and fighting management, project owners and businesses must still carry out fire prevention and fighting design appraisal procedures, prepare the required design dossiers and relevant legal documents, and ensure compliance with technical and safety requirements throughout construction, operation, and use.

Accordingly, the key effect of this change is the simplification of certain procedures after the design approval stage, rather than any reduction in the responsibility of project owners and operators to ensure fire safety.

## **Foreign-Linked Education and Training: Greater Autonomy for International Cooperation Activities**

Resolution 66.18 also introduces notable changes to foreign-linked education, foreign-linked training, and foreign-linked organization of examinations for foreign language proficiency certificates. Avoidance of doubt, it only applies to foreign-linked education and training activities, other than foreign-invested educational institutions.

Certain prior procedures relating to approval, renewal, amendment, or termination will no longer be required, including:

- Procedures relating to approval, renewal, amendment, or termination of foreign-linked education activities at preschool and general education levels;
- Procedures relating to approval, renewal, amendment, or termination of foreign-linked training at bachelor’s, master’s, and doctoral levels;
- Procedures relating to approval, or termination of foreign-linked organization of examinations for foreign language proficiency certificates; and

- Procedures relating to the issuance of certificates of registration for foreign-linked training activities applicable to colleges, intermediate schools and vocational secondary schools, and procedures relating to termination such foreign-linked training activities.

As a result, educational institutions in general education, higher education, foreign language testing, and vocational education will no longer need to go through prior approval, renewal, amendment or termination before implementing relevant foreign-linked activities. This is a meaningful reform for institutions seeking to cooperate with foreign partners or expand international education and training programs in Vietnam.

At the same time, greater autonomy will require stronger internal governance. Educational institutions should continue to ensure the legal status and capacity of foreign partners, maintain quality assurance conditions, disclose required information, update data on relevant sectoral systems and protect the rights and interests of learners, teachers, and employees.

## Conclusion

Resolution 66.18 reflects the Government's continuing commitment to reducing administrative barriers, streamlining enterprise conditions, and improving Vietnam's regulatory environment. The reforms discussed above may bring practical benefits to a wide range of enterprise activities, including M&A, labor and employment services, consumer goods, construction and facility operation, and education.

At the same time, enterprises should not view the reduction of licenses or ex ante procedures as a removal of all compliance obligations. In many cases, the regulatory focus shifts from prior approval to self-compliance, notification, reporting, public disclosure, and post-inspection. Enterprises should therefore review their existing operations, identify licenses, approvals or procedures that may no longer apply, and update their internal compliance frameworks to address the remaining obligations applicable during operation.

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## Contact Us

For further information or assistance, please contact the following professionals at Indochine Counsel:



**Pham Thi Thanh Lan**

Partner | Co-Head of Corporate and M&A

E [lan.pham@indochinecounsel.com](mailto:lan.pham@indochinecounsel.com)



**Nguyen Thi Thanh Truc**

Associate | Head of Investment & Corporate Services

E [truc.nguyen@indochinecounsel.com](mailto:truc.nguyen@indochinecounsel.com)



**Than Thi To Nhi**

Junior Associate

E [nhi.than@indochinecounsel.com](mailto:nhi.than@indochinecounsel.com)

## Ho Chi Minh City

Unit 305, 3rd Floor, Centec Tower  
72-74 Nguyen Thi Minh Khai, Xuan Hoa Ward  
Ho Chi Minh City, Vietnam

T +84 28 3823 9640  
F +84 28 3823 9641  
E [info@indochinecounsel.com](mailto:info@indochinecounsel.com)

## Hanoi

Unit 705, 7th Floor, CMC Tower  
Duy Tan Street, Cau Giay Ward  
Hanoi, Vietnam

T +84 24 3795 5261  
F +84 24 3795 5262  
E [hanoi@indochinecounsel.com](mailto:hanoi@indochinecounsel.com)

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