



REPORT SUMMARY

VIETNAM BUSINESS ENVIRONMENT REFORM PROGRAM: FROM BUSINESS PERSPECTIVE

The Report on *Business Environment Reform Program: From Business Perspective* (assessing the implementation of Resolution No.02 in 2020 and Resolution No.35 in 2016 of the Government) was compiled by the Vietnam Chamber of Commerce and Industry (VCCI) within the framework of *Enhancing businesses participation in monitoring and implementing economic restructuring* (under the Australian program for supporting Vietnam economic restructuring - Aus4Reform, funded by the Australian Department of Foreign Affairs and Trade - DFAT).

The report reflects and analyzes measures applied by ministries, branches and local authorities to implement Resolution 02¹ and Resolution 35² and their impact on economic activities and the business environment in Vietnam. Thereby, the Report attempts to sketch out an overall picture from the business community's perspective of the achievements and shortcomings that need to be solved in Vietnamese business environment over the past year.

In general, measures to improve the business environment and to support businesses continue to take place, despite the Covid-19 pandemic and the transition of Vietnamese government's term. *Business registration* and *Access to electricity* still are the two highest-scoring indices (respectively 72.5% and 65.9% of the surveyed enterprises rated them as having good or very good progress) and ranked the lowest was business insolvency resolution (44.4% rated it as good or very good).

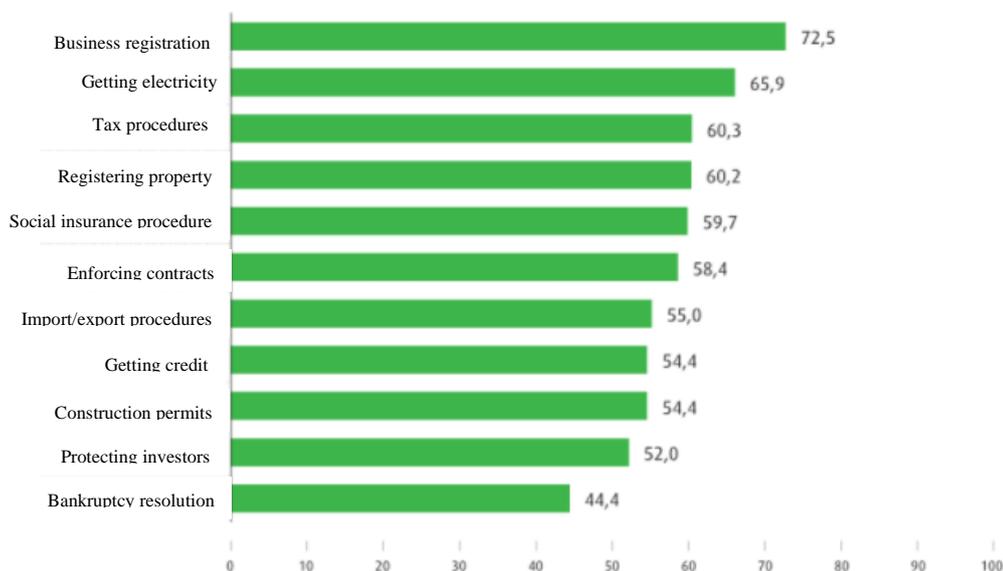
However, the rate of improvement seems to slow down compared to previous years, and the changing trend of sectors is quite opposite: the sectors with low scores (resolving

¹ Resolution 02/NQ-CP in 2019 and 2020, formerly Resolution 19/NQ-CP from 2014 to 2018 are resolutions on improving the business environment and enhancing national competitiveness. Resolution No.02 in 2020 continues to (i) improve rankings in international indexes; (ii) simplify investment conditions; (iii) cut down on specialized inspection; and focus on (iv) electronic payment, applying level 4 administrative procedures; and (v) supporting innovative start-ups.

² Resolution 35/NQ-CP on enterprise supporting and developing enterprises to 2020. Resolution No.35 aims to focus on private enterprise development such as the number of enterprises, the contribution of the private sector to GDP, social capital investment. Five groups of solutions are proposed, including: (i) administration reform; (ii) creating a favorable environment for entrepreneurship and innovation; (iii) ensuring the business rights and being equal in accessing resources and having business opportunities of enterprises; (iv) reducing business costs; (v) protecting the legitimate rights and interests of enterprises.

insolvency, protecting investors and import/export procedures) had improved, while others with high scores (business registration, getting electricity) declined in their scores. Notably, while getting credit in 2020 was perceived to be more difficult than in 2019, paying taxes - also relating to corporate finance - becomes much easier. The change at the provincial levels still is in the positive way, but the rate of improvement has slowed down.

Evaluation of the progress in some indices in Resolution 02/NQ-CP across the country



The proportion of enterprises rating for positive improvement nationwide

Source: VCCI-USAID, PCI Survey

THE TASK OF INDEX IMPROVEMENT

On starting a business and business registration

Business registration has always been a highly regarded procedure with encouraging results: the median time for enterprises applying for registration procedures or notifying of changes to enterprise registration information has halved over the last 6 years, though business registration time in 2020 is slightly longer than in 2019.

However, Vietnam’s Starting a business index ranking, according to the World Bank's Doing Business report, remains low due to the incompatibility of regulations on starting a business and the lack of linkage between the procedures. Some recently issued regulations are expected to contribute to the improvement of this ranking, including Decree 122/2020/ND-CP dated October 15, 2020 on the inter-agency coordination of procedures for enterprise establishment registration, declaration of labor use, grant of identification numbers of units participating in social insurance, and registration for use of invoices of enterprises; and Decree 22/2020/ND-CP dated February 24, 2020 exempting of license fees in the first year for newly established enterprises and business households.

Regarding the quality of business registration procedures: in general, all indicators (Procedures at one-stop service departments are publicly listed; Clear and complete

procedure instructions; Officer with expertise; Enthusiastic, friendly officer) have increased. However, the group of provinces with the lowest scores recorded a sharp decline in Publicly listed Procedures at one-stop service departments index and the Enthusiastic and Friendly Officer Index.

Regarding methods for enterprise to conduct registration procedures, this year has seen an increase in the use of non-contact administrative procedures such as through post offices and online (up to 92% in certain localities). However, the support capacity of local information technology systems has not been sufficient (on average, 36.67% of the surveyed enterprises are satisfied; the highest provincial rate is only 40%, the lowest one is 3%). When applying for business registration with the Department of Hanoi Planning and Investment through the National Business Registration Portal, some enterprises have reported on undetailed instructions on needed documentation, causing the enterprises spend more time on research; and response is time-consuming when sent back by post.

Taxes and social insurance procedures

Tax and social insurance payment procedures have made remarkable progress in 2020. However, on average, 22% of enterprises still have difficulty in carrying out tax administrative procedures such as requests for tax exemption or reduction (encountered by 23% of enterprises), tax refund (18%), tax finalization (17%) ...

Assessment of enterprises on improvement of tax payment index according to Resolution 02 from 2017 to 2020



Source: VCCI-USAID, PCI Survey

In the context of the Covid-19 epidemic, tax authorities have created many policies to support enterprise (reducing corporate income tax, extending tax payments and land rentals, reducing fees and charges) with simple and easy-to-follow procedures. The information technology system of the tax authorities also meets the increasing demand for conducting tax-relating administrative procedures by electronic means.

The Law on Tax Administration 2019, effective from July 2020, is expected to improve the business environment with improvements in processing time, reduction of administrative procedure obligations, and resolving problems regarding electronic tax declaration and payment, adding regulations on the right of inspection and audit information, etc. New regulations, which are being drafted on tax administration with e-commerce activities and

cross-border service provisions, are expected to ensure tax equity and facilitate stakeholders' adoption.

The number of tax inspections and tax audits in 2020 has decreased compared to its in 2019, possibly due to Covid-19 reducing the time of direct inspection combined with the adjustment of the inspection and audit plan from the tax industry to support enterprises. However, the proportion of enterprises that had to negotiate with tax authorities in 2020 have not been reduced over time, it rather increased to 52.8% from 47.1% in 2019, reflecting the situation of incomprehensive tax regulations, lack of consistency in interpretation between tax authorities and enterprises.

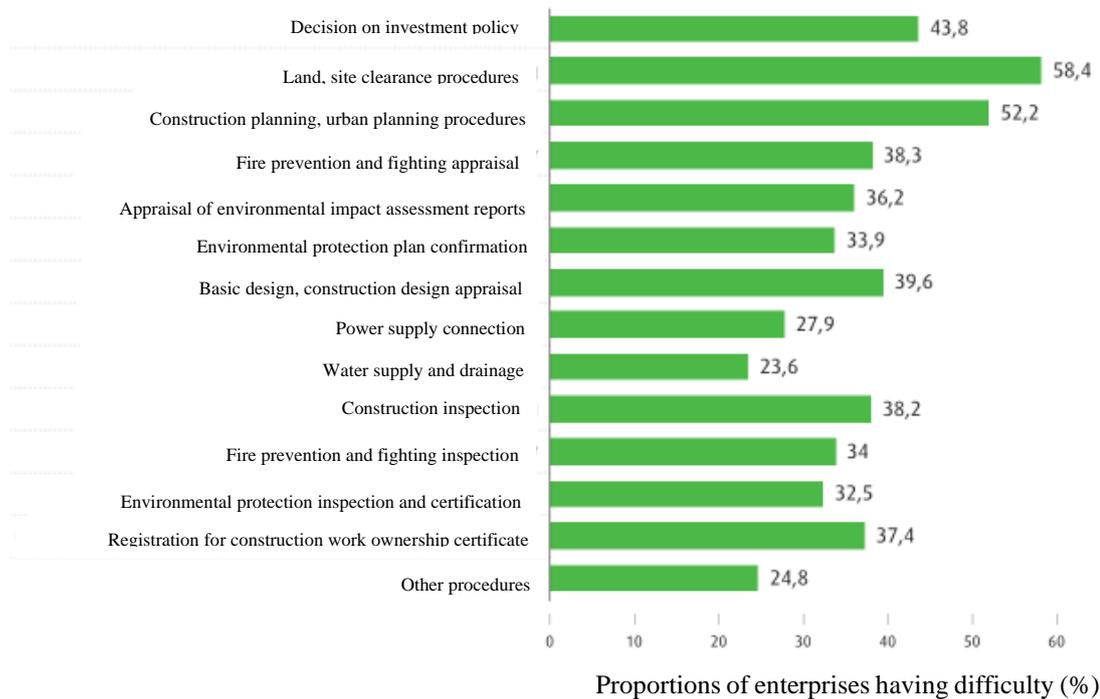
There is nearly no change in terms of social insurance payment index between 2020 and 2019. Some of the difficulties that enterprises often face with when complying to administrative procedures are in cases of treating occupational accident and diseases (encountered by 18% of enterprises), adjusting social insurance information (15%), application for reissuance of social insurance books (15%), procedures for sickness benefits (15%), procedures for maternity benefits (13%), social insurance registration (11%).

Construction-related permits

Construction-related administrative procedures, although improved in recent years, are not simple enough for enterprises. The most complicated procedures include those involving land, site clearance, construction planning, urban planning, decision on investment policy...

Private and small enterprises face more difficulties in construction procedures than foreign-invested and large-scale firms. Informal fees are the biggest problem enterprises face with. The main reason for enterprises' troubles is the officer in charge of records handling and the legal regulations.

Proportions of enterprises having difficulty in completing construction-related administrative procedures.

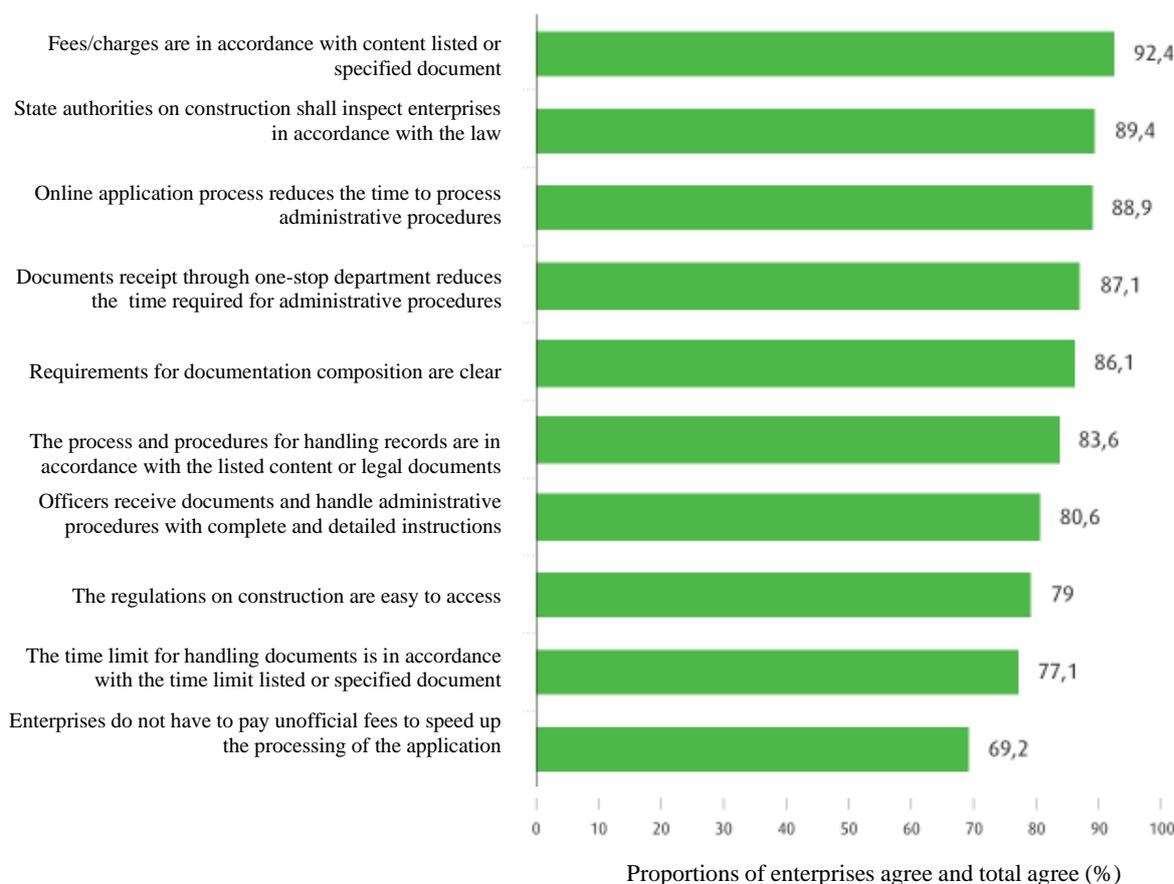


Source: VCCI-USAID, PCI Survey

The proportion of the surveyed enterprises having rated the construction licensing index having good or very good process in 2020 declined compared to its in 2019, yet still higher than those in 2017 and 2018. This shows that the pace of reform in this field needs to be maintained and further strengthened.

Resolution No.02 in 2020 requires an increase in discipline when carrying out administrative procedures for construction, shortening the time for licensing and inspection, examination for no more than 50 days, and the application of risk management. However, many of these measures have not been implemented and enterprises have not felt the positive impact from these measures yet.

Some comments on the implementation of interdisciplinary administrative procedures in the construction field

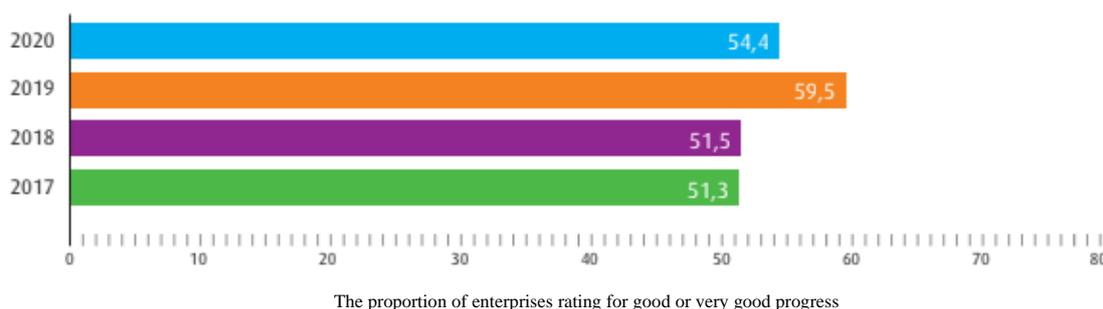


Source: VCCI-USAID, PCI Survey

Getting credit

Getting credit is one of the fields ranked decreasing by the enterprises, with only 54.4% noticing improvements, which is lower than 59.5% in 2019.

Evaluation of the transformation in getting credit from 2017 to 2020



Source: VCCI-USAID, PCI Survey

Despite many measures to loosen monetary policy, many enterprises still have difficulty in accessing and obtaining concessional loans because loan conditions are not easy. For example, since October 2020, no enterprises had been able to get finance from the refinancing package of VND 16,000 billion with a 0% interest rate that was designed so

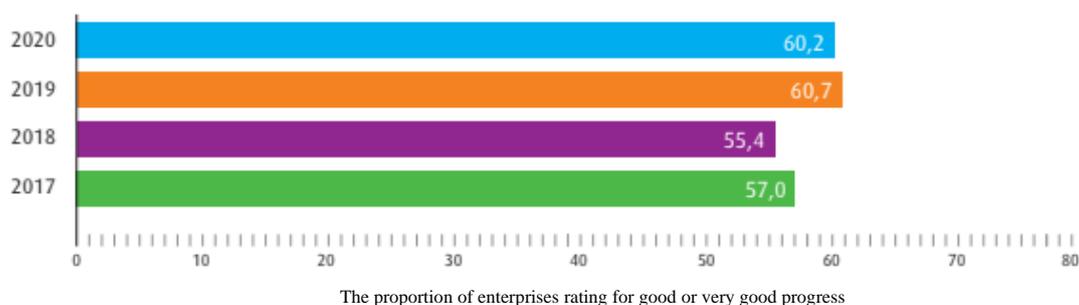
that enterprises and employers with financial difficulties can pay salaries for pandemic-suspended employees.

Regarding the credit information depth index, the non-state credit information companies are not operating effectively. The drafting of a Decree on credit information operations of credit information companies, with the reduction of barriers to market entry, is expected to encourage resources to invest in this service, thereby opening more value-added financial technology services, open banking services. This draft is being revised according to the opinion of the Government members. Regarding the getting credit index, the Ministry of Justice is drafting a Decree on registration of security interest and collecting opinions of the interested parties.

Real estate registration and land management

This index has almost no change over the years of implementing Resolution No.19 and Resolution No.02. The improvement in registering property in 2020 decreased slightly compared to its in 2019, from 60.7% to 60.2%.

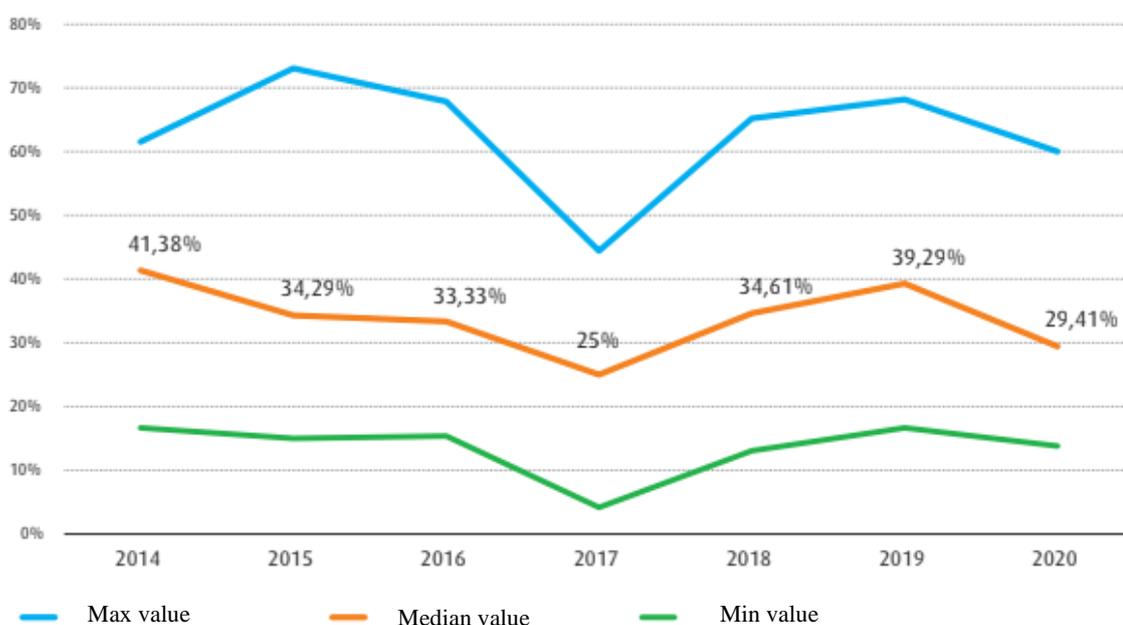
Evaluation of the transformation in registering property filed from 2017 to 2020



Source: VCCI-USAID, PCI Survey

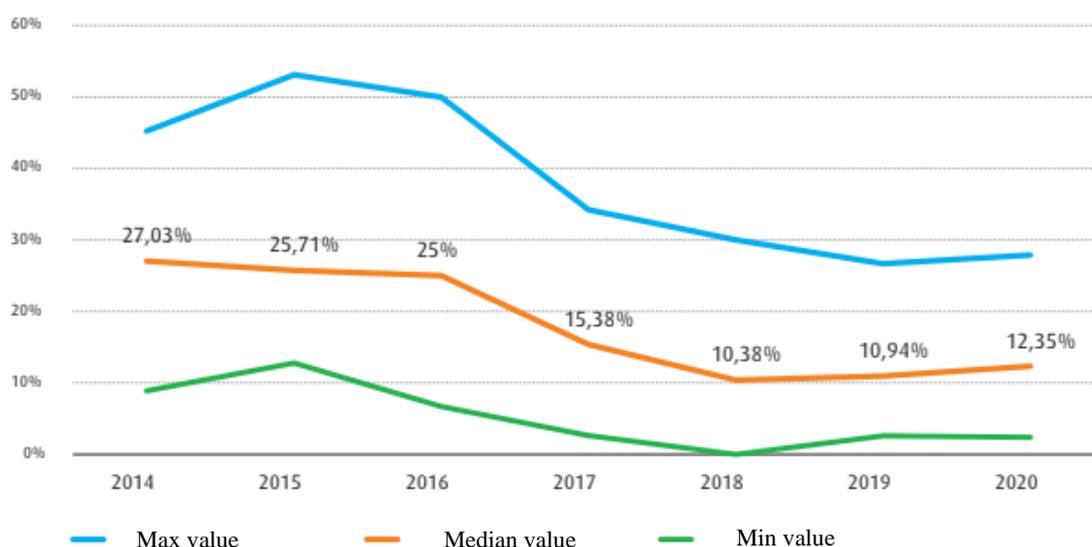
The implementation of land procedures still faces many difficulties and has not been focused on for actual improvement in 2020. The rate of enterprises that do not have difficulties in land procedures in the past 2 years has decreased from 39% in 2019 to 29% in 2020. Some common difficulties include the lack of sufficient and detailed instructions (18% of enterprises encountered), the determination of the value of the land use right taking a long time (16%), and the process and procedures for handling records not in accordance with regulations (12%).

Proportion of enterprises carrying out land administrative procedures over the past two years without any difficulties in the procedures



Source: VCCI-USAID, PCI Survey

Proportion of enterprises demanding to be granted Certificate of land use right and ownership of land but could not be due to cumbersome administrative procedures or concerns of officer corruption



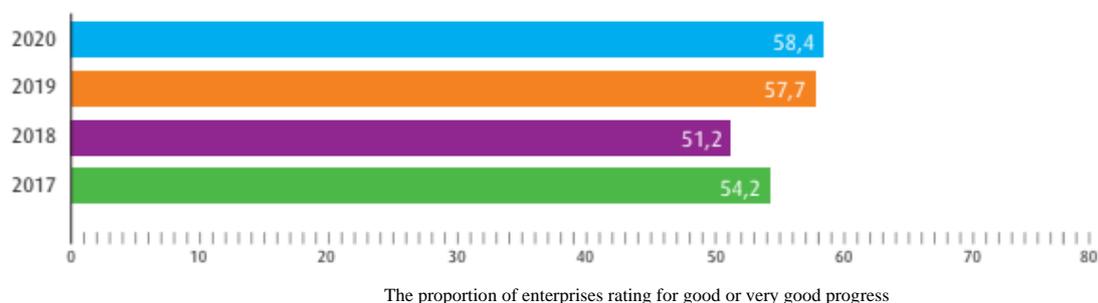
Source: VCCI-USAID, PCI Survey

The provision of land information in 2020 slightly improved compared to 2019. The proportion of enterprises that believe that land information is not provided in a favorable manner has rapidly decreased from 32.65% in 2019 to 30.19% in 2020.

Judicial reform, settling contract disputes and resolving insolvency

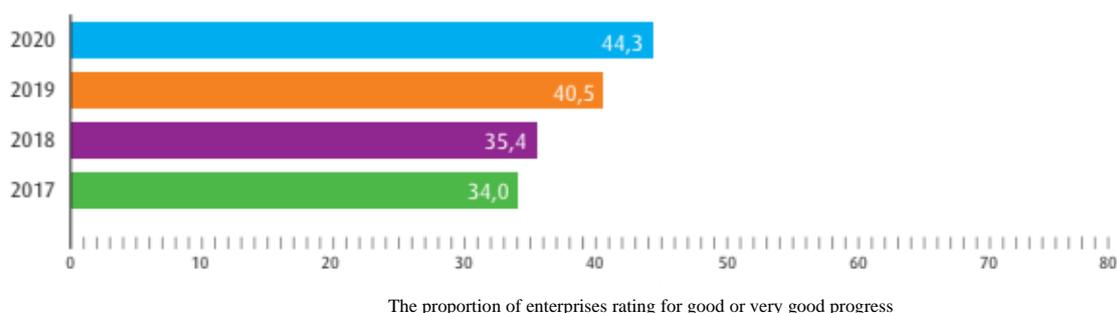
Contract enforcement and corporate bankruptcy indices have improved in 2020, especially corporate bankruptcy. This is a very remarkable result since the bankruptcy index had always been the lowest ranked field in Resolution No.19 and Resolution No.02.

Evaluation of the transformation in contract enforcement from 2017 to 2020



Source: VCCI-USAID, PCI Survey

Evaluation of the transformation in corporate bankruptcy field from 2017 to 2020

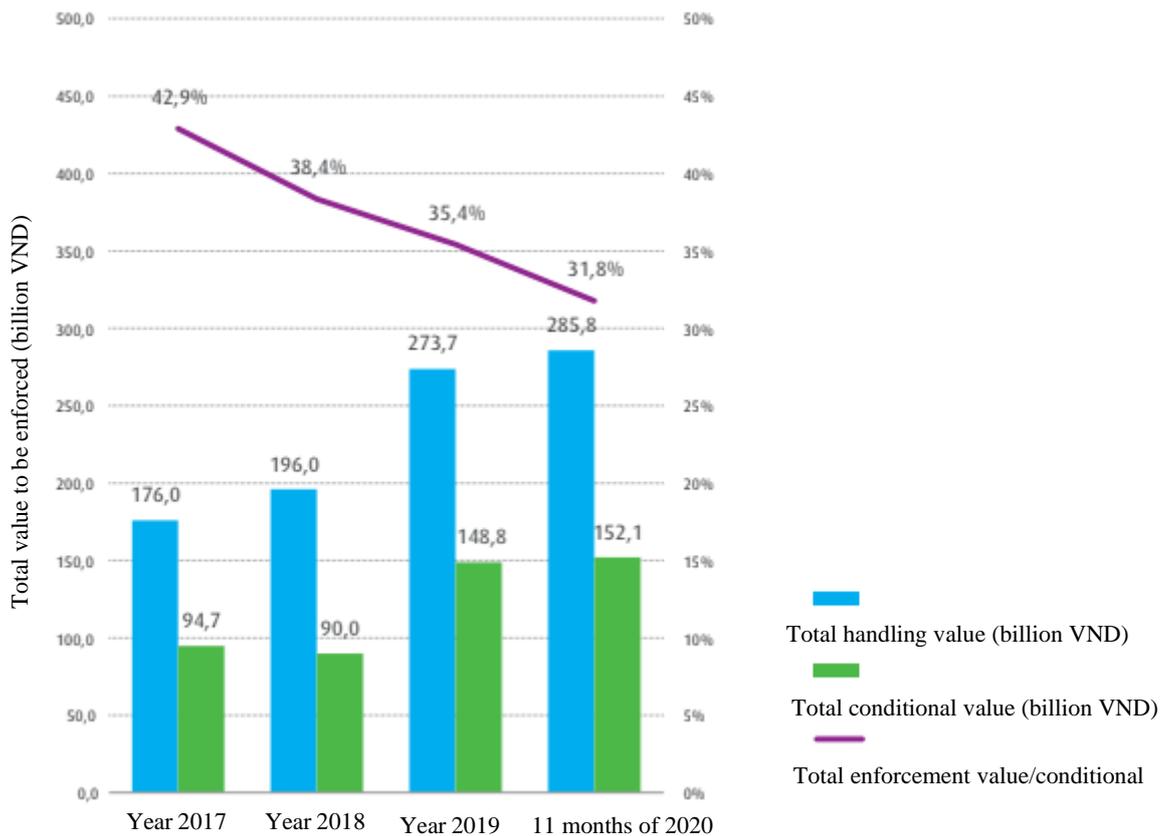


Source: VCCI-USAID, PCI Survey

In the pandemic context, the year 2020 saw the sharp increase in the number of bankruptcy cases. However, the response of the judiciary is quite confusing. By the end of 2020, the Supreme People's Court publicly published Official Letter No. 199/TANDTC-PC dated December 18, 2020 announcing the answers to 30 problems involving bankruptcy cases via online methods, thereby providing good reference for local courts, lawyers, enterprises in their own cases.

Even so, the biggest problem has been enforcement of civil judgments. The Law on Enforcement of Civil Judgments is currently in the research phase for amending. Regarding the efficiency of the enforcement process, in 2020, for every 100 VND that needs to be recovered, only 17 VND was actually recovered, while 47 VND could not be enforced, and 36 VND, though with collaterals, cannot be recovered.

Situation of civil judgment enforcement between 2017 and 2020



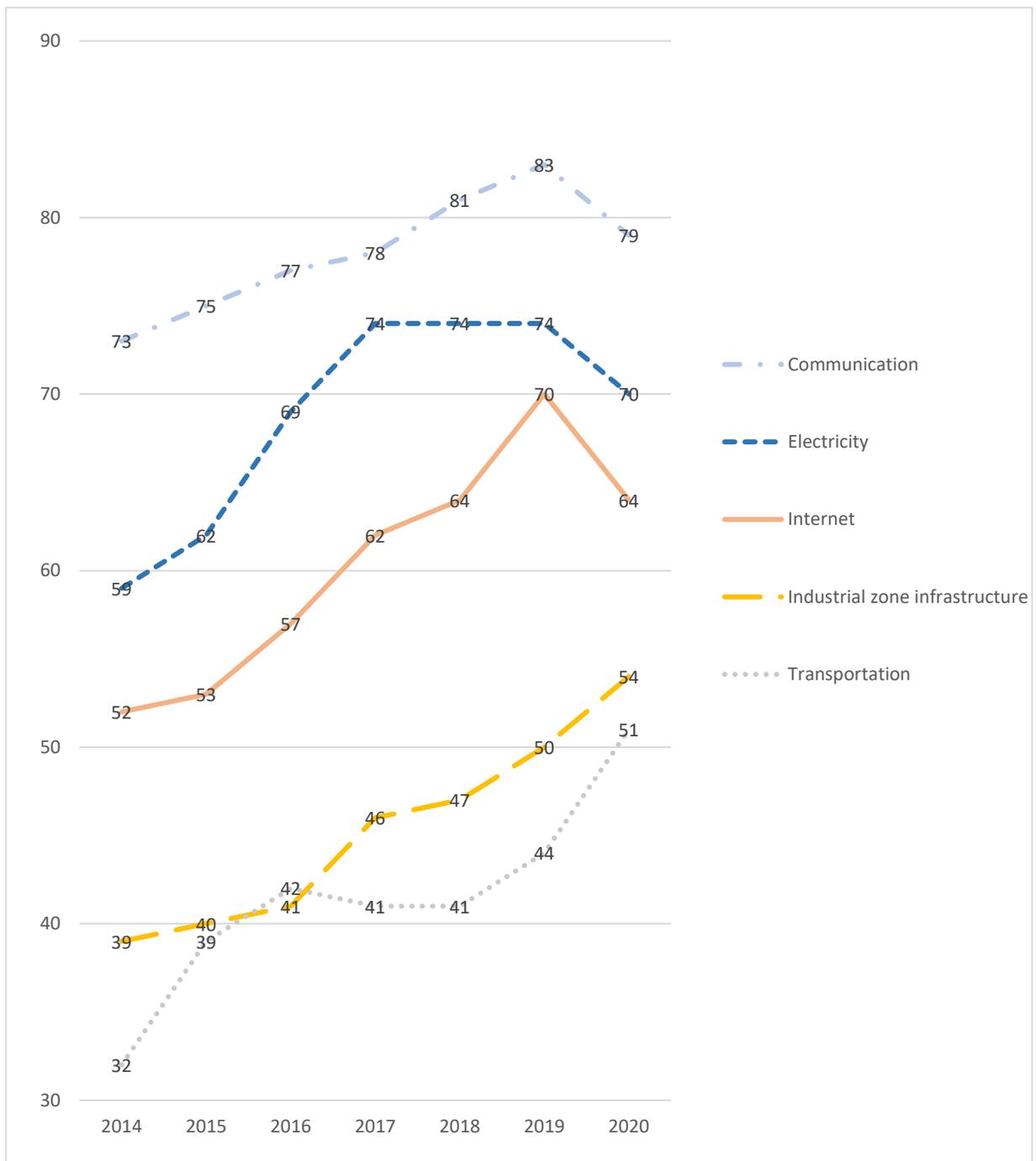
Source: Statistics from information publicly available on the website of the General Department of Civil Judgment Enforcement at: https://thads.moj.gov.vn/noidung/thongbao/Lists/BaoCaoThongKeTongCuc/View_Detail.aspx

Electronic payment of the court fees has not been implemented yet. The National Public Service Portal requires a profile code to be entered in order to pay court fees in advance. However, notices for advance of court fees do not have document code or specify the address to pay court fee in advance at the premises of the judgment enforcement agency, leading to the impossibility for enterprises to use this function.

Infrastructure and getting electricity index

In general, the quality of some basic infrastructure in Vietnam in Vietnam has been continuously improving over the years. By 2020, the rate of enterprises satisfied with industrial park and transport infrastructure has been increasing.

Percentage of enterprises satisfied with some basic infrastructure, from 2014 to 2020



Source: VCCI-USAID, PCI Survey

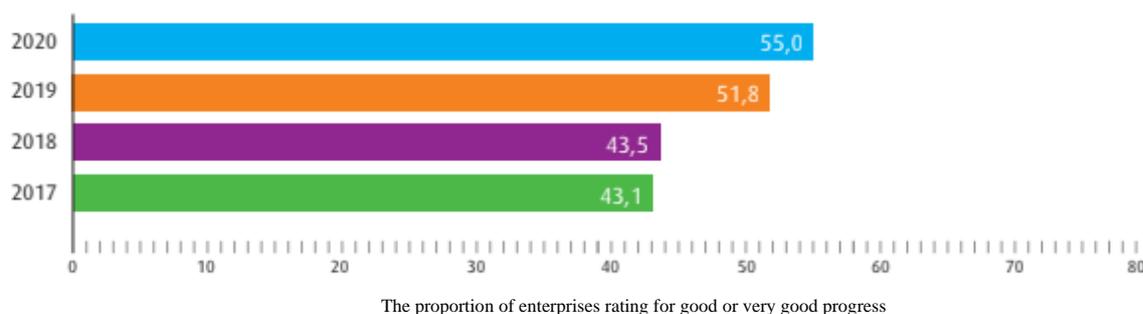
In 2020, in the context of the Covid-19 pandemic, the demand for services has changed. While telecommunication and internet services have increased in demand, the infrastructure could not catch up with them, therefore, the quality assessment by enterprises has slightly decreased. On the contrary, the demand for transportation infrastructure decreases due to social distancing, which could lead to an increase in the quality rating of this sector. Traffic non-functioning time has also been reduced, from 10 days (2014) to only 2.74 days (2020).

The notable policy highlight is that the getting electricity index declines again in 2020, while the electricity demand did not increase as strongly as past years, even decrease in some industries.

Specialized inspection and national one-stop portal connection

Specialized inspection is one of the few fields with sharp improvement in 2020 and is also the field that has witnessed continuous improvement over the years.

Evaluation of the transformation in the import/export procedures from 2017 to 2020



Source: VCCI-USAID, PCI Survey

Searching for items which are in the list of specialized inspection is still relatively complicated. Although the list of goods subject to specialized inspection with the corresponding HS code had been fully published, these documents has been changing frequently and relatively complicated; many detailed instructions are in the official dispatch of specialized units, so logistics enterprises often have to set up professional process guidance boards for the employees in charge of imported goods for specialized inspection.

The project to reform the quality inspection model and food safety inspection model for imported goods has been approved by the Prime Minister and is expected to be institutionalized by a decree in the second quarter of 2021. Many enterprises expect regulations to be in the light of reducing inspection costs, focal lengths, procedures, and avoiding monopolizing the provision of conformity certification services.

Regarding the tax calculation for excess materials and supplies in the processing of goods, Decree 18/2021/ND-CP has solved this problem and received consensus from many enterprises.

Regarding specialized inspection in the agricultural sector, many enterprises reported that the tasks assigned to the Ministry of Agriculture and Rural Development have not yet been performed, including: applying risk management principles, priority streaming, mutual recognition in specialized management, specialized inspection for sea product cross-border trading; guiding and distinguishing between quarantine and food safety inspection; specific and clear instructions on how to inspect (especially sensory examination).

The National One-stop service Portal has integrated 24 new procedures, bringing the total to 212 administrative procedures of 12 ministries, branches officially deployed on this portal. The problem of slow connection, congestion, dropouts or denial of access has been

improved. The response time to some procedures has considerably improved, such as chemical import procedures, certificate of origin procedures, certificate of free sale, registration of specialized vehicles, procedures for cosmetic declaration... However, the procedures for group 2 items subject to quality inspection such as steel, electric fans... still need to be improved, because they must apply for registration at the metrology departments of provinces before being able to use that application to file a declaration.

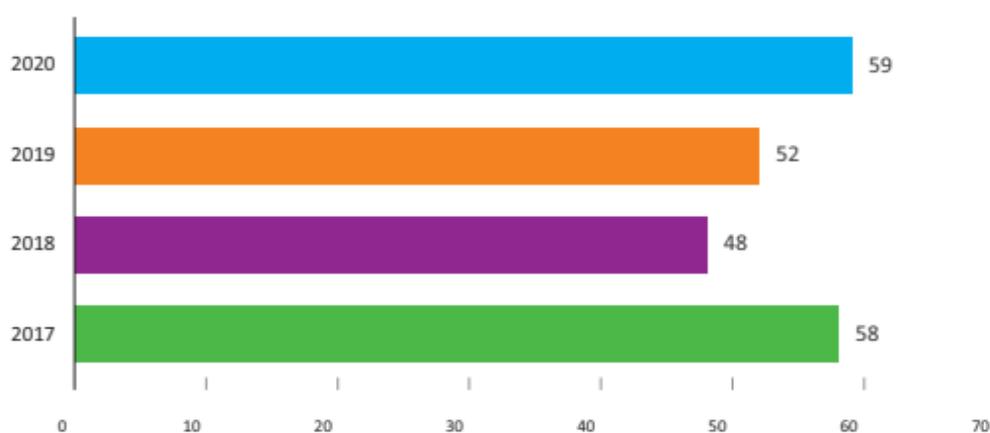
The application of risk management principles in commodity specialized inspections has hardly been implemented or has just been performed with individual criteria that are hard to comply with. No items will be removed from the inspection checklist or moved from import inspection mechanism to circulation inspection in 2020.

REDUCE AND SIMPLIFY BUSINESS AND INVESTMENT CONDITIONS

The series of Decrees to reduce and simplify business conditions in 2018 made an important boost, as the proportion of enterprises having to apply for a business license decreased from 58% in 2017 to 48% in 2018, the rate of enterprises meeting difficulties in carrying out the procedure decreased from 42% to 34%.

Resolutions in 2019 and 2020 focus on the task of maintaining and avoiding creating new business conditions. The survey data shows that the proportion of enterprises applying for business license tended to increase to 52% in 2019 and 59% in 2020. This proves that there is also a shift in business trends to conditional business lines, which may be partly because getting business license has become easier. The proportion of enterprises having difficulty in applying for business licenses continued to decrease to 32%. However, the room for reform in this field is still very large with the existence of non-transparent and qualitative conditions, which can be interpreted in many ways.

Proportion of enterprises with a conditional business license



The proportion of enterprises

Source: VCCI-USAID, PCI Survey

APPLYING INFORMATION TECHNOLOGY, ELECTRONIC PAYMENT AND PROVIDING ONLINE PUBLIC SERVICES

The promotion of e-payments and level 4 public services has been generally very slow. Some state agencies provide effective online public service portal, but some are not. The number of level 4 public services has increased, however, many ministries, branches have yet to meet the requirement of a minimum rate of 30% of online public services at level 4. The actual number of submissions via this means is not much. If any, documents in some ministries focus mainly on one or a few simple procedures, such as the Transport Department's passenger reporting procedure.

The transition of public services in 2020 tends to move straight to level 4 without going through level 3 (provided directly but still requiring a paper file when upon results receipt). However, this is mainly applied to reporting procedures, which do not require replies from state agencies, or only need automatic response.

The establishment of the National Public Service Portal is a strong move in 2020, helping to connect and monitor public service portals of ministries, branches and localities. Vietnam Electricity Corporation has the largest number of submissions through this portal, with nearly 600,000 dossiers. The Ministry of Transport, the Ministry of Science and Technology, the Ministry of Industry and Trade and the Vietnam Social Insurance have more than 1,000 applications submitted through the National Portal.

However, the conducting administrative procedure via electronic means still faces some of the following situations:

- Successfully submitted an online application at the Public Service Portal but not be resolved and later, that company owner was instructed to submit a paper application instead of online application;
- The online payment of fees has not been applied for many ministries and branches' procedures. Additionally, there are errors, inaccessibility or inability to pay for unknown reasons within the payment website;
- Online public service portals often encounter errors for unknown reasons, such as system crashes, inability to submit for unknown reasons; fail to upload attachment for unknown reason; no receipt notification or with notification but without a profile code to look up; the time-consuming account sign-up confirmation especially with procedures which are conducted with low frequency;

The response for the result depends too much on paper copies (hard copies with signature and seal). Many enterprises express the need that results can be sent electronically with a defined format such as numerical codes, barcodes or QR codes. Thereby, they can print out this result sheet to use as the original. In case confirmation is needed, it is possible to look up confirmed content on the website of state agencies.

The application of information technology to the implementation of administrative procedures is progressive, but enterprises are hesitant for several reasons: their obligation to submit paper copies in spite of already submitting soft copy; online submission has no instructions for immediate document modification as with direct submission; information technology systems often have errors.

The Ministry of Information and Communications has attempted licensing of the band to exploit 4G technology and advance to 5G, but the process has yet to be carried out due to the time-consuming auction process. Mobile money service is officially allowed for testing in Vietnam according to Decision No. 316/QĐ-TTg dated March 9, 2021 approving the pilot implementation of using telecommunication accounts to pay for goods and services with small value, which is expected to compete directly with e-wallets and banks in the non-cash payment services segment.

The financial mechanism of state agencies in non-cash payment services has not been guided, leading to problems in the service provision of intermediary payment organizations.

The payment of fines for traffic administrative violations on the National Public Service Portal has been implemented but is not convenient because the person who is fined still must go to the authorities to take their identification, the payments method are not diversified, account registration in Public Service Portal is required.

THE TARGET OF ONE MILLION ENTERPRISES BY 2020

The target of 1 million enterprises by 2020 has not been achieved, as there had been only 811,538 businesses in operation as of December 31, 2020. The impact of the Covid-19 pandemic was one of the main causes for this consequence. In 2020, the number of newly registered enterprises only reached 134,941, 2.3% lower than its in 2019, while the number of business suspensions for a period, suspension of operations pending dissolution and dissolution procedures is 13.93% higher than in 2019.

In the implementation of Resolution No.35, 41 provinces and cities made commitments regarding the number of enterprises by 2020. However, only 17 localities have met or exceeded the committed level. Some provinces with a strong increase in the number of enterprises are Vinh Phuc (168%), Bac Ninh (185%), Hung Yen (152%), Bac Giang (221%), Binh Phuoc (162%), Binh Duong (163 %), Dong Nai (164%). In contrast, some localities with low growth rates are Dien Bien (24%), Quang Tri (38%).

ORGANIZING DIALOGUE AND SOLVING PROBLEMS FOR ENTERPRISES

In the context of the Covid-19 pandemic, many local authorities have actively applying the technology to organize dialogues, such as Da Nang, Ho Chi Minh City, Hai Phong on the portal. This typical format of dialogue is that enterprises send questions (before or during the dialogue), then local government representatives read and assign in-charge person for answers. Audio or video recordings may be posted in some provinces.

The advantage of this format is saving time, increasing the number of participants, and answering more questions. But the downside is that the interaction is not high, businesses do not have a chance to debate, and the government can ignore the difficult question. Therefore, this form is more suitable in the situation of disseminating new policies, while the form of face-to-face meeting and debating is still more effective when dialogue is needed to remove difficulties and problems.

The quality of solving problems for businesses in 2020 shows signs of decrease compared to 2019, namely: rate of receiving feedback after reporting decreased from 95.82% to 94.57%; satisfaction rate with feedback decreased from 81.25% to 79.24%; the rate of prompt resolution decreased from 74.19% to 71.2%. One possible reason here is that many localities are confused when answering and solving difficulties involving the Covid-19 responded policies which are usually unclear, incoherent and causing confusion upon application.

RECOMMENDATION

From the above analysis, the Report offers the following recommendations to improve the business environment in Vietnam:

SHORT-TERM SOLUTIONS

- ✚ Continue to cut down on time for procedures and increase the application of information technology to business registration procedures;
- ✚ Improve the transparency of tax regulations;
- ✚ Link construction-related administrative procedures such as design evaluation procedures, construction permits with fire prevention and fighting appraisal, approval of environmental impact assessment reports; group procedures of completion inspection, fire prevention and fighting acceptance, and environmental licensing;
- ✚ The State Bank should soon issue a Decree on credit information operations of credit information companies;
- ✚ Soon revise the Land Law, focusing on reducing time of land procedures, publicity and transparency of land information, including information on land use planning, cadastral maps, land disputes and settlement;
- ✚ The Ministry of Justice should quickly propose amendments to the provisions of the Law on Civil Judgments Enforcement and guiding documents to shorten the time and reduce the number of procedures to be carried out. Civil judgment enforcement database and reporting forms should not only include the number of cases, the amount of money, the rate of successful enforcement, but there should also be the time to handle each case;
- ✚ The Ministry of Justice should organize online professional exchanges in two fields of civil judgment enforcement and asset management officer to remove difficulties and problems in solving bankruptcy cases;

- ✚ Continue to improve the electricity retail market into a competitive place, diversify forms of electricity retail, proceed to implement the two-component electricity price mechanism (electricity price and transmission price) to create a basis for the reduction of transmission line connection procedures;
- ✚ Soon issue a Decree to implement the project to reform quality inspection and food safety inspection model for imported goods in the direction of cutting costs of import and export inspection, reducing intermediaries and procedures and avoid monopolistic provision of conformity certification services;
- ✚ When developing regulations on the types of goods subject to specialized inspection, inspection criteria, together with the risk management mechanism (exemption inspection), it is necessary to request ministries and agencies to draft proof with actual historical data on the proportion of violating goods. If these disclosures are not available, they should be consistently excluded from the category of inspection;
- ✚ Amend the Inspection Law in the direction of considering risk management as a mandatory principle of all inspection and examination activities;
- ✚ In addition to continuing to connect and link the specialized inspection procedures for goods of the ministries to the National One-stop Portal, it is necessary to expand the procedures of localities, such as at the department of metrology and quality;
- ✚ Continue to control the issuance of new business conditions and the amendment of legal documents containing business conditions, so that these conditions meet transparency and rationality requirements, and maximize the competitive environment. Resolutely eliminate subjective, qualitative and unclear business conditions that prevent enterprises from entering the market;
- ✚ The goals of electronicizing public services should not stop at the current number of level 3, level 4 public services, but need to go into statistics about the proportion of online dossiers submitted to the total number of dossiers received for each procedure;
- ✚ Reporting procedures (which do not require a response from a government agency or just require a simple response that the report has been received) need to be quickly promoted to level 4. Procedures requiring response by government agencies should be raised to at least level 3, prioritising the procedures that enterprises and citizens have high frequency of using and then moving to low frequency procedures later;
- ✚ When implementing information technology systems for online public services, it is important to pay attention to public service supervision measures, report regularly to competent authorities to ensure that enforcement officers handle records strictly, on time;
- ✚ The Government should research an appropriate mechanism so that it can independently monitor information technology systems that provide online public services by agencies. Supervisors will play the role of users, periodically assessing and testing the functions of public service portals so that errors, nonconformities

- are detected, aggregated reports are produced and modifications are recommended;
- + Quickly deploy a national open database on population and enterprises to save time and costs for account registration in each information system. Information systems should also increase cases where services can be used without the need to register an account, for example payment cases (just fill in the correct application code);
 - + Head towards the return of administrative procedure results in electronic form. Enterprises only need to print this result sheet, which shall be valid for use as the original. If it is necessary to authenticate the printed copy, it is possible to access the website of the respective state agency;
 - + It is necessary to quickly re-plan frequencies to reserve bands used for 4G and 5G, and at the same time carry out necessary procedures to auction and license these frequencies;
 - + The Ministry of Finance should promptly provide guidance on the payment of non-cash payment services charges in state agencies and public non-business units;
 - + The work of dialogue, solving difficulties and problems for enterprises should continue to be focused on, especially for domestic private enterprises;
 - + The form of online dialogue is suitable for cases where the government needs to propagate and disseminate new policies for enterprises to implement. Meanwhile, if the purpose of the dialogue is to remove real problems and troubles in applying existing policies, it should be organized in a direct form whenever possible.

LONG-TERM SOLUTIONS

- + Certain progress has been made on simplifying administrative procedures, cutting business conditions, and cutting down on specialized inspection, which needs to be maintained. However, the improvement focus should be on the group of administrative procedures related to construction;³
- + Judicial reform, settlement of commercial business disputes, corporate bankruptcy and civil judgment enforcement should be considered as one of the strategic breakthrough to improve the business environment;
- + The provision of level 3 and level 4 online public services, online payment should continue to be considered an important task, but it is necessary to provide more achievable objectives and tasks and solve actual existing technical problems;
- + The group of issues on transparency and application of risk management to business inspection should be included as an important content of improving the business environment;

³ Procedures related to construction investment include all phases of an investment project from planning, land, investment, construction, fire protection, environmental protection, electricity, water supply and drainage and some other related procedures.

- ✚ The stability and predictability of policies is also an issue that many businesses are interested in, especially those with large investments in manufacturing and infrastructure industries;
- ✚ Improving the business environment and supporting businesses in the digital economy should also be regarded as important task to help the industry keep up with the pace of development and strengthen national competitiveness in the new context.