

BUSINESS PARTICIPATION IN

LEGISLATION

Amendment to
Law on excise tax

Recommendation related to the
aggressive incident in Binh Duong,
Dong Nai and Ha Tinh provinces

Law-making events held
solely by VCCI or in
coordination with VCCI



Amendments on Law
on enterprises and Investment Law

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Functions and responsibilities of VCCI in collecting enterprises' opinion on legal normative documents and international trade negotiation:

Decree No. 24/2009/ND-CP dated 3rd May, 2009 on detailing and providing measures for the implementation of the Law on promulgation of legal documents

Article 27. Collection of opinions in the drafting process (quotation)

1. In the drafting process, the drafting agency shall collect opinions of the subjects to be directly impacted by the document and of agencies, organizations and individuals by the methods prescribed in Clause 2, Article 35 of the Law on Promulgation of Legal Documents

4. The drafting agency shall send the draft document to ministries, ministerial-level agencies and government-attached agencies for opinion.

Ministers, heads of ministerial-level agencies and government-attached agencies shall assign their units in charge of domains related to the draft document to assume the prime responsibility for, and coordinate with the legal organization and other units in, preparing their opinions.

Contributed opinions shall be sent to the drafting agency within 20 (twenty) working days after receiving the draft document.

For a draft legal document concerning the rights and obligations of enterprises, the minister of the drafting ministry or the head of the drafting ministerial-level or government-attached agency shall send it to the Vietnam Chamber of Commerce and Industry for collecting opinions of enterprises.

Within 20 (twenty) working days after receiving the draft legal document, the Vietnam Chamber of Commerce and Industry shall collect opinions of enterprises; sum up and send these opinions to the Ministry of Justice, the Government Office and the drafting ministry or agency.

Decision No. 06/2012/QĐ-TTg issued on January 20, 2012 by the Prime Minister on consultation with Business Community on international trade negotiation

Article 7: Rights and responsibilities of The Chamber of Commerce and Industry (VCCI) in collecting and reflecting comments from business community:

1. Circular materials which negotiation agencies give out for business community.

2. Research to recommend negotiating plans and contents, included request to partners, guidance for enterprises participate into negotiation process.

3. Organise activities aim at enhancing awareness and circulating information for enterprises.

4. Follow up, collect and sum up responds of enterprises, send it to negotiation authorised agencies.

LEGISLATION

The **BUSINESS PARTICIPATION IN LEGISLATION** is a publication by Vietnam Chamber of Commerce and Industry about Vietnam business community participation in current legislation.

Highlights reflect VCCI's major comments/recommendations on legal normative documents with significant impact on business community, and recommendations on solution of business difficulties.

Receptiveness analyzes and evaluates how state agencies are receptive to VCCI's inputs through comparison of issued legal document against VCCI's recommendation sent to drafting board.

Quick look provides:

- Draft of legal documents which VCCI has commented on and main points.
- List of drafts open for comments.
- List of drafts with VCCI's participation in drafting and reviewing.
- Law-making events held solely by VCCI or in coordination with VCCI



Amendment to Law on excise tax



Evaluate 12 documents issued in the first 6 months of 2014 which VCCI had commented

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Full draft of legal normative documents and supporting materials, comments and recommendations, information on related past and upcoming events are posted on our website: www.vibonline.com.vn

Revision of Law on Enterprises and Investment law

These important laws constitute regulation framework for business and investment in Vietnam; current revision is led by Ministry of Planning and Investment. Due to its importance, VCCI has been actively participating in the drafting session through various methods:

- *Participate in the Drafting Board and the Editing Team;*
- *Coordinate with the drafting agency and other agencies to invite broad participation from business community through workshops, round tables of experts; comments by mail and online via our website – www.vibonline.com.vn;*
- *Participate in review/verification meetings held by Committee on Economy of National Assembly.*

Initially, VCCI's comments have been focusing on revision of Law on enterprises and Investment law toward an favorable and level business environment:

Law on enterprises

■ *Application of the Law on enterprises and relevant legislations:*

VCCI suggests reviewing industry-specific laws with separated regulations that differ from the Law on enterprises to evaluate necessity of such discrepancy. If it is negative, unnecessary different regulations shall be annulled and replaced with the Law on enterprises. In affirmative case, it must be specified in Article 3 of the Law on enterprises, for example: "Regarding the establishment, organization and management, dissolution of enterprise, this Law shall precede over all sectorial laws law except in specialized areas a, b, c (envisaged)" to mitigate negative impact to the freedom of trade in Law in enterprises, and in extreme cases, its neutralization by industry-specific laws.

■ *Business registration:* VCCI supports the orientation of simplified administration procedure of business registration in Law on enterprises. However, the Law must have a provision on post-registration control, at least in the Law's general provisions, and concentrate on close cooperation and two-way communication between business registration agencies and governing agencies, especially tax

authorities, in order to avoid overlapping inspection on same business issues by different agencies.

■ *Line of business filing and coding in registration procedure:* VCCI supports idea of removing filing of business coding in registration procedure, instead going towards: Registration certification does not record business lines and shall pre-state: "Enterprises have right to conduct business in all lines, except for lines prohibited by laws, as specified in Annex 1 attached hereto and updated on website of Ministry of Planning and Investment.

For conditional line of business listed in Annex 2 attached hereto and updated on website of Ministry of Planning and Investment, enterprises have to comply with specified conditions. Business registration certification does not replace conditions and/or specified business license of conditional line of business" which are specified in two above Annexes.

■ *Definition of "foreign investors"*
+ Need to eliminate all procedural discrimination between domestic and foreign investors,



leaving intact differential treatment mechanisms related to right of conducting business (provided upon reasonable grounds, according to international commitments and implemented by industry-specific authorities);

+ Specify definition of foreign investors: foreign investors are every subject which has more than 50% of foreign capital. For subjects with second-generation foreign investment, once a subject is defined as a foreign investor (with more than 50% foreign capital), every action of these investors considered purely foreign.

Investment Law

■ *Investment registration:* eliminate investment registration procedure (and Investment Certificate) of all projects except:

+ Projects that use State resources (land, minerals, credits...) or significantly impact unavailable/scarc resources;

+ Projects of national importance

or projects that need Prime Minister's approval (provided that criteria for this category are specified).

■ *Execution of investment projects*

+ Regulations related to investor's activities in investment project implementation: to eliminate regulations on rights of investors during investment project implementation because these rights are already governed by other laws (Law on enterprises, Law on cooperative, Commercial law...). If needed, the Draft should only have one article to recognize autonomy of investors in all activities in accordance with relevant laws.

+ Adjustment of investment registration certification: the Draft should stipulate that investors only have to apply for adjustment to investment certificate when project's changes are related to content of Investment registration certificate, and this procedure shall be conducted by

authorities in the most expedite manner along as an action of recording, while appraisal process shall be applied only to items that have been subject to appraisal in the original investment registration certification.

VCCI had circulated comments on almost all versions of these two drafts through various means: by sending official letters of comments to drafting board (Ministry of Planning and Investment), by participating in verification meetings held by Committee on Economy of National Assembly, through ideas exchange with group of National Assembly Members, by participating in National Assembly Sessions, directly talking with drafting board;...(these above comments are on the latest updated ones, comments on different versions are uploaded fully on website: www.vibonline.com.vn).

VCCI continues to follow-up and participate in drafting process of these two laws.

Law on excise tax



VCCI had conducted wide consultation on Law on excise tax (revised) with enterprises, business associations all over the country, cooperated with the Office of Government to hold workshop in Ho Chi Minh city. Based on received responses, VCCI initiatively submitted comments to the Drafting board and related authorities. The comments specifically focused on three taxable objects: non-alcoholic carbonated beverages; cigarette; beer.

NON-ALCOHOLIC CARBONATED BEVERAGES

VCCI suggested that application of Law on excise tax is only deemed reasonable when the drafting board:

- Have a full, more coherent and convincing explanation of harmful impacts of stand-

alone non-alcoholic carbonated beverages on human health (not harmful impacts of beverage in general);

- Have a detailed analysis and more comprehensive rationale about harmfulness of particular substances specific to carbonated beverages (such as CO₂, Natrium...) as well as its cumulative effects in a product or when it is used at higher frequency than other products which have the same substances in order to support arguments of relevant enterprises;

If the drafting board finds that non-carbonated soft drinks themselves are harmful to human health if overused, but carbonated soft drinks have worse effects (due to accumulated effect of carbonated drinks-only substances), full explanations about implementation

roadmap shall be provided (excise tax shall initially be levied on carbonated soft drinks due to more prominent negative impact; in the long run there shall be measures on non-carbonated soft drinks if statistics data support the degree of use or overuse creates hazard at the level similar to carbonated soft drink at present).

The drafting board also needs a prudent and comprehensive explanation on opinion that foreign investors are holding major market share on non-alcoholic carbonated soft drinks, while local investors are more concentrated in non-carbonated soft drinks in order to avoid accusation of discrimination in accordance with WTO regulations.

CIGARETTE:

Basically, it is necessary to levy high tax on cigarette in order to limit consumption of this hazardous product. However, the policies should take into account all stakeholders in order to balance and protect rights of affected subjects, including enterprises producing and trading cigarettes. VCCI recommends postponing tax raising period due to the following reasons:

- Policies on cigarette are now rather strict: health warning pictures printed on 50% of the products package; enterprises have to contribute to Fund for preventing and against cigarette harmfulness (1% of excises tax from the 1st May, 2013, increase to 1,5% in May, 2016 and reach to 2% in May, 2019); prohibit advertisement and promotion in all forms; govern production and trading activities by licensing (from manufacture, wholesale to retail stores); prohibit smoking in many places; levy especially high excise tax on cigarette; target product volume stipulated under Decree No. 67/2013/ND-CP...
- Proliferation of tobacco smuggling, especially during the period of excise tax raising, and low efficiency of anti-smuggling activities makes significant impact on legitimate trading activities of cigarette enterprises; creates unfair competition between legitimate cigarette and smuggled cigarette prod-

ucts; affects State budget revenue (reduction of revenue from cigarette enterprises due to decreased demand on market and tax collection falling short due to smuggling activities).

BEER:

The tax rate increase on beer products in the proposal is rather high, VCCI recommends reviewing the regulations for the following reasons:

- Conflicts in beer industrial development policies: Levying high concise tax on beer products in order to reduce consumption and decrease production of beer. However, the beer industry is now developing in accordance with approved industry master plan, and current growth rate is fully corresponding to the plan;
- Negative impact of beer on social stability: the drafting board should separate negative impact caused by beer and wine, as due to different alcohol content of these two products, the impact on health is different.

VCCI will continue gathering comments on draft on Law on excise tax (revised) from business community and send to drafting board, as well as to relevant agencies.



Recommendation related to aggressive incident in Binh Duong, Dong Nai and Ha Tinh provinces

In the middle of May this year, exploiting the wave of patriotism activities against illegal placement of drilling rig Haiyang Shiyou 981 in Vietnam's exclusive economic zone and continental shelf, on 13th and 14th May, 2014, some riots in Binh Duong, Dong Nai, Ha Tinh provinces had caused public disorder, damaged property of FDI enterprises, especially Chinese and Taiwan enterprises... This regrettable incident had a negative impact on country image and investment environment of Vietnam.

Responding to this incident, on 19th May, 2014, VCCI organized a meeting with Foreign business association in Vietnam in order to further investigate current situation and receive suggestions from affected enterprises in order to propose suitable solution to Government. At the meeting, representatives from enterprises proposed to the Government:

- To guide and assist enterprises in addressing the problem of salary and wages for workers during the suspension period due to the incident; To consider to loosen regulations on working permit certification for foreigners, specifically in cases when enterprises have to hire new expatriate experts to substitute those that left due to the incident and not willing to come back Vietnam;
- To build up a Procedure and guideline for insurance companies to expedite damage identification procedure and compensation for enterprises so that they could quickly recover their activities.

In cases where that damage identification is prolonged, it is petitioned that the



Government extend temporal support.

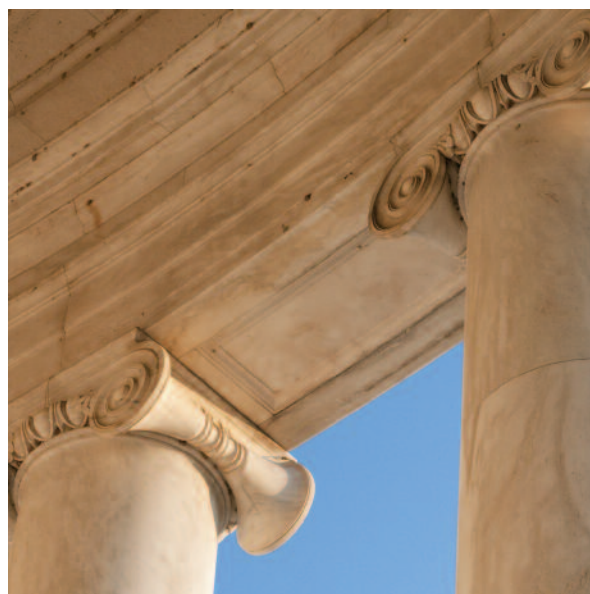
- To direct customs authorities to prioritize and accelerate clearance procedure for affected enterprises, thus ensuring that they could meet the contract delivery deadline;
- To take measures to resolutely punish violators in the incident.
- To take measures to find and re-collect property of enterprises which were lost in the incident.

After the meeting, VCCI had collected comments of enterprises and submitted to the Government, and also petitioned to the Prime Minister:

- To direct authorities to take **immediate, decisive, thorough and practical actions** for mitigation of the damage. These actions and the initial results shall be published in mass media in real time, with full details so that all enterprises, citizens and the foreign countries are well notified.
- To direct ministries, agencies and local authorities to establish **Task Force** in each province and each Industrial/Economic Zone where the incident took place to be focal point to effectively, promptly and consistently solve all problems that resulted the incident.
- To direct ministries and agencies to consider flexible application of some legal regulation in cases that were directly affected by the incident.

There were 12 legal documents issued in the first 6 months of the year 2014 to which VCCI have comments, including: 5 Decrees, 1 Decision of the Prime Minister, 6 Circulars drafted by 5 Ministries (Ministry of Finance, Ministry of Science and Technology, Ministry of Planning and Investment, Ministry of Industry and Trade, Ministry of Transportation). Namely:

- Decree No. 08/2014/ND-CP dated 27/01/2014 of the Government detailing and guiding the implementation of some articles of Law on science and technology
- Decree No. 30/2014/ND-CP dated 14/4/2014 of the Government regulate shipping business conditions and shipping supporting services
- Decree No. 42/2014/ND-CP dated 14/5/2014 of the Government managing multi-level marketing activities
- Decree No. 36/2014/ND-CP dated 29/4/2014 of the Government on raising, processing and exporting pangasius
- Decree No. 63/2014/ND-CP dated 26/6/2014 of the Government detailing some articles of Law on tendering for selection of contractors
- Decision No. 28/2014/QD-TTg dated 07/04/2014 of Prime Minister on electricity retailing price
- Circular No. 25/2014/TT-BTC dated 17/2/2014 of Ministry of Finance on general valuation methods for goods and services
- Circular No. 13/2014/TT-BTC of Ministry of Finance dated 24/01/2014 guiding customs procedure for processing products for foreign traders
- Circular No. 38/2014/TT-BTC dated 28/3/2014 of Ministry of Finance guiding some articles of Decree No. 89/2013/ND-CP dated 6/8/2013 detailing Law on price about appraisal
- Circular No. 56/2014/TT-BTC dated 28/4/2014 of Ministry of Finance guiding implementation of Decree No. 177/2013/ND-CP dated 14/11/2013 detailing and guiding implementation of Law on price.
- Circular No. 01/2014/TT-BKHDT dated 14/11/2014 of Ministry of Planning and Investment guiding implementation of some articles of Decree No. 38/2013/ND-CP dated 23/04/2013 of the Government on managing and using Official development Assistant and preferential loans from sponsors.
- Circular No. 78/2014/TT-BTC dated 18/6/2014 of Ministry of Finance guiding implementation of the Decree No. 218/2013/ND-CP dated 26/12/2013 on regulating and guiding Law on enterprises income tax



During drafting process of the above 12 documents, VCCI had 141 comments, with average of 12 comments per draft. VCCI's comments concentrated on:

- **Reasonability:**
 - Remove some unreasonable business conditions which burden enterprises while the administrative governance gains are vague;
 - Remove unreasonable burdensome procedures for businesses;
 - Adjust regulations in order to ensure that right objects in the sector benefit through industry-specific goals and policies;
 - Remove or adjust impractical regulations...

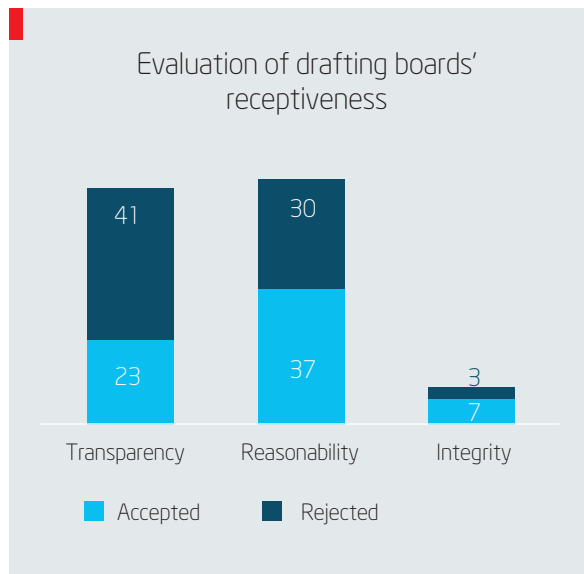
Evaluation of drafting boards' receptiveness

■ Transparency:

- Clarify definitions to ensure common understanding among beneficiaries;
- Explicitly define regulations on certificating procedure in order to limit harassment from authorized officials;
- Adjust other unclear regulations.

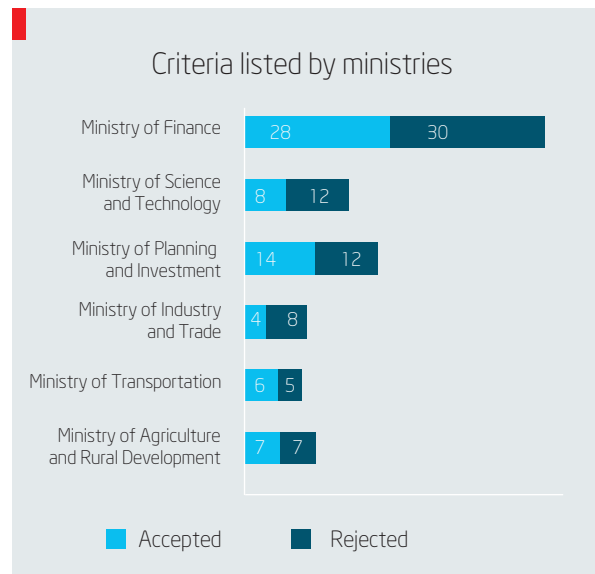
■ Integrity:

- Suggest compliance of the regulations with other relevant legal documents.

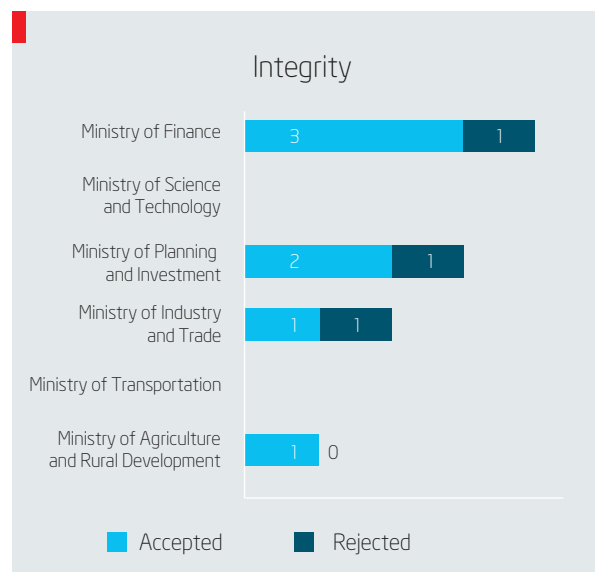


Review of the regulations against comments based on VCCI's criteria showed that comments related to reasonability and integrity enjoyed much higher degree of receptiveness comparing to non-receptiveness. Receptiveness of comments on integrity doubles that of non-receptiveness. However, comments on transparency are received at low rate.

Analysis of response rate by ministries showed that VCCI's comments in sectors governed by Ministry of Transport, Ministry of Planning and Investment, Ministry of Agriculture and Rural Development are accepted in majority. In case of other ministries, though rate of non-receptiveness was higher, but the difference was not significant (i.e. Ministry of Finance, Ministry of Science and Technology).



From the perspective of criteria, the graph indicates that most of VCCI's comments on reasonability and integrity are accepted. Especially, rate of comments on integrity of ministries' drafts with related legal system being accepted at most of ministries is higher than that of unaccepted. In Ministry of Agriculture and Rural development, this rate is 100%.

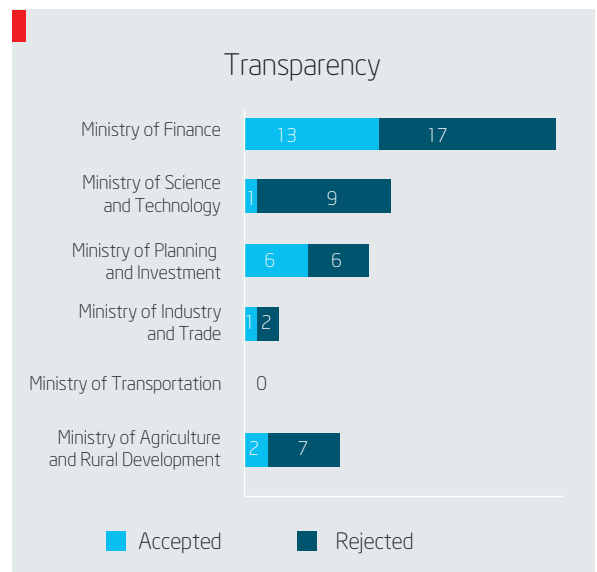
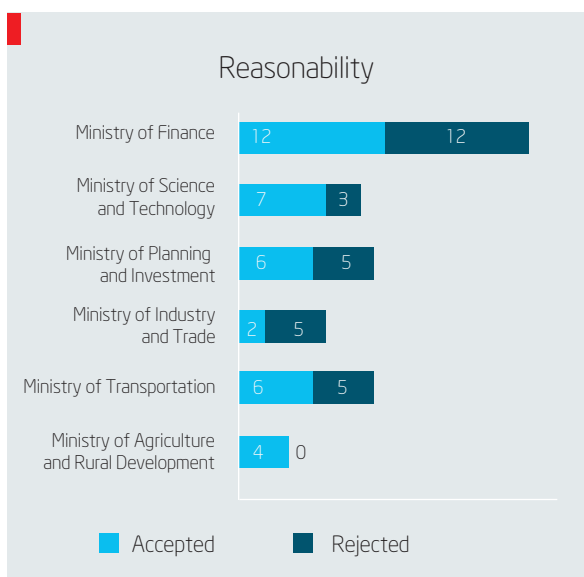


- There is no comment on integrity to legal documents drafted by Ministry of Science and Technology and Ministry of Transportation



Comments on reasonability are seen as hard-to-be-accepted, however, there were 37 out of 67 VCCI's comments were acknowledged. By ministries, two third were receptive to the majority of comments (Ministry of Agriculture and Rural development listened to the whole idea of VCCI while Ministry of Science and Technology listened to 7 comments in the total of 10 comments sent to them), one ministry equaled rate of acceptance and non-acceptance. Only one ministry rejected more comments than accepted.

In most of VCCI's comments, transparency was always considered. However, it seems that comments on transparency in administrative procedures, business conditions were not always acknowledged by the ministries. This criterion is the only one where rate of acceptance is lower that of non-acceptance.



- There is no comment on transparency to legal documents drafted by Ministry of Transportation

List of documents commented by VCCI

In the first 6 months of the year, VCCI had commented on 33 drafts of normative legal documents¹, including: 6 Laws, 7 Decrees, 01 Decision of the Prime Minister, 18 Circulars, 01 Project (as per below):

No.	Type of legal document	Name of draft of normative legal document	Drafting agency
LAW/CODE			
1	Code	Civil code of Vietnam (amended)	Ministry of Justice
2	Law	Excise tax law (amended)	Ministry of Justice
3	Law	Law on enterprises (amended)	Ministry of Planning and Investment
4	Law	Law on state budget (amended)	Ministry of Finance
5	Law	Law on natural resources, environment and islands	Ministry of natural resources and environment
6	Law	Law on statistics	Ministry of Planning and Investment
DECREE			
1	Decree	Decree on automobile transportation business and business conditions replace Decree No. 91/2009/ND-CP dated 21/10/2009 of the Government on automobile transportation business and business conditions and Decree No. 93/2012/ND-CP dated 08/11/2012 amending and supplementing Decree No. 91/2009/ND-CP	Ministry of Transportation
2	Decree	Decree on automobile passenger transportation business conditions	Ministry of Transportation
3	Decree	Decree on guiding Law on tendering for selection of contractors	Ministry of Planning and Investment
4	Decree	Decree detailing the implementation of Law on fire protection and Law on fire protection (amended)	Ministry of Public security
5	Decree	Decree detailing and guiding implementation of Ordinance on management, using weapons, explosive and supporting tools	Ministry of Industry and Trade
6	Decree	Decree replace Decree No. 42/2012/ND-CP dated 11/5/2012 on management and using land for rice cultivation	Ministry of Agriculture and Rural Development
7	Decree	Decree on establishment and management of Fund of disaster prevention	Ministry of Agriculture and Rural Development
DECISION OF PRIME MINISTER			
1	Decision of the Prime Minister	Decision of Prime Minister on management of foreign specialized economics information trading in Vietnam	Ministry of Information and Communications

¹ All comments were posted on VCCI's website: www.vibonline.com.vn

No.	Type of legal document	Name of draft of normative legal document	Drafting agency
CIRCULAR			
1	Circular	Circular guiding quality assessment of biological samples on serological diagnosis of HIV	Ministry of Health
2	Circular	Circular guiding some articles of Decree No. 202/2013/ND-CP dated 27/11/2013 of the Government on fertilizer management	Ministry of Agriculture and Rural Development
3	Circular	Circular guiding some articles of Decree No.27/2013/ND-CP dated 15/7/2013 of the Government on online games	Ministry of Information and Communications
4	Circular	Circular guiding some regulations on investment and planning inspectorate	Ministry of Planning and Investment
5	Circular	Circular guiding Decree of the Government on enterprises income tax Law	Ministry of Finance
6	Circular	Circular guiding content, procedure of reviewing the scientific and technological basis of investment projects, social-economic development programs	Ministry of Science and Technology
7	Circular	Circular on Form of package bidding document for contract of construction and installation, procurement of goods, consulting service and Form of EPC package	Ministry of Planning and Investment
8	Circular	Circular guiding the collateral auction stipulated in Decree No. 53/2013/ND-CP dated 18/5/2013 of the Government on the establishment and operation of the Vietnam Asset Management Company	Ministry of Justice
9	Circular	Joint circular on evaluating scientific and technological development, Intellectual property using state budget	Ministry of Finance
10	Circular	Joint circular guiding procedure for capital contribution, management of contributed capital investing in basic geological survey on minerals; enterprises' equity confirmation in mining and exploration licenses	Ministry of Natural resources and Environment
11	Circular	Circular detailing and guiding some articles on inorganic fertilizer stipulated in Decree No. 202/2013/ND-CP dated 27/11/2013 of the Government on fertilizer management	Ministry of Industry and Trade
12	Circular	Circular on importing management for used machines, equipment, technological lines	Ministry of Science and Technology
13	Circular	Circular on payment of credit institutions using State budget; Circular on cash service's fee	The State Bank of Vietnam
14	Circular	Circular on corruption evaluation criteria and contents of evaluation on preventing and against corruption	The Government Inspectorate of Vietnam
15	Circular	Circular on aquatic animals and aquatic animal products epidemiology (replace Circular No. 06/2010/TT-BNNPTNT)	Ministry of Agriculture and Rural Development

No.	Type of legal document	Name of draft of normative legal document	Drafting agency
CIRCULAR			
16	Circular	Circular on route and conditions for Vietnamese enterprises to participate in foreign commodity exchange	Ministry of Industry and Trade
17	Circular	Circular replace Circular No. 60/2012/TT-BTC dated 12/4/2012 of Ministry of Finance guiding tax obligations applied to foreign individuals and organizations doing business or receive income in Vietnam	Ministry of Finance
18	Circular	Circular issue Quality standards for passenger transportation by automobiles	Ministry of Transportation
PROJECT			
1	Project	Project on overall design for competitive wholesale electricity market	Ministry of Industry and Trade

Recommendations from VCCI are related to:

■ **Abrogate unreasonable business conditions that burden enterprises, for example:**

- Regulation on minimum number of vehicle for automobile transportation business²
- Impose conditions on foreign enterprises selling specialized economic information in Vietnam³
- Impose conditions on enterprises when trading through foreign commodity exchange⁴
- Impose capacity, factory area regulations on organic fertilizer factories

■ **Abrogate the method of management by licensing and replace with other management methods, for example:**

- Move from license granting upon fulfilling business conditions to requesting compliance with business conditions without license in case of fire fighting and fire prevention enterprises⁵
- Move from license granting for specialized economic information trading to registration⁶
- Move from requesting enterprises to return expired license back to issuing authorities to regulation that authorities proactively annulate expired license⁷
- Adjust the procedure to issue certification for G2, G3, G4 game services, from licensing to

regulation of information registration, where technical appraisal must be included in the application dossier; shorten license granting period; abolish regulation on duration of the license.⁸

■ **Abrogate regulation that are unclear in state governance goals, unfeasible and burden enterprises, for example:**

- The driver must carry list of passengers in the contractual passenger transportation business⁹
- Prohibition in using converted-function vehicles for the distance above 300 km from 01/01/2016¹⁰
- Organizations buying specialized economic information in Vietnam have to inform relevant authorities¹¹

² Comment to Draft of the Decree on automobile transportation business and business conditions

³ Comment to Draft of the Decision of the Prime Minister on management of foreign specialized economics information trading in Vietnam

⁴ Comment to Draft of Circular specifying roadmap, conditions for Vietnamese businesses for participation in trading of goods through foreign commodity exchange

⁵ Comment to Draft of Decree guiding on Law on Fire fighting and Prevention

⁶ Comment to Draft of Decision of Prime Minister on specialized economic information trading

⁷ Comment to Draft of Decree guiding on Ordinance on management and usage of industrial explosives

⁸ Comment to Draft of Circular on online game

⁹ Comments to Draft of Decree on automobile transportation services business conditions

¹⁰ Comments to Draft of Decree on automobile transportation services business conditions

¹¹ Comments to Draft of the Decision of Prime Minister on management of foreign specialized economics information trading in Vietnam

- Requirement towards organisations that specialized economic information bought from foreign information agencies can only be used internally, without the right to resell or openly publish on mass media¹²
 - Requirement towards organization that specialized in trading of specialized economic information to report on some content¹³
- **Abrogate inconsistent regulations that overlap or interfere into autonomy of subjects, i.e.:**
- Identify scope of application of Law on natural resources, environment and sea and islands, to avoid overlapping with relevant laws, like: Law on environment protection; Law on petroleum, Mineral law¹⁴
 - Define maximum damage compensation applied to goods on contracted freight¹⁵
 - Delegate local agencies to regulate the minimum number of taxi car and its colors.
 - Authorise planning and investment inspectors to inspect “enterprises’ implementation of financial obligations (fee, charges, land use and land rent fee...)”; evaluate contributed asset, contributed capital, filing of documents at enterprises¹⁶
 - Inspect the law enforcement at investment recipient countries for enterprises with investment abroad¹⁷
- Abrogate conditions on minimum legal capital, possession of head office with clear contact address and telephone, certification of legal possession of head office, requirements on professional qualification of management staff for gaming operations, etc. for¹⁸
- **Amend regulations to improve its transparency¹⁹:**
- Clearly formulate definition to ensure common understanding among regulatees
 - Clearly define criteria, administrative procedures, especially procedures applied for licensing and “sub-licences”
 - Clearly define targets for application in order to identify suitable governing methods²⁰.

¹² Comments to Draft of the Decision of Prime Minister on management of foreign specialized economics information trading in Vietnam

¹³ Comments to Draft of the Decision of Prime Minister on management of foreign specialized economics information trading in Vietnam

¹⁴ Comments to draft of Law on Natural resources, environment and sea and islands

¹⁵ Comments to draft of Decree on condition for automobile transport services

¹⁶ Comments to draft of Circular on inspection in planning and investment

¹⁷ Comments to draft of Circular on inspection in planning and investment

¹⁸ Comments to draft on Circular on online games

¹⁹ Present in almost all of VCCI's comments

²⁰ Comments to Draft of Decree guiding on Ordinance for management, usage of industrial explosives

List of drafts open for comments

No.	Type of Document	Name of document	Drafting agency	Deadline for comments
1	Decree	Decree promulgating the Regulation on the protection of ports and maritime channels	Ministry of Transportation	29-08-2014
2	Circular	Circular on technical maintenance and repair of motorized land-road traffic means	Ministry of Transportation	29-08-2014
3	Circular	Circular amending, supplementing some articles of Circular No. 105/2010/TT-BTC dated 23.7.2010 of the Ministry of Finance guiding the implementation of natural resources tax	Ministry of Finance	04-09-2014
4	Decree	Decree detailing some articles of Law on customs on customs procedure, inspection, supervision, customs control	Ministry of Finance	10-09-2014

List of drafting boards in which VCCI is a member:

- Law on enterprises (amended)
- Civil code of Vietnam (amended)
- Law on civil judgments (amended)
- Law on promulgation of normative legal documents
- Decree replacing Decree on establishment, functions, duties and organizational structure of Vietnam Competition Council

List of reviewing board in which VCCI is a member:

- Law on pharmacy (amended)
- Law on investment (amended)
- Law on enterprises (amended)
- Accounting law (amended)
- Excise tax law (amended)
- Law on investment and management of state budget to enterprises
- Decree on collection of land use fee
- Decree on collection of land rent, water rent
- Decree on land price
- Decree on implementation of some articles about compensation, support and resettlement when the State recovers land
- Decree on information security

Events held or coordinately held by VCCI

- Law on civil judgments – From the perspective of enterprises (Hanoi, 25/2/2014)
- Commenting on Draft of Law on enterprises (amended) (Ho Chi Minh city, 11/3/2014)
- Commenting on Draft of Investment law (amended) (Ho Chi Minh city, 11/3/2014)
- Commenting on Draft of Law on real estate business (amended) (Ho Chi Minh city, 21/3/2014)
- Civil code - amending orientation (Ho Chi Minh city, 10/4/2014)
- Commenting on Excise tax law (Ho Chi Minh city, 11/4/2014 and Vinh Phuc, 19/5/2014)
- Announcing comments on drafts of decrees detailing implementation of Law on land 2013 (Hanoi, 22/4/2014)
- Commenting on Law on accounting (amended) (Hanoi, 27/5/2014)
- The role of enterprises in the new Law on promulgation of legal normative documents (Hanoi, 13/8/2014; Danang 19/8/2014, Hochiminh City 20/8/2014)