JUNE 2025

NEWSLETTER

LAC DUY & ASSOCIATES

CIRCULAR 31/2025/TT-BTC AMENDING AND SUPPLEMENTING A NUMBER OF ARTICLES OF CIRCULAR 23/2021/TT-BTC GUIDING THE PRINTING, ISSUANCE, MANAGEMENT AND USE OF ALCOHOL AND TOBACCO E-STAMPS

CIRCULAR 32/2025/TT-BTC GUIDING SOME CONTENTS ON INVOICES, FINANCIAL PAPERS, GUIDING THE IMPLEMENTATION OF DECREE 70/2025/ND-CP AND SOME OTHER CASES

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LAC DUY & ASSOCIATES

Dear Clients,

Lac Duy & Associates would like to send you the legal newsletter of June 2025 with some notable updates and articles as follows:

- Circular 31/2025/TT-BTC amending and supplementing a number of articles of Circular 23/2021/TT-BTC guiding the printing, issuance, management and use of alcohol and tobacco e-stamps
- Circular 32/2025/TT-BTC guiding some contents on invoices, financial papers, guiding the implementation of Decree 70/2025/ND-CP and some other cases
- Legal documents in 06/2025

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CIRCULAR 31/2025/TT-BTC AMENDING AND SUPPLEMENTING A NUMBER OF ARTICLES OF CIRCULAR 23/2021/TT-BTC GUIDING THE PRINTING, ISSUANCE, MANAGEMENT AND USE OF ALCOHOL AND TOBACCO E-STAMPS

Circular 31/2025/TT-BTC was signed on 31 May 2025 and comes into force from 01 June 2025 ("**Circular 31/2025**") to amend and supplement a number of articles of Circular 23/2021/TT-BTC dated 30 March 2021 guiding the printing, issuance, management and use of alcohol and tobacco e-stamps ("**Circular 23/2021**"). New points to note of Circular 31/2025 include:

No	Criteria	Circular 31/2025	Legal Basis
1	**Terms and conditions on Entities applying e-stamps**	Supplementing the content of regulations on Entities applying e-stamps for imported alcohol and tobacco products. Specifically: "*a. Enterprises and organizations importing bottled alcohol products and alcohol products in containers imported and transferred to bottles or importing tobacco products, that wish to apply e-stamps* ***in the course of carrying out import procedures or after completing import procedures*** *must apply e-stamps in accordance with the provisions of this Circular and be responsible for applying e-stamps prior to market circulation.* *b. In case enterprises and organizations importing bottled alcohol products or tobacco products wish to apply e-stamps in overseas manufacturing facilities, application of imported e-stamps onto imported products must comply with regulations and law prior to import to Vietnamese market for consumption.”.*	Article 1.1 of Circular 31

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2	**Purchasing and selling e-stamps for imported tobacco products, e-stamps for imported alcohol products**	Discard papers and documents that organizations and enterprises must provide when going to the tax authorities to purchase and receive e-stamps for imported tobacco and alcohol products. Specifically, organizations and enterprises when buying e-stamps only need: *"- Submit 01 application for purchasing e-stamps for imported alcohol/imported tobacco products using Form No. 09/TEM under Appendix 6 attached hereto, to the Customs electronic data processing system or submit a paper copy in case the system has problems.* *- Make payment for stamps purchase, receive stamps, management and use of stamps in accordance with the provisions of this Circular.*"	Article 1.2.b of Circular 31
3.	**Report on e-stamps usage**	Supplement the case where the Customs electronic data processing system has problems. Specifically: "*... c) In case the Customs electronic data processing system has problems, after completing applying e-stamps, enterprises and organizations shall make a report on e-stamps usage using Form No. 12/TEM under Appendix 6 attached hereto, and send it to the Customs Sub-department in the region where the e-stamp is issued.* *Within 05 days from the date the Customs authorities notify that the system's problem is remedied, the enterprises and organizations declare and send information data on e-stamps to the Customs electronic data processing system as prescribed."*	Article 1.2.c of Circular 31
4.	**Look up e-stamps information**	Supplementing the form of looking up e-stamps information applied to imported tobacco and alcoholic products. Specifically, users and relevant agencies scan the QR code if there is need to look up e-stamps information.	Article 1.2.d of Circular 31

5	**Procedures for purchasing e-stamps applied at overseas manufacturing facilities**	Supplementing regulations on procedures for purchasing e-stamps applied at overseas manufacturing facilities before importing into the Vietnamese market. Specifically, enterprises and organizations are responsible for (i) filling information for Customs Declarations before and after importing products; (ii) keeping e-stamps.	Article 1.2.đ of Circular 31
6	**Notification responsibilities of the Department of Taxation**	Supplementing information about location in case the e-stamps are lost, burned or damaged.Specifically: "*Declaring e-stamps for tobacco products and e-stamps for alcohol products no longer usable due to changes to policies on management of e-stamps or missing, burned or damaged e-stamps* ***at the warehouse of the Department of Taxation***"	Article 1.3.a of Circular 31
		Supplementing the case where the Department of Taxation does not need to declare the e-stamps are no longer usable due to missing, burned or damaged by organizations and individuals.	Article 1.3.c of Circular 31
7	**Purchasing tobacco e-stamps and alcohol e-stamps manufactured for domestic consumption**	1. Change the form organizations and individuals use to apply for purchase of e-stamps from Form No. 03/TEM to Form No. 02/TEM under Appendix 3 attatched hereto. 2. Discard the documents and papers that organizations and individuals need to provide when they are accepted to register to purchase e-stamps. Organizations and individuals only need to make payments for stamps purchase, receive stamps, management and use of stamps in accordance with the provisions of this Circular. 3. Supplementing regulation c3 on the issuance of e-stamps. Specifically, when organizations and individuals issue stamps to the manufacturing facilities, it is necessary to scan the QR code attached to the stamp cartons or stamp blocks or	Article 1.3.d of Circular 31

		stamps; meanwhile, input data to ensure the connection of information about e-stamp data transmitted to the e-stamp management system.	
8	**Report on missing, burned, damaged, or deposal e-stamps**	Replacing the form of reporting missing or burned of e-stamps from Form No. 05/TEM to Form No. 04/TEM under Appendix 3 attached hereto.	Article 1.3.g of Circular 31
9	**Expenditure on printing stamps**	Exclude the stamp issuance and management costs in the principle of determining stamp selling prices.	Article 1.4 of Circular 31
10	**Substituted phrases**	1. Replacing the phrase "General Department of Taxation" with "Department of Taxation" 2. Replace the phrase "Tax Departments of province and centrally-run city", "Tax Departments of provinces and centrally-run cities", "Tax Departments of provinces and cities" with "Regional Tax Sub-departments". 3. Replace the phrase "Tax authorities of provinces and centrally-run cities" with "Tax authorities at all levels". 4. Replace the phrase "Sub-Department of Taxation" with "District-level Tax Team". 5. Replace the phrases "website of the General Department of Taxation" and "Web portal of the General Department of Taxation" with "Web portal of the tax sector". 6. Replace the phrase "Web portal of the General Department of Taxation" with "Tax Administration Procedure Information System" 7. Replacing the phrase "General Department of Customs" with "Customs Department"	Clause 1 and Clause 2, Article 2 of Circular 31

11	**Replacing Forms and Form Categories**	1. Replace Form No. 02/TEM, Form No. 04/TEM and Form No. 07/TEM under Circular 23/2021 with Form No. 02/TEM, Form No. 04/TEM and Form No. 07/TEM under Circular 31/2025. Replace the List of forms related to the printing, issuance, management and use of e-stamps of tobacco and alcohol manufactured for domestic consumption in Appendix 3 under Circular 23 with the similar List in Appendix 3 under Circular 31.	Clause 3 and Clause 4, Article 2 of Circular 31
12	**Exculde articles, clauses and forms**	Exclude Clause 1, Article 5 of Circular 23 and Form No. 03/TEM, Form No. 05/TEM under Circular 23	Clause 5 and Clause 6, Article 2 of Circular 31

CIRCULAR 32/2025/TT-BTC GUIDING SOME CONTENTS ON INVOICES, FINANCIAL PAPERS, GUIDING THE IMPLEMENTATION OF DECREE 70/2025/ND-CP AND SOME OTHER CASES

On 31 May 2025, Circular 32/2025/TT-BTC guiding the implementation of some articles of Law on Tax Administration dated 13 June 2019, Decree No. 123/2020/ND-CP dated 19 October 2020 of the Government on invoices, financial papers, Decree No. 70/2025/ND-CP dated 20 March 2025 amending, supplementing some articles of Decree No. 123/2020/ND-CP ("**Circular 32**") was enacted by the Ministry of Finance to replace the old Circular 78/2021/TT-BTC ("**Circular 78**"). These notable changes include:

No.	Categories	Circular 32	Legal Basis
1	**Subject of application**	Addition of organizations, persons stipulated in clause 1 Article 1 Decree No. 70/2025/ND-CP.	Article 2 Circular 32
2	**Regulation on the implementation of consumer incentivization**	Addition of regulation on the Tax Department implementing measures incentivizing consumers taking invoices when purchasing goods, services. In particular: "*1. The Tax Department utilizes the online database of e-invoice to build, deploy lucky database of e-invoice to build, deploy lucky invoice program with e-invoices that have the*	Article 3 Circular 32

		consumer as the buyer *2. The Tax Department builds plan on organization, reward spin frequency, reward value of the lucky invoice program based on the online e-invoice database and reports to the Minister of Finance for review and approval before implementing".*	
3	**Conditions on the authorized third party**	Elimination of the requirement that a third party must have an affiliate relationship with the seller in the authorization: "*Goods sellers, service providers may authorize a third party which is eligible to use e-invoices and is not subject to cases of suspension of using e-incoives per Article 16 Decree No. 123/2020/ND-CP (amended by clause 12 Article 1 Decree No. 70/2025/NĐ-CP) to issue e-incoives for sale of goods, provision of service*".	Point a clause 1 Article 4 Circular 32
4	**Invoice issuance authorization principle**	Supplementation of the invoice issuance authorization principle: "*h) E-invoices issued by the authorized party must be appropriate with the tax calculation method of the authorizer*".	Point h clause 1 Article 4 Circular 32
5	**Information in e-invoice issuance authorization**	Addition of the use of personal identification number in authorization contracts, agreements, and notice form to the tax authority regarding authorization.	Clause 2 and 3 Article 4 Circular 32
6	**Subject giving notice on invoice issuance authorization**	Supplementation of regulation on organizations managing e-commerce platform being the entity that notifies the tax authority in case the seller of goods is a business household, business person that authorizes these organizations to issue e-invoices.	Point c clause 3 Article 4 Circular 32
7	**Sample number symbol,**	Addition of symbols No. 6 to No. 9 and symbol Letter X to assist in the differentiation, information reflection of e- invoices forms. Meanwhile, in regulations on invoices commissioned by the Tax Department, invoices which are stamps, tickets,	Article 5 Circular 32

	invoice symbol, invoice name	cards commissioned by the Tax Department must have 03 first symbols to differentiate stamps, tickets, cards belonging to the value-added tax invoice and sale of goods invoice. Other information is stipulated by the Tax Department as needed to manage but must not exceed 11 symbols.	
8	**Implementing e-invoices in some other cases**	Replacement of previous cases in Circular 78 with the following cases: • Some cases of selling goods and providing services in large quantities, arising frequently, necessary to have time to reconcile data between the enterprise selling goods and providing services and customers, partners; and • Cases where a financial leasing organization leases assets that are subject to value added tax.	Article 6 Circular 32
9	**Content of value-added tax invoice cum tax refund declarant**	Supplementation of regulations on compulsory content and form regarding value-added tax invoice cum tax refund declarant.	Article 7 Circular 32
10	**Conversion to e-invoices application**	Addition of in case an enterprise has many business activities, the enterprise registers to use e-invoices generated from cash registers applicable to the sale of goods, provision of service directly to consumers; the enterprise registers to use e-invoices with or without codes of the tax authority applicable to other business activities.	Clause 3 Article 8 Circular 32
11	**Criteria for identifying taxpayers with high tax risks in registering to use e-invoices**	Addition of 05 criterias for identifying taxpayers with high tax risks in registering to use e-invoices.	Article 9 Circular 32

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NEW LEGAL DOCUMENTS IN JUNE 2025

NO.	EFFECTIVE DATE	NAME
		ENTERPRISE
1.	June 15, 2025	Circular No. 01/2025/TT-NHNN on the issuance of initial licenses, replacement of licenses for people's credit funds issued by the Governor of the State Bank of Vietnam.
2	June 15, 2025	Circular No. 003/2025/TT-BNV on guidance on the management of labor, salaries, remunerations, and bonuses for employees in state-owned enterprises issued by the Minister of Home Affairs.
		INVESTMENT
1.	June 16, 2025	Circular No. 03/2025/TT-NHNN on opening and use of vnd-denominated accounts for conducting foreign indirect investment in viet nam issued by the Governor of the State Bank of Vietnam.
		CURRENCY - BANKING
1.	June 15, 2025	Decision No. 2179/QD-NHNN in 2025 announcing new administrative procedures, amending and supplementing the fields of establishment and banking operations implemented at the One-Stop Shop under the management of the State Bank of Vietnam issued by the Governor of the State Bank of Vietnam.
2.	June 16, 2025	Circular No. 02/2025/TT-NHNN regarding domestic issuance of certificates of deposit by credit institutions and foreign bank branches issued by the Governor of the State Bank of Vietnam.
		TAXES - FEES
1.	June 01, 2025	Decree No. 70/2025/ND-CP amendments to government's Decree No.123/2020/ND-CP dated October 19, 2020 prescribing invoices and records

2.	June 01,2025	Circular 31/2025/TT-BTC amending and supplementing a number of articles of Circular No. 23/2021/TT-BTC dated March 30, 2021 of the Minister of Finance guiding the printing, issuance, management and use of alcohol and tobacco e-stamps.
3.	June 01,2025	Circular 32/2025/TT-BTC guidance on Law on tax administration dated June 13, 2019, and government's Decree No. 123/2020/ND-CP dated October 19, 2020 prescribing invoices and records, Decree No. 70/2025/ND-CP dated March 20, 2025 on amendments to Decree No. 123/2020/ND-CP.
4.	July 01, 2025	Decree No. 117/2025/ND-CP stipulates tax administration for business activities on e-commerce platforms and digital platforms of households and individuals
		ADMINISTRATIVE VIOLATIONS
1.	June 15, 2025	Decree No. 93/2025/NĐ-CP amendments to government's Decree No.19/2020/nd-cp dated february 12, 2020 on inspection of and disciplinary actions against violations arising from enforcement of laws on administrative penalties.
		EXPORT - IMPORT
1.	June 30, 2025	Circular No. 43/2024/TT-BTNMT National Technical Regulation on scrap imported from abroad as production materials promulgated by the Minister of Natural Resources and Environment.