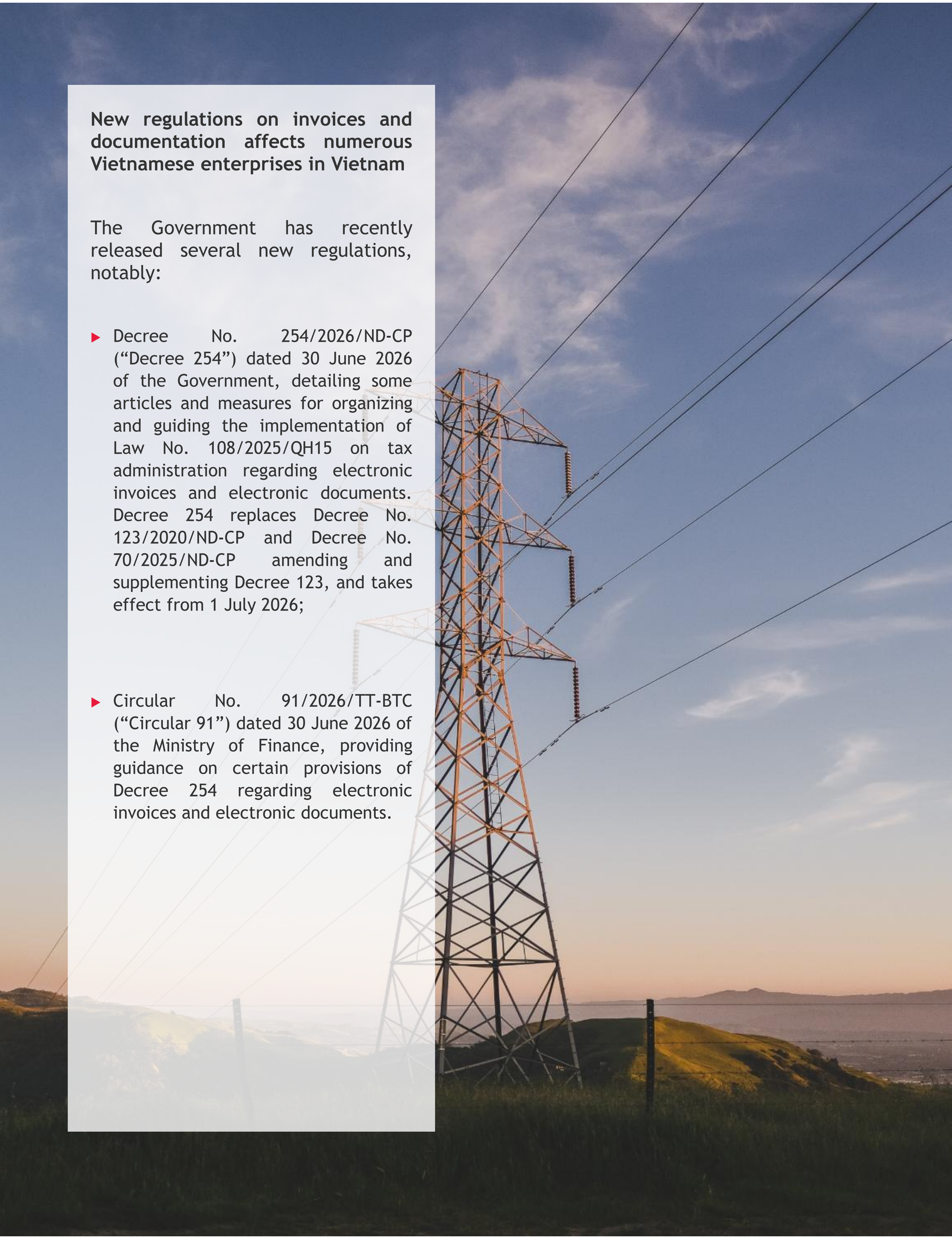
INDIRECT TAX NEWS

JULY 2026| https://www.bdo.vn



New regulations on invoices and documentation affects numerous Vietnamese enterprises in Vietnam

The Government has recently released several new regulations, notably:

- Decree No. 254/2026/ND-CP ("Decree 254") dated 30 June 2026 of the Government, detailing some articles and measures for organizing and guiding the implementation of Law No. 108/2025/QH15 on tax administration regarding electronic invoices and electronic documents. Decree 254 replaces Decree No. 123/2020/ND-CP and Decree No. 70/2025/ND-CP amending and supplementing Decree 123, and takes effect from 1 July 2026;

- Circular No. 91/2026/TT-BTC ("Circular 91") dated 30 June 2026 of the Ministry of Finance, providing guidance on certain provisions of Decree 254 regarding electronic invoices and electronic documents.

Key changes regarding e-invoices are summarized below.

1. Expansion of cases not subject to mandatory use of electronic invoices

Decree 254 introduces additional cases where the issuance of electronic invoices is not required, including certain activities of business households and business individuals (such as real estate leasing, provision of digital content services to foreign organizations, lottery/insurance/multi-level marketing agents where tax has been withheld), as well as receipts arising from reinsurance activities, financial activities, capital contribution by assets, internal asset transfers, and certain receipts not directly related to the sale of goods or provision of services.

2. Amendments to regulations on the timing of invoice issuance

Key noteworthy changes include:

- Security deposits for the performance of service contracts (in accordance with the Civil Code) are no longer required to be invoiced at the time of depocsit receipt. This treatment applies to all types of services (previously, it only applied to certain specific industries such as accounting, audit and tax consulting services).
- Additional categories of services with frequent transactions, high transaction volumes are permitted to perform reconciliation before invoice issuance (within seven days) such as digital services, digital platforms, insurance services, technology-based passenger transportation services, crypto assets, …
- Healthcare facilities with appropriate management software are permitted to issue consolidated invoices at the end of the day for medical services where patients do not request immediate invoice issuance.
- Where transactions arise outside normal working hours and the seller does not have automated invoice issuance software, the invoice issuance deadline is no later than the next working day.

3. Additional requirements regarding invoice contents

Decree 254 introduces certain amendments to supplement, enhance and clarify the mandatory information requirements on invoices, specifically as follows:

- Invoices issued by business households/business individuals must include the name, code and address of the business location. Specific provisions are also introduced for petroleum businesses, authorized invoice issuance arrangements, and auction sales of assets subject to enforcement proceedings.
- Where the purchaser is a consumer who does not provide personal information, the invoice must clearly state “Sold to consumer” instead of leaving the buyer information blank. This is a new requirement compared with previous regulations. For electronic invoices issued for retail sales at supermarkets, shopping malls and cinemas, buyer information (including name, address, personal identification number and digital signature) is not required where the purchaser is an individual who does not provide such information.
- For food and beverage services, the seller is not required to list each individual item where the charges are calculated based on set meals or portions.
- Additional regulations on mandatory information for electronic invoices on the sale of automobiles and motorcycles.
- The requirements on invoice contents for road transportation services are clarified, including information on vehicles, routes, transported goods and consignors. Certain information requirements are waived for transportation services or vehicle rental services provided under fixed-route contracts.
- A mechanism for issuing consolidated invoices for promotional goods/services and goods/services provided as gifts or donations based on VAT filing periods is introduced, helping enterprises reduce administrative procedures while ensuring tax management and transaction traceability requirements.

4. Amendments to the mechanism for authorized issuance of electronic invoices

Instead of limiting authorization to organizations managing e-commerce platforms as previously regulated, Circular 91 expands the scope of entities eligible to receive authorization for issuing electronic invoices. Accordingly, business households and business individuals may authorize economic organizations to issue electronic invoices on their behalf.

Business households and business individuals are responsible for providing information to the authorized organizations, while the authorized economic organizations are required to notify the tax authorities of the list of authorizing parties in accordance with applicable regulations.

5. Termination of validity of pre-printed invoices and paper receipts

From 1 July 2026, pre-printed invoices issued by tax authorities will no longer be valid for use and must be destroyed in accordance with regulations issued by the Ministry of Finance.

Unused self-printed or pre-printed paper receipts may continue to be used until 31 December 2026, after which they must be converted to electronic receipts.

6. Reward mechanism for reporting violations relating to failure to issue invoices

This is an entirely new regulation: consumers who provide accurate and substantiated information on the failure to issue/provide invoices, resulting in a penalty decision issued by the tax authority, may be entitled to a reward of up to 10% of the imposed penalty amount, capped at VND10 million per violation case. Reports may be submitted through eTax Mobile, the National Public Service Portal, email, or directly to the tax authority.

7. Conversion of electronic invoices into paper invoices

Decree 254 stipulates that the conversion of electronic invoices into paper invoices must ensure consistency between the electronic version and the converted paper version. The Decree also specifies the permitted cases for such conversion, including for purposes of tax inspection, examination, audit, or accounting activities.

Converted invoices used for accounting records or internal monitoring purposes do not have the same validity as electronic invoices for transactions or payments (except for certain cases involving electronic invoices generated from cash registers as prescribed).

8. Additional guidance on e-invoices issued by foreign suppliers

For foreign suppliers (including organizations managing foreign e-commerce platforms and digital platforms) conducting business activities generating taxable revenue in Vietnam and voluntarily registering to use electronic invoices in accordance with Vietnamese regulations, Decree 254 clarifies that the electronic signatures affixed to invoices must comply with the regulations on electronic transactions.

In light of the above updates, enterprises are recommended to proactively review their current processes for issuing, managing and using e-invoices to assess their compliance with the new regulations, particularly regarding the timing of invoice issuance, mandatory invoice contents, and the selection of applicable electronic invoice formats from 1 July 2026.

We will continue to monitor and provide further updates on detailed guidance issued by the Ministry of Finance and relevant authorities during the implementation of Decree 254 and Circular 91, to support enterprises in timely understanding and complying with the new requirements.

Contact us

BDO Consulting Vietnam Co., Ltd.

11th Floor, 60 Nguyen Dinh Chieu Street, Tan Dinh Ward,
Ho Chi Minh City, Vietnam
Tel.: +84 (0) 28 39110033
Fax: +84 (0) 28 39117439
Email: bdo@bdo.vn

www.bdo.vn