



PwC Vietnam Newsbrief

New customs procedures effective from 1 February 2026

December 2025





At a glance

On 18 December, the Ministry of Finance issued Circular 121/2025/TT-BTC to amend Circular 38/2015 and Circular 39/2018 which regulate customs procedures, inspections and supervision, export and import duties, and the management of exported and imported goods. This new Circular effects changes introduced by Law No. 90/2025/QH15 and Decree 167/2025, which were issued in July. Circular 121 will take effect from 1 February 2026.

Key changes made by Circular 121



01

Indirect value consultations via the Customs system

The Circular adds a new form of indirect value consultation which can be conducted through Customs' electronic system. This new consultation channel is available only to enterprises with a high customs compliance rating.

02

Guidance on destruction procedures

The Circular provides more detailed procedures for the destruction of excess raw materials and consumables, semi-finished and finished goods; scrap, defective products and waste; and machinery and equipment. Responsibilities of both enterprises and Customs pertaining to the destruction procedures are set out. Notably, the supervision of destruction based on risk management now applies only to scrap materials incurred from production - it no longer applies to defective products (phế phẩm).

03

Tightening opt-in/opt-out rules for export processing enterprises

The Circular narrows the range of cases where EPEs are allowed to choose whether to carry out customs procedures. For example, goods bought, sold, leased or lent between EPEs are no longer classified as transactions where EPEs can opt not to perform customs procedures.

Key changes made by Circular 121



04

Clarifying customs procedures for transactions between EPEs and domestic enterprises

The Circular provides guidance on customs procedures for goods purchased, sold, leased or lent between EPEs and domestic enterprises. Under the amended Law 90/2025 and Decree 167/2025, such goods are no longer treated as “in-country export-import goods”.

05

Requiring separate norms for re-imported repaired/recycled products

The Circular requires enterprises engaging in contract and toll manufacturing activities, including EPEs, to establish separate material/consumption norms for re-imported products that are repaired or recycled in certain cases.

06

Harmonizing ICEI procedures with new legislation at law and decree levels

The Circular aligns procedures for ICEI goods with the new provisions in Law 90/2025, Decree 167/2025 and Decree 18/2021.

Contact us

This publication has been prepared for general guidance on matters of interest only, and does not constitute professional advice. For further information, please reach out to us.



Nguyen Huong Giang

Partner

n.huong.giang@pwc.com



Richard Irwin

Partner

r.j.irwin@pwc.com



www.pwc.com/vn