DEDICA
—DEDICATED LAWYERS—

# ECONOMIC CONCENTRATION THRESHOLD DOUBLES
# FROM 1 JULY 2026

×2

NOTIFICATION THRESHOLD FOR ECONOMIC CONCENTRATION

Pursuant to Resolution No. 66.18/2026/NQ-CP (effective 1 July 2026) and Decree No. 35/2020/ND-CP

www.dedica-law.com · david@dedica-law.com · 039 969 0012

# What is the economic concentration notification obligation?

**Under Article 33 of the 2018 Competition Law**, enterprises participating in an economic concentration (merger, consolidation, acquisition, joint venture, etc.) must submit a notification dossier to the National Competition Commission BEFORE carrying out the deal, if the transaction meets the “economic concentration notification threshold.”

**The threshold is determined by ONE of the following four criteria:**

| | | | |
|---|---|---|---|
| Total assets in Vietnam | Total revenue in Vietnam | Transaction value | Combined market share |

# General enterprises: threshold doubled

| Criteria | OLD threshold (Decree 35/2020, Art. 13.1) | NEW threshold (Resolution 66.18, from 1 July 2026) | Notes |
|---|---|---|---|
| Total assets in the Vietnam market | VND 3,000 billion | **VND 6,000 billion** | Includes affiliated enterprise groups |
| Total revenue/sales in Vietnam | VND 3,000 billion | **VND 6,000 billion** | Based on the fiscal year immediately preceding the year of execution |
| Value of the economic concentration transaction | VND 1,000 billion | **VND 2,000 billion** | Many mid-sized deals will fall outside the notification requirement |
| Combined market share in the relevant market | 20% | **20%** (unchanged) | Market share criterion unchanged — notification still required if it reaches 20% |

**Note:** Meeting just ONE of the four criteria triggers the notification obligation.

DEDICA
—DEDICATED LAWYERS—



# Notification threshold for economic concentration involving credit institutions, insurers, and securities companies

Resolution 66.18 only raises the threshold for general enterprises. **Credit institutions, insurance companies, and securities companies** in M&A transactions must still comply with the following notification threshold:

| Criteria | Threshold unchanged under Decree 35/2020, Art. 13.2 |
|---|---|
| **Total assets in Vietnam** | Insurance / securities: VND 15,000 billion. Credit institutions: from 20% of total assets of the credit institution system |
| **Total revenue/sales** | Insurance: VND 10,000 billion · Securities: VND 3,000 billion · Credit institutions: from 20% of total system revenue |
| **Transaction value** | Insurance / securities: VND 3,000 billion · Credit institutions: from 20% of total system charter capital |
| **Combined market share** | 20% or more in the relevant market |

# Economic concentration notification procedure

## 1 Online filing

Enterprises can now file the economic concentration notification online via the National Public Service Portal, in addition to filing in person or by post (Appendix I.2, Resolution 66.18/2026/NQ-CP)

## 2 Review procedure

The National Competition Commission reviews the completeness of the dossier within 07 working days, then conducts a preliminary review within 30 days.

**Note:** The review procedure must still comply with Articles 34–35 of the Competition Law and Decree 35/2020.

DEDICA
—DEDICATED LAWYERS—



# Note: Special, TIME-LIMITED mechanism

**1 JULY 2026**
Takes effect

→

**28 FEB 2027**
Expires

Resolution 66.18/2026/NQ-CP, issued under the special mechanism of the National Assembly's Resolution 206/2025/QH15, is a “bridging” solution pending the formal amendment of Decree 35/2020. The new economic concentration notification threshold in the Resolution will expire once another decree amends or replaces Decree 35/2020.

**Note:** Dossiers filed before 1 July 2026 must still follow the (lower) thresholds currently in effect under Decree 35/2020/ND-CP

# Contact Us

DEDICA's team of lawyers and legal experts is always ready to help. Get in touch now for in-depth legal advice and services.

| | | |
|---|---|---|
| Corporate & Investment | Ongoing Legal Advisory | Dispute Resolution |
| Criminal | Mergers & Acquisitions (M&A) | Trademark & Copyright |


## Address

Floor 11, A&T Building, No. 171 Hai Ba Trung, Xuan Hoa Ward, Ho Chi Minh City

## Phone

+84 39 969 0012

## Email

david@dedica-law.com

## Website

www.dedica-law.com


Call us now or leave a message for a consultation.