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Updated labelling requirements under Decree 37/2026/ND-CP

This alert outlines the updated labelling regulations introduced under Decree 37/2026/ND-CP, which took effect on 23 January 2026.

On 23 January 2026, the Government issued Decree 37/2026/ND-CP (Decree 37), detailing and providing measures for the implementation of the Law on Product and Goods Quality. One of the in-scope measures introduced under Decree 37 is the updated labelling requirements.

Upon Decree 37's entry into force on the date of issuance, Decree 43/2017/ND-CP and Decree 111/2021/ND-CP governing previous labelling requirements are no longer applicable.

Several notable labelling requirements under Decree 37 are set out as below:

- **Electronic label:** Decree 37 introduces, for the first time, the concept of an electronic label, which is presented in electronic form through a data carrier affixed, printed, attached, cast, engraved, embedded, or displayed directly on the product or its commercial packaging. However, e-labels are not applicable to imported goods or to goods that are required to bear a physical label under specialised legislation.
- **Minimum font size:** For imported goods that are too small to display all mandatory information at the minimum font size of 0.9 mm, the required information must be affixed to the goods' packaging by means of a physical label.
- **Country of origin:** Abbreviations of the country of origin are permitted in accordance with Vietnam Standard (TCVN) 7217-1.
- **Information of the manufacturer or responsible entity:** The full or abbreviated name and address of the manufacturer or the entity responsible for the goods must be indicated on the label. Where the original label does not display the full name and address, such information must be fully provided in the accompanying documents or in the shipment documentation of the consignment.

Transitional provisions

As mentioned earlier, Decree 37 came in force from **23 January 2026**. Key transitional provisions include:

- Products that were produced, imported, circulated, or used before 23 January 2026 may continue to circulate and be used until the end of their shelf life.
- Pre-printed or pre-produced labels issued before 23 January 2026 may continue to be used for up to two years from 23 January 2026.
- Pre-printed or pre-produced labels displaying the responsible entity's former address prior to recent administrative boundary adjustments may continue to be used for up to two years from the effective date of the adjustment, provided such use does not cause confusion regarding the responsible entity and traceability is ensured upon request by the authorities.



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