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**XUẤT KHẨU TÔM CỦA VIỆT NAM SANG THỊ TRƯỜNG EU THEO HIỆP ĐỊNH  
EVFTA: PHÂN TÍCH CÁC RÀO CẢN PHI THUẾ**

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**Tóm tắt**

Tôm được coi là một trong những mặt hàng xuất khẩu hải sản chủ lực của Việt Nam sang thị trường châu Âu nhờ nguồn cung chất lượng và giá cả hợp lý. Việc áp dụng Hiệp định EVFTA đã mở ra nhiều cơ hội cho sự phát triển mạnh mẽ của ngành tôm Việt Nam nhờ lộ trình giảm thuế, nhưng đồng thời cũng đặt ra những thách thức đáng kể đối với ngành này thông qua các rào cản phi thuế, đặc biệt là các quy định nghiêm ngặt về biện pháp vệ sinh và kiểm dịch thực vật (SPS)

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và rào cản kỹ thuật thương mại (TBT). Nghiên cứu này tập trung vào phân tích và làm rõ tác động của các rào cản phi thuế quan, cụ thể là các quy định về SPS và TBT trong EVFTA đối với xuất khẩu tôm của Việt Nam sang thị trường châu Âu. Từ đó, nghiên cứu đưa ra những quan sát khách quan về điểm mạnh và điểm yếu của ngành tôm Việt Nam, cũng như các cơ hội và thách thức mà EVFTA mang lại cho việc xuất khẩu sản phẩm này sang thị trường EU. Cuối cùng, các tác giả đề xuất các giải pháp và khuyến nghị cho chính phủ Việt Nam và các nhà sản xuất tôm nhằm nâng cao năng lực sản xuất và kỹ năng để đáp ứng các tiêu chuẩn kỹ thuật, tối đa hóa lợi ích của Hiệp định EVFTA và thúc đẩy xuất khẩu tôm mạnh mẽ hơn sang thị trường châu Âu.

**Từ khóa:** EVFTA, tôm, châu Âu, Việt Nam, rào cản phi thuế

## **VIETNAM'S SHRIMP EXPORTS TO THE EU UNDER EVFTA: AN ANALYSIS OF NON-TARIFF BARRIERS**

### **Abstract**

Shrimp is considered one of Vietnam's key seafood exports to the European market due to its quality supply, and reasonable prices. The introduction of the EVFTA has opened up many opportunities for the strong development of the Vietnamese shrimp industry thanks to the tariff reduction roadmap, but it also poses significant challenges to this industry through non-tariff barriers, especially strict regulations on sanitary and phytosanitary measures (SPS) and technical barriers to trade (TBT). This study focuses on analyzing and clarifying the impact of non-tariff barriers, specifically the SPS and TBT regulations in the EVFTA, on Vietnamese shrimp exports to the European market. From this, it provides objective observations on the strengths and weaknesses of the Vietnamese shrimp industry, as well as the opportunities and challenges that the EVFTA brings to the export of this product to the EU market. Finally, the authors propose solutions and recommendations for the Vietnamese government and shrimp producers to improve their production capacity and skills to meet technical standards, maximize the benefits of the EVFTA agreement, and promote stronger shrimp exports to the European market.

**Keywords:** EVFTA, shrimp, EU, Vietnam, non-tariff barriers

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## **1. Introduction**

### ***1.1. Background information***

In the past and upcoming years, Vietnam's shrimp industry has been one of the country's most dynamic export sectors, playing an important role in both economic growth and rural development. Estimates illustrate that Vietnam's shrimp export accounted for around 40-45 % of

total seafood export turnover and reached about USD 4.3 billion in 2023, including exporting to some 100 markets (Vietnam Ministry of Agriculture and Rural Development & VASEP). Furthermore, shrimp farming and processing have helped Vietnam establish a strong presence in international seafood markets.

The European Union (EU) is one of Vietnam's most important export destinations. High purchasing power and strong demand for sustainable seafood in the EU market show both opportunities and challenges. The EU-Vietnam Free Trade Agreement (EVFTA), which came into effect in August 2020, eliminated tariffs on most seafood products, including shrimp. This gave Vietnam a competitive edge over non-EVFTA countries. However, while tariff reductions opened doors, strict non-tariff barriers such as sanitary and phytosanitary (SPS) standards, traceability requirements, and sustainability certifications do the opposite. These measures are designed to protect consumer health and ensure responsible fishing practices, but they also raise compliance costs and create obstacles for Vietnamese exporters.

### ***1.2. The reason for choosing the topic***

The decision to study the impact of EVFTA on Vietnam's shrimp exports to the EU, with emphasis on non-tariff barriers (NTBs), is both academically and practically important. Shrimp is Vietnam's most valuable seafood export, contributing significantly to GDP, foreign exchange, and rural employment. EVFTA grants tariff-free access to the EU, offering Vietnam an advantage over competitors, but strict NTBs, such as SPS measures, traceability rules, sustainability certifications, and IUU fishing regulations, pose complex and costly challenges, especially for small and medium enterprises.

NTBs are crucial because they evolve with consumer preferences and regulatory changes, particularly in the EU, where certifications like ASC and MSC are increasingly demanded. Compliance requires systemic changes, and failure risks exclusion from the market, undermining tariff benefits. Larger firms often adapt more easily, creating disparities within the industry.

Academically, most studies have focused on tariff impacts, leaving NTBs underexplored. This research addresses that gap, showing that tariff elimination alone does not guarantee competitiveness. Practically, it provides insights for exporters to develop compliance strategies and for policymakers to design supportive reforms. In doing so, the study contributes both to trade liberalization literature and to Vietnam's efforts to strengthen its position in the EU market under EVFTA.

### ***1.3. Literature review***

Research on the EVFTA's impact on Vietnam's seafood exports has primarily emphasized tariff reductions, often overlooking the role of non-tariff barriers. Hoa Phuong et al. (2023)

employed the SMART model to demonstrate that tariff elimination under EVFTA would significantly boost Vietnam's seafood exports to the EU. While their findings were optimistic, the study acknowledged that sanitary and phytosanitary (SPS) measures were not fully considered, leaving a critical gap in understanding. Kinzius, Sandkamp, and Yalcin (2019) provided a broader global perspective, arguing that NTBs have become increasingly prominent as tariffs decline, particularly in food sectors where safety and sustainability standards dominate. This observation is highly relevant to Vietnam's shrimp industry, which faces strict EU requirements on traceability, food safety, and environmental certifications.

Reports from the Vietnam Association of Seafood Exporters and Producers (VASEP, 2024) highlighted practical challenges, especially EU regulations on illegal, unreported, and unregulated (IUU) fishing and the growing demand for certifications such as ASC and MSC. These certifications are costly and require systemic changes in aquaculture practices, posing difficulties for small and medium-sized enterprises. Nguyen and Le (2022) further examined Vietnam's seafood export performance under EVFTA, concluding that while tariff reductions improved competitiveness, NTBs remained a major obstacle, particularly for SMEs lacking resources to comply with EU standards.

Taken together, these studies reveal a consistent pattern: while tariff liberalization under EVFTA is beneficial, NTBs significantly shape export outcomes. However, systematic analysis of NTBs in the context of Vietnam's shrimp exports remains limited. This research seeks to fill that gap by focusing specifically on NTBs and their implications for Vietnam's shrimp industry.

#### ***1.4. Research questions***

This study is guided by these central questions.

- What are the key non-tariff barriers affecting Vietnam's shrimp exports to the EU under EVFTA, and how do they influence market access and export competitiveness?
- What policy and business-level responses can help mitigate these barriers and improve the utilization of EVFTA preferences in the shrimp sector?

#### ***1.5. Research aim and objectives***

This research aims to analyze the impact of non-tariff barriers on Vietnam's shrimp exports to the EU under EVFTA. To achieve this aim, the study sets out the following objectives:

- To identify and analyze major non-tariff barriers affecting Vietnam's shrimp exports to the EU, particularly SPS measures, TBT, and rules of origin
- To assess how these barriers affect export performance and competitiveness in the EU market

- To propose policy and business-level measures to enhance compliance and improve the effective use of EVFTA

### ***1.6. Research methodology***

This study adopts a qualitative research approach, using descriptive and comparative analysis to examine the impact of non-tariff barriers on Vietnam's shrimp exports to the EU under EVFTA.

The research relies on secondary data and policy documents collected from sources such as Vietnam Customs, VASEP, Trade Map (ITC), and EVFTA-related reports.

Descriptive analysis is used to identify key non-tariff barriers, particularly SPS measures, technical barriers to trade (TBT), and rules of origin. Comparative analysis is applied to examine changes in Vietnam's shrimp export conditions during the EVFTA implementation period and to assess how these barriers affect export competitiveness in the EU market.

### ***1.7. Subject and scope***

The subject of this research is Vietnam's shrimp exports to the EU, with a particular focus on the EVFTA period from 2020 to 2024. The scope is limited to non-tariff barriers rather than tariff measures, as tariffs have already been eliminated under EVFTA. By concentrating on NTBs, the study aims to provide a clearer understanding of the challenges and opportunities facing Vietnam's shrimp industry in the EU market, offering insights that are both timely and policy-relevant.

## **2. An Overview of the EVFTA**

### ***2.1. Introduction***

The EU–Vietnam Free Trade Agreement (EVFTA), signed in June 2019 and effective from August 2020, is a landmark trade deal between Vietnam and the European Union. It was established to deepen economic cooperation, eliminate tariffs, and promote sustainable development. For Vietnam, the agreement provides preferential access to one of the world's largest and most demanding markets, while for the EU it secures entry into a fast-growing economy in Southeast Asia.

### ***2.2. Main contents of EVFTA***

EVFTA's main contents include extensive tariff reductions, with nearly all tariffs removed within 7–10 years. Vietnam gains advantages in exporting seafood, textiles, footwear, and agricultural products, while EU exporters benefit from improved access to Vietnam's industrial goods and services markets. The agreement also addresses non-tariff barriers by enhancing

transparency, simplifying customs procedures, and strengthening commitments on sanitary and phytosanitary standards. In addition, it covers services liberalization, investment protection, intellectual property rights, and sustainable development, including labor and environmental standards.

The objectives of EVFTA go beyond trade liberalization. For Vietnam, it accelerates economic modernization, attracts foreign investment, and encourages regulatory reforms. For the EU, it strengthens its presence in Southeast Asia and supports its broader geopolitical and economic strategy. Overall, EVFTA is both a trade and strategic partnership, designed to foster long-term cooperation, improve competitiveness, and promote sustainable growth for both sides.

### **3. Commitments of Vietnam and EU under EVFTA about shrimp export products**

The EU–Vietnam Free Trade Agreement (EVFTA), which entered into force in August 2020, represents one of the most comprehensive trade agreements that the European Union has concluded with a developing economy. For Vietnam, the agreement is particularly significant for export-oriented sectors such as fisheries, where the EU has long been one of the most important but also most demanding markets. Shrimp products, accounting for a substantial share of Vietnam’s seafood exports to the EU, are directly affected by a wide range of EVFTA commitments that go beyond simple tariff reductions. While tariff liberalisation under the EVFTA provides immediate price advantages for Vietnamese shrimp exporters, effective market access ultimately depends on compliance with detailed rules of origin and stringent non-tariff measures, especially sanitary and phytosanitary (SPS) requirements and technical barriers to trade (TBT).

Against this backdrop, this section examines the key commitments undertaken by Vietnam and the EU under the EVFTA that are relevant to shrimp export products. It focuses on three core dimensions: tariff commitments, rules of origin, and SPS and TBT measures. Together, these provisions shape the actual trade effects of the EVFTA by determining not only whether Vietnamese shrimp can enter the EU market at preferential tariff rates, but also under what regulatory conditions such access is granted and maintained.

#### ***3.1. Commitments on tariff***

Under the EVFTA, the European Union agreed to eliminate customs duties on Vietnamese seafood, including shrimp. The EU’s tariff schedule (Appendix 2-A-1) shows a 0% base rate on all major shrimp categories once the agreement is in effect. For example, tariff lines for frozen prawns (HS 0306.17.91–99) are listed with a base duty of 0%. In practical terms, this means Vietnamese shrimp enter the EU market duty-free under EVFTA. On the Vietnamese side, similar commitments apply to imports and exports of seafood. Vietnam’s tariff schedule (Appendix 2-A-2) indicates that key shrimp products destined for export will also become duty-free. Some other shrimp categories had small duties that are phased out: live or chilled shrimp (e.g. HS 0306.22.xx)

initially carried a 10% duty (Category B3) that is being removed over a short schedule. In summary, by 2025 the EVFTA ensures virtually all Vietnamese shrimp exports enjoy tariff-free access to the EU market, reflecting both parties' market-access commitments.

### ***3.2. Rule of Origin***

To benefit from these tariff preferences, shrimp must qualify as originating under EVFTA's rules of origin. The Agreement's Protocol 1 (Rules of Origin) specifies that most raw seafood in HS Chapter 3 is considered "wholly obtained" if caught or farmed in the exporting country. In particular, Annex II to Protocol 1 states that for Chapter 3 (fish and crustaceans), "all fish and crustaceans... are wholly obtained". This means that Vietnamese shrimp must come entirely from Vietnam's own waters or farms to claim EU preferences. (EVFTA does allow a general 10% tolerance for non-originating inputs in Chapters 2–24, but Annex II expressly overrides this for fish/shrimp by requiring full indigenous origin.) In practice, exporters must provide proof of origin (such as an EUR.1 certificate or origin declaration) demonstrating that the shrimp qualify. Any added ingredients (e.g. breeding, seasonings) for processed shrimp must also meet the content rules. Thus under EVFTA, to ship shrimp duty-free the exporter must demonstrate that the crustaceans were born, raised or caught in Vietnam, in line with the Agreement's origin criteria.

Apart from the assessment of eligibility for the granting of tariff preference, the rules of origin in the EVFTA also play an important role in trade by affecting trade flows. In the case of shrimp products, the "wholly obtained" requirement in Vietnam for the crustaceans ensures that only shrimp that are farmed and harvested in Vietnam are granted preferential tariffs. This, in turn, promotes the use of local resources in the aquaculture industry in Vietnam, thus encouraging value addition in the seafood industry.

While the rules of origin in the EVFTA are beneficial in ensuring that only Vietnamese shrimp are granted preferential tariffs, the "wholly obtained" requirement in Vietnam for the crustaceans could also impose costs on exporters in the form of costs incurred in proving the "traceability" of the shrimp products. The exporters would be required to prove that the shrimp products originated in Vietnam, and this could be an added cost on exporters in Vietnam, particularly in proving the "traceability" of the shrimp products.

### ***3.3. SPS and TBT measures***

EVFTA's Chapter 6 (SPS) and Chapter 5 (TBT) lay out commitments to ensure sanitary and technical regulations do not unfairly hinder trade.

On the sanitary side, both parties reaffirm compliance with WTO-SPS disciplines. The objectives include protecting health but avoiding unnecessary trade barriers. Specifically for shrimp, EVFTA requires that each side recognize and certify the other's facilities. Annex 6-A

(SPS) specifies that the importing Party (e.g. the EU) must maintain a public list of approved Vietnamese seafood establishments. The Vietnamese authorities in turn must ensure their processing plants meet EU standards and provide “satisfactory sanitary guarantees” to the EU. Vietnam also retains the power to suspend or withdraw an export plant’s approval if it fails to comply. In effect, Vietnamese shrimp can only enter duty-free if processed in EU-approved facilities and accompanied by valid health certificates. Article 6.6 further clarifies responsibilities: Vietnamese ministries handle inspection and certification of exports, while EU member states inspect compliance with EU import rules. Both sides commit to close coordination via an SPS Committee (Art. 6.11) and to promptly share information on any new SPS measures that affect trade.

The sanitary and phytosanitary (SPS) measures affect shrimp export mainly in terms of enforcing food safety standards and inspecting imports. In the case of the European Union, the SPS measures require that the exporting country prove that its production and processing practices comply with extremely strict standards for hygiene, residues, and disease prevention. In the case of Vietnamese shrimp, access to the EU market is granted to shrimp that have been processed in facilities that have met EU standards and have official health certificates. This system essentially filters the quality of the products that are being exported.

However, the compliance of SPS measures also imposes significant costs on exporters. Exporters have to spend money on better aquaculture practices, testing, and state-of-the-art processing facilities to comply with EU sanitary standards. While this may increase the costs of compliance in the short term, it may benefit exporters in the long term by raising the quality of products, as well as the reputation of Vietnamese shrimp.

In the domain of Technical Barriers to Trade (Chapter 5), EVFTA similarly emphasizes international standards and regulatory transparency. Vietnam and the EU should align shrimp quality and labeling rules with Codex and ISO norms whenever appropriate, minimizing arbitrary EU-specific technical hurdles. Article 5.4(2) further obliges each Party to give “*favourable consideration*” to accepting the other’s technical regulations as equivalent if they achieve the same objectives. In practice, this could allow Vietnamese shrimp exporters to meet EU safety or labeling requirements more easily by relying on Vietnam’s own approved procedures. These TBT provisions are designed to prevent duplicate testing and reduce non-science-based regulatory delays for traded goods.

The technical barriers to trade impose their influence on the exports of shrimp through the regulatory provisions in place concerning the standards of the products, the labeling of the products, the packaging of the products, and the conformity assessment procedures. The provisions of the EVFTA agreement state that the contracting parties agree to adopt international standards as the basis of the technical regulations, as well as enhancing the transparency of the regulatory

procedures. The impact of the TBT provisions on the shrimp exporters is the determination of the technical specifications that the exporters need to meet before entering the market of the EU.

The mechanism of the TBT provisions is the process of ensuring conformity with the regulatory provisions of the EU. The exporters need to ensure that the products they are exporting meet the technical specifications set by the EU. Although the regulatory provisions may impose certain additional costs in the initial stage of the operation of the exporters, the transparency of the regulatory procedures may reduce the operational difficulties in the long run.

In summary, EVFTA’s commitments on tariffs, origin and standards collectively facilitate shrimp trade. The EU’s complete tariff liberalization of shrimp, combined with Vietnam’s reciprocal tariff cuts, opens market access. Clear rules of origin ensure only truly Vietnamese shrimp benefit. Finally, SPS/TBT chapters require both sides to base rules on science and international norms and to recognize each other’s certificates, reducing duplicative controls and barriers for shrimp exports

#### 4. Analysis of shrimp export performance in Vietnam to EU countries under EVFTA

##### 4.1. Overview of Vietnam’s shrimp export value

The shrimp industry has soon established its status as a vital pillar of Vietnam’s agricultural and fisheries economy. As one of the top four shrimp-producing nations and a top three global exporter (VASEP, 2025), the industry significantly contributes to national export revenue and economic growth while providing livelihoods for millions of people.

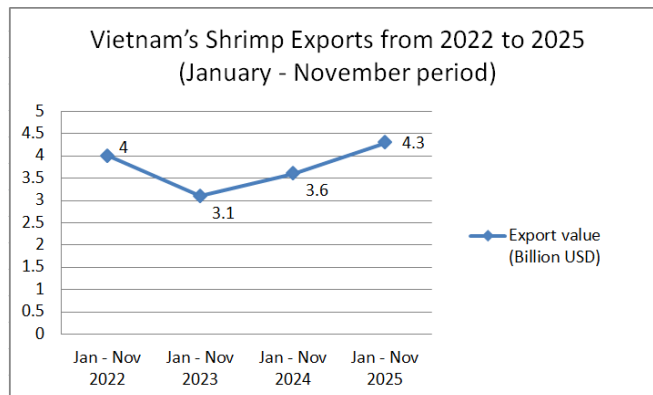


Figure 1. Vietnam’s shrimp exports from 2022 to 2025 (January - November period)

Source: VASEP

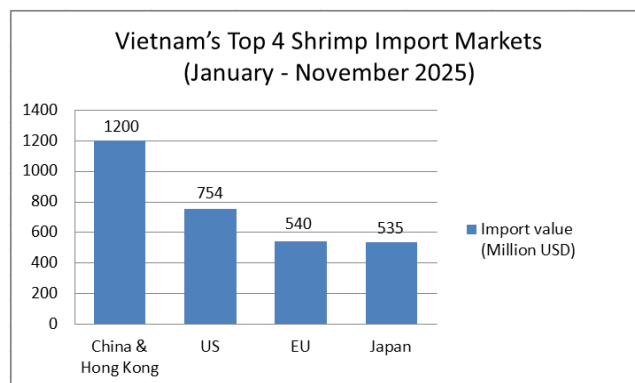


Figure 2. Vietnam's top 4 shrimp import markets (January - November 2025)

Source: VASEP

According to the Vietnam Association of Seafood Exporters and Producers (2025), following a downturn in 2023 with a turnover of \$3.1 billion, shrimp exports witnessed a positive recovery to \$3.6 billion in 2024 and achieved a robust breakthrough in 2025. By the end of November 2025, Vietnam's total shrimp export value reached \$4.3 billion, the highest value over the 4 years.

Regarding the markets, the EU stands as the third-largest import market for Vietnamese shrimp with \$540 million, following China & Hong Kong (\$1.2 billion) and the United States (\$754 million). The EU's position reaffirms it as one of the most critical import partners, creating vast opportunities for Vietnamese shrimp to penetrate deeper into the region's value chain.

Notably, one of the most important factors contributing to EU-Vietnam's robust performance is the implementation of the EU-Vietnam Free Trade Agreement (EVFTA). On August 1, 2020, the EVFTA officially came into effect, which has fundamentally transformed the trade landscape by offering unprecedented market access and strengthening the competitive advantage of Vietnam's shrimp industry. To evaluate the transformative role of this agreement, the following sections provide a comparative analysis of export dynamics during the pre-EVFTA and post-EVFTA periods. As frozen shrimp products account for a dominant share of approximately 60% of the total export turnover and processed items have begun to assert superior value in premium markets such as the United States or the EU, this paper focuses on three primary product categories namely: frozen shrimps and prawn, shrimps and prawns not in airtight containers, and shrimps and prawns in airtight containers.

#### 4.1.1. Before applying EVFTA (2017-2019)

Before the implementation of the EVFTA, Vietnam's shrimp exports to the EU experienced a significant and continuous decline across all three product categories.

<b>Product code</b>	<b>Product label</b>	<b>Value in 2017 (US thousand)</b>	<b>Value in 2018 (US thousand)</b>	<b>Value in 2019 (US thousand)</b>
030 617	Frozen shrimps and prawns	380,149	334,454	275,147
160 529	Shrimps and prawns in airtight containers	144,393	181,350	151,217
160 521	Shrimps and prawns not in airtight containers	116,950	82,475	57,932

Table 1. The situation of shrimp exports to the EU in 2017-2019

*Source: ITC, Trademap*

As illustrated in Table 2, the HS 030617 category (frozen shrimp), which represents the predominant share of the export market, witnessed a sharp decrease of approximately 27.6% over the three years. Similarly, HS 160521 experienced a drastic reduction, falling from over \$116 million in 2017 to just \$57.9 million by 2019.

One of the primary reasons behind this decrease was the high Generalized System of Preferences (GSP) tariff rates, ranging from 7% to 10.8%, which hindered the competitiveness of Vietnamese products against rivals like Ecuador. Additionally, the declining export performance might partly result from the tightening of EU regulatory requirements, particularly those related to Illegal, Unreported, and Unregulated (IUU) fishing and Rules of Origin (ROO). For instance, following the EU’s issuance of the “yellow card” warning to Vietnam in October 2017, seafood exports to the EU were subject to stricter inspection procedures and documentation requirements. Specifically, EU import regulations, which act as significant TBT measures, require detailed traceability information such as fishing location, vessel identification, and catch certification, which many Vietnamese exporters initially struggled to provide due to high compliance costs, strict technical standards, and complex documentation requirements.

*4.1.2. After applying EVFTA (2020-2024)*

With the official entry into force of the EVFTA, the downward trend was reversed, initiating a period of recovery. The immediate elimination of tariffs on most raw shrimp, including frozen shrimp, to 0% provided a crucial price advantage to Vietnamese exporters. This creates a significant competitive edge for Vietnam against primary competitors like Thailand, which is ineligible for GSP benefits due to a failure to meet origin requirements and the lack of a formal bilateral Free Trade Agreement (FTA). Although tariffs on processed shrimp are scheduled to be reduced to 0% over a 7-year roadmap, the product's value increased slightly during the period.

<b>Pro duct code</b>	<b>Prod uct label</b>	<b>Value in 2020 (US thousand)</b>	<b>Value in 2021 (US thousand)</b>	<b>Value in 2022 (US thousand)</b>	<b>Value in 2023 (US thousand)</b>	<b>Value in 2024 (US thousand)</b>
030 617	Froze n shrimps and prawns	297,11 0	380,58 0	380,378	245,202	262,09 4
160 529	Shri mps and prawns in airtight containers	155,17 9	153,30 1	210,998	113,132	155,61 9
160 521	Shri mps and prawns not in airtight containers	63,892	76,036	91,528	62,042	62,621

Table 2. The situation of Vietnam's shrimp exports to the EU in 2020-2022

*Source: ITC, Trademap*

By 2021, the export value of frozen shrimps and prawns had increased to \$380.5 million, effectively returning to 2017 levels. Notably, the value-added segment under HS 160529 saw a substantial surge of 37% in 2022 (\$210.9 million), reflecting the industry's successful penetration of deep-processed products into the high-end European market.

However, since 2023, the data has seen a notable decline, with the total export turnover for the first eleven months falling to 3.1 billion USD, a 22.5% decrease compared to the 4 billion USD recorded in 2022. This downturn was heavily influenced by the HS 030617 product, which plummeted from 380.3 million USD to 245.2 million USD, marking a significant 35.5% drop. Similarly, the high-value processed category HS 160529 faced a severe contraction of 46.4%, with its value falling from 210.9 million USD in 2022 to 113.1 million USD in 2023. In contrast, HS 160521 showed a slight growth of 8.9%; however, this minor increase could not offset the massive losses in other major categories. In 2024, all the export value was marginally increased.

One of the underlying reasons for this downturn was intense price competition, as Vietnamese shrimp faced fierce rivalry from lower-cost suppliers like Ecuador and India, whose aggressive pricing significantly undercut Vietnam's market share. This challenge was heavily exacerbated by high inventory levels in major markets such as the U.S. and EU, which necessitated a prolonged period of stock clearance and significantly suppressed new export orders throughout 2023 (Bao Ngoc, 2023). Moreover, the difficulties were further compounded by a combination of non-tariff barriers (NTBs) and other factors across major export destinations, including strict SPS measures, particularly those related to antibiotic residue limits, traceability systems, and food safety inspections such as anti-subsidy investigations and logistical disruptions in the U.S. market caused by Red Sea tensions or adverse macroeconomic conditions like stagnant demand and the sharp depreciation of the Yen in Japan, and volatile demand in China and Hong Kong (Thanh Hai, 2024). Furthermore, the rules of origin (ROO) under the EVFTA also constrain export growth. Because domestic raw materials meet only around 40-45% of processing demand, the heavy reliance on imported shrimp makes it difficult for firms to satisfy origin requirements and fully benefit from tariff preferences (Ministry of Industry and Trade, 2025). As a result, the presence of NTBs in the EU market has continued to limit the extent to which Vietnamese exporters can fully capitalize on the tariff advantages provided by the EVFTA.

Overall, the implementation of the EVFTA has marked a turning point for Vietnamese shrimp exports to the EU. While frozen shrimp products witnessed a robust recovery due to the immediate elimination of tariffs, the processed shrimp segment has demonstrated impressive adaptation despite facing a longer reduction roadmap. This growth reflects a strategic structural shift toward high-value-added segments, enhancing the competitive edge of domestic enterprises in premium markets. However, while EVFTA effectively reduces tariff barriers, the competitiveness of Vietnamese shrimp exports to the EU is increasingly determined by the industry's ability to comply with non-tariff barriers, particularly SPS and TBT measures.

Consequently, the maintenance of quality standards, strict adherence to ROO, and rigorous procedural compliance are essential factors influencing the effective capitalization on the agreement's long-term benefits.

## ***4.2. Market structure and product segmentation***

### *4.2.1. EU import demand and consumer preferences*

The European Union represents one of the most sophisticated shrimp markets globally, characterized by a high demand for warm-water shrimp, specifically *Litopenaeus vannamei* (Whiteleg shrimp) and *Penaeus monodon* (Black Tiger shrimp) (VASEP, 2025). Furthermore, the EU's consumption patterns have shifted significantly toward convenience-oriented and sustainably sourced products. As a result, the market is segmented into two primary categories: bulk frozen shrimp for further processing and high-value, ready-to-eat (RTE) processed shrimp for direct retail and food service sectors.

### *4.2.2. Vietnam's export portfolio: Strategic alignment*

Vietnam has undergone a strategic realignment of its export portfolio to maximize compatibility with the EU's rigorous quality standards and evolving consumer preferences. This shift centers on three primary categories: HS 030617 (frozen shrimp), HS 160521, and HS 160529 (processed shrimp). The selection of these segments reflects not only domestic production capacity but also the agility of Vietnamese enterprises in capturing market trends within the preferential framework of the EVFTA.

Regarding frozen shrimp, while it maintains a dominant share in terms of volume, there has been a significant qualitative transformation. Instead of exporting raw or whole shrimp, Vietnamese exporters have shifted toward "semi-processed" products, such as peeled, deveined, and tail-on varieties. This change aims to directly serve the EU's HORECA (Hotel, Restaurant, and Catering) segment, which demands high-convenience products that minimize preparation time while ensuring peak freshness. More importantly, these high-value-added products are often produced under stringent international certifications such as HACCP, ISO 22000, and ASC. These certifications serve as a technical passport, allowing Vietnamese shrimp to navigate NTBs more effectively than raw materials. By meeting these premium standards, exporters can ensure strict adherence to SPS measures and TBT, thereby securing a stable position in the high-end European market segment.

Simultaneously, the value-added processed shrimp segment has achieved remarkable breakthroughs in value, particularly in the post-EVFTA period. Vietnam has distinguished itself from competitors by providing items requiring complex processing techniques, such as breaded shrimp, tempura, marinated shrimp, and RTE categories. The robust growth in this sector reflects

a successful utilization of the EVFTA's preferential tariff roadmap to penetrate high-end retail and supermarket chains in the EU, where consumers increasingly prioritize convenience, sustainability, and eco-certified products.

#### *4.2.3. Vietnam's comparative advantages*

The competitive advantage of Vietnamese shrimp in the EU market is fundamentally rooted in specialized differentiation and a robust institutional framework. Notably, Vietnam stands as one of the few Asian nations to have secured a comprehensive Free Trade Agreement with the European Union (EVFTA). This strategic agreement, which facilitating a 0% tariff rate for numerous shrimp product lines, has functioned as a strong foundation for industry growth. Therefore, it creates a significant price advantage that is currently not shared by any major regional competitors, such as Thailand or China, effectively allowing Vietnam to capture market share in price-sensitive yet high-quality segments.

Beyond tariff preferences, Vietnam possesses a sophisticated network of processing facilities that are strictly aligned with European quality and safety standards. A substantial number of these plants have successfully secured official export codes from the EU, signifying their compliance with the most rigorous sanitary and technical requirements in the world. This advanced technical infrastructure serves as the primary foundation for Vietnamese shrimp to move beyond wholesale commodities and penetrate more deeply into high-end supply chains, including major European supermarket networks and specialized distribution channels.

Furthermore, in a market that is highly sensitive to environmental and social governance (ESG), Vietnam has established a non-price competitive edge through its leadership in Sustainability and Certification Excellence. The industry's commitment to obtaining ASC (Aquaculture Stewardship Council) certifications, which is widely considered the "gold standard" for European retailers, proves Vietnam's green and clean value proposition. Its dedication to sustainability, coupled with a dominant niche in premium Black Tiger shrimp, ensures that Vietnamese products remain the preferred choice for the most demanding European consumers.

#### ***4.3. Overall assessment: The structural paradox of the EVFTA and the impacts of main non-tariff barriers (NTBs)***

The EVFTA has significantly influenced the development of Vietnam's shrimp exports to the European Union by reshaping trade conditions and market access. Synthesizing our findings, the landscape of Vietnam's shrimp exports to the EU under the EVFTA presents some dual impacts. While the EVFTA's 0% tariff reduction roadmap acts as a huge opportunity for price competitiveness, some non-tariff measures act as strict barriers that Vietnam exporters need to overcome.

#### *4.3.1. Sanitary and Phytosanitary Measures (SPS): Narrowing the profit margin*

The EU's Sanitary and Phytosanitary (SPS) rules, particularly the strict mandatory testing for antibiotic residues, exert a disproportionate financial strain on exporters. For enterprises operating within the raw frozen shrimp segment (HS 030617), a commodity inherently characterized by thin profit margins, the impact is structurally debilitating. The cumulative expenditures associated with rigorous sampling, laboratory tests, and prolonged warehousing during the customs clearance phase, combined with the high risk of shipment rejection, systematically erode the initial competitive pricing advantage offered by the 0% tariff reduction of the EVFTA.

#### *4.3.2. Technical Barriers to Trade (TBT): Operational and financial burden*

Technical Barriers to Trade (TBT) requires a fundamental overhaul of supply chain logistics, specifically concerning complicated labeling and packaging processes. The EU mandates explicit separation in the labeling of processed versus unprocessed aquatic products, alongside the strict differentiation between farmed and wild-caught shrimp. Non-compliance, even an isolated mislabeling incident, incurs the severe penalty of complete shipment return. To attain full regulatory compliance, enterprises are compelled to allocate significant capital expenditure toward establishing absolute processing line separation and integrating innovative labeling technologies, thereby imposing an onerous financial and operational burden on small and medium-sized enterprises (SMEs).

#### *4.3.3. Rules of Origin (ROO): The Traceability Trap*

The fundamental architectural flaw of Vietnam's shrimp sector is its heavy reliance on a highly fragmented network of smallholder farmers. This structural characteristic engenders a severe "traceability bottleneck" across the procurement nexus, complicating the seamless tracking of raw materials from localized aquaculture ponds to industrialized processing facilities. Due to this informational fragmentation, a substantial volume of premium Vietnamese shrimp is rendered ineligible for the EUR.1 Certificate of Origin. In the absence of this critical documentation, shipments are automatically disqualified from the EVFTA's preferential tariff treatment and subjected to standard import duty rates.

Ultimately, optimizing the EVFTA is not merely a function of cost-based competition; it constitutes a rigorous stress test of technical compliance capabilities. Collectively, these three core NTBs operate as an uncompromising market filter. This mechanism exerts a highly distributive effect: it systematically crowds out undercapitalized SMEs and demonstrates the unsustainability of an export model predicated on low-value, raw commodities. From a macroeconomic perspective, however, this regulatory pressure serves as an indispensable catalyst. It obligates the Vietnamese shrimp sector to execute a structural pivot-transitioning away from volume-driven raw

exports toward the deep-processing segment, wherein premium value-addition can sustainably cover the requisite costs of these technical barriers.

## **5. Opportunities and Challenges**

### ***5.1. Opportunities***

#### *5.1.1. Commitment to reducing tariffs to 0% on seafood products*

Tariff reductions from the EVFTA have created favorable conditions for Vietnamese shrimp products to enter the demanding EU market. The gradual elimination of tariffs to 0% enhances price competitiveness and creates opportunities for Vietnamese shrimp to be widely promoted to international consumers, laying the foundation for expansion into other potential global markets. Vietnam can use the tax savings to reinvest in product design, research and development (R&D), and quality management systems for upgrading the shrimp value chain.

Furthermore, Vietnam possesses a system of processing plants that meet European standards, with many facilities granted EU export codes. This provides a foundation for Vietnamese shrimp to penetrate deeper into the supply chains of supermarkets and distribution channels in Europe, creating a price competitive advantage in the EU market compared to other countries.

#### *5.1.2. Long-term trading partnership with the EU*

The EU is a stable market with low policy risks, compared to other constantly fluctuating markets like the US. While trade remedies and sudden regulatory shifts are frequent in some major markets, the EU maintains a transparent and rules-based trade framework. Additionally, the EU economy is gradually recovering from the impacts of the Covid-19 pandemic, and inflation control is also a driving factor in increased consumption, strengthening access to the EU market for Vietnamese shrimp exports in the long term.

#### *5.1.3. Sustainable consumption trends in the EU*

Sustainable development has become a core policy priority in the EU, clearly demonstrated in the European Green Deal, notably the "From farm to fork" (F2F) strategy. The F2F strategy has introduced strict regulations and quality control measures, including a 50% reduction in the sale of antibiotics for livestock and aquaculture, and requiring imported products to provide certification of EU "green standards" (WTO Center - VCCI). Therefore, Vietnamese shrimp exports that are certified internationally to meet GLOBAL GAP or ASC standards will gain a significant advantage and enhance trust among EU importers, helping to maintain long-term trade and expand market share in this demanding but stable market.

#### *5.1.4. Opportunities to access the EU retail market*

Besides traditional channels, the EU retail market is opening up new opportunities for shrimp suppliers in the medium and long term. Rising input costs have made food retail systems increasingly cautious in pricing strategies and seek stable supply sources at reasonable prices. Simultaneously, restaurants and food service sector are becoming more sensitive to price fluctuations, increasing the role of retail channels in seafood consumption. This trend creates favorable conditions for Vietnamese shrimp exporters that can control costs, ensure consistent quality, and meet EU market standards effectively.

## **5.2. Challenges**

### *5.2.1. The complexity and variability of TBT and SPS requirements*

Regarding SPS requirements, the EU has consistently set high standards for food hygiene and safety. For seafood products, Vietnam needs to demonstrate compliance with the stringent maximum residue limits (MRLs) governing veterinary drug and pesticide residues. Regulation (EC) No. 470/2009 establishes procedures for assessing MRLs for veterinary pharmacological substances, typically antibiotics, while Regulation (EC) No. 396/2005 sets maximum MRLs for pesticides in imported food (WTO Center - VCCI). For shrimp exporting businesses, non-compliance at any production stage can lead to the rejection of shipment. Therefore, these SPS requirements have transformed into non-tariff barriers, requiring Vietnamese exporters to continuously adapt to EU regulatory changes to avoid unfortunate risks.

Regarding TBT requirements, the EU provides transparent regulations on labeling and packaging processes. However, there are also differences between the labeling of unprocessed and processed seafood products, and between wild-caught and farmed seafood. Although these principles are non-discriminatory, they significantly increase compliance costs. For small and medium-sized enterprises (SMEs), these costs will reduce their ability to fully benefit from the EVFTA tariff preferences.

### *5.2.2. High compliance costs and investment in production process changes*

Complying fully with updated EU SPS, TBT, and other eco-standards such as F2F regulations, requires substantial financial investment, posing a major challenge for Vietnamese shrimp exporters, especially SMEs. Firms need to allocate expenditures wisely to invest in electronic traceability systems, standardize shrimp farming areas, and reduce antibiotic use to achieve sustainable certification aligned with EU standards.

Furthermore, emerging animal welfare requirements require Vietnamese shrimp exporters to replace the traditional cold shock method (VASEP). The capital costs associated with such investments significantly increase production expenses, narrowing profit margins and limiting SMEs' ability to fully utilize EVFTA tariff benefits.

### *5.2.3. Strict Origin Traceability Requirements*

Under the EVFTA, shrimp imported into the EU must be farmed in Vietnam within legally recognized aquaculture areas and not violate IUU (Illegal, Unreported, and Unregulated) fishing practices (Thanh Ha, 2025). However, meeting these requirements is challenging in Vietnam due to the fragmented structure of the shrimp supply chain. Most farms are small-scale, record-keeping practices are inconsistent, and traceability systems are not yet fully digitized. These structural limitations increase the burden of proving origin for Vietnamese shrimp exporters, especially in compiling documentation and verifying raw material sources, thereby raising transaction costs and compliance risks.

### *5.2.4. Increased Competition in the EU Market*

Thanks to the EVFTA, Vietnam's shrimp exports have achieved impressive figures. According to VASEP, Vietnam's shrimp export volume increased by 14% during the first eight months of 2025, ranking third among the largest suppliers to the EU market, after Ecuador and India. Yet, these two countries benefit from larger production scales and low costs, enabling them to supply large volumes of frozen shrimp at low prices, which may reduce the price competitiveness of Vietnamese shrimp.

Furthermore, Ecuador and India are adapting effectively to EU SPS and TBT requirements, and exhibit higher shares of sustainably certified shrimp (such as ASC) compared to Vietnam, giving them a strong competitive advantage in the context of increasingly strict EU sustainability standards (Kim Thu, 2026). Therefore, without improving quality, sustainability, and value addition, Vietnamese shrimp risks losing market share in the EU in the long term.

## **5.3. Recommendations**

### *5.3.1. For Government*

*Firstly*, strengthen policies supporting shrimp exporting businesses in adopting international standards through technical consulting, training programs, preferential credit, and incentives for applying science and technology. Simultaneously, it is necessary to strengthen collaboration between research and training institutions and businesses and farming areas, prioritizing the development of human resources in shrimp farming, improving skills and technical expertise.

*Secondly*, continue assisting businesses, especially SMEs, in accessing and implementing certificates of origin, including the self-certification mechanism, to effectively utilize the benefits from the EVFTA and improve compliance capacity.

*Thirdly*, require regulatory agencies to enhance information dissemination and guidance on any updated EU non-tariff barriers, especially SPS and TBT, thereby helping businesses proactively prepare and adapt to increasingly strict requirements.

*Finally*, continue planning aquaculture production areas based on comparative advantages, focusing on developing distinctive products with higher value added and complementary features to EU products, in order to improve the ability to overcome technical barriers and adapt to the trend of trade protectionism.

### *5.3.2. For businesses*

*Firstly*, proactively updating changes in the regulations of the EVFTA and focus on improving competitiveness in product quality. According to experts, to further promote the strong development of Vietnamese shrimp exports, businesses need to shift from price competition to quality competition, thus ensuring compliance with strict technical standards from the EU (Thanh Ha, 2025). Businesses need to update changes in policies and innovate in aquaculture, production and processing technologies for shrimp products, control antibiotic and chemical residues in shrimp farming to promptly meet EU's SPS and TBT standards. In particular, following trend of sustainable consumption, green consumption, and animal welfare being emphasized in the EU, Vietnamese businesses should proactively research, adopt ESG framework, and apply humane technical measures such as investing in electrostunting shrimp production lines or eliminating the practice of cutting the eyes of shrimp larvae, thereby gain favor with consumers in the EU market. This will both improve product quality and reputation, build brand image, and meet EU market expectations to create a competitive advantage before these regulations become mandatory.

*Secondly*, investing in establishing a transparent and clear digital traceability system. To meet EU requirements, Vietnam needs to implement a traceability system that is synchronized and digitized throughout the entire shrimp value chain. More specifically, the recording and management of data at the farming stage needs to be standardized and unified. Businesses should adopt traceability technologies such as QR codes or digital databases to track products from the farm to the EU market. Simultaneously, it is necessary to encourage cooperation between farmers, cooperatives, and businesses to ensure the continuity and transparency of traceability information.

*Thirdly*, focusing on product segmentation and value-added enhancement. Diversifying value-added product lines such as ready-to-serve processed shrimp, peeled cooked shrimp, marinated shrimp, will contribute to enhancing Vietnam's competitiveness against competitors in the EU market. The high-end processed shrimp segment in Europe still has much potential, especially convenient products that suit modern consumer trends. These products mainly serve retail and food service channels, where high demands for quality, convenience, and food safety standards are required. More importantly, this product group has higher profit margins and is less directly affected by fluctuations in raw shrimp prices, thus reducing price competition pressure.

## 6. Conclusion

This study has analyzed the impact of the EU–Vietnam Free Trade Agreement (EVFTA) on Vietnam’s shrimp exports to the European Union, with a particular focus on non-tariff barriers (NTBs), including sanitary and phytosanitary (SPS) measures, technical barriers to trade (TBT), and rules of origin. The findings indicate that EVFTA has created significant opportunities for Vietnam’s shrimp industry through comprehensive tariff elimination, but the realization of these benefits depends largely on exporters’ capacity to comply with strict regulatory requirements in the EU market.

Empirical analysis shows that the removal of tariffs has improved the price competitiveness of Vietnamese shrimp and contributed to the recovery of export value in the post-EVFTA period. Export growth has been particularly notable in frozen shrimp and value-added processed shrimp products, reflecting a gradual shift toward higher-value segments that better match EU consumer preferences. This trend demonstrates the positive role of EVFTA in reshaping Vietnam’s shrimp export structure.

However, the study also highlights that tariff preferences alone are insufficient to ensure sustainable export growth. Rules of origin requirements impose significant documentation and traceability obligations, especially in a fragmented supply chain dominated by small-scale shrimp farms. In addition, SPS and TBT measures have emerged as the most critical determinants of market access, requiring continuous investment in food safety, quality control, sustainability certification, and compliance with evolving EU regulations.

Overall, EVFTA has facilitated Vietnam’s transition from a commodity-based shrimp exporter toward a more quality-oriented and value-added supplier in the EU market. Nevertheless, the long-term success of Vietnam’s shrimp exports depends on coordinated efforts by both the government and businesses to strengthen compliance capacity, reduce trade-related costs, and enhance traceability and sustainability across the shrimp value chain. By addressing non-tariff barriers effectively, Vietnam can fully leverage the EVFTA to reinforce its competitiveness and secure a stable position in the EU seafood market.

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