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Research on Fiscal and Tax Policies of Cross–border Cooperation Zones Between China and Vietnam

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Abstract—Due to the large differences in economic and social development between the two countries, the construction of the Sino-Vietnamese cross-border economic cooperation zone needs to face the problem of coordination in all aspects. This paper summarizes the relevant policies signed by China and Vietnam, mainly the fiscal and taxation policies, and analyzes the problems of lack of top-level design, shortage of funds, small functions of fiscal and taxation policies, and the need to improve the taxation coordination mechanism. Combined with the current development and opening strategy along the border and the "the Belt and Road" strategy, this paper proposes the introduction of central financial planning, broadening investment and financing channels, improving tax coordination mechanisms, and improving tax service levels.

Keywords—cross-border economic cooperation zone; fiscal and taxation policy; coordination

I. INTRODUCTION

In the past 40 years of reform and opening up, China has implemented the opening strategy, giving priority to the development of the eastern coastal areas, and gradually coordinating along the Yangtze River and along the border areas, forming a comprehensive opening up pattern of the East and the West, and the country's economic and social development has achieved tremendous development. At this stage, with the steady advancement of China's "The Belt and Road" strategy and the further improvement of the border opening strategy, the border areas are changing from the "nerve endings" of the coastal opening strategy to the "frontier positions" of the border opening strategy. The geographical advantages of Guangxi and Yunnan will be particularly prominent. In the "The Belt and Road" strategy, the country's functional orientation to Guangxi is "an international channel for the ASEAN region, a new strategic fulcrum for the opening up of the southwest and southcentral regions, an important gateway for the organic integration of the Belt and Road, and the "radiation center of South Asia and Southeast Asia." In order to accelerate the economic development of the border areas, the cross-border economic cooperation zone, as a new development model, has gradually become a strategic choice for the development of economic and social development in China's border areas. With the continuous advancement of the "two corridors and one circle" strategy, the continuous development of economic cooperation in the Greater Mekong Sub-region,

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the breakthrough in the construction of the upgraded version of the China-ASEAN Free Trade Area, the construction of the Sino-Vietnamese cross-border economic cooperation zone is more practical.

The construction of the Sino-Vietnamese cross-border economic cooperation zone has provided a good opportunity for the economic and trade development of the border areas of the two countries. In the cooperation zone, economic factors such as commodities, capital, technology and labor of the two countries can flow freely and complement each other. The governments at all levels of China and Vietnam have given strong support to the site selection, land allocation, infrastructure construction, and customs inspection and quarantine in the economic cooperation zone. However, in the field of finance and taxation, the policy framework and specific implementation content of the top-level design are still lacking. The subject of this paper is: under the background of the new economic normal development, how to formulate and improve the fiscal and tax preferential policies of the cross-border cooperation zones between China and Vietnam, actively play the role of fiscal and taxation policies, and accelerate the construction and the development of the cross-border economic cooperation zone between China and Vietnam.

II. REVIEW ON THE DEVELOPMENT OF SINO-VIETNAMESE CROSS-BORDER ECONOMIC COOPERATION ZONE

In 1992, the state began to implement the border opening strategy and established 14 border economic cooperation zones. In 2005, on the basis of building the "two corridors and one circle" cooperation, China and Vietnam reached a consensus on building a cross-border economic cooperation zone between China and Vietnam. In September of the same year, Yunnan Province and Lào Cai Province of Vietnam signed the "China Red River-Vietnam Lào Cai Economic Cooperation Zone Program". In 2007, China's Guangxi and Vietnam's neighboring four provinces held a meeting to propose the construction of "Pingxiang-Thi trấn Đồng Đăng, Dongxing-Móng Cá and Longbang-Chaling three crossborder economic cooperation zones" and signed "Local Inter-related Governments Framework Agreement (Memorandum)" with relevant Vietnamese provinces. In June 2010, Yunnan Province and Vietnam's Lao Cai

Province signed the "Framework Agreement on Accelerating the Research and Construction Cooperation of Hekou, China-L ào Cai, Vietnam Cross-Border Economic Cooperation Zone". In September of the same year, Guangxi and Quang Ninh Province of Vietnam signed "Jointly Promote the Establishment of Guangxi Dongxing, China-Móng Cá of Quảng Ninh Province, Vietnam Cross-border Economic Cooperation Zone Agreement". In July 2012, the State Council proposed in the approval of the "Dongxing Key Development and Open Pilot Area Construction Plan" that "when conditions are ripe, according to the consensus reached between China and Vietnam, we will study and build a cross-border economic cooperation zone between China and Vietnam."

In October 2013, during Premier Li Keqiang's visit to Vietnam, the two governments signed the "Memorandum of Understanding on Building a Cross-Border Economic Cooperation Zone" and agreed to accelerate the construction of cross-border economic cooperation zones. The four Sino-Vietnamese cross-border economic cooperation zones of "Dongxing-Móng Cái, Pingxiang-Thị trấn Đồng Đăng, Hekou-Lào Cai, Longbang-Chaling" rose to the national strategic level and entered the accelerated construction track. A number of basic supporting facilities projects started the construction. In 2016, the State Council issued the "Opinions of the State Council on Supporting the Development and Opening of Several Key Policies in Key Areas Along the Border", and the Sino-Vietnamese Cross-border Economic Cooperation Zone was listed as a key area for development along the border. In May 2017, at the "The Belt and Road" International Cooperation Summit Forum, the "The Belt and Road Summit Forum Sino-Vietnamese Joint Communiqué" was issued, urging the acceleration of the signing of the "Common Overall Plan for the Construction of Sino-Vietnamese Cross-border Economic Cooperation Zone". In November of the same year, during the period of Xi Jinping

visited Vietnam, the two sides signed a "Memorandum of Understanding on Accelerating the Negotiation Process for the Construction of the Framework Agreement for the Crossborder Economic Cooperation Zone Between China and Vietnam", actively discussing the framework agreement for the construction of cross-border economic cooperation zones, and greatly promoting the pace of construction of the economic cooperation zone.

III. SINO-VIETNAMESE CROSS-BORDER ECONOMIC COOPERATION ZONE RELATED FISCAL AND TAX POLICIES

Since the establishment of 14 border economic cooperation zones in China in 1992, China and Vietnam have successively issued relevant policies and regulations, which have promoted the development of bilateral economic and trade. From the various policies and regulations signed by the governments at various levels, the planning and design of the cross-border cooperation zones, the guiding opinions, the scope of cooperation between the two sides, etc., clarify existing policies and regulations, and help to accelerate the cross-border economic construction and development of the cooperation zone.

A. Relevant Fiscal and Taxation Policies Promulgated by the Vietnamese Government

Vietnam has introduced a comprehensive plan for crossborder economic cooperation zones at the national level, and 10 port economic zones have been established on the Sino-Vietnamese border. Due to the different functional orientations of various ports and the differences in development levels, preferential policies are inconsistent. Vietnam has issued a series of policies and regulations related to cross-border economic cooperation zones. Here, this paper mainly discusses some relevant fiscal and taxation policies (see "Table I" for details).

Release year	Policy name	Policy key points			
2015	Investment Law	 Within the agreed time limit for the implementation of investment projects, the preferential corporate income tax rate shall be implemented to reduce or exempt corporate income tax; For imported goods used for construction of fixed assets, import duties, materials and parts imported for the implementation of investment projects are exempt from import duties; Land rent, land use fees, and land use tax are reduced. 			
2014	The Latest Tax Incentives for Cross- border Economic Zone Cooperation Zones	 A 50% personal income tax on domestic and foreign laborers in the port economic zone is imposed; Exemption of value-added tax in the port economic zone includes: goods and services produced and consumed in the tax-free zone; commodity sales and service consumption between the tax-free zones in each port economic zone; Objects exempt from special consumption tax include: goods exported from duty-free zones; goods and services produced and consumed in duty-free zones. 			
2013	Draft of Corporate Income Tax Law	From January 1, 2014, Vietnam's corporate income tax will be reduced from 25% to 22%; from January 1, 2016, the general tax rate will be lowered again to 20%, and the original preferential tax rate will be lowered from 20% to 17%.			

 TABLE I.
 Relevant Fiscal Policy Forms Issued by the Vietnamese Government

a. Source: Website of the Economic and Commercial Counsellor's Office of the Embassy of the People's Republic of China in the Socialist Republic of Vietnam



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B. Relevant Fiscal and Taxation Policies Promulgated by the Chinese Government

Since the proposal of building a Sino-Vietnamese crossborder economic cooperation zone in 2005, it has been 14 years since China has not yet issued a general plan for the construction of economic cooperation zones by the central government. And no corresponding laws, regulations and fiscal and taxation policies have been formulated. The development of the economic cooperation zone can only be promoted in accordance with the Western Development Strategy and the relevant preferential policies of the development strategies along the border and the cooperation agreements signed between the Chinese and Vietnamese governments. Here this paper mainly discusses some fiscal and taxation policies (see "Table II" for details). Pingxiang, China-Thị trấn Đồng Đăng, Vietnam Cross-border Economic Cooperation Zone belongs to the scope of Pingxiang Free Trade Zone and enjoys preferential tax and taxation policies in the bonded area (see "Table III" for details).

TABLE II.	RELEVANT FISCAL AND TAX POLICY STATEMENTS ISSUED BY CHINA

Policy number	Policy key points		
Letter from the General Administration of Customs on the "Relevant Matters Concerning the Planning and Construction of Guangxi Pingxiang Comprehensive Bonded Zone", Departmental Letter [2009] No. 11	Domestic goods entering the bonded area are treated as export, and can be immediately refunded; products imported into the zone are bonded, and the goods required for construction in the bonded area are exempt from customs duties and import link taxes. Overseas goods enter and leave the bonded area, exempt from licenses and export quotas, and enterprises in the bonded area. Products shipped overseas or sold in the region are exempt from value-added tax on processing, and transactions between enterprises in the bonded area are exempt from VAT and transaction tax.		
Notice on the Pilot Program for the Reimbursement (Exemption) of Exports of Goods in the Border Area for General Trade and Border Small-scaled Trade Exports in RMB (Finance and Taxation [2010] No. 26)	If the goods are exported from the designated port of the land to the neighboring country by means of general trade or border small-scale trade, and the bank transfer method is adopted for bank settlement. The full export tax rebate policy for the tax refund shall be enjoyed. Goods exported by means of RMB cash settlement do not enjoy export tax rebate policy		
Notice on the Implementation of the Relevant Tax Policy Issues in the Western Development Strategy (Finance and Taxation [2011] No. 58)	From January 1, 2011 to December 31, 2020, corporate income tax will be levied at a reduced rate of 15% on encouraged industrial enterprises located in the western region. Eligible self-use equipment is exempt from customs duties within the scope of the policy. The traffic, electricity, water conservancy, postal, and broadcasting and television enterprises newly established in the western region before December 31, 2010 that meet the conditions for enjoying the "Two Exemption, Three Half" of corporate income tax will enjoy the "Two Exemption, Three Half corporate income tax" until expiration.		
"Announcement of the State Administration of Taxation on Deepening the Implementation of the Enterprise Income Tax Issues Related to the Western Development Strategy" (State Administration of Taxation Announcement No. 12 of 2012)	The enterprise can meet the above policies even if it meets the 15% preferential tax rate conditions for the development of the western region and meets the "Enterprise Income Tax Law" and its implementation regulations and various preferential tax conditions stipulated by the State Council. Enterprises with institutions in and outside the preferential areas can enjoy preferential tax rates for the development of the western region.		
"Announcement of the State Administration of Taxation on Issuing the Measures for the Implementation of the Mutual Consultation Procedures for Tax Agreements" (State Administration of Taxation Announcement No. 56 of 2013)	"The Measures for the Implementation of the Mutual Consultation Procedures for Tax Agreements" mainly include: "Fifteen Items of the Mutual Consultation Procedures Initiated by Chinese Residents (Nationals)"; "Ten Mutual Consultation Procedures Initiated by the Competent Authorities of the Contracting Parties"; Two mutual consultation procedures initiated by the contracting parties of the State Administration of Taxation; the implementation of the agreement and four legal responsibilities.		
Notice of the General Office of the People's Government of Guangxi Zhuang Autonomous Region on Printing and Distributing the Implementation Plan of the Operational Campaign for the Prosperity of the Border and the People in Guangxi Zhuang Autonomous Region (Gui Zheng Ban Fa [2012] No. 313)	In the new processing enterprises within the range of 0-3 km on the border, the tax refunds the local part to implement the five-year tax exemption preferential policy; the enterprise income tax within the range of 0-20 km from the land border, the tax return to the local part of the implementation of the "Two Exemption, Three Half Policy".		

Source: the website of the People's Government of the People's Republic of China, the website of the Ministry of Commerce of the People's Republic of China, the website of the State Administration of Taxation.

TABLE III. LIST OF ECONOMIC REFORM PILOT AREAS ESTABLISHED IN GUANGXI AND YUNNAN ALONG THE BORDE	ER
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Province (District)	Financial reform pilot zone	Comprehensive bonded area	Key development test area	Sino-Vietnamese Cross- border Economic Cooperation Zone
Yunnan	Comprehensive Experimental Zone of Financial Reform in	Honghe Comprehensive Bonded Zone	Ruili, Boten Xishuangbanna	Hekou-Lào Cai
Guangxi	Yunnan Province and Guangxi Zhuang Autonomous Region Along the Border	Pingxiang Comprehensive Bonded Zone	Dongxing Pingxiang	Dongxing-M ứng C á Pingxiang-Thị trấn Đồng Đăng Longbang-Chaling

Source: the website of the People's Government of the People's Republic of China, the website of the Ministry of Commerce of the People's Republic of China, the website of the State Administration of Taxation.



C. Relevant Fiscal and Taxation Cooperation Agreements Signed Between China and Vietnam

In 1995, the "Agreement Between the Government of the People's Republic of China and the Government of the Socialist Republic of Vietnam on the Avoidance of Double Taxation and Prevention of Fiscal Evasion of Income" was signed by China and Vietnam states.

First, in Vietnam, the elimination of double taxation is as follows: the income, profits or gains obtained by Vietnamese residents, in accordance with Chinese law and this "Agreement", Vietnam should allow a tax credit of the income, profits or proceeds to be equivalent to the amount of tax paid in China. [2] However, the amount of the credit shall not exceed the amount of Vietnamese tax calculated on the gains, profits or income in accordance with Vietnamese tax laws and regulations.

Second, in China, the elimination of double taxation is as follows:

- The income of Chinese residents' gained from Vietnam, which is paid in Vietnam in accordance with the provisions of this "Agreement", can be credited against the amount of Chinese tax levied on the resident. However, in accordance with Chinese tax laws and regulations, the amount of the credit should not exceed the amount of Chinese tax on the income.
- The income obtained from Vietnam is the dividend paid by the Vietnamese resident company to the Chinese resident company, and the Chinese resident company owns not less than 10% of the company paying the dividend company. The credit shall be considered for payment of the Vietnamese tax paid by the dividend company for the income. [3]

IV. PROBLEMS IN THE RELEVANT FISCAL AND TAXATION POLICIES OF THE SINO-VIETNAMESE CROSS-BORDER ECONOMIC COOPERATION ZONE

Although both countries have introduced some fiscal and taxation policies to promote economic and trade exchanges on the border, in general, the fiscal and tax incentives that the Sino-Vietnamese cross-border economic cooperation zone can enjoy mainly involve the country's western development strategy and development strategies along the border. These fiscal and taxation policies are not targeted, the content is not specific enough, and the scope is not comprehensive enough. The assistance for further development of the Sino-Vietnamese cross-border economic cooperation zone is relatively limited.

A. Insufficient Fiscal Policy

1) It is lack of fiscal policy guidance at the central level: Since the "Sino-Vietnamese Cross-border Economic Cooperation Zone Construction Common Overall Plan" has not been issued, the financial department has no relevant documentary basis, and it is impossible to formulate corresponding fiscal preferential policies. In order to speed up the construction of the Sino-Vietnamese cross-border economic cooperation zone, the central government still needs further assistance.

2) Financial support is insufficient: At present, the construction of cross-border economic cooperation zones is mainly promoted by local governments in Guangxi and Yunnan. The areas belong to the former revolutionary base areas in the southwestern border. The local government has limited financial resources and material resources, and it is stretched in terms of construction capital investment. The infrastructure of the Sino-Vietnamese cross-border economic cooperation zone needs to be matched. It is difficult to meet the construction fund demand by relying only on the limited financial resources and a small amount of transfer payment funds.

3) The guiding function of fiscal policy is not strong: The formulation of fiscal policies, especially when highlighting the key areas of government support, is conducive to guiding the direction of social capital investment. Since the establishment of the Sino-Vietnamese cross-border economic cooperation zone, the lack of support in fiscal policy has constrained the rapid development of the economic cooperation zone.

B. Problems in Tax Policy

1) The tax incentives are not sound enough: Although some preferential policies have been promulgated in the strategy of developing the western region and the development strategy along the border areas, tax benefits have been enjoyed along the border areas. However, compared with the eastern coastal areas and even the central regions, the tax policy preferential measures along the border areas are still at a disadvantage. In particular, in the implementation of a certain policy in the eastern and central regions, the preferential margin is converging with the border areas, and even weaker than the border areas. It will still have a competitive magnetic field effect on the production factors such as people flow, logistics, capital flow and information flow along the border areas.

2) The tax coordination mechanism needs to be improved: Due to differences in the taxation systems between the two countries, the issue of international tax coordination in cross-border economic cooperation zones is particularly serious. From the identification of tax jurisdiction, to the basic elements of the tax system, the tax collection and management system, and the tax revenue sharing, it is a specific tax issue to be resolved in the cross-border economic cooperation zone. [4]

3) Tax service levels still need to be improved: The Sino-Vietnamese cross-border economic cooperation zone is located at the junction of Guangxi, Yunnan and Vietnam. It belongs to economically and socially underdeveloped regions. It has fewer comprehensive talents who are proficient in Vietnamese and familiar with international

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taxation, which is not conducive to the comprehensive development of tax services.

V. FINANCIAL AND TAXATION MEASURES TO PROMOTE THE CONSTRUCTION OF SINO-VIETNAMESE CROSS-BORDER ECONOMIC COOPERATION ZONES

Promoting the sustainable development of the Sino-Vietnamese cross-border economic cooperation zone is not only an important measure for the development strategy along the border, but also an important part of the national "the Belt and Road" strategy. Establishing a sound fiscal and taxation policy is particularly important for accelerating the construction and development of Sino-Vietnamese cross-border economic zones.

A. Financial Policy Advice

1) Developing a master plan for fiscal policy: It will be necessary to negotiate with the Vietnamese government and sign the "Common Overall Plan for the Construction of China-Vietnam Cross-Border Economic Cooperation Zone" as soon as possible. According to the overall plan, the central government will unify the "Financial Master Plan for the Sino-Vietnamese Cross-border Economic Cooperation Zone" and formulate specific implementation rules for the relevant policies to ensure that fiscal policies can be effectively implemented and play their due policy functions. The financial departments at all levels, in conjunction with the policies formulated by the central government, need to formulate relevant fiscal preferential measures in the region according to local conditions. According to different economic industries, different fiscal preferential policies are formulated and policy-oriented functions are exerted to stimulate all walks of life to play the greatest role in the development of cross-border economic cooperation zones.

2) Increasing the scale of financial transfer payments: In the calculation of the transfer payment subsidy, combined with the actual situation of the border areas of the Sino-Vietnamese cross-border economic cooperation zone, the per capita disposable income reflecting the local economic level is taken as the main factor in the calculation, taking into account the population size and density, per capita GDP, and administrative operations. For factors such as cost, it will appropriately increase the distribution weight and increase the amount of subsidies, and increase the subsidies for border cities and counties in the construction cooperation areas as appropriate. [5] It need to establish special transfer payment for the development of Sino-Vietnamese cross-border economic cooperation zone, focus on supporting infrastructure construction in the cooperation zone, and give financial incentives to major industrial development projects settled in the economic cooperation zone through financial subsidies and loan interest subsidies.

3) Broadening investment and financing channels: The establishment of the "Sino-Vietnamese Cross-border Economic Cooperation Zone Construction and Development Fund" will adopt various investment and financing methods

such as BOT and PPP, and leverage the leverage of fiscal funds to generate an investment multiplier effect and promote the rapid development of the cooperation zone. [6] It should allow local governments to issue "Special Bonds for Local Governments of the China-Vietnam Cross-Border Economic Cooperation Zone" for infrastructure construction and public service investment in the cooperation zone. It should also promote the organic combination of fiscal policy and financial instruments, and use the policy advantages of the Along-the-border Financial Reform Comprehensive Experimental Zone in Yunnan Province and Guangxi Zhuang Autonomous Region to guide and encourage financial institutions, especially CDB, AIIB, and Silk Road Fund, to service for the economic cooperation zone of cross-border between China and Vietnam.

4) Improving fiscal preferential policies: In the key support areas, priority will be given to budgetary funds, and social capital flows will be guided through policy measures such as transfer payments, fiscal interest subsidies, and financial subsidies. It will gradually increase the proportion of incentive financial subsidies and expand the scope of financial subsidies for key industries. It will also increase the interest rate discount on enterprise loans participating in infrastructure construction in the economic cooperation zone, and establish a risk guarantee mechanism to reduce the investment risk of enterprises.

B. Suggestions on Tax Policy

1) Developing a supporting tax policy system: Under the framework of the tax treaty signed by the two countries, China and Vietnam have strengthened the coordination of taxation policies and introduced taxation policies including major tariffs such as tariffs, income taxes, and commodity taxes to achieve a win-win situation of tax coordination in cross-border economic zones. [7]

2) Increasing tax incentives: It will be of great significance to implement the preferential policies for the Western Development Strategy and the "The Belt and Road" strategy, learn from the preferential tax policies of domestic special economic zones and free trade zones, and refer to the tax incentives policy of the Vietnam Thị trấn Đồng Đăng Port Economic Zone to formulate a suitable cross-border economic cooperation zone. For example, in the Sino-Vietnamese cross-border economic cooperation zone, newly established processing enterprises can implement a five-year tax exemption policy. Corporate income tax can be levied at a tax rate of 10% or lower, and personal income tax can be levied at half the current tax rate. Goods transactions between enterprises in the cooperation zone can be exempted from the transfer link tax, such as value-added tax and consumption tax. Domestic goods entering the cross-border economic cooperation zone may be recognized as exports, and tax refunds shall be implemented in accordance with the relevant export tax rebate policy.

3) Improving the tax coordination mechanism: In 1995, China and Vietnam signed the "Agreement on the Avoidance of Double Taxation and Prevention of Tax Evasion on Income". In 2013, the State Administration of Taxation promulgated the "Notice on the Issuance of the Measures for the Implementation of the Mutual Consultation Procedures for Tax Agreements". According to the trade agreement, the China-ASEAN Free Trade Area has formulated a coordination mechanism including tariffs, income tax, value-added tax, and consumption tax. The Sino-Vietnamese cross-border economic cooperation zone is a park jointly managed by the two countries. The tax system of the two countries is very different and the coordination is difficult. The central government decided to implement the policy provisions, and the local government is responsible for the specific implementation. Due to the restriction of power, local governments cannot fully carry out coordination work in certain aspects, which restricts the construction and development of cross-border cooperation zones. Therefore, it will be necessary to moderately relax the power restrictions of the border government, grant local large cross-border tax coordination power, promote mutual exchange of tax-related information, exchange tax information, and conduct tax negotiations. At the same time, the Sino-Vietnamese cross-border economic cooperation zone should be integrated into the "The Belt and Road" strategy and actively implement the eight measures of the "Notice on Further Improving the Construction of the Taxation Service 'the Belt and Road'". Drawing on the current international tax principles of the OECD and UN model, the BEPS Action Plan will be implemented, and the tax coordination mechanism of the China-Vietnam crossborder economic cooperation zone will be established and improved under the principle of achieving a win-win situation for both China and Vietnam.

4) Upgrading tax service levels: It will be important to further upgrade and improve the "Golden Tax Project" system, conform to the trend of "Internet +" era, create an upgraded version of "Internet + Taxation", and prepare the "Investigation Tax Guide for China-Vietnam Cross-Border Economic Cooperation Zone" through the establishment of a special website for taxation of Sino-Vietnamese crossborder economic cooperation zone", etc., with the mode of "online + offline" to optimize tax services in all aspects. According to the "Implementation Plan for the Special Plan for Science and Technology Personnel in the Remote Poverty Area, Frontier Ethnic Areas and Revolutionary Old Area Talent Support Program", it will be of great significance to do a good job in introducing high-level talents and cultivating budgetary fund arrangement plans, and establish a "Cross-border Cooperation Zone Talent Development Fund", attaching importance to the recruitment and training of regional international taxation professionals, encouraging taxation, finance, and accounting intermediaries with professional background to enter the

cooperation zone to provide professional tax-related services for enterprises and individuals, and fully meet the needs of investors. [8] It will also be necessary to create a quality business environment, serve the sustainable development of cross-border economic cooperation zones, and achieve a win-win situation for both China and Vietnam.

VI. CONCLUSION

Combing the different stages of China's economic development strategy, this paper studies the subject of fiscal and taxation policy of cross-border economic cooperation zones between China and Vietnam, reviews the deep-seated exchanges between the governments of China and Vietnam, compares the fiscal and taxation policies of cross-border economic cooperation zones issued by China and Vietnam, clarifies the existing problems in fiscal and taxation policies of cross-border economic cooperation zones in current construction, and concludes the fiscal and taxation countermeasures to promote the construction of cross-border economic cooperation zone between China and Vietnam. Firstly, it is necessary for the two countries to jointly promote the formulation of the overall plan of the crossborder economic cooperation zone, to formulate the overall plan of relevant fiscal policies, and to improve the tax coordination mechanism between the two sides; secondly, the central government should formulate relevant fiscal and tax preferential policies for the cross-border economic cooperation zone, further upgrade the level of fiscal and taxation services, and create a high-quality business environment in order to promote the good and fast development of cross-border economic cooperation zone, and share the development dividends of cross-border economic cooperation zones.

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