



Case study

Thailand

Ease of Doing Business reforms

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Overview

Over the past decade, Thailand has undertaken a comprehensive reform agenda to enhance regulatory transparency, simplify administrative procedures and improve the overall ease of doing business in the country. Spurred by critical findings from international assessments and domestic legal reviews, the Thai government sought to move away from a legacy of control-based regulation and towards a more service-oriented model of governance. Beginning in 2015, a suite of legal and institutional reforms laid the groundwork for embedding GRPs across the public sector.

This case study examines the evolution and implementation of Thailand's ease of doing business (EoDB) reforms, focusing on the legislative and policy tools used to institutionalize GRPs, including the *Licensing Facilitation Act 2015*, the *Rules on Legislative Drafting and Evaluation of the Outcomes of Law Act 2019*, the *Constitution of the Kingdom of Thailand 2017*, the *Digitalization of Public Administration and Services Delivery Act 2019*, and the *Act on Carrying Out of Public Services via Electronic Means 2022*. It also explores the operationalization of these reforms through the establishment of digital platforms and regulatory streamlining initiatives. Finally, the study considers the ongoing challenges of implementation and reflects on broader lessons. Thailand's experience offers interesting insights on building a transparent, efficient and user-focused regulatory system.

Thailand's economy and the importance of the services sector

Thailand's economic trajectory reflects a successful shift from agricultural dependence to a modern, industrial and export-led economy.¹ Over the past two decades, the services sector has emerged as a cornerstone of the Thai economy. Since 2020, Thailand has experienced a deficit in trade in services. This deficit was driven by the collapse of tourism following the COVID-19 pandemic, which led to a sharp fall in travel service exports. The tourism industry has gradually recovered but travel service exports have not yet reached their pre-pandemic levels.

In 2024, Thailand generated US\$ 526.41 billion in GDP², of which the services sector accounted for 59.2 per cent of total value added.³ Service exports

were valued at around US\$ 71.36 billion, while service imports reached US\$ 73.33 billion.⁴ Exports were headed by travel services at US\$ 42.69 billion, followed by other commercial services at US\$ 21.08 billion and transport services at US\$ 7.58 billion. On the import side, other commercial services reached US\$ 34.62 billion, transport US\$ 23.01 billion, and travel US\$ 15.70 billion. Figure 1 shows the development of Thailand's commercial services trade between 2015 and 2024 and its sectoral distribution in 2024.

Between 2019 and 2024, Thailand experienced strong growth in digital trade, outpacing the global average and despite starting from a relatively low base. Over this period, exports of digitally delivered services nearly doubled, from US\$ 9.67 billion to US\$ 17.60 billion in 2024, while imports increased from US\$ 22.36 billion to US\$ 33.37 billion.⁵ Figure 2 depicts the 2015–2024 growth of Thailand's digitally delivered services trade and its 2024 sectoral structure.

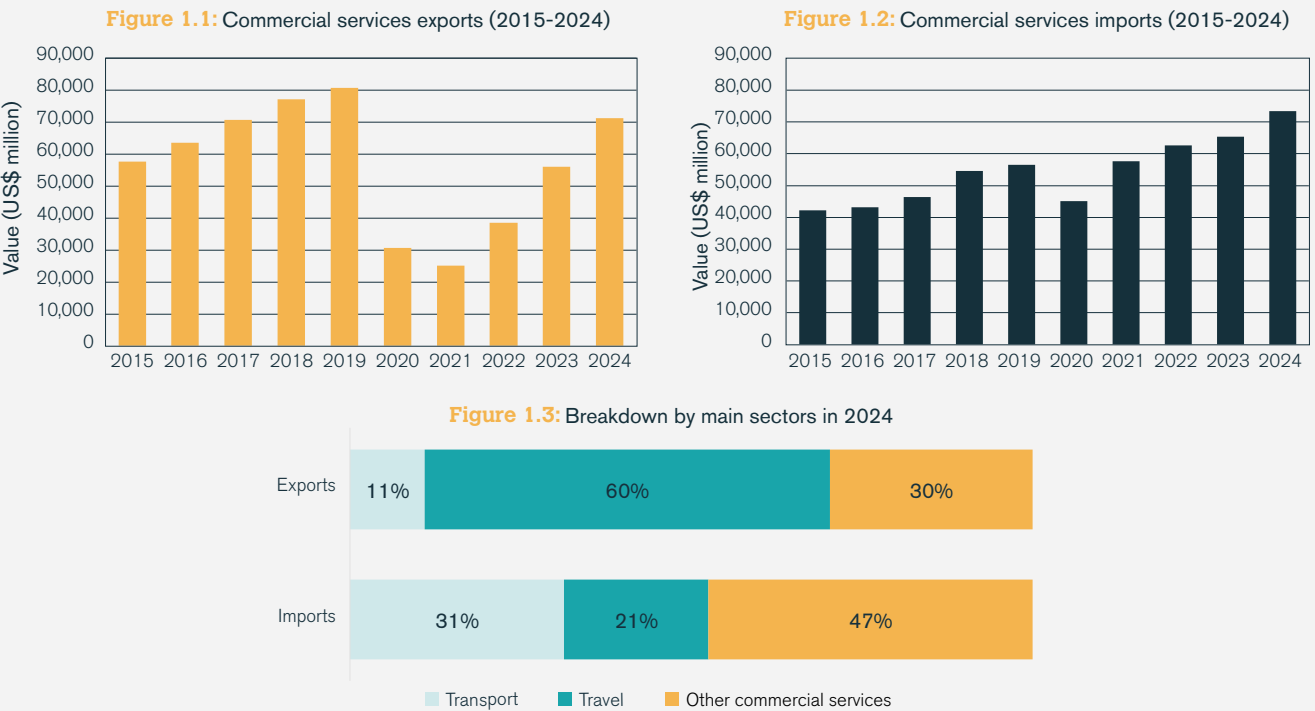
In terms of employment, about half of all Thai workers are employed in the services sector. The National Economic and Social Development Council (NESDC) of Thailand reported that, in 2022, the services sector employed 20.8 million people (53 per cent of total employment).⁶

GRP commitments in Thailand's services trade agreements

Since joining the WTO in 1995, Thailand has actively pursued the liberalization of services trade through a series of bilateral and regional trade agreements. The latter have increasingly placed emphasis on the adoption and implementation of GRPs to promote transparency, administrative efficiency and regulatory predictability of trading relations. As a member of ASEAN, Thailand has entered into PTAs with several major economies, including Australia, China, India, Japan, New Zealand and the Republic of Korea. In January 2022, Thailand further deepened its regional integration with the entry into force of the RCEP.⁷

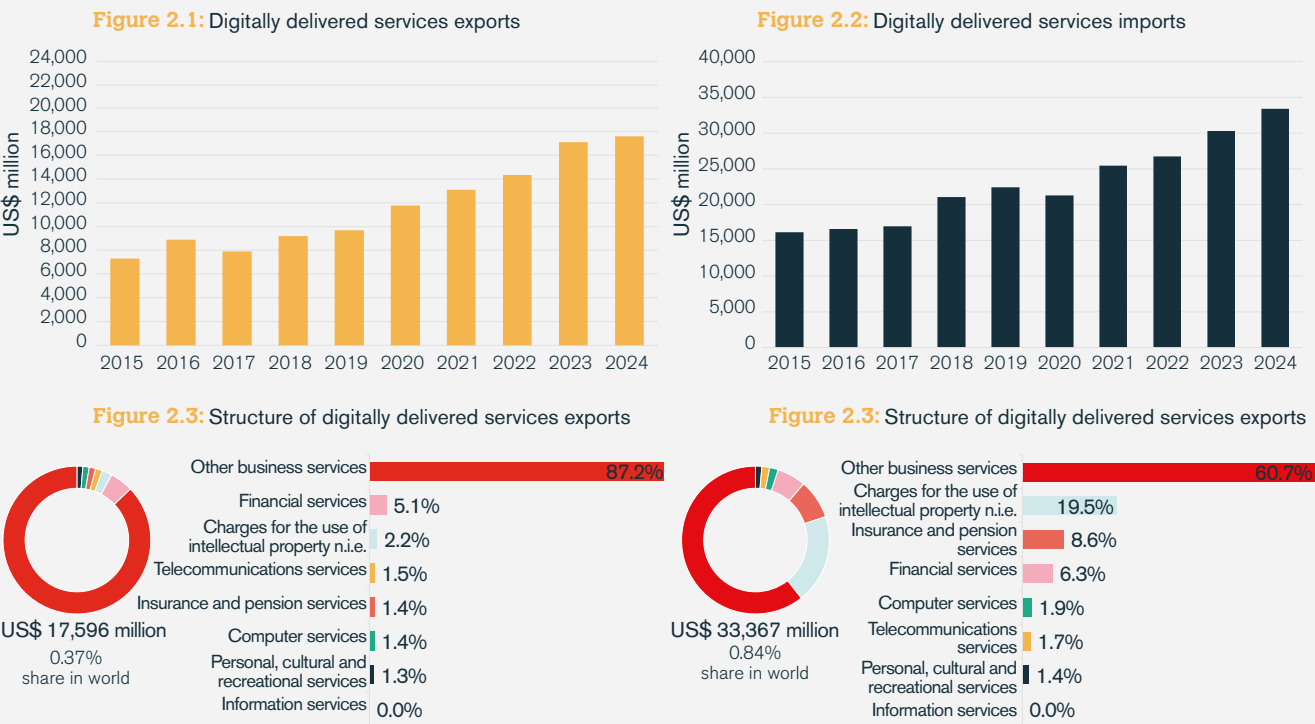
Thailand's earlier trade agreements generally incorporated basic elements of GRPs, including the obligation to publish information on licensing procedures and requirements⁸, inform applicants of the status and outcome of their applications⁹, permit the correction of minor errors¹⁰, and decide on authorization

Figure 1: Commercial services trade between 2015 and 2024, and sectoral composition in 2024



Source: WTO, Statistics – Trade in commercial services.

Figure 2: Digitally delivered services trade between 2015 and 2024, and its sectoral composition in 2024



Source: WTO, Statistics – Digitally delivered services trade dataset.

applications based on transparent and objective standards.¹¹ More recent agreements, such as RCEP and certain ASEAN+1 PTAs, mark a notable shift toward incorporating more robust GRP provisions. These include commitments on establishing indicative time frames for processing applications¹², acceptance of electronic submissions¹³, and reasonable opportunity for public comments on proposed regulatory measures.¹⁴

In 2018, together with other APEC member economies, Thailand endorsed the APEC *Non-binding Principles for Domestic Regulation of the Services Sector*.¹⁵ These principles encourage the adoption of GRPs, such as publication of information, administrative efficiency and stakeholder consultation, to foster a more open, efficient and predictable regulatory environment for services trade across the APEC region.

At the WTO, in 2024, Thailand adopted the SDR Disciplines in its schedule of specific commitments.¹⁶ This underscores Thailand's commitment to enhancing the quality and coherence of its domestic regulatory frameworks in a manner consistent with internationally agreed rules.

Ease of Doing Business reforms in Thailand

Prior to 2014, with the ambition of enhancing the country's investment and business prospects, successive Thai governments had heavily invested in hard infrastructure, such as roads, power grids, airports, seaports and similar assets.¹⁷ However, studies by international institutions consistently placed Thailand's national competitiveness in relatively modest positions. In 2014, in the World Economic Forum (WEF)'s *Global Competitiveness Report*, Thailand ranked 31st out of 133 countries¹⁸, while in the International Institute for Management Development (IMD)'s *World Competitiveness Yearbook*, it ranked 29th out of 60 economies.¹⁹ These rankings suggest that investing in infrastructure development is only one component of a strategy to enhance national competitiveness.²⁰ As pointed out in the WEF's *Global Competitiveness Report 2014-2015*, key obstacles to doing business in Thailand, besides government instability, were mainly related to good governance, including concerns about corruption, bureaucratic inefficiency and policy instability.²¹

Against this backdrop, the government led by General Prayuth Chan-o-cha, who assumed office in 2014, commissioned the Law Reform Commission (LRC) of the Office of the Council of State (OCS) to conduct

a comprehensive review of over 650 legislative instruments, including both acts in force and draft bills pending approval at that time.²² The findings of the analysis revealed that approximately 90 per cent of Thai legislation was still based on a close government control model that was developed for the trade protectionism regime during the 1950s to 1970s.²³

Under this antiquated model, nearly all economic and social activities required licensing or prior authorization.²⁴ As there were no standard rules on licensing procedures, licensing authorities had broad discretionary powers. The predictability of regulatory decisions, therefore, depended largely on individual officials handling them.²⁵ Moreover, authorities were empowered to issue secondary legislation, the purpose of which was often to facilitate the operations of government agencies rather than to serve or protect the public interest.²⁶ Cost-benefit and cost-effectiveness analyses, as well as stakeholder consultation were virtually absent in the regulatory process.²⁷

Based on its findings, the LRC recommended a set of measures to the Council of Ministers (Cabinet) for further action. These recommendations laid the groundwork for Thailand's subsequent efforts to modernize its regulatory framework and shift toward a more transparent, efficient and user-oriented model of governance.

Embedding GRP elements into Thailand's regulatory framework

Building on the LRC's recommendations, the Thai government initiated a comprehensive legal overhaul aimed at embedding GRP elements into its regulatory system. The LRC specifically proposed three pieces of legislation²⁸ – the *Licensing Facilitation Act 2015*, the *Royal Decree on Revision of Law 2015* (also known as the Sunset Law), and a draft law on regulatory impact assessment. These were subsequently complemented by a broader framework, including the *Constitution of the Kingdom of Thailand 2017*, the *Rules on Legislative Drafting and Evaluation of the Outcomes of Law Act 2019*, the *Digitalization of Public Administration and Services Delivery Act 2019*, and the *Act on Carrying Out of Public Services via Electronic Means 2022*. The following sections will examine the key GRP-related provisions contained in these laws.

Licensing Facilitation Act 2015

The *Licensing Facilitation Act*, B.E. 2558 (LFA) was adopted by the National Legislative Assembly

on 22 January 2015 and took effect from 21 July 2015.²⁹ Its enactment is seen as a pioneering piece of legislation paving the way for various reform efforts to improve the efficiency of the public sector.³⁰ Promoting two overarching principles of greater transparency and less administrative discretion, the Act aims to streamline the processes by which individuals and businesses obtain licenses and approvals from government agencies. The Act applies to all government authorities responsible for issuing authorizations that are required by law, except for certain agencies or procedures.³¹

The LFA incorporates several important GRP elements into Thailand's licensing system. These are (a) the mandatory publication of licensing manuals; (b) the establishment of procedures for document verification and applicant protection; (c) the imposition of time frames for application processing; (d) the creation of a One-stop Shop Service Centre; as well as (e) the requirement for the periodic review of licensing procedures. These GRP elements are examined in the subsections that follow.

a. Publication of licensing manuals³²

A key element of the LFA is the obligation for all licensing authorities to create licensing manuals for public use. Under Section 7, these manuals contain, at a minimum, the rules, procedures and conditions applicable to the licensing applications; the workflow and the time required for the granting of the license; and the list of documents or evidential materials that must accompany the application. While the Act permits the submission of applications via electronic means, this option is only available if the competent authority expressly provides for it in the licensing manual. The time frame for processing applications is likewise left to the discretion of each authority.

The licensing manual must be available at the location where applications are submitted and disseminated via electronic media. Upon request, the competent official must provide a physical copy of the manual, subject to the payment of an appropriate service charge, the amount of which must also be specified in the manual.

b. Document verification and applicant protection³³

Under Section 8 of the LFA, competent officials, upon receiving a licensing application, must promptly examine the completeness of the application, including

all required documents or evidential materials. Should deficiencies be identified, the official is obliged to advise the applicant to make corrections. If such corrections can be made immediately, they must be carried out on the spot. If not, the official must record the deficiencies, the specific requirements for rectification, and the time frame within which corrections must be made. This record must be signed by both the official and the applicant, and a copy must be provided to the latter.

If the application is complete as specified in the licensing manual, or if the application has been corrected as suggested by the official on the spot or as recorded in the deficiency record, the official is barred from requesting additional documentation or refusing to process the application on grounds of prior deficiencies. Should a license be wrongfully withheld on the basis of such claims, the law requires that the responsible official be subject to disciplinary or criminal proceedings. This provision is designed to serve as a safeguard against arbitrary or repetitive demands that could undermine procedural fairness during the licensing process.

However, it appears that the Act does not require a formal record of when an application is deemed complete. This procedural gap creates a degree of ambiguity as to the precise point at which the official's obligation to proceed with the application, along with the prohibition against requesting additional documents, takes effect – thereby diluting the effectiveness of the intended safeguard.

c. Time-bound decision-making³⁴

Section 10 of the LFA establishes binding time frames for licensing decisions. Authorities are required to complete their consideration of an application within the time specified in the licensing manual. Upon concluding the decision-making process, the competent official must notify the applicant of the result within seven days. If the official fails to conclude processing the application within the prescribed period, a written clarification must be issued to explain the cause of delay to the applicant every seven days until a final decision is rendered. Each such notification must also be transmitted to the Public Sector Development Commission (OPDC).

The Act further empowers the OPDC to review whether such delays are the result of inefficiency or other unreasonable causes. If so, it must report its findings to the Cabinet and submit recommendations for institutional or procedural improvement.

In cases where no explanation is provided, and the delay is not attributable to *force majeure*, the failure to act is deemed an omission causing damage to another person. This approach introduces a measure of administrative accountability and reinforces the principle that licensing agencies must not only act, but act within clearly defined time limits to ensure predictability.

d. Establishment of the One-stop Shop Service Centre³⁵

Another innovation introduced by the LFA is the establishment of the One-stop Shop Service Centre (OSSC). Under the Act, the OSSC operates as a government agency attached to the Office of the Prime Minister. Branches of the OSSC can be established in any ministry or province as necessary.

The OSSC's duties are set out in Section 16 of the Act. It is authorized to receive license applications, fees, and appeal requests and forward them to the competent licensing authority. The OSSC is also tasked with providing the public with information and clarification regarding licensing rules and procedures. Importantly, the OSSC is bound by the same procedural obligations and accountability standards as those applied to the licensing authorities.

To support the OSSC's functions, licensing authorities are required to disseminate up-to-date licensing manuals to the OSSC and to provide training to the OSSC officials to ensure consistency and competence in service delivery.

e. Regulatory review³⁶

The LFA imposes on government agencies the obligation to periodically review the legal frameworks underpinning their licensing powers. Specifically, every five years – or earlier, if deemed necessary – each competent authority must examine the laws that authorize it to issue licenses. This review is intended to determine whether the existing procedures remain appropriate or should be repealed or replaced with alternatives that are more streamlined, less time-consuming and better aligned with principles of administrative efficiency.

Constitution of the Kingdom of Thailand 2017

Section 77 of the 2017 Constitution formalizes the implementation of GRPs across governmental institutions and throughout the decision-making process.³⁷ It mandates that laws should be enacted

only when necessary and that outdated, unsuitable or unnecessarily burdensome laws be revised or repealed. Additionally, laws must be easily accessible and understandable to the public to facilitate compliance. Prior to enacting any new legislation, the government is required to conduct stakeholder consultations and systematically assess the potential impact of the proposed law. The findings from these consultations and assessments must be publicly disclosed and considered at every stage of the legislative process. After a law comes into effect, its implementation and outcomes must be regularly reviewed, again involving stakeholder consultation, with a view to ensuring its continued relevance amid changing circumstances.

Furthermore, the Constitution requires laws to clearly define the rules governing the exercise of official discretion and to set time limits for each procedural step. These provisions are particularly relevant for the services sector, where complex licensing and regulatory requirements often affect market entry and operation. By mandating stakeholder consultation, regulatory impact assessment and regular review, Section 77 helps ensure that service-related regulations remain transparent, proportionate and responsive to business needs.

Section 258 of the Constitution complements these provisions by setting specific targets related to national reforms and includes related directives tied to Section 77. These include the establishment of a mechanism for reviewing existing laws, regulations and rules prior to the date of promulgation of the Constitution; enhancing legal education to promote ethical and informed legal practitioners; developing a public legal database to improve access and understanding; and facilitating public participation in lawmaking through assistance mechanisms for proposing draft laws.³⁸

Rules on Legislative Drafting and Evaluation of the Outcomes of Law Act 2019

The *Rules on Legislative Drafting and Evaluation of the Outcomes of Law Act*³⁹ was established in 2019 to implement the requirements under Section 77 of the Constitution, consolidating provisions on the processes and tools necessary for good quality regulation into a single legal instrument.⁴⁰ As such, it serves as the key reference text for the application of GRPs in Thailand.⁴¹

This Act builds upon and expands the principles set out in the Sunset Law 2015⁴² by providing more systematic processes of legislative review. While the Sunset Law only required *ex post* review of laws at least once every five years from their entry into force⁴³, the 2019 Act looks at the entire regulatory cycle and also mandates *ex ante* RIA, stakeholder engagement procedures and regular assessment of existing laws.⁴⁴ Under the 2019 Act, regulatory quality standards, such as necessity, proportionality, effectiveness, transparency and minimization of public burden, apply not only to the review of existing laws but also to the drafting of new legislation.⁴⁵ Notably, the 2019 Act only requires *ex ante* RIA for draft primary legislation, and not for secondary legislation, whereas *ex post* review is required for both primary and secondary legislation. In 2022, the scope of *ex ante* RIA was extended to all secondary legislation that has an impact on people or businesses under a Ministerial Regulation titled *Prescribing Draft Regulations Which Must Conduct Public Consultation and Impact Assessment*.⁴⁶

Since the entry into force of the Act and its *Guidelines for Evaluation of the Outcomes of Law* in 2019⁴⁷, the Sunset Law has been repealed.

Digitalization of Public Administration and Services Delivery Act 2019

Thailand's first dedicated law on digital government⁴⁸, the Digitalization of *Public Administration and Services Delivery Act*, B.E. 2562⁴⁹, was introduced in 2019 to drive digital transformation forward across the public sector. The Act focuses on three key areas: (a) user-focused digital service delivery; (b) cross-agency data integration; and (c) open government data promotion.

a. User-focused digital service delivery

Section 4 mandates that all state agencies provide services via digital means, with the aim of enhancing efficiency, accessibility and responsiveness in public service delivery. Section 11 provides that, where a law or regulation requires an applicant to submit a government-issued document, this obligation shall not fall on the applicant if the document originates from another state agency. Instead, the receiving agency is required to obtain necessary data or documentation directly from the issuing agency through digital means. Furthermore, in Section 12, government agencies are

required to develop supporting systems, including a digital payment system and a system for digital identification and identity verification. Additionally, competent agencies must implement appropriate security and protection measures for accessing digital services, including cybersecurity safeguards, to ensure readiness, credibility and transparency in digital government service delivery.

b. Cross-agency data integration

Concerning data integration and interoperability among government agencies, Section 4(2) calls for the development of standards and infrastructure to enable secure and efficient data sharing across government agencies. The obligation to facilitate such integration is further elaborated in Sections 13 and 14, which require agencies to share digital data with one another upon request, provided it is relevant to their official duties. To support this, Section 15 establishes a centralized data exchange centre that acts as an intermediary platform for coordinating inter-agency digital connectivity.

c. Open government data promotion

To promote open government data, Section 17 requires state agencies to publish government information digitally, ensuring public access without cost, and enabling the reuse of data for the development of services and innovations. Section 18 reinforces this by establishing an open government data centre and mandating that data disclosure standards align with internationally accepted open data principles.

Act on Carrying Out of Public Services via Electronic Means 2022

The *Act on Carrying Out of Public Services via Electronic Means*, B.E. 2565 (2022) came into force on 10 January 2023.⁵⁰ This legislation marks another important step in Thailand's efforts to modernize government service delivery by requiring state agencies to provide public services through electronic means.⁵¹

At the core of the Act lies the principle that electronic processes are to be treated as legally equivalent to traditional paper-based ones. Section 7 explicitly authorizes applicants to submit license applications, supporting documents and related filings electronically.⁵² Importantly, it prohibits state officials from rejecting such applications solely on the grounds that they were submitted through digital channels. This principle also

extends to payments made to government agencies, including application fees, taxes, fines and other forms of payment.⁵³ Additionally, Section 11 requires that any subsequent correspondence or issuing of documents following such filings be carried out electronically, unless the applicant expressly requests otherwise.⁵⁴

The Act further sets out procedural rules to facilitate electronic filings. Copies of documents submitted electronically are not required to bear physical signatures to be considered certified.⁵⁵ Where laws require submission of multiple copies of the same document, a single electronic submission of such a document is deemed sufficient.⁵⁶ Moreover, in cases where copies of original paper documents presented by the applicant are necessary, the relevant agency is responsible for making and certifying copies at its own expense.⁵⁷ The key milestones in embedding GRP elements in Thailand's regulatory framework are presented in Figure 3.

Making GRPs work: implementation of EoDB reforms

While great strides in embedding the GRP elements in the legal instruments have been made, the practical success of these reforms ultimately depends on their implementation. This section examines how the GRP elements have been put into practice to simplify procedures, increase transparency and improve public service delivery through the implementation of the

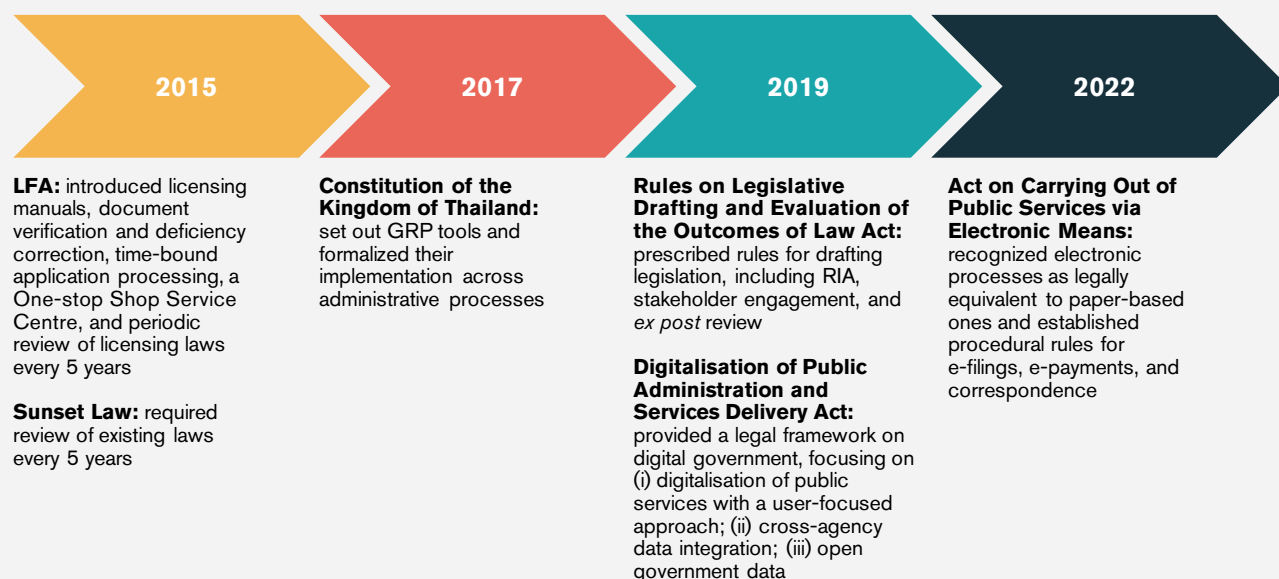
LFA, the expansion of e-government platforms, and the operationalization of regulatory review mechanisms.

Implementation of the LFA

Since the enactment of the LFA, significant progress has been made in enhancing the transparency, efficiency and accessibility of government licensing procedures. One of the Act's most notable achievements has been the development and dissemination of the licensing manuals. By the end of 2020, 3,418 licensing manuals had been produced and made publicly available.⁵⁸ As of 2023, this number had risen to 3,997 – an increase of approximately 17 per cent over the three-year period.⁵⁹

Furthermore, the reform has resulted in a measurable reduction in regulatory burden. As of 2023, 63 government agencies had managed to reduce licensing procedural steps by between 30 and 50 per cent for a total of 532 types of licenses, with the average processing time reduced by 41.7 per cent.⁶⁰ In some cases, the impact was even greater. For 41 specific licenses, the time required to complete the licensing process dropped by more than 70 per cent.⁶¹ Equally noteworthy was the reduction in documentary requirements imposed on applicants: a total of 1,212 document types were eliminated from application processes across 58 agencies, affecting 530 types of licences.⁶²

Figure 3: Key milestones in embedding GRP elements in Thailand's regulatory framework



Source: WTO/World Bank, based on Thai legislative instruments adopted between 2015 and 2022.

In support of Thailand's broader digital government agenda, the issuance of electronic documents has also been implemented. As of 2023, 50 agencies had issued 148 types of official documents, including electronic receipts and corporate registration certificates, through digital platforms.⁶³ To complement these developments, legal reviews had been undertaken for 56 licensing schemes across 22 agencies to ensure that existing laws were compatible with digital service delivery.⁶⁴

An example of the implementation of the LFA can be seen in the education sector. The Office of the Private Education Commission (OPEC) implemented reforms under the LFA to improve licensing processes for international schools. In line with Section 7 of the LFA, OPEC published a detailed licensing manual for the establishment and operation of international schools.⁶⁵ The manual outlines procedures, required documents, fees and expected timelines, and is available in Thai. Licensing timelines were established and published online.⁶⁶ Specifically, the process for the establishment of a school is broken down into specific steps across a 30-day window, including 1 day for document receipt, 7 days for document review, 6 days for school inspection, 15 days for license issuance and 1 day for license notification. While Section 19 of the *Private School Act 2007* already requires completion of the process within 30 days⁶⁷, OPEC's updated timeline provides a more detailed and structured breakdown of each procedural step, improving clarity and consistency in implementation.

Beyond the services sector, the LFA's provisions have also been implemented across a wide range of regulatory domains. One such example are the reforms undertaken by Thailand's Food and Drug Administration (FDA) which came into effect on 1 May 2024. In compliance with Section 7 of the LFA, the FDA revised its manuals to reflect the updated procedures, which now cover more than 100 guiding documents. Additionally, the FDA has upgraded its information systems and revised 375 procedures to support the implementation of the electronic application submission system. Furthermore, the FDA removed the requirement for three commonly required documents: copies of national ID cards, house registration documents and business registration certificates. These documents, which can now be retrieved electronically through system linkages with the Department of Provincial Administration (DOPA) and the Department of Business Development (DBD), are no longer required to be submitted by entrepreneurs seeking health product approvals.

E-Government Services

As part of Thailand's digital government strategy, e-government platforms such as the Centralized Information System for Government Services (info.go.th), the Government Central Service System for Businesses (bizportal.go.th), and the DBD Biz Regist (edbr.dbd.go.th) – available only in Thai – have been developed. This subsection looks at how these platforms contribute to the practical implementation of GRP elements by enhancing regulatory transparency and streamlining administrative procedures for investors and businesses.

a. Centralized Information System for Government Services

To facilitate the dissemination of the licensing manuals to the public, the Digital Government Development Agency (DGA), in collaboration with the OPDC, launched in 2015, the Centralized Information System for Government Services (accessible via info.go.th).⁶⁸

From the user's perspective, the platform significantly simplifies access to information and has become an essential feature of Thailand's digital government architecture. Users can search for licensing requirements and procedures by service, agency, or type of document, and receive information tailored to their needs. The platform also maps data for public service offices, offers navigational support by linking location data to mapping applications for showing directions, and includes public feedback mechanisms to express satisfaction or lodge complaints. For government agencies, the platform provides a structured digital environment to manage, review and update information in real time. Agencies can also monitor user satisfaction, and record data on instances where processing times exceed the timelines set under the LFA. As of August 2023, all licensing manuals were published on the online system.⁶⁹

b. Government Central Service System for Businesses

Launched in 2016, through the joint efforts of the OPDC, the DGA, and other relevant bodies, the Government Central Service System for Businesses (accessible via bizportal.go.th) was developed as an integrated one-stop electronic government services system to support entrepreneurs and businesses.⁷⁰

In terms of functions, the portal supports entrepreneurs' applications, renewals, modifications, and cancellations of certificates, licenses, and various official documents digitally. It consolidates data from multiple agencies and allows applicants to submit requests, track progress, make fee payments, and receive electronic licenses entirely online. For government agencies, the Biz Portal serves as a shared service infrastructure, especially useful for those without their own digital systems, to streamline application processing, collect fees and issue licenses.

By 2022, the portal had offered services for 94 licenses across 25 business categories in Bangkok and 18 licenses across 10 business categories in all 76 provinces.⁷¹ Between 2020 and 2021, 36 of these licensing procedures – approximately 38 per cent – were upgraded to fully digital status.⁷² As of August 2024, the number of services available through the portal had increased to 134, reflecting a 20 per cent rise compared to 2022.⁷³ However, this accounted for only a limited share of government services available.

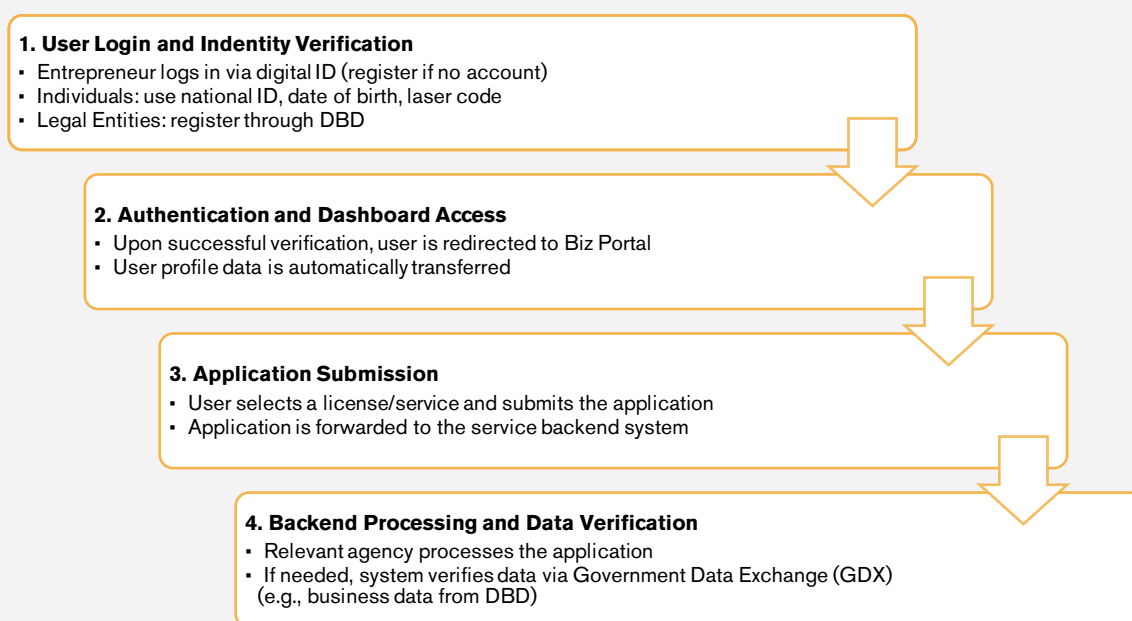
In fact, by 2022, there had been approximately 343 e-services offered by 117 agencies⁷⁴, out of several thousand public services nationwide.

The application submission workflow and the corresponding backend processing steps through the Biz Portal are shown in Figures 4 and 5.⁷⁵

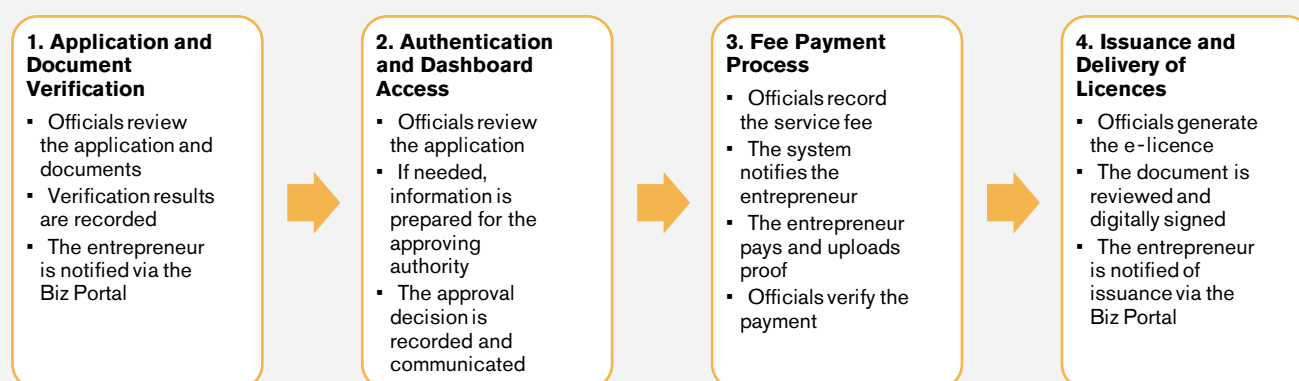
c. DBD Biz Regist

In January 2025, the DBD launched a digital platform called "Biz Regist" (accessible via edbr.dbd.go.th). This platform offers a fully digital, end-to-end solution for the registration of partnerships and private limited companies in Thailand. This initiative marks another important step forward in Thailand's efforts to modernize and streamline its corporate registration system, particularly in the light of a 2022 government report revealing that paper-based registrations still accounted for 96 per cent of all submissions, while online registrations made up only 4 per cent.⁷⁶

Figure 4: Application Submission Workflow through the Biz Portal⁷⁵



Source: WTO/World Bank, based on information provided on the Biz Portal, <https://www.dga.or.th/en/bizportal-2/>.

Figure 5: Backend Processing Workflow for Licensing Applications through the Biz Portal⁷⁶

Source: WTO/World Bank, based on information provided on the Biz Portal, <https://www.dga.or.th/en/bizportal-2/>.

A key feature of the new system is the possibility to complete the entire application and identity verification process online. Users can create accounts on the platform and authenticate their identity through secure digital channels.⁷⁸ The platform also supports the use of electronic signatures, allowing applicants to sign and submit documents without the need for their physical presence.⁷⁹ Upon approval, certified corporate documents are issued in digital format and made available for immediate download through the platform.⁸⁰ The platform is designed to facilitate the completion of the full registration process within a single business day.⁸¹

Although the DBD had set 1 July 2025 as the target date for shifting all business registration services to the DBD Biz Regist platform, data from May 2025 indicated that the transition was still underway.⁸² Specifically, walk-in registrations still accounted for 47 per cent of total submissions, while 53 per cent were processed through the online platform.⁸³ Recognizing that a large portion of users had yet to fully adapt to the digital system, the DBD decided to extend the availability of walk-in services until the end of December 2025, with full migration to the online platform expected to take effect from 1 January 2026.⁸⁴

Ex ante and ex post review

As previously mentioned, the LFA and the Sunset Law of 2015 introduced formal requirements for *ex post evaluations at least every five years. This concerned in particular: (i) licensing procedures to be reviewed by the competent authorities under the LFA, as well as (ii) laws to be assessed by the responsible ministries under the Sunset Law.* In practice, however, the implementation of these review mechanisms remained limited. By 2020, only a small number of government agencies had undertaken evaluations in accordance with the Sunset Law, and no reviews of licensing procedures had been reported under the LFA.⁸⁵

Since the repeal of the Sunset Law and the entry into force of the 2019 Act, regulatory reviews in Thailand have become more structured and systematic. As of 2024, more than 200 *ex post reviews had been conducted by Thai authorities, many of which resulted in the amendment or repeal of outdated laws and regulations.*⁸⁶ These reviews are guided by methodological templates and manuals developed by the OCS, in coordination with the LRC.⁸⁷

With respect to *ex ante* review, however, persistent challenges remain. While a RIA process is now formally required for most primary and secondary legislation, this is often treated as a procedural formality with limited influence on decision-making.⁸⁸ In many cases, RIAs are not initiated during the early stages of policy formulation, when consideration of alternative policy options would be most meaningful, but are instead prepared shortly before the draft law is submitted to the Cabinet.⁸⁹ This sequencing reduces the potential of RIAs to inform the design of regulatory instruments and undermines the broader objective of evidence-based policy-making.

Regulatory Guillotine Project

Complementing the legal review requirements under the LFA and the Sunset Law, the Regulatory Guillotine project was a distinct, fast-track mechanism to screen licences, permits and other rules and accordingly, repeal, amend or simplify those which were obsolete, redundant or disproportionately costly. It formed part of the broader wave of reforms launched between 2015 and 2017, which aimed to modernize Thailand's regulatory landscape and improve the country's performance in international competitiveness indices.⁹⁰ Unlike agency-led reviews mandated under the LFA and the Sunset Law, the Regulatory Guillotine was centrally coordinated and driven by strong political backing from the Office of the Prime Minister.⁹¹

In 2016, the Thai government launched the project by engaging the Thailand Development Research Institute (TDRI) to conduct a review of the existing laws and regulations, since many of these were considered redundant, outdated, or incompatible with the regulatory environment.⁹² Through the project, the government aimed to eliminate approximately 1,000 unnecessary laws from the country's regulatory framework, which comprised around 100,000 laws in total.⁹³ It was estimated that this removal could reduce compliance costs for the private sector and the Thai public by approximately 133.8 billion baht (US\$ 3.75 billion) per year, equivalent to 0.8 per cent of GDP.⁹⁴

Building on the political support, the implementation of the Guillotine scheme has led to concrete reforms. Permits and licenses were cut or simplified in several sectors. For example, in the financial sector, the Securities and Exchange Commission of Thailand (SEC) engaged in the Guillotine scheme during 2020-2023⁹⁵ and subsequently developed fully digital procedures for the establishment and management of mutual funds through the Online Fund

Approval and Management System (OFAM). The latter was finalized and became operational in the first quarter of 2020.⁹⁶ Additionally, the SEC undertook a comprehensive review of the filing process for debt instrument offerings and expected to reduce the number of required forms from 32 to 13.⁹⁷

Implementation challenges

Despite the progressive ambition of the LFA and related regulatory reform initiatives, their full realization in Thailand has faced several implementation challenges. These include insufficient implementation support, institutional workarounds, lack of compliance, limited coordination among government agencies, fragmented digital infrastructure and uneven political momentum behind reform efforts.

Insufficient implementation support

In the early phase of implementation, confusion over institutional responsibilities and the scope of obligations under the LFA led to inefficiencies and misallocation of resources. For instance, over 700,000 licensing manuals were created due to misunderstandings regarding which services had to be prescribed in manuals and which units were responsible for preparing them.⁹⁸ This duplication was particularly widespread among provincial and local government agencies, suggesting a lack of operational guidance and training from the central level.⁹⁹ The OPDC later resolved this issue by consolidating and standardizing the manuals into a single national set of 3,418 manuals.¹⁰⁰ While this solution addressed the immediate problem, the incident revealed the limitations of a top-down legislative approach without adequate implementation planning and institutional capacity-building.

Institutional workarounds through gaps in the LFA

Although the requirements on licensing manuals under the LFA were designed to provide clarity by specifying procedures and time frames, the delegation of authority to individual licensing agencies to determine these parameters has resulted in problems. As reported by the OPDC, within the first five years of the LFA implementation, some agencies adopted excessively generous timelines to shield themselves from performance pressure.¹⁰¹ Others imposed unrealistically short deadlines to demonstrate efficiency, which in turn contributed to procedural backlogs.¹⁰²

Moreover, in responding to complaints, certain agencies resorted to repeatedly issuing seven-day delay notifications to avoid legal accountability.¹⁰³ In more problematic cases, officials circumvented formal processing altogether by requesting applicants pre-submit documents for informal review of the applications, thereby postponing the official commencement of the licensing timeline.¹⁰⁴

Institutional non-compliance and limited inter-agency coordination

Institutional non-compliance has also posed a critical obstacle to realizing the full potential of the regulatory reforms. In practice, many public agencies have lagged in complying with the mandated reforms, in part due to insufficient personnel or lack of effective oversight mechanisms at the central level.¹⁰⁵ As a result, competent agencies have often defaulted to a business-as-usual approach, rather than adapting to new regulatory practices.¹⁰⁶ This has been evident in the implementation of the licensing manuals, as many agencies have failed to operationalize them effectively and often demonstrated a limited understanding of the procedures and requirements outlined by their own institutions.¹⁰⁷

Between 2015 and 2020, a total of 21 public complaints were filed concerning the implementation of the LFA.¹⁰⁸ Among these, eight cases involved agencies establishing inappropriate procedures and timelines, failing to clearly display required steps, and granting officials excessive discretion. In five cases, agencies did not complete the licensing process within the time frame specified in the licensing manual and failed to provide progress updates or reasons for delay. Another five cases concerned agencies requesting additional documents not listed in the manuals, including copies of government-issued documents. In two cases, applicants fully complied with the licensing procedures but were still denied a license. One case involved an unjustified suspension of licensing procedures, causing serious harm to the public.

Lack of institutional compliance has, in turn, led to coordination gaps among agencies, undermining the Act's transparency objectives, particularly those linked to the central portals.¹⁰⁹ When agencies neglected to prepare or update licensing manuals, the result was regulatory ambiguity, as the public faced difficulty accessing essential sector-specific information. While the portals are meant to consolidate such data, their

effectiveness depends on consistent inter-agency collaboration and communication to ensure the information is complete, updated and accessible from single sources.

Fragmented digital infrastructure and data incompatibility

Thailand has made notable efforts to develop digital platforms aimed at streamlining public service delivery, including both multi-agency platforms, such as info.go.th and the Biz Portal, as well as single-agency platforms, like the DBD Biz Regist. However, the implementation of the multi-agency platforms has revealed broader systemic challenges that limit their overall effectiveness.

A key limitation is that many of these platforms still follow a conventional e-government model that prioritizes one-way information provision rather than offering fully digital, interactive and user-centred services.¹¹⁰ A major barrier lies in the fragmentation of data systems across government agencies. Since agencies manage their own datasets independently, information is stored in diverse formats and lacks standardization.¹¹¹ This fragmentation impedes efforts to link and integrate services across platforms, such as Biz Portal, which relies heavily on cross-agency data interoperability to function effectively as a one-stop service for business procedures.

A further limitation is the language of these digital platforms, which are currently only operated in Thai. While this is suitable for domestic users, it significantly limits accessibility for foreign investors and service providers seeking regulatory information.

Inconsistent political backing

Another challenge lies in the regulatory review process. The implementation of the Regulatory Guillotine has advanced more slowly than anticipated. Although the initiative initially gained momentum, private sector stakeholders have repeatedly urged the government to expedite reforms and repeal outdated or unnecessary laws.¹¹² However, progress in responding to these proposals has been limited.¹¹³ This slowdown can be attributed to a combination of factors in the current Thai context, including inconsistent political support, resistance from certain government agencies and shifting institutional mandates.¹¹⁴

Public impact

Overall, Thailand's regulatory reforms have yielded significant improvements in transparency and administrative efficiency including through digital solutions. These gains are reflected in key international benchmarks. Notably, in the World Bank's *Doing Business* rankings, Thailand advanced significantly from 49th place in 2016¹¹⁵ to 21st in 2020, out of 190 economies.¹¹⁶

Between 2016 and 2024, the country also advanced on the United Nations *E-Government Development Index* (EGDI), moving from 77th to 52nd place out of 193 countries.¹¹⁷ This steady climb reflects the impact of successive digital government reforms and inter-agency coordination initiatives. As of 2024, Thailand holds the position of the second highest-ranked country in ASEAN on the EGDI and aspires to further improve its standing, with an ambitious goal of reaching the global top 40.¹¹⁸

Next steps

As Thailand continues to advance its regulatory reform agenda, the government has outlined a series of next steps to modernize its regulatory environment and enhance public service delivery. Among the various reforms underway, this chapter focuses on two initiatives that illustrate Thailand's strategic shift toward more transparent, efficient and technology-driven governance. The first is the revision of the LFA and the second is the nationwide expansion of e-government platforms.

Revisions to the LFA

In April 2024, the Cabinet approved the *Draft Act on Licensing Facilitation and Public Service Delivery*, which is expected to be passed into law and enter into force soon.¹¹⁹ This revision process is undertaken as a consequence of the legal review requirement under Section 77 of the Constitution and is driven by practical challenges identified during the implementation of the LFA.

The Draft Act introduces several key reforms designed to further streamline administrative procedures, improve service delivery and increase transparency and accountability across all levels of government. One of the major changes is the envisaged expansion of the LFA's scope. The Draft Act will no longer be limited to licensing procedures but will also apply to requests

for any public services that fall within the authority of government agencies. To support this shift, the definition of government agency under the Draft Act will be expanded to cover all public-sector entities, not only those authorized to grant licenses.¹²⁰

The Draft Act also seeks to rectify certain procedural shortcomings of the LFA, as discussed above. Regarding the discretion granted to licensing authorities in determining processing time frames in the licensing manuals, the Draft Act retains this discretion but introduces an important safeguard: the licensing authorities must take into account public convenience and avoid imposing unreasonable burdens on applicants.¹²¹ Additionally, whereas the LFA does not impose an explicit obligation to issue a formal record stating the completeness of a received application – only requiring such documentation in cases where deficiencies are identified – the Draft Act now envisages that officials must issue a formal record in both cases.¹²²

Furthermore, the Draft Act will introduce three important procedural changes. First, in line with the *Act on Carrying Out of Public Services via Electronic Means 2022*, it incorporates provisions on electronic interactions between the public and government agencies. These include recognition of the right to submit applications electronically¹²³, a requirement that licensing manuals must prescribe provisions for submission of applications electronically¹²⁴, and procedures for receiving those applications.¹²⁵ Second, a fast-track processing option would be made available to applicants who require urgent attention, provided that this option is specified in the licensing manual and subject to additional fees set by the relevant authority.¹²⁶ Third, the Draft Act introduces a consolidated licensing mechanism known as the super licence.¹²⁷ This mechanism is designed for business operators who require multiple permits to carry out their activities, under which the holder of a super licence is deemed to have received all related subsidiary licences. The specific requirements and conditions for the super licences will be prescribed by Royal Decree.

Lastly, the Draft Act also seeks to enhance accessibility, particularly for non-Thai speakers, by authorizing government agencies to provide English-language or bilingual versions of application forms.¹²⁸ While not mandatory, this change is expected to benefit foreign investors, businesses and individuals navigating Thai administrative procedures.

Expansion of e-government platforms

To accelerate the implementation of digital government policies in line with the *Digitalization of Public Administration and Services Delivery Act* (2019) and the *Digital Government Development Plan (2023–2027)*, the *Digital Government Integration Plans* for Fiscal Years 2025¹²⁹ and 2026¹³⁰ have been developed by the DGA. Both plans are structured across three levels – upstream, midstream and downstream – each representing a distinct phase in Thailand's digital transformation journey. At the upstream level, efforts focus on laying the institutional and technical groundwork, which includes strengthening digital foundations, developing core infrastructure and disclosing master datasets to facilitate data interoperability between agencies.

The midstream phase emphasizes the development of shared platforms and digital tools across the public sector to avoid duplication, reduces administrative overheads and ensures that all agencies can benefit from common digital resources. Finally, at the downstream level, the full integration of public services into end-to-end digital platforms is envisioned. This includes not only the digitization of forms and workflows, but the reimagining of service delivery through user-centred design and cross-platform connectivity. Compared to the 2025 plan, the 2026 plan has introduced a sharper focus on emerging technologies, particularly artificial intelligence and cloud computing, reflecting a policy shift under the administration led by Prime Minister Paetongtarn Shinawatra.

The government has introduced a series of initiatives to operationalize the goals set out in the integration plans. In May 2024, the Joint Corporate Data Linkage initiative was announced.¹³¹ By allowing government agencies to share corporate information through a centralized platform, the initiative aims to reduce redundant documentation requirements, such as repeated submissions of ID cards, house registrations and company affidavits. As an initial phase, 10 key agencies have joined the platform, with the potential for expansion. The system is expected to eliminate nearly 400 document retrieval procedures and reduce administrative costs. It operates via the government data exchange infrastructure, which was mandated under the *Digitalization of Public Administration and Services Delivery Act* (2019). A practical example of the benefits of this initiative can already be seen in the reforms implemented by the FDA.

Furthermore, on 4 June 2025, the Cabinet endorsed a proposal by the OPDC to accelerate the integration of 2,101 government services into either the Biz Portal (for business users) or the Citizen Portal (for the general public), in alignment with the country's *Digital Government Development Plan (2023–2027)*.¹³² As of the most recent report, only 182 government services have been successfully integrated into these platforms. Under the approved framework, government agencies must follow one of two pathways: those without existing electronic service channels are required to launch their services directly via the central platforms, while agencies with existing digital services must migrate and integrate them into the Biz or Citizen Portal. The implementation of this initiative is scheduled to take place from 2025 to 2027.

Lessons learned

Thailand's EoDB reforms offer important lessons on how legal, institutional and digital reforms can transform governance. Through the adoption of important regulatory instruments and digital government initiatives, Thailand has moved towards a more transparent, efficient and user-oriented regulatory system. Key lessons include the following:

1. Regulatory reform must focus on users' experience

Thailand's regulatory landscape was historically shaped by a legacy of discretionary, control-based regulation. The adoption of laws, such as the LFA and subsequent digital government legislation, marked a meaningful shift towards institutionalizing transparency, time-bound procedures and digital service provision, laying the foundation for a more user-focused public administration.

2. Central guidance and oversight are critical for implementation and operational clarity

The initial proliferation of over 700,000 licensing manuals under the LFA revealed that, without detailed central instructions and training, local agencies could misinterpret or inconsistently apply reform mandates. Standardized templates, centralized oversight and ongoing capacity-building are essential to translate legal mandates into coherent action at all administrative levels.

3. Reform design must anticipate and close procedural loopholes

Discretion left to agencies under the LFA regarding processing timelines and licensing manual content led to both over-cautious and overly ambitious behaviours, undermining efficiency and accountability. The experience suggests that reform frameworks should include safeguards against potential non-compliance or procedural inaccuracies by public officials.

4. Digital tools enhance service delivery but require interoperability

Digital platforms, such as info.go.th and bizportal.go.th, have improved access to public services, but fragmented data systems and at times poor inter-agency coordination have limited their effectiveness. Reform success depends on integrated digital infrastructure and shared standards.

5. High-level political support drives, but does not guarantee, reform

Initial momentum from the government enabled major initiatives, including the Regulatory Guillotine. Yet uneven political backing and bureaucratic resistance later slowed progress, highlighting the need for sustained leadership and institutional incentives.

6. Implementation and monitoring matter as much as regulatory frameworks

Despite strong legal frameworks, inconsistent compliance by line agencies revealed gaps in operational capacity. Effective reform requires follow-through mechanisms, regular monitoring, as well as continuous training for government officials.

Conclusion

This case study demonstrates a significant and multifaceted effort to modernize Thailand's regulatory framework and improve the delivery of public services. Anchored in the LFA and complemented by a broader legislative and digital infrastructure, the reform agenda marked a decisive shift from discretionary, control-based regulation towards a system grounded in transparency, efficiency and service orientation.

The implementation of digital platforms, such as info.go.th and bizportal.go.th, along with the rollout of the Regulatory Guillotine, demonstrated Thailand's commitment to simplifying procedures, reducing administrative burdens and leveraging technology for good governance.

However, reform outcomes have been uneven. While there have been measurable gains in processing times, document reductions and international rankings, persistent challenges, including inter-agency fragmentation, uneven compliance and limited data interoperability, have constrained the full realization of the reform goals.

Looking ahead, the planned revisions to the LFA and expansion of end-to-end digital government services signal a continued push to deepen and sustain regulatory reform to improve the business environment. To achieve its ambitions, Thailand must continue investing in institutional capacity, enforce implementation across all levels of government and strengthen the governance frameworks that support digital integration and regulatory coherence. Thailand's experience provides reflections that could be informative for other economies seeking to modernize public administration and embed GRP elements in a complex and evolving policy environment.

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