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Directorate for Financial and Enterprise Affairs
COMPETITION COMMITTEE

Annual Report on Competition Policy Developments in Ireland

-- 2021 --

This report is submitted by Ireland to the Competition Committee FOR INFORMATION.

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Ireland

1. Executive Summary

1. 2021 was another busy year for the CCPC in terms of competition enforcement and merger control. The CCPC received 81 merger notifications in 2021 which represents a 98% increase of the number notified in 2020. In competition enforcement, significant competition cases were completed in ticketing services, private motor insurance and resale price maintenance in the supply of furniture.

2. The CCPC dedicated significant resources throughout 2021 to negotiations at the European Council on the proposed Digital Markets Act (DMA) and Digital Services Act (DSA). The CCPC contributed feedback as part of the ECN Verticals Working Group into the review of the Vertical Block Exemption Regime (VBER) guidelines and actively supported the work of an Irish government review of white-collar economic crime.¹

3. The CCPC provided its views to the Irish Government on the competition aspects of public policy including the scope of EU competition law in relation to collective bargaining by the solo self-employed and highlighted the need for further reform of professions which in 2021 focused on legal education services and incorporated veterinary practices.

4. Throughout 2021 the CCPC continued to work closely with the Department of Enterprise, Trade and Employment (DETE), other Government Departments and the EU to ensure that any issues arising from Brexit were quickly identified and appropriate action taken. Among the challenges posed by Brexit, which were identified by the CCPC as a regulator, was the inability to exchange confidential information with the UK, creating a wider knowledge gap the longer it continued. The CCPC raised this issue at the relevant national and international forums across issues of competition, consumer protection and product safety. The CCPC also regularly engaged with the European Commission on progression of cooperation agreements provided for under the Trade and Cooperation Agreements.

1.1. Changes to Competition Laws and Policies, Proposed or Adopted

1.1.1. Summary of new legal provisions of competition law and related legislation

5. In 2021, preparatory work was conducted on new legislation, the Competition (Amendment) Bill 2022, which, when enacted later in 2022 will commenced transposition of Directive EU 2019/1 (“the ECN+ Directive”) into Irish law.² The ECN+ Directive aims to ensure that national competition authorities have the appropriate tools to enforce EU competition law in a harmonised manner. The legislation also includes other amendments.

¹ Department of Justice (2020) ‘Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption’

² Directive (EU) 2019/1 of the European Parliament and of the Council of 11 December 2018 to empower the competition authorities of the Member States to be more effective enforcers and to ensure the proper functioning of the internal market.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32019L0001>

While preparation of the Bill was conducted in 2021 the publication of the final version of the Bill was not published until 30 January 2022.

6. The Competition (Amendment) Bill also includes amendments to existing competition legislation, which are outside the scope of the ECN+ Directive to further bolster the CCPC’s powers in the enforcement of EU and Irish competition law and for the statutory merger review regime. These include:

- Providing for a specific offence of ‘bid-rigging’;
- Providing a specific offence of ‘gun jumping’ in merger cases. Gun-jumping is a criminal offence under Irish law. Currently, only the Director of Public Prosecutions can bring prosecutions for “gun-jumping” offences;
- Providing for the CCPC, when investigating serious criminal breaches of competition law and under specific conditions, have powers to:
 - carry out video and audio surveillance; and
 - to require interception and recording of electronic communications attached to such powers.

1.1.2. Other relevant measures, including new guidelines

7. In 2021 the CCPC put in place project groups to develop the organisational policies and structures that are needed when the Competition (Amendment) Bill 2022 is finalised. In October, 2021, the CCPC informed stakeholders that we will carry out a series of public consultations on the proposed new policies and procedures for the Bill in early 2022. The first of these drafts include an Administrative Leniency Policy (“ALP”) and ii) the interaction between the ALP and the Cartel Immunity Programme (CIP) and iii) the interaction between criminal and administrative competition law enforcement regimes.

8. In July 2021, the CCPC published a guide for businesses on Resale Price Maintenance (“RPM”).³ The guide is intended to provide information and guidance for suppliers and resellers and highlights the pitfalls of engaging in a serious infringement of competition law such as RPM. It also seeks to advise suppliers and resellers to review their practices around pricing and discounting policies to ensure that they do not risk entering into illegal agreements and to contact the CCPC immediately if its business is, or has been involved in, an unlawful RPM arrangement.

1.1.3. Government proposals for new legislation

9. There are currently no proposals for further new legislation.

³ *Resale Price Maintenance, What you need to know*, <https://www.ccpc.ie/business/wp-content/uploads/sites/3/2021/06/Resale-Price-Maintenance-Booklet.pdf>

2. Enforcement of competition Laws and Policies

2.1. Action against anti-competitive practices, including agreements and abuses of dominant positions

2.1.1. Summary of activities

10. One of the core functions of the CCPC is to enforce competition law and to take legal action when the CCPC believes that the law has been broken. Enforcement work can be divided into two categories:

11. The first category relates to hard-core cartels. In Ireland these are treated as criminal breaches of competition law. As cartels are criminal breaches of competition law they need to be proven beyond a reasonable doubt. Where the CCPC believes that it has enough evidence of a criminal cartel agreement, a file on that case is normally referred to the Director of Public Prosecutions (“DPP”) for a prosecution on indictment in the Central Criminal Court or in some instances, the CCPC may initiate a summary prosecution in the District Court. On conviction before the courts, individuals can face prison sentences and both individuals and companies can be fined. The CCPC, in conjunction with the DPP, operates a Cartel Immunity Programme, which is aimed at helping to uncover cartels and providing witnesses for the criminal prosecution of cartel members. The programme means that a member of a cartel may avoid prosecution, including fines and jail time, if they are the first member to come forward and reveal their involvement in illegal cartel activity before the CCPC has completed any investigation and referred the matter to the DPP.

12. The second category relates to abuse of dominance and anti-competitive agreements which do not amount to a cartel, for example, vertical agreements. These are treated as civil breaches of competition law. The CCPC can seek a declaration in court that the behaviour is unlawful, and secure an injunction directing the undertaking to cease the behaviour. However, under current Irish law, in civil cases the CCPC does not have decision making powers or fining powers.

2.1.2. Description of significant cases, including those with international implications.

Ticketing investigation

13. The CCPC completed its investigation into suspected abuse of dominance practices by Ticketmaster Ireland in 2021. The CCPC suspected that Ticketmaster Ireland had abused its dominant position in the provision of ticketing services by entering into long-term contracts which hindered the ability of venues and live event organisers to work with other ticketing services providers. The CCPC had concerns that Ticketmaster Ireland’s conduct was a potential breach of competition law under sections 4 and 5 of the Competition Act 2002 and under Articles 101 and 102 of the Treaty on the Functioning of the European Union.

14. Ticketmaster Ireland entered into a legally binding agreement with the CCPC where it committed to a number of actions, including the removal of exclusivity clauses from agreements with venues, and limiting all of Ticketmaster Ireland’s agreements with live event organisers and venues in Ireland to a maximum duration of five years. Venues controlled by Live Nation Entertainment, Inc, Ticketmaster’s parent company, are excluded from the agreement.

15. Ticketmaster Ireland is also required to report annually to the CCPC on its compliance with new and existing agreements with venues and live events organisers in

Ireland for a period of seven years. The CCPC agreement with Ticketmaster Ireland was made an order of the High Court under section 14B of the Competition Act 2002 on 15 December 2020 and the order came into effect on 29 January 2021.⁴

Motor insurance investigation

16. In August 2021, the CCPC secured legally binding commitments from six private motor insurance companies following an investigation into alleged price signalling practices.⁵ The CCPC opened this investigation on foot of public statements made by a number of entities in the insurance sector which appeared to be forecasting with confidence that motor insurance premiums would rise. At the time, Irish consumers were reporting increases in their premiums and the CCPC was concerned that these statements could be considered price-signalling and, along with other communications about pricing, a breach of competition law.

17. The CCPC issued preliminary findings to seven parties in September 2020. These preliminary findings set out the CCPC's initial view that the parties may have engaged in conduct that potentially infringed section 4 of the 2002 Act and Article 101 TFEU in the period between January 2015 and September 2016. The organisations involved denied their involvement in a breach of competition law and there was no finding of liability.

18. AIG Europe S.A., Allianz PLC, AXA Insurance DAC, Aviva Insurance Ireland DAC, FBD Insurance PLC and AA Ireland Limited agreed to reform their internal competition law compliance programmes. A seventh party, Brokers Ireland (formerly the Irish Brokers Association and the Professional Insurance Brokers Association) was also alleged to have engaged in price signalling, and was named in the CCPC's preliminary findings but refused to enter into similar commitments.

19. This was the third investigation the CCPC has undertaken in the sector. Upon closing the investigation, the CCPC wrote to the Central Bank of Ireland outlining its concerns about the culture of the industry which came to light during the course of the investigation. This work is against the backdrop of broader reforms in insurance in Ireland.

Furniture Resale Price Maintenance investigation

20. In April 2021, the CCPC entered into an agreement with Coach House, a wholesale furniture supplier, following an investigation into the manner in which Coach House's then suggested selling prices were applied between March 2013 and August 2017. The investigation involved an assessment of whether there was conduct which could constitute resale price maintenance (RPM), contrary to section 4 of the Competition Act 2002 and/or Article 101 of the Treaty on the Functioning of the European Union (TFEU).

21. Coach House denied it had engaged in RPM, however, in the interests of ensuring that the investigation could be concluded in a way that was acceptable to both parties, Coach House agreed to give a commitment not to engage in RPM conduct in future and, in particular:

⁴ The CCPC's report on the Ticketmaster Ireland investigation is available to download from the CCPC's website: <https://www.ccpc.ie/business/enforcement/civil-competition-enforcement/civil-court-cases/ccpc-publishes-report-on-ticketing-investigation/>

⁵ The CCPC's report into the private motor insurance investigation is available to download from the CCPC's website: <https://www.ccpc.ie/business/enforcement/civil-competition-enforcement/closed-investigations/private-motor-insurance/>

- to refrain from imposing or agreeing any terms and conditions that place obligations on its resellers to adhere to Coach House’s suggested, minimum or fixed resale prices for household furniture products; and
 - to refrain from restricting the ability of resellers to independently determine the resale price of household furniture products.
22. The CCPC considered that these commitments addressed the competition concerns arising from its investigation.

Cartel Enforcement

23. Cartel enforcement is currently criminal in Ireland and in an attempt to create and ensure a consistent cartel case stream, a number of activities were conducted in 2021, including ongoing assessment of complaints, research and monitoring specific areas and sectors. An anonymous whistleblowing system for cartels was also developed, tested, implemented and first complaints received. Two cartel investigations and two gun-jumping investigations were opened in 2021.

24. Also in 2021, the DPP directed charges on indictment to be laid against 13 suspects in a case involving bid-rigging of public transport tenders.

2.2. Mergers and acquisitions

2.2.1. Statistics on number, size and type of mergers notified and/or controlled under competition laws;

- 81 mergers were notified to the CCPC in 2021 which represents a 98% increase of the number notified in 2020.
- Financial and insurance services were the most prominent sectors. Manufacturing and other services were also prominent.
- During the course of 2021, the CCPC issued 74 determinations. 66 of the determinations were issued in respect of proposed transactions notified during 2021 and the remaining 8 were in respect of proposed transactions notified towards the end of 2020 which were carried over to 2021. Of the 74 determinations issued, 32 were issued under the CCPC’s Simplified Merger Procedure, representing approximately 43% of all determinations issued in 2021.⁶
- Of the 81 mergers notified, 14 required an extended Phase 1 investigation. The 14 extended Phase 1 and Phase 2 investigations were;
 - M/20/029 – Brookfield (Greenergy)/Amber Oil
 - M/20/003 – Link Group/Pepper (Phase 2 investigation)
 - M/20/005 – ESB/Coillte (JV) (Phase 2 investigation)
 - M/21/009 – CityLink / GoBus
 - M/21/011 – Easycash/Bank of Ireland ATMs
 - M/21/012 – AIB/Goodbody

⁶ Further information on the CCPC’s simplified merger notification procedure is available from the CCPC’s website www.ccpc.ie

- M/21/016 – Pandagreen/Exomex
- M /21/024 – Orpea / FirstCare
- M/21/031 – Glennon Brothers/Balcas
- M/21/046 – Bank of Ireland/Davy (Wealth Mgmt and Capital Markets)
- M/21/054 – Zeus Packaging/Limerick Packaging
- M/21/004 – AIB/BoI/PTSB – Synch Payments JV (Phase 2 investigation)⁷
- M/20/021 – Bank of Ireland/Certain Assets of KBC (Phase 2 investigation)⁸
- M/20/040 – AIB/Certain Assets of Ulster Bank (Phase 2 investigation)⁹

Media Mergers

- M/21/007 - Bauer/Communicorp
- M/21/008 - DMG Media/New Scientist
- M/21/028 - Bauer / Imagine Radio
- M/21/052 - DMG Media/Nalac
- M/21/072 - Bauer (Expres Net) / E2 Services.

2.2.2. Summary of significant merger cases.

25. While the CCPC did not prohibit any mergers during 2021, one notification (M/20/003 – Link Group/Pepper) was withdrawn during a Phase 2 investigation. The investigation identified potential competition concerns with the proposed transaction and involved extensive engagement with the parties to address the identified potential competition concerns. It was during this process of engagement, that the parties announced that they were withdrawing from the proposed transaction. Consequently, the CCPC closed the investigation without the need to issue a determination.

26. Formal commitments to ameliorate competition concerns were required and obtained from notifying parties in respect of the following three cases:

- M/20/005 - ESB/Coillte (JV)
- M /21/016 – Pandagreen/Exomex
- M/ 21/024 -Orpea/FirstCare

27. The CCPC is required to monitor EU merger activity and, when it considers there is a significant interest to Ireland the CCPC can attend and participate in EU merger advisory committees. Over the period 1 January 2021 to 31 December 2021, the CCPC followed the European Commission’s investigations into a number of proposed mergers including the following:

- M.10132 Blackstone/B&J/Applegreen
- M.10493 Illumina/Grail

⁷ Ongoing investigation carried over to 2022

⁸ Ongoing investigation carried over to 2022

⁹ Ongoing investigation carried over to 2022

- M.8181 Merck/Sigma-Aldrich
- M.9987 – Nvidia/Arm (Article 4 referral)
- M.10262 Meta (Formerly Facebook)/Kustomer

3. The Role of Competition Authorities in the formulation and implementation of other policies

28. The CCPC promotes competition in many different ways. The CCPC highlights areas of the economy where competition is restricted, publishes reports on how competition may be improved in certain sectors, advises Government Departments and other State agencies on competition issues relevant to their work, including procurement and tendering for public contracts, comments on proposed legislation and responds to public consultations.

3.1. Key areas of focus in 2021 included:

29. **Digital Markets Act & Digital Services Act:** The CCPC engaged throughout 2021 with the Department of Enterprise, Trade and Employment (DETE) on the negotiations at the European Council on the proposed Digital Markets Act (DMA) and Digital Services Act (DSA). Both proposals aim to create a safer and more open digital space and to establish a level playing field to foster innovation, growth and competitiveness in the Single Market. The CCPC provided suggestions on improving the draft DMA which were incorporated into the Irish negotiation position leading to the adoption of CCPC proposed language in the European Council text. In addition, the CCPC provided suggestions on the DSA proposal with the aim of ensuring that it protects consumers and can be effectively enforced. The CCPC also extensively engaged with colleagues in other regulators to ensure that the regulatory landscape is best designed to ensure effective cooperation and enforcement of the digital proposals.

30. **Vertical Block Exemption Regulation:** The Vertical Block Exemption Regulation (VBER) allows agreements by undertakings at different levels of the market where neither undertaking has a market share exceeding 30%. The Vertical Guidelines provide guidance for undertakings to assess vertical agreements for compatibility with the VBER and EU competition law. The European Commission's completed a review process in 2021 as part of having a revised VBER and Vertical Guidelines in place from 1 June 2021. The CCPC provided feedback as part of the ECN Verticals Working Group. The review found that the VBER and Vertical Guidelines are generally working well with updates to take account of the increased use of the internet as a selling and distribution platform, provide increased flexibility to undertakings and use clearer language to help simplify the assessment of vertical agreements.

31. **Public procurement bid-rigging:** The CCPC actively supported the work of the Hamilton Review Group on white collar economic crime.¹⁰ Recommendations that will impact on the work of the CCPC included recommendations on creating a specific offence for bid-rigging and introducing legislation to collect and analyse all public procurement data to detect and deter bid-rigging. The the Competition (Amendment) Bill 2022, which will transpose Directive EU 2019/1 ("the ECN+ Directive") into Irish law will designate

¹⁰ Department of Justice (2020) '*Structures and Strategies to Prevent, Investigate and Penalise Economic Crime and Corruption*'

bid-rigging as a specific offence. The report also recommended that guidance, awareness raising and education on bid-rigging is provided to public procurers to complement the introduction of a bid-rigging screening system. The CCPC had advocated for these changes as international studies have estimated that bid-rigging raises the cost of public procurement by 20%. The CCPC has set up a working group to support the implementation of these recommendations. The CCPC submitted a note on bid rigging for discussion by the OECD Competition Division Working Party 3 in November. The CCPC also has representatives on the Economic Crime and Corruption Forum and on the National Advisory Council Against Economic Crime and Corruption, established to implement the Hamilton Review Group's recommendations.

32. **Bid-rigging awareness:** The CCPC continued to regularly present about cartels and bid-rigging on public procurement courses presented by Public Affairs Ireland, which are aimed at and primarily attended by public sector staff engaged in public procurement. We also presented about bid-rigging to the Procurement Officer Forum of the Office of Government Procurement (OGP) and used a survey during the session to gauge actual awareness amongst public procurement officials. As part of this engagement with the OGP, we also attended their SME Advisory Group meetings, chaired by the Irish Minister of State, for responsibility in this area, and presented about bid-rigging to this Group as well.

33. **Pricing Practice:** In 2021 the CCPC continued its work on the Pricing Practices project. This project is examining the prevalence of practices with the potential for consumer detriment, such as 'dual pricing', in a range of markets in Ireland, with a particular focus on more vulnerable consumers. The aim of the research is to identify consumer switching levels, consumer cohorts who are more likely to switch, barriers to switching and consumer perceptions of pricing practices. It is intended that the findings will inform potential recommendations to policy makers with the aim of ensuring that competitive markets deliver benefits to consumers. In 2021, the project team carried out a comprehensive review of research and initiatives undertaken by regulators in Ireland and internationally to assist consumers. In addition, market research among consumers was commissioned and the CCPC began engaging with relevant stakeholders, including sectoral regulators to discuss pricing practices in regulated markets.

34. **Barriers for early career solicitors and barristers:** In July 2021, the CCPC provided views to the Legal Services Regulatory Authority's consultation on 'Barriers for Early Career Solicitors and Barristers and Increasing Diversity'. The consultation concerned the challenges faced by solicitors and barristers at the start of their careers as well as how to increase diversity across the legal professions. The submission restated previous CCPC recommendations on reforming the system of education and training of legal professionals to encourage greater entry in the profession and foster greater competition. It also discussed the role of competition policy in fostering diversity and equality, an area which has received growing attention in recent years. The CCPC's submission endorsed the facilitation of entry of additional legal education and training providers in the market, the creation of new routes to legal qualification, and the introduction of new forms of service delivery in the legal profession.

35. **Guidelines on collective agreements for solo self-employed:** In 2021 the European Commission opened a public consultation process on potential options to define the scope of EU competition law in relation to collective bargaining by the solo self-employed. The key objective was to ensure that EU competition law does not stand in the way of initiatives to improve working conditions through collective agreements for solo self-employed, while still guaranteeing that consumers and SMEs continue to benefit from competitive prices and innovative business models. The CCPC provided its views to the consultation process in May 2021. The CCPC stated that competition law should not act

as a barrier for vulnerable self-employed workers such as ‘false self-employed’ workers and ‘fully-dependent’ self-employed workers to collective bargaining rights and better working conditions. The CCPC stated that the application of competition rules to self-employed workers promotes efficiency and benefits consumers. However, the CCPC emphasised that competition law should not act as a barrier for self-employed workers facing precarious working conditions to access collective bargaining rights. The CCPC therefore stated that exemptions to competition rules should be provided to limited groups of self-employed workers.

36. **Veterinary Practice (Amendment) Bill 2021:** The CCPC addressed the Joint Oireachtas Committee on Agriculture, Food and the Marine in October, to discuss the Veterinary Practice (Amendment) Bill 2021. The Bill is intended to prevent corporate bodies owning and managing veterinary practices in Ireland by restricting the ownership of practices to veterinary practitioners. Prior to addressing the Committee, the CCPC wrote to the Chairperson indicating that it opposed the content of the Bill, as it sought to impose a disproportionate restriction on competition in the market for the provision of veterinary services and could lead to negative outcomes for consumers. The CCPC restated its opposition to the provisions in the Bill when we appeared before the Committee and our view that enhanced regulation could instead be employed to ensure that veterinary practices continue to provide a high standard of care irrespective of ownership structure.

37. **Brexit:** Throughout 2021 the CCPC continued to work closely with the Department of Enterprise, Trade and Employment (DETE), other Government Departments and the EU to ensure that any issues arising from Brexit were quickly identified and appropriate action taken. Immediately following the end of the transition period in January 2021, the CCPC provided daily briefings to DETE. Considerable work was done in the lead-up to Brexit, and in the first three months of 2021 to identify the impact of the UK’s departure and mitigate its consequences for the CCPC internally, and for consumers and businesses. As the year progressed, the CCPC focused on the medium- and longer-term issues resulting from Brexit. Among the challenges posed by Brexit, which were identified by the CCPC as a regulator, was the inability to exchange confidential information with the UK, creating a wider knowledge gap the longer it continued. The CCPC raised this issue at the relevant national and international forums across issues of competition, consumer protection and product safety. The CCPC also regularly engaged with the European Commission on progression of cooperation agreements provided for under the Trade and Cooperation Agreements.

38. **Foreign Subsidies Regulation:** The European Commission published a proposal in 2021 for a Regulation on foreign subsidies that distort the internal market. The proposal set out the rules and procedures for investigating foreign subsidies from third countries that may be distorting the Single Market, complementing existing rules in relation to State Aid, public procurement and mergers, and suggested what remedies would be appropriate for such distortions. In December 2021, the CCPC provided views on the proposal to the Department of Enterprise, Trade and Employment as part of a public consultation. The CCPC welcomed the alignment of the measures with those contained in other legislative instruments, such as the EU Merger Regulation, and also noted that certain aspects required further clarity, particularly in respect of the role and level of involvement for Member States and national competent authorities in supporting the European Commission to enforce the proposed regulation.

39. **Resale Price Maintenance:** In July following our work in the furniture industry on Resale Price Maintenance (RPM), we launched a business compliance campaign to alert Irish retailers to the harm that RPM practices can cause. The campaign included the publication of guidance on our website to help businesses recognise this practice. The

guidance explained how the practice of RPM is different from a recommended retail price suggested by a supplier. Retailers were encouraged to contact the CCPC if they had encountered suppliers who tried to impose a minimum price that could be charged for their products or services. The campaign also included the development and promotion of advertisements focussing on the ‘Do’s and Don’ts’ of RPM for retailers.

4. Resources of the Competition and Consumer Protection Commission

4.1. Resources Overall (current numbers and change over previous year):

40. At the end of 2021, 137 staff members were employed by the CCPC, which represents approximately a 19% increase on 2020. (At the end of 2020, 115 staff members were employed at the CCPC.)

4.1.1. Annual budget (in your currency and USD):

41. The CCPC is funded by way of an annual grant from the Department of Enterprise, Trade and Enterprise, and also an industry levy in respect of specific consumer information and education functions in the financial services sector. The CCPC’s budget allocation in 2021 was €18,021,257. As the CCPC is a dual agency for competition and consumer protection, many Divisions’ functions have a dual mandate including Criminal Enforcement, Policy & International, Legal Services, Corporate Services, Human Resources and Communications. Budgets are not apportioned between competition and other functions/activities.

Table 1. Competition and Consumer Protection Commission Budget 2021

Euro

Budget	2021 (euro)	2021 (US Dollars)
Exchequer	€15,236,000	\$18,020,000 (approx.)
Levy	€2,785,275	\$3,294,000 (approx.)
Total	€18,021,275	\$21,314,000 (approx.)

4.1.2. Number of employees**Table 2. Number of employees**

Lawyers/ Legal Qualification (primarily competition focused)	12
Economists (primarily competition focused)	24 ¹¹
Other professionals (primarily competition focused)	14 ¹²
Total (primarily competition focused)	50
Other Staff (e.g. staff working in Consumer Protection, Communications, Product Safety, Corporate Services and Human Resource functions)	87 ¹³
Total Staff	137

4.2. Human Resources

42. The main Divisions that are specifically responsible for competition enforcement are as follows:

- Competition Enforcement & Mergers – 19 staff.
- Criminal Enforcement – 15 staff.
- Legal Services – 6 staff.
- Other professionals: in 2021 the CCPC employed two forensic IT investigators whose roles are primarily concerned with competition enforcement investigations, 11 staff members worked in the CCPC's policy function. Legal Services and Policy staff members have a dual competition and consumer role.

4.3. Period covered by the above information

43. The above information covers the period 1 January 2021 to 31 December 2021.

5. New Reports and Studies on Competition Policy Issues

44. There are no further new reports and studies on competition policy to report.

¹¹ Focussed on Policy.

¹² Criminal investigators, two forensic IT investigators.

¹³ Other staff are not assigned specifically to competition functions, but work across the organisation.