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COMPETITION COMMITTEE

Annual Report on Competition Policy Developments in Finland

-- 2022 --

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

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Finland

Executive Summary

1. In 2022, the FCCA gave several decisions on antitrust and merger cases and continued its active participation in the field of international cooperation. Furthermore, three significant competition cases were processed in the national courts. In addition, the Finnish Competition Act was amended, and a changed merger control notification thresholds entered into force in January 2023. In November, the annual FCCA Day was held with the theme “*Better decisions and better regulation based on researched evidence – examples from competition and consumer policymaking.*” The event was held as a hybrid event, with both in-person and virtual attendees. In the event, examples of impact assessments carried out by the FCCA were presented.

2. This report outlines the activities of the FCCA from the calendar year 2022.

1. Changes to competition law, policies, proposed or adopted

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

3. In 2022, the merger control notification thresholds in Finland were revised and Section 22 of the Finnish Competition Act (948/2011) was amended. In addition, three other Sections of the Competition Act were amended. The changes entered into force on 1 January 2023 and the new thresholds will apply to transactions in which an acquisition agreement has been signed or a takeover bid has been announced after that date.¹ Following the amendment of the Competition Act, the FCCA will investigate transactions where the parties’ combined turnover generated in Finland exceeds EUR 100 million and the total turnover generated in Finland of at least two parties exceeds EUR 10 million per each party. Prior to the amendments, a notification had to be submitted to the FCCA if the parties’ combined worldwide turnover amounted to EUR 350 million and the turnover in Finland of at least two of the parties exceeded EUR 20 million. Since the purpose of the national supervision of mergers and acquisitions is to prevent harmful market concentration in Finland, the notification threshold is now determined on the basis of combined turnover of the parties generated in Finland, instead of globally.

4. In its statement from 2022, the Government of Finland² finds that the previous turnover limits for the notification obligation were high in relation to the size of Finland’s national economy. As a result, certain sectors and product and geographical markets were below the notification thresholds, and the amendment improves the FCCA’s ability to investigate transactions especially in those markets.

5. Furthermore, the Government estimates that the number of notifications submitted to the FCCA will rise from about 30 mergers and acquisitions to about 60-70 notifications per year, and the notification obligation is estimated to result in direct consumer benefits

¹ See a press release on the FCCA’s website (available only in Finnish): <https://www.kkv.fi/ajankohtaista/tiedotteet/markkinoiden-haitallista-keskittymista-voidaan-ehkaista-aiempaa-tehokkaammin-yrityskaappojen-ilmoituskynnys-alenee-1-1-2023/>.

² See a press release on the Ministry’s website, available in Finnish: <https://tem.fi/-/esitysluonnos-yrityskaappojen-ilmoituskynnyksen-muuttamisesta-lausunnoille>.

of EUR 50–67 million. Additional resources will be allocated to the FCCA to respond to the increased number of notifications in the budget proposal for 2023.

6. Simultaneously, amendments to the merger notification form have been adopted and will enter into force on 1 January 2023. One of the aims of this amendment is to reduce the administrative burden of companies in notifying of transactions that are unlikely to cause problems to competition.

1.2. Other relevant measures, including new guidelines

7. In January, the FCCA updated the guidelines on the application of the Competition Act in leniency cases, i.e. on the immunity from penalty payment and reducing the penalty payment in cartel cases. The update was based on the ECN+ directive which harmonised the relevant legislation in the European Union.³

8. In November, the FCCA updated the guidelines on market-based pricing of public bodies. The guidelines describe the principles based on which the FCCA assesses the pricing and enables public bodies to assess the competitive neutrality of their activities. In the updated guidelines the monitoring methods used by the FCCA have been clarified, in particular regarding the assessment of reasonable return on capital employed in competitive activities. The update also takes into account the accounting separation provision introduced in the Competition Act, which has been applied as of 1 January 2020.⁴

9. In December, the FCCA published a collection of guidelines regarding merger control. The contents of the guidelines regarding the obligation to notify a concentration, calculation of turnover, the reviewing of mergers and ancillary restraints were republished. In addition, new guidelines regarding the amended merger notification form and information requirements of the notification form were published. Furthermore, the FCCA has announced that it will publish new guidelines regarding imposition of conditions in early 2023. The aforementioned guidelines replace the guidelines for merger control from 2011.⁵

1.3. Government proposal for new legislation

10. Apart from the merger control notification thresholds amendments to the Competition Act, no new proposals were published in 2022.

³ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/the-fcca-updated-the-guidelines-on-immunity-from-penalty-payment-and-reducing-the-penalty-payment/>.

⁴ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-paivitti-suuntaviivat-seuraamusmaksusta-vapautumiseksi-ja-seuraamusmaksun-alentamiseksi/>.

⁵ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/uudistetut-ohjeet-yrityskauppavonnasta-julkaistu/>.

2. Enforcement of competition laws and policies

2.1. Action against anticompetitive practices, including agreements and abuses of dominant position

2.1.1. Summary of the activities of the FCCA and courts

11. In 2022, the FCCA gave altogether eleven decisions concerning anticompetitive practices. Four of these were penalty payment proposals submitted to the Market Court. Most decisions concerned public procurement and only one new penalty payment proposal regarding an antitrust matter was submitted to the Market Court this year. However, seven cases were processed in the national courts altogether.

The FCCA

Restriction of competition / The HVAC infrastructure pipeline market

12. In September 2022, the FCCA made a proposal to the Market Court in a case concerning prohibited cooperation between companies in the Finnish market for plastic HVAC infrastructure pipeline products in 2009-2016. The total amount of the penalty payments proposed by the FCCA is EUR 44 million. Based on evidence gathered by the FCCA, the largest manufacturers of plastic HVAC infrastructure pipeline products in Finland, Uponor Infra and Pipelife, as well as the largest wholesalers selling infrastructure pipeline products, Ahlsell, Onninen, and Dahl, acted in mutual understanding in restricting the manufacturers to trade directly with customers and directing the distribution and sale of manufacturers' products to the wholesalers. According to the FCCA, the wholesalers also refrained from selling significant amounts of competing products. In addition, the FCCA argued that the companies jointly strived to prevent and hinder activities of companies outside the cooperation in order to limit external competitive pressure and to hamper foreign operators' entry to the Finnish market. The cooperating companies are market leaders in the sector whose combined market share at the time of the infringement was around 70% on both the wholesale and manufacturer levels. The FCCA began investigations on its own initiative.⁶ The proceedings are pending at the Market Court.

Abuse of commanding market position / Faba co-operative, the Association of ProAgria Centers and Mtech Digital Solutions Oy

13. The commitment provided for the FCCA in 2014 regarding the creation of interfaces in their breeding and production monitoring registers that will enable businesses operating in the commercial software market to access these registers was removed in June 2022 following an application from the companies. The main ground for the withdrawal of the commitment was the change in market conditions after the adoption of the commitment, due to the increase of automated milking, the launching of the Nordic Cattle Data eXchange ('NCDX') interface, the independent linking software launched by Mtech in 2016, and the updating of the official Cattle Register.⁷

⁶ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/the-fcca-proposes-penalty-payments-totalling-eur-44-million-for-restricting-competition-in-the-hvac-infrastructure-pipeline-market/>.

⁷ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-poisti-faballe-proagrialle-ja-mtechille-noudatettavaksi-maaratyt-sitoumukset/>.

Public procurement

The City of Turku

14. In July 2022, the FCCA submitted a proposal to the Market Court to impose a fine of EUR 30 000 on the City of Turku (the contracting authority) for an illegal direct procurement made in November 2021. The direct procurement concerned gastroenterological endoscopic examinations and related appointments. The City of Turku invoked that it had been essential to conclude the agreement and that all the obligations of the Finnish Procurement Act could not be observed arising from unforeseen circumstances beyond the control of the contracting authority. According to the City of Turku, such circumstances consisted of queues for care that exceeded the guaranteed times for access to treatment, a sudden deterioration in the unit's staffing situation, and the fast merging of out-patient clinics related to the implementation of the Finnish health and social welfare reform. The FCCA considered that the City of Turku's direct procurement did not fall under the invoked exception of extreme urgency and should have been put out to tender.⁸ The proposal of the FCCA was rejected by the Market Court due that eventually the value of the direct procurement did not exceed the obligatory thresholds which would have made the direct procurement illegal.

The Municipality of Isokyrö

15. In July 2022, the FCCA submitted a proposal to the Market Court to impose a fine of EUR 35 000 on the Municipality of Isokyrö for illegal direct procurement. Furthermore, The FCCA proposed that the Market Court should impose a sanction (and quash the procurement decision, or secondarily, shorten the agreement period. The Municipality of Isokyrö had decided to use market-conform public transport to organize its school transport services and bought the school transport tickets without tendering from Linja-autoliikenne Lehtonen Oy. The value of the direct procurement was approximately EUR 1 600 000. The municipality justified the decision not to put the transport services out to tender by arguing that this was not a direct award within the meaning of the Finnish Public Procurement Act. However, the Municipality did not indicate to the FCCA on which provisions of the Act this was based. According to the FCCA, the Municipality of Isokyrö carried out an illegal direct procurement of school transport services even though the procurement should have been put out to tender.⁹ The Market Court approved the FCCA's proposal.

The City of Hanko

16. In September 2022, the FCCA submitted a proposal to the Market Court to impose a fine of EUR 65 000 on the City of Hanko for breaching the Public Procurement Act by artificially splitting the procurement of health services in order to avoid the application of the public procurement rules and failing to comply with its obligation to put the procurement out to tender. In Spring 2021, the city decided to procure the health services directly from a private healthcare provider for a period of one year. The direct procurement

⁸ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-esittaa-seuraamuksia-turun-kaupungille-tahystystutkimusten-laittomasta-suorahankinnasta/>.

⁹ See a press release on the FCCA's website, available in Finnish <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-esittaa-seuraamuksia-isonkyron-kunnalle-laittomasta-koulukuljetusten-matkalippujen-suorahankinnasta/>.

was made from the same company with which a previously tendered contract was about to expire. The city re-examined the procurement of health services in Autumn 2021, after concluding that the value of the direct procurement exceeded the national threshold value of EUR 400 000 for health care and social services contracts. The city shortened the contract to five months in order to keep the value of the contract below the threshold. As the contract period was about to expire, the City awarded an additional eight-month service contract. The value of the two contracts combined, the total value of the direct procurement was approximately EUR 1 400 000. The City justified the direct procurement on the grounds of, *inter alia*, the uncertainty caused by the social security reform, the need to safeguard the treatment of individual patients, and technical and financial reasons which, according to the City, required the contract to be extended with the same service provider. The FCCA considers that the justifications put forward by the City did not meet the criteria laid out in the provisions of the Public Procurement Act and the procurement of health care services should have been put out to tender.¹⁰ The proceedings are pending at the Market Court.

17. Furthermore, the FCCA has¹¹:

- reprimanded the Pirkanmaa Hospital Districts Joint Municipal Authority for a direct procurement of custom-made orthopaedic footwear for a total amount of approximately EUR 422 000 in 2021.
- reprimanded The Municipality of Utsjoki for a direct award of construction supervision services for schools and multi-purpose buildings in 2020 for a total amount of approximately EUR 97 390, where the municipality had wrongly estimated that the procurement of the services was below the national threshold in the Procurement Act.
- reprimanded The City of Rovaniemi for a direct procurement of an environmental machinery procurement contract for approximately EUR 109 500, as the City failed to fulfil its obligation to examine the market supply in accordance with the requirements of the Public Procurement Act before proceeding with the direct procurement.
- reprimanded The Kainuu Social and Health Care Joint Authority for the direct procurement of equipment and supplies for wound decompression therapy for 2018–2021, worth approximately EUR 67 000–133 000. The procurement unit justified the direct award on the grounds of a technical reason and experimental use, which the FCCA did not consider suitable in accordance with the Procurement Act.
- reprimanded Helsingin Asumisoikeus Oy, a right-of-occupancy housing company owned by the City of Helsinki, which in 2020 made substantial modifications to the contract for the provision of hosting services without competitive tendering. Modifications were made especially to the contract's value and scope. The value of the hosting services procured without competitive tendering was around EUR 1 million per year in 2020–2021. The FCCA considered that the updating of the

¹⁰ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-esittaa-hangon-kaupungille-65-000-euron-seuraamusmaksua-terveyspalvelujen-laittomasta-suorahankinnasta/>.

¹¹ Cases available on the FCCA's website, available in Finnish: <https://www.kkv.fi/maatokset/kilpailuasiat/>.

contract constituted a substantial modification of the contract, which did not qualify for an exemption under the Public Procurement Act.

- drawn Backstaff Oy's, a subsidiary of Kotkan Julkiset Kiinteistöt Oy, which is a company owned by the City of Kotka, attention to compliance with grounds for direct awards and amendments to procurement agreements. Backstaff Oy had used negotiated procedure without prior publication after no tenders were submitted in the open procedure for project management contract for an event center in Kotka. The FCCA considered that Backstaff Oy had made substantial modifications to the original request for tenders and the contract should have been put out for tender.

The Market Court

Prohibited resale price maintenance / Isojoen Konehalli Oy

18. In May 2020, the FCCA proposed to the Market Court that a penalty fee of EUR 9 million be imposed on the import and hardware store Isojoen Konehalli Oy (IKH) for prohibited resale price maintenance. The FCCA's investigations indicated that IKH recommended resale prices for its products and put pressure on its resellers in different ways to comply with them. The FCCA considered that the resale price maintenance concerned the sale of IKH's products both in retailers' online stores and brick-and-mortar stores. On 11 August 2022 the Market Court concluded that IKH, contrary to competition legislation, has imposed retail prices for its retailers in their online stores from March 2010 to February 2015. In addition, IKH agreed with its authorised retailers on fixed resale prices to be applied on the chain's joint online store from 2014 to 2020, when the FCCA decided to prohibit the procedure. However, the Market Court considered that it was not proved in a sufficiently reliable manner that IKH would have required its retailers to comply with the retail price level for the sales of IKH products in brick-and-mortar stores. The Market Court imposed a penalty fee of EUR 1.75 million on IKH.¹² The case has been appealed to the Supreme Administrative Court.

Price cartel / The Finnish Real Estate Management Federation and companies on real estate management

19. In February 2021, the FCCA proposed that the Market Court impose penalty payments in total of approximately EUR 22 million on six companies operating in the real estate management sector and on the Finnish Real Estate Management Federation. In 2014–2017, the companies and the Finnish Real Estate Management Federation fixed prices of the real estate management services, aiming to increase the national price level in the real estate management sector. In December 2022 the Market court confirmed that the companies and the Finnish Real Estate Management Federation have engaged in prohibited price fixing but found that the proposal did not show the intensity and number of activities to be as large as the FCCA had suggested. The Market Court imposed penalty payments of 4,93 million in total on the companies and the Finnish Real Estate Management Federation. The case has been appealed to the Supreme Administrative Court¹³

¹² See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/the-market-court-imposed-a-penalty-fee-of-eur-1-75-million-on-isojoen-konehalli-oy-for-imposing-retailer-prices-in-online-stores/>.

¹³ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/market-court-imposes-fines-of-about-eur-5-million-on-finnish-real-estate-management-federation-and-real-estate-management-companies-for-cartel/>.

The Supreme Administrative Court

Cartel / Jackon Finland Oy (formerly ThermiSol Oy), UK-Muovi Oy and Styroplast Oy

20. The three biggest expanded polystyrene insulation, more commonly known as styrofoam, manufacturers in Finland, Jackon Finland Oy Oy (formerly ThermiSol Oy), UK-Muovi Oy and Styroplast Oy, participated in a price cartel covering the Finnish market in 2012-2014. In December 2018, the FCCA proposed that the Market Court impose a total of over EUR 4 million in penalty payments on Jackon Finland Oy (formerly ThermiSol Oy) and UK-Muovi Oy for their involvement in the cartel. The FCCA granted Styroplast Oy immunity from the penalty payment as it was the first to provide the FCCA with information and evidence on the cartel. In March 2021, the Market Court confirmed the FCCA proposal and ordered Jackon Finland to pay EUR 2 million and UK-Muovi to pay EUR 1.2 million in penalty payments. UK-Muovi appealed the decision in regard its involvement in the cartel and the penalty payment imposed on it to the Supreme Administrative Court. In a ruling handed down in July 2022, the Supreme Administrative Court upheld the Market Court's ruling.¹⁴

2.2. Mergers and acquisitions

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

Table 1. Merger cases overview 2012–2022

	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
Mergers filed	29	20	30	28	36	32	39	34	22	38	35
Phase II required	3	3	2	2	3	6	8	4	4	5	3
Conditional clearance	0	2	2	1	2	2	5	4	2	3	2
Mergers blocked	0	0	0	0	0	0	0	1	1	0	0

2.2.2. Summary of significant cases

21. In 2022, the FCCA processed altogether 35 merger filings, around the same amount as in previous years. The FCCA gave out three decisions on moving merger cases into Phase II, whereof two were conditionally cleared and one transaction was withdrawn. The FCCA submitted an application for the extension of the time limit for further proceedings to the Market Court in one case.

The acquisition of Pohjola Sairaala Oy By Pihlajalinna Terveystyö Oy

22. In January 2022 the FCCA approved the acquisition after concluding that it does not lead to a significant impediment to competition in the market for health services offered to insurance companies or to negative effects on services offered to self-paying customers. Pihlajalinna Group operates extensively in the markets for social and health services in Finland. Pohjola Hospital, which is part of the OP Financial Group, is a specialized

¹⁴ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/eps-eristekartellin-kasittely-lopulliseen-paatokseen-korkein-hallinto-oikeus-piti-markkinaoikeuden-paatoksen-ennallaan/>.

provider of orthopaedic and hand surgery services, whose hospitals mainly treat Pohjola Insurance's insurance customers and customers who acquire the service at their own expense.¹⁵

The acquisition of Fysios Holding Oy by Mehiläinen Oy

23. In January 2022 the FCCA approved Mehiläinen Oy's acquisition of Fysios Holding Oy. Mehiläinen Group offers health and social services and operates extensively in the healthcare and social services market. Fysios is a national chain operator offering therapy services with a primary focus on different areas of physiotherapy. The approval is conditional upon partial divestiture of Fysios' physiotherapy business in Vaasa to a third party.¹⁶

The acquisition of Sponmill Oy and Myllyn Paras Finland Oy by Lantmännen

24. In April 2022 the FCCA approved the acquisition of Sponmill Oy and Myllyn Paras Finland Oy by Lantmännen after an investigation, wherein it was concluded that the acquisition does not have adverse effects on competition in Finland. In particular, the FCCA looked into competitive effects in the sale of frozen bakery products to retailers and foodservice customers. Lantmännen is a Swedish agricultural cooperative that operates in the food industry and grain trade. Lantmännen sells products under, for example, the Vaasan brand. Sponmill owns Myllyn Paras Finland Oy, which manufactures frozen bakery products and grain mill products.¹⁷

The acquisition of Jackon Holding AS by BEWI ASA

25. In July 2022 the FCCA approved the acquisition conditionally upon BEWI divesting its entire Finnish business in the manufacturing and sales of EPS insulations. BEWI undertakes to divest its subsidiary BEWI Insulation Oy, which manufactures and sells EPS insulation in Finland, to a third party.

26. Bewi and Jackon are Norwegian, internationally operating industrial groups of companies that manufacture and sell insulation, packaging and component products mainly made of EPS, XPS and EPP materials. The operations of the parties cover the entire production chain from the manufacture and sale of raw materials to the manufacture and sale of finished products. The phase two investigation carried out by the FCCA showed that the transaction would have adverse competitive effects on the market for EPS thermal and thermal barrier insulation in Finland, wherein the market is already highly concentrated. As a result of the transaction, the parties' combined market share would become significantly high, and the market would not remain sufficiently competitive.

¹⁵ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/fcca-approves-the-acquisition-of-pohjola-sairaala-by-pihlajalinna/>.

¹⁶ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/fcca-approves-mehilainens-acquisition-of-fysios-subject-to-conditions/>.

¹⁷ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/fcca-approves-lantmannens-acquisition-of-myllyn-paras/>.

However, as a result of the aforementioned commitment, the market will not be concentrated beyond the pre-transaction situation.¹⁸

Merger between Helen Oy and Lämpöykkönen Oy

27. In July, the energy company Helen and Lämpöykkönen that specialises in heat pumps, announced that they would establish a joint venture through which the companies would offer geothermal and heat pump solutions in Finland. However, in December 2022 the transaction was withdrawn. According to the preliminary assessment of the FCCA, the transaction would have led to adverse competitive effects in the market for heat pumps connected to district heating in Helen's district heating network.¹⁹

3. The role of competition authorities in the formulation and implementation of other policies, e.g. regulatory reform, trade, and industrial policies

28. In 2022, the FCCA has issued opinions on matters concerning competition e.g., to the committees of the Parliament. Altogether 118 opinions were issued and the FCCA remains an active stakeholder in terms of legislative processes.

4. Resources of competition authorities

4.1. Resources overall

29. The overall resources of the FCCA in 2022: 224,1 person-years

30. Competition enforcement: 75,93 person-years

4.1.1. Annual budget (in EUR and USD)

Number of employees (person-years)

31. Competition enforcement:

- economists: 18,99 (-0,57)²⁰
- lawyers: 42,81 (-1,19)
- other professionals: 10,99 (+1,99)
- support staff: 3,80 (-1,2)
- all staff combined: 75,93 (-1,63)

¹⁸ See a press release on the FCCA's website, available in Finnish: <https://www.kkv.fi/ajankohtaista/tiedotteet/kkv-hyvaksyi-ehdollisena-bewin-ja-jackon-holdingin-valisen-yrityskaupan/>.

¹⁹ See a press release on the FCCA's website, available in English: <https://www.kkv.fi/en/current/press-releases/fcca-opens-in-depth-investigation-into-the-proposed-merger-between-helen-and-lampoykkonen/>.

²⁰ Change from previous year.

32. Additionally, 20,84 person-years in the Advocacy and research department.²¹

4.2. Human resources in competition enforcement (person-years) applied to

- Enforcement against anticompetitive practices: 43,25 person-years
- Merger review and enforcement: 15,39 person-years
- Advocacy efforts: 20,84 person-years from the Advocacy and research department.

4.3. Period covered by the above information

- The information provided is based on the situation on 31 December 2022.

5. Summaries of or references to new reports and studies on competition policy issues

33. In 2021, the FCCA published several studies on competition issues. The topics for these studies vary from the effects of entry deregulation in the Finnish interurban bus market²², and the competitive effects of state aid, to the scope of the market activities of Finnish municipal sector and the extent to which the local government sector has adopted new provisions on competition neutrality. In November, a study on the effects of the taxi services reform was published. The FCCA study compares the development of the taxi market in Continental Finland with that in the Åland Islands, where the taxi market remains heavily regulated. All the reports are available on the FCCA's website, however, only in Finnish.²³

²¹ Also called the Market Research Unit. These figures are not included in the Competition Enforcement statistics as the department serves both the Competition and Consumer Divisions in the agency.

²² See working paper: The effects of entry deregulation: evidence from passenger transport, available in English <https://www.kkv.fi/tutkimus-ja-vaikuttaminen/julkaisut/working-papers/the-effects-of-entry-deregulation-evidence-from-passenger-transport/>

²³ See all the reports, available in Finnish: <https://www.kkv.fi/tutkimus-ja-vaikuttaminen/julkaisut/>.