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Directorate for Financial and Enterprise Affairs  
**COMPETITION COMMITTEE**

## Annual Report on Competition Policy Developments in Spain

-- 2023 --

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

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## *Spain*

### Executive Summary

1. This report covers the competition enforcement and advocacy activities carried out in 2023 by the Spanish National Markets and Competition Commission (“CNMC”).
2. On the enforcement side, in 2023, the CNMC adopted seven fining decisions, 23 non-fining decisions, and two proceedings were finalised under the commitment procedure<sup>1</sup>.
3. Three of the fining proceedings related to Article 1 of the Spanish Competition Act and 101 of the Treaty on the Functioning of the European Union (TFEU). Two of them were identified as cartels and one involved bid rigging in public tenders. One of the fining decisions concerned Article 2 of the Spanish Competition Act (similar to Article 102 TFEU). The remaining three fining decisions dealt with other competition law infringements, namely breach of commitments.
4. The fines imposed by the CNMC amounted to 215.69 million euros (€204.60 million for prohibited conduct and €11.08 million for other practices). A total of 16 companies were fined (13<sup>2</sup> companies for prohibited conduct and three because of breach of commitments). In addition, six individuals were fined in 2023 for engaging in bid rigging in multiple Ministry of Defence tenders, involving two distinct cartels.
5. In 2023, the CNMC opened seven formal proceedings. Specifically, two formal investigations were launched into alleged infringements of Article 1 of the Spanish Competition Act and/or Articles 101 of the TFEU, four formal investigations focused on analysing the possible existence of abuse of dominant position under Article 2 of the Spanish Competition Act and/or Article 102 of the TFEU, and finally one formal investigation was initiated based on indications of a potential violation of Article 2 of the Spanish Competition Act, Article 102 of the TFEU, and Article 3 of the Spanish Competition Act that prohibits the distortion of free competition by unfair practices.
6. On the merger side, in 2023, the CNMC was notified of a total of 70 deals. This figure deviates from the trend of recent years (in 2022 were 103) but the number and proportion of cases requiring complex and sophisticated analysis increased. Thus, in 2023 we carried out an in-depth investigation in 7 cases (out of 70) compared to 4 cases (out of 103) in 2022. In particular, three transactions were analysed and cleared in Phase I (subject to remedies offered by the parties) and two transactions were cleared in Phase II after a more thorough analysis of the possible damage to competition arising from the merger and upon the approval

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<sup>1</sup> Decisions that ended with no fines and no declaration of infringement, following immediate termination of the suspected practice and behavioral commitments made by the undertakings.

<sup>2</sup> One company was exempted from paying the fine in the Business Information Database Case due to its collaboration with the Competition Directorate through the leniency programme.

of remedies offered by the parties. Moreover, following the withdrawal of the parties involved, three other transactions were closed (two of them were in Phase II and the other one was in Phase I). In one additional case, the CNMC opened Phase II of the merger control procedure.

7. As regards competition advocacy, the CNMC issued 20 reports on legislative drafts. These reports were addressed to legislative authorities so that they could improve, from the competition perspective, new legislative measures at the drafting stage. A further six reports not related to draft regulations were also adopted.

8. Likewise, in 2023, the CNMC published one market study (study on the pass-through of the VAT reduction in the food sector); one *ex-post* evaluation report (impact assessment study of the recommendations issued in the report on the aid granted through the MOVES III Plan); three guides (one on the quantification of damages, another on how competition and efficient regulation can help contain inflation and, thirdly, a guide to disseminate the good use of in-house resources and agreements in the context of public procurement); and, lastly, the Annual Report on State Aid.

9. Finally, it should be noted that some members of the Competition Chamber changed in 2023.

## 1. Changes To Competition Law and Policies, Proposed or Adopted

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

11. The Spanish Competition Act was amended in March 2023 to include a provision related to whistleblowers reporting breaches of competition law. Although the transposition into Spanish law of the Whistleblower Directive creates a new independent authority to manage the external reporting channel, the CNMC's Competition Directorate will be in charge of the external reporting channel for anti-competitive behaviour.

12. In June, Royal-Decree Law 5/2023<sup>3</sup>, introduced relevant amendments in Spanish Competition Law 15/2007, especially concerning the application by the CNMC of certain Digital Markets Act (DMA) provisions and proceedings deadlines. The new legislation enables the CNMC to carry out investigations in Spain under the DMA and further develops coordination mechanisms with the European Commission (EC) and other European Union countries.

13. Likewise, the deadline to issue a final decision in a sanctioning proceeding has been extended from 18 to 24 months, while the deadline for the parties to reply to the statement of objections and to the decision proposal is now one month rather than 15 days. In addition, in the merger review proceeding, the deadline has been extended from two to three months in the second phase and a new 15-day deadline has been enacted for pre-notified mergers that require only a short-form decision.

14. Finally, Royal-Decree Law 8/2023<sup>4</sup>, of 27 of December, introduced new provisions into Spanish Competition Law with the aim of enabling the CNMC to assist the EC in investigations carried out in Spain and to undertake other measures contemplated in the new EU Regulation on Foreign Subsidies distorting the internal market.

### 1.2. Guidelines

15. In 2023, the CNMC approved several new guidelines.

16. On the one hand, after a period of internal reflection and a public consultation on a draft, the CNMC approved [Notice 1/2003, of 13 June, 2023](#), which allows interested parties to know the general criteria that the CNMC will take into account to determine, in each case, the scope and duration of each ban on contracting with the public sector. The CNMC will include the duration and scope of the bans in the decisions in sanctioning proceedings initiated after the entry into force of Notice 1/2023. The guidelines also intend to give prominence

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<sup>3</sup> Real Decreto-Ley 5/2023, de 28 de junio, por el que se adoptan y prorrogan determinadas medidas de respuesta a las consecuencias económicas y sociales de la Guerra de Ucrania, de apoyo a la reconstrucción de la isla de La Palma y a otras situaciones de vulnerabilidad; de transposición de Directivas de la Unión Europea en materia de modificaciones estructurales de sociedades mercantiles y conciliación de la vida familiar y la vida profesional de los progenitores y los cuidadores; y de ejecución y cumplimiento del Derecho de la Unión Europea.

<sup>4</sup> Real Decreto-Ley 8/2023, de 27 de diciembre, por el que se adoptan medidas para afrontar las consecuencias económicas y sociales derivadas de los conflictos en Ucrania y Oriente Próximo, así como para paliar los efectos de la sequía.

to compliance programmes designed by companies to avoid these infringements and the role of the CNMC in validating them.

17. On the other hand, the Advocacy Department published three guidelines:
- The “**Guide for quantifying harm from competition law infringements**” ([G-2020-03](#)) is an advisory document (not legally binding) in which the most relevant economic, statistical and econometric concepts for quantifying harm are presented in a simple manner and with practical examples. Its main objective is to help judges and courts determine the harm originating from anti-competitive conduct and to disseminate good practices among all the agents involved in harm quantification procedures. The Guide is the result of more than two years of exhaustive work, during which the CNMC conducted two public consultations and held several working sessions to gather the opinions of the main players in both the public and private sectors. Different stakeholders participated in this consultation, including economists, associations, regional competition authorities, magistrates, scholars and individuals.
  - The “**Guide to competition against inflation: How competition and efficient regulation help protect the purchasing power of consumers**” ([G-2020-02](#)) shows, based on a review of studies on the subject, how measures to promote competition and efficient regulation can help moderate prices and facilitate the work of economic authorities in their efforts to control inflation. Moreover, such measures have the potential to mitigate the negative effects of inflation on purchasing power by boosting growth and employment to benefit all citizens, particularly including the lowest-income and most vulnerable groups.
  - The “**Guide to in-house procurement and horizontal cooperation**” ([G-2020-01](#)) focuses on the use of in-house procurement and horizontal cooperation agreements, aimed at public procurers. The guide, which is part of a collection of materials with which the CNMC aims to improve public procurement in Spain, reviews the regulation of agreements and orders made to in-house resources, and offers multiple recommendations and practical examples of numerous aspects of these figures, based around four blocks: creating in-house resources; attributing orders to in-house resources; reviewing the status of in-house resources; and agreements.

### 1.3. Government proposals for new legislation

18. In January 2024, the CNMC was designated the Digital Services Coordinator (DSC) in Spain. Currently, the CNMC is awaiting for its formal designation as DSC so it will be empowered to fully implement the Digital Services Act (DSA) regulation.

## 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

19. In 2023, the CNMC opened seven formal proceedings. Specifically, two formal investigations were opened for alleged infringements of Article 1 of the Spanish Competition Act and/or Article 101 of the TFEU, four formal investigations focused on analysing the possible existence of abuses of dominant position under Article 2 of the Spanish Competition Act and/or Article 102 of the TFEU, and finally one formal investigation was initiated based on indications of a potential violation of Article 2 of the Spanish Competition Act, Article 102 of the TFEU, and Article 3 of the Spanish Competition Act that prohibits the distortion of free competition by unfair practices.

20. Likewise, in 2023, the CNMC carried out nine dawn raids in eight cases (4 cases concerned alleged infringement of Article 1 of the Spanish Competition Act and/or Article 101 of the TFEU and 4 cases concerned alleged infringements of Article 2 of the Spanish Competition Act and/or Article 102 of the TFEU). In total, twenty premises were inspected. The inspections were aimed at investigating alleged horizontal and vertical infringements, abuses of dominant positions and compliance with a previous decision. Additionally, Spanish officers took part in two dawn raids organised by the European Commission.

21. The Spanish competition authority adopted the following final decisions in 2023:

- A total of four fining decisions regarding prohibited conducts (anti-competitive agreements and an abuse of a dominant position)
- Two cases were also finalised under the commitment procedure.
- Finally, twenty-two non-fining decisions were adopted by the CNMC.

22. Three of the fining proceedings related to Article 1 of the Spanish Competition Act and Article 101 of the TFEU. Two of them were identified as cartels and one involved bid rigging in public tenders. The remaining decision concerned Article 2 of the Spanish Competition Act and Article 102 of the TFEU.

23. In addition, the CNMC also adopted three other fining decisions related to other practices (breach of commitments).

24. Further information about these cases is available at the following links:

- [SNC/DC/153/22](#): FUSIÓN TERMINALES MÓVILES
- [SNC/DC/010/23](#): TELEFÓNICA ACUERDO DAZN
- [SNC/DC/065/23](#): MOORING PORT SERVICES / CEMESA AMARRES BARCELONA

25. The fines imposed by the CNMC amounted to 215.69 million euros (€204.60 million for prohibited conduct and €11.08 million for other practices);

16 companies were fined in total (13<sup>5</sup> companies for prohibited conduct and three because of breach of commitments). Likewise, six individuals were fined<sup>6</sup> in 2023 for engaging in bid rigging in multiple Ministry of Defence tenders, involving two distinct cartels.

26. On the other hand, the Competition Directorate launched 15 new investigations and 48 preliminary investigations.

### *2.1.2. Description of significant cases*

27. In the **Business information databases** (*Bases de Datos Empresariales*) case, two of the main companies providing business information database services in Spain were sanctioned with a total fine of 3,558,135 euros. Both companies benefited from the leniency programme: one was exempted from paying the fine and the other one received a 30% reduction in the fine. Additionally, both of them benefited from an exemption of the prohibition to contract with the public sector due to their collaboration with the Competition Directorate through the leniency programme. The companies admitted the existence of an agreement that had lasted for almost 20 years, whereby the companies committed not to interfere in client acquisition and avoid competition related to database sale prices.

28. In the **Military equipment tenders** (*Licitaciones de Material Militar*) case, four companies in the defence sector were fined 6 million euros for engaging in anti-competitive agreements involving two different cartels for rigging several tenders related to the supply, maintenance and modernisation of military equipment. Six individuals were also fined in the framework of this case. These agreements affected almost a hundred contracts, worth 60 million euros.

29. In the **Amazon/ Apple Brand Gating** case, the CNMC imposed the highest-ever fine for a company fining Apple and Amazon a total amount of 194 million euros for restricting competition on Amazon marketplace in Spain. Both companies agreed to include a series of clauses in the contracts regulating Amazon's conditions as an Apple reseller that affected the sale of Apple products and other brands on Amazon's website in Spain. Among other actions, they limited the possibility for competing brands to purchase advertising space on Amazon's website in Spain to advertise their products in certain searches for Apple products and excluded more than 90% of the resellers that had been using Amazon's website to sell Apple products from the main marketplace in Spain. This resulted in an increase in the relative prices paid by consumers for the purchase of Apple products on the online marketplace in Spain.

30. Finally, in December 2023, the CNMC fined the company *Luminora* a total of 384,672 euros for preferentially supplying its own renewable energy to the owner of the electricity transmission grid (Red Eléctrica) over its competitor's, abusing its dominant position as sole node agent. The company refused to manage the competitor's request, despite a request from Red Eléctrica to do so. This case is another example of the close collaboration and coordination between the

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<sup>5</sup> One company was exempted from paying the fine in the Business Information Database Case due to its collaboration with the Competition Directorate through the leniency programme.

<sup>6</sup> Military equipment tenders' case.

different units at the CNMC, as the investigation stemmed from a decision by the CNMC's Regulatory Supervision Chamber in an access dispute.

### ***2.1.3. Judicial review***

31. In 2023, the **Supreme Court upheld 100% of the cases** (four decisions involving seven companies) it reviewed. The decisions concerned collusive practices in prices for professional services provided by legal practitioners and in the supply of medicines from pharmaceutical laboratories; a cartel in the sector of transport services; and an abuse of dominant position in the market for the professional basketball league in Spain (ACB).

32. The court of first instance to review the CNMC's decision, the National High Court (*Audiencia Nacional*) upheld 15 CNMC decisions involving 45 firms and overturned six decisions related to 12 firms.

33. The confirming judgments included significant cases such as the cartels identified in the market for the manufacture and sale of LV/MV cables, which was used to illegally impose prices and commercial conditions, and to manipulate public bids.

34. Furthermore, the Court upheld cartels in stevedoring services in the Port of Vigo; the cartel was used to raise prices and limit the number of workers available to carry out tasks. In addition, the Court has acknowledged the existence of bid rigging practices in public bids related to information technology services and in the market for intermediation services.

35. On the other hand, the six repealed decisions are, mainly, related to the market for interest rate hedging derivatives associated with syndicated loans in project finance and the abuse of a dominant position by SGAE in the intellectual property rights of audiovisual and musical works sector. Additionally, the aforementioned decision on the cartel for stevedoring services was annulled for four workers' unions, as the High Court found they had not participated in the illegal conduct.

36. To summarise, 71.4% of the CNMC's decisions subject to review by the National High Court in 2023 were confirmed.

## **2.2. Mergers and acquisitions**

### ***2.2.1. Statistics on the number, size and type of mergers and/or acquisitions controlled under competition law***

37. In 2023, the CNMC was notified of 70 merger transactions and 73 decisions were adopted in merger cases. Three transactions were analysed and cleared in Phase I, subject to remedies offered by the parties. Two additional transactions were cleared in Phase II after a more thorough analysis of the possible damage to competition arising from the merger and upon the approval of remedies offered by the parties. Moreover, following the withdrawal of the parties involved, three other transactions were closed, two were in Phase II and one in Phase I. In one additional case, the CNMC opened Phase II of the merger control procedure.

### 2.2.2. Summary of significant cases

38. In 2023, five transactions were cleared with remedies offered by the notifying parties, with a view to preventing a significant impediment to effective competition.

39. Commitments may be submitted in Phase I, as long as the alleged competition restrictions are clearly identified and can be easily resolved. This was the case for three transactions that were cleared in 2023 subject to the commitments offered by the parties: **ALCAMPO/ ACTIVOS DIA**, **WONDERBOX/ SMARTBOX** and **EBIQUITY/ MEDIAPATH ESPAÑA**.

40. In the first concentration, the Spanish subsidiary of the French company Auchan Retail (**ALCAMPO**) acquired 234 retail stores from **DIA**, as well as its logistics activities in two different warehouses. The operation affected the retail distribution sector of self-service daily consumer products in which Alcampo's activities horizontally overlap with those of the purchased DIA assets. The CNMC considered the resulting scenario should the operation be authorised with no remedies, resulting in Alcampo attaining high market shares in the relevant market in several municipalities, especially in areas of Zaragoza, due to the significant strengthening of its previous position and low competitive pressure. To eliminate the detected risks to competition that could increase prices and decrease the diversity of products on offer, Alcampo offered commitments that were analysed and finally deemed to be sufficient by the CNMC. These included divestitures in the areas with a dire risk of much higher concentration and additional commitments to reinforce the effectiveness of the divestment commitments.

41. The transaction between **WONDERBOX and SMARTBOX** concerns the supply of multi-choice gift vouchers, where these two companies are the main players in this market in Spain. The acquisition concerns a market which includes intermediary companies offering gift vouchers with experiences related to gastronomy, hotel stays or leisure, and health and beauty services, among other things. The CNMC considered that there were significant horizontal overlaps in this transaction with the two companies with the largest market shares in this sector merging. However, the CNMC also ran a market test that verified the dynamism of the market where several companies could enter as competitors and there was competitive pressure exerted by companies offering single-experience vouchers (such as hotel chains). Commitments were offered by Wonderbox to limit the possibility of imposing exclusivities on suppliers and distributors, including refraining from adding exclusivity clauses to contracts with service providers, committing to not penalising providers for working in-parallel with competitors and communicating the commitments to suppliers and distributors.

42. The transaction between **EBIQUITY and MEDIAPATH ESPAÑA** concerned the provision of advertising spend performance auditing and valuation services in Spain. The transaction affected auditing and evaluation services for media advertisers, creating horizontal overlaps and reinforcing Ebiquity's market leadership. However, the CNMC found the barriers to entry were not insurmountable, given Mediapath's small customer portfolio. Although no exclusivity strategies were observed, the CNMC identified the risk of Ebiquity acquiring a quasi-monopolistic position, potentially hindering market entry for competitors. To address these concerns, Ebiquity committed to not imposing exclusivity clauses, limiting contract durations, and informing commercial users

of these commitments. The CNMC believed these measures were sufficient to maintain effective competition in the market.

43. Two additional transactions were cleared after a more thorough analysis in Phase II, since the CNMC detected serious risks to competition that were not effectively addressed by the commitments offered by the parties and therefore needed more time to be analysed.

44. The transaction between **GRIMALDI and TFB** concerns the market for managing the terminals in the Port of Barcelona and the regular transport of roll-on/roll-off (ro-ro) cargo and passengers between Barcelona and the Balearic Islands. Grimaldi's acquisition of control over the only two public ro-ro and passenger terminals in the Port of Barcelona, coupled with the absence of alternative terminals, posed a significant threat to competition. Grimaldi would have had the capacity to increase prices and alter access conditions to the terminals harming competing shipping companies in a market where it has significant vertical overlaps. The situation could have extended to scheduled maritime transport routes between Barcelona and the Balearic Islands, where Grimaldi could apply less favourable conditions to competing companies compared to its own vessels, strengthening its market position. Grimaldi presented new commitments that were accepted by the CNMC, focused on enabling the development of a new ro-ro and passenger terminal in the Port of Barcelona. Grimaldi undertook, among other things aimed at guaranteeing non-discrimination in terms of access to the terminal by other competing operators, to relinquish and return part of its current concession in the port of Barcelona to the Barcelona Port Authority (APB).

45. The transaction between **LOGISTA PUBLICACIONES and DISTRISUR** concerned the wholesale distribution of periodicals and, in particular, magazines. The risk of the operation stemmed from the change in the relationship between Logista and its competitor Boyacá, which owned a 50% share in the company DISTRISUR. The strengthening of the link between Logista and its competitor Boyacá could have significantly affected the competition in a market already in decline and with only one alternative that was similarly established. The original terms of the acquisition also provided for a preferential deal with Logista Regional (the subsidiary through which the operation was being carried out) for the distribution of future publications, which reinforced the anti-competitive risk of the transaction. The transaction was finally cleared subject to commitments by the companies. These included the commitment to not appoint representatives to Logista Regional's board of directors from Boyacá for a period of three years plus a possible one-year extension. Additionally, once that period has expired, members from the board of directors of Boyacá cannot simultaneously be members of Logista Regional's board for another three years. Logista Regional cannot share sensitive information with Boyacá and has made commitments to guarantee the negotiation between Logista Regional and Boyacá in non-discriminatory terms and under market conditions.

46. Additionally, in 2023, the CNMC, along with other ECN agencies, requested the referral to the European Commission of the acquisition operation of the Israeli company specialised in the manufacturing of semiconductors for vehicles **AUTOTALKS Ltd.** by **QUALCOMM Inc.**

Likewise, the CNMC requested the case **ORANGE/MASMOVIL** be referred to Spain by the European Commission, although the operation was finally analysed in Brussels.

### 3. The Role of Competition Authorities in Formulating and Implementing other Policies

47. The Advocacy Department plays a fundamental role in promoting competition culture. The department uses several tools for that purpose: (i) market studies, guides, and *ex officio* reports; (ii) reports on draft regulation; (iii) reports on non-legislative activities; (iv) active legal capacity to challenge regulations and administrative acts before Spanish Courts; (v) and economic impact reports for Court challenges.

#### 3.1. Market studies and other reports

48. The CNMC's studies and reports seek to identify the operating problems of a given sector and propose regulation changes. Occasionally, the studies take the form of guides with an educational function. In 2023, the CNMC issued one study, one *ex-post* evaluation report, three guides<sup>7</sup>, and the Annual Report on State Aid.

##### 3.1.1. Market Studies

49. In 2023, the CNMC issued one Market Study:

- [E/CNMC/003/23](#): **Study on the pass-through of the VAT reduction in the food sector**. The study analysed, from a competition perspective, the retail distribution sector for daily consumer goods and the extent to which the level of competition has influenced the pass-through to the price of the VAT reduction on a set of basic foodstuffs implemented in Spain in January 2023. For this study, data on prices and concentration levels in establishments throughout Spain were collected from different institutional and private sources, as well as from the main distributors. The analysis of the available data showed no evidence of a lack of pass-through by distributors of the aforementioned VAT reduction, nor of the existence of differences in the degree of pass-through according to the estimated levels of concentration and competition in different geographical areas.

50. Likewise, in 2023, the CNMC **initiated eight studies on different areas** such as the driver training sector, the cloud services sector, electric vehicle charging, health care insurance, the use of behavioural economics tools to improve regulation and supervision, the VTC-taxi sector, public aid to photovoltaic self-consumption, and an additional study on barriers for SMEs in terms of their access to public procurement and growth. In addition, progress has been made in other ongoing initiatives, such as the updating of phase III of the "Guide to Public Procurement and Competition", focused on the preparation and design of specifications.

51. Some of these projects not completed in 2023 have registered public progress, highlighting the following:

- Public consultation for the study on the **driver training sector**, which had 72 responses.

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<sup>7</sup> Already described in section 1.

- Public consultation for the study on **electric vehicle recharging**, with 108 responses.
- Public consultation for the study on the **healthcare insurance sector**, which received 619 contributions.
- Public consultation for the study analysing **barriers for SMEs** in terms of their access to public procurement and growth, which received 45 responses.

### 3.1.2. *Ex-post evaluation reports*

52. In 2023, the CNMC approved one *ex-post* evaluation report:

- [EI/03/2023](#): **Impact assessment of the recommendations made in the report on the aid granted under the MOVES III Plan**. This study analysed the degree of compliance and the impact on the economy of the recommendations of report [PRO/CNMC/003/21](#), using the method developed by KPMG and VVA in the project for *ex-post* analysis of actions to promote competition and market unity ([EI/01/2021](#)), financed by the European Union through the Technical Support Instrument. The study concluded that efficient economic regulation, which favours effective competition by eliminating the supply restrictions incorporated by some Spanish regions into MOVES III Plan calls, leads to lower prices and a greater variety of suppliers, encourages innovation, stimulates investment and favours job creation. This positive effect on the green vehicle sector in Spain and the overall economy will increase as more regions follow the recommendations of the CNMC set out in report PRO/CNMC/003/21.

### 3.1.3. *Report on State Aid*

53. In 2023, the CNMC approved the Annual Report on State Aid in Spain ([IAP/CNMC/001/23](#)). The report analyses state aid granted in Spain and in the rest of the EU Member States in 2021, and includes the main regulatory, administrative, and judicial developments in the area of state aid in 2022.

## 3.2. Reports on draft regulations

54. In 2023, the CNMC issued **20 reports**<sup>8</sup> on regulatory rules in progress. The number of reports in this category is slightly higher than in 2022.

55. By industry, the most frequently analysed reports on draft regulations are legislation in waste management, professional services, industry, social economy, and the transport sector.

## 3.3. Reports on non-legislative activities

56. The CNMC acts as an advisory body for competition and efficient economic regulation, advising public administrations on actions that are not linked to regulatory projects.

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<sup>8</sup> Please, find further information about the reports in Section 6 or on the [CNMC's website](#).

57. The Public Procurement Act is not applicable to contracts between two public companies in the same group. The CNMC must therefore prepare a report analysing the contracts to be signed. This led to the publication of **six reports** in 2023<sup>9</sup>.

### 3.4. Active legal capacity instruments

58. The CNMC is competent to challenge in court administrative acts and regulatory provisions ranking below the level of law when they introduce obstacles to the maintenance of effective competition in the markets.

59. In 2023, the CNMC filed **four appeals** according to its legal capabilities:

- An appeal was filed against Decree 98/2022 regulating the registry of real estate agents in the autonomous region of Valencia and the requirements for registration ([LA/03/2022](#)).
- A second appeal was filed against the Agreement on the vehicle ceiling and the period of application of the limitation of entry, circulation and parking on the public roads of the island of Formentera for the year 2023 ([LA/01/2023](#)).
- A third appeal was related to the tax ordinance with regards to the tax on the special use of the domain derived from the distribution to final destinations indicated by consumers of goods purchased via e-commerce ([LA/02/2023](#)).
- Finally, a fourth appeal was filed against the bidding criteria in the tender of postal services for administrative notifications on paper of the City of Madrid and its autonomous agencies ([LA/04/2023](#)).

60. Regarding appeals filed in previous years under the aforementioned legal basis, in 2023 an appeal was upheld by the Audiencia Nacional ([LA/01/2015](#)). Likewise, the Court of Justice of the EU ruled on the preliminary question raised by the Court of Justice of Catalonia in the framework of the regulation of the VTC sector in Catalonia ([ECLI:EU:C:2023:448](#)).

### 3.5. Economic reports to support court challenges

61. The aim of these reports is to economically and quantitatively analyse competition restrictions in regulations that have been appealed by the CNMC before the courts<sup>10</sup>. They sometimes quantify the costs that such restrictions entail for consumers and social welfare.

62. During 2023, the CNMC drafted **four economic reports** to accompany its legal standing proceedings before the courts, referring to the four appeals filed in 2023.

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<sup>9</sup> Please, find further information about the reports in Section 6 or on the [CNMC's website](#).

<sup>10</sup> The economic reports will be published on the CNMC's website once a ruling has been issued.

### 3.6. Public consultations and advocacy events

#### 3.6.1. Public consultations

63. As mentioned before, in 2023, the CNMC opened four public consultations on the driver training sector, electric vehicle recharging, healthcare insurance sector, and barriers for SMEs in terms of their access to public procurement and growth. The number of contributions received were 72, 108, 619 and 45, respectively.

#### 3.6.2. Advocacy events

64. 2023 was particularly intense in this regard, with important actions to be noted:

- In collaboration with FUNCAS, the book "*Reforms to boost competition in Spain*" was published, which contains two dozen articles by academics and experts from the CNMC analysing, from the competition and efficient regulation perspectives, numerous markets and key aspects for the Spanish economy. To present this book, a conference was organised on May 9, 2023, at the CNMC headquarters in Madrid and another round table was held at the Industrial Economics Conference in Bilbao in September 2023.
- An [agreement](#) was entered into and published with the ICO Foundation to transfer the Competition Yearbook to the CNMC. Therefore, from next year the CNMC will be responsible for publishing this Yearbook, which is a reference in the sector.
- Five articles were published in magazines, two entries in blogs, and eight more entries in the CNMC blog.
- Twenty-six presentations were given at national and international public events, on a variety of subjects including public procurement, State aid and European funds, damages claims for competition infringements, the regulation of the digital and telecommunications sectors, urban mobility, professional services, access to cash and inflation.
- The training program for public employees on competition in public procurement continued to be implemented, which in 2023 was extended to more than 1,000 public employees.

65. In addition to the above actions, reference should be made to the "[Municipalities and Competition](#)" project. This initiative was launched in 2021 and consists of recommendations, public consultations and discussion days on the most common barriers to free competition in the performance of municipalities. In 2023, this initiative was awarded by the World Bank and the International Competition Network for promoting a greater understanding of competition principles across the country.

66. The project is carried out in collaboration with the regional competition authorities and is developed through "stories", which focus the analysis on the most problematic sectors of activity or areas of municipal public intervention from the point of view of barriers to competition. For each story, a discussion document is prepared for public consultation and a day of debate is organised with representatives of municipalities, companies, consumers and academics to gather a wide variety of opinions on the phenomenon, and recommendations are drawn

up. It is also worth mentioning the signing of an [agreement with the Spanish Federation of Municipalities and Provinces](#)<sup>11</sup> for the proper development of the project.

67. In 2023, two new topics were developed:

- *Renewable energies*, in collaboration with the Jury for the Defence of Competition of Extremadura, with a day of debate in Merida on February 17.
- *Concession bidding*, in collaboration with the Competition Defence Court of Aragon, with a discussion day held in Zaragoza on April 18.

## 4. International Cooperation

### 4.1. European Competition Network (ECN)

68. In 2023, the CNMC continued its cooperation with the European Competition Network (ECN). In particular, the CNMC participated in the following work and discussions:

- Hosting European Competition Day in October in Barcelona in the framework of the Spanish Presidency of the Council of the EU.
- Work and discussions on the overhaul of Council Regulation N° 1/2003 of 16 December 2002, on the implementation of the rules on competition laid down in Articles 81 and 82 of the Treaty.
- Assistance to the European Commission for the implementation of Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September, 2022, on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (or DMA), signifying the CNMC's President inclusion in the High-Level Group on behalf of the ECN, coupled with the CNMC's active participation in the working groups and advisory committees specifically addressing said Regulation.
- Participation in the work and discussions within the ECN on the review of the Communication from the Commission – Guidance on the Commission's enforcement priorities in applying Article 82 of the EC Treaty (current Article 102 of the TFEU) to abusive exclusionary conduct by dominant undertakings.
- Participation in the review proceedings of the Horizontal Block Exemption Regulation and its interpretation guidelines, and of Regulation 1/2003 implementing Articles 101/102 of the TFEU started in September 2022, as well as on Regulation 139/2004 for simplifying procedures in the control of corporate mergers, finally adopted in April 2023 and which entered into force from 1 September, 2023.

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<sup>11</sup> Federación Española de Municipios y Provincias (FEMP).

- Discussions and analysis on the legal definition of “relevant market”, the EU Regulation on foreign investments, finally published on 23 December 2023.
- Responding to multiple information requests on competition advocacy by other authorities.
- Participation in the ECN working groups, especially the contributions made in the following groups: Agri-Food, Pharmaceuticals, Cooperation, Cartels, Digital, Artificial Intelligence and Digital Research, Vertical Agreements and Horizontal Agreements, Financial Sector, Telecommunications, Environment, Promotion, Chief Competition Economists, and Concentrations.

69. In the framework of cooperation for implementing Articles 101 and 102 of the TFEU within the ECN, the CNMC received documentation from the Directorate -General for Competition (DG COMP) regarding 14 cases that the European authority opened in 2023. The CNMC notified the ECN of the opening of five proceedings under Articles 101 and 102 of the TFEU. Additionally, the CNMC participated in a total of 10 hearings and 23 meetings of the Advisory Committee, summoned by the DG COMP.

70. As for bilateral cooperation activities, the CNMC received and answered 121 requests for information from other European competition authorities and the DG COMP.

71. Additionally, in the area of mergers, the CNMC received 351 notifications from the DG COMP. In this regard, the CNMC engaged in 30 cases.

#### **4.2. European Competition Authorities (ECA)**

72. The ECA is a discussion forum for competition directors from European countries, both EU and non-EU, and for cooperation in merger control.

73. Pursuant to the Agreement of the ECA meeting held on 20 April, 2001, the CNMC has received 186 notifications and has communicated two multi-jurisdictional concentrations.

#### **4.3. Organisation for Economic Co-operation and Development (OECD)**

74. The OECD Competition Committee aims to protect and promote competition as the backbone of all modern economies and brings together the competition authorities of the 38 OECD member countries, as well as the EC. The President of the CNMC is a member of the Bureau of the OECD Competition Committee.

75. The CNMC made written contributions and interventions and gave presentations on competition advocacy and promotion at the meetings of the Competition Committee and its working groups in June and December 2023. It also participated in the Global Forum on Competition, held in December.

76. The CNMC also participates in specific working groups, including on Intellectual Property Rights and Competition, the Network of Economic Regulators (NER), and the Regulatory Policy Committee. In addition, the CNMC has participated in the drafting of various OECD recommendations.

77. Finally, in 2023, the CNMC participated in seminars and training activities developed by the OECD's regional competition centres.

#### **4.4. International Network of Competition Authorities (ICN)**

78. The CNMC continues to participate in the conferences, working groups and meetings of this important international network of competition authorities. The main objective of the ICN is to promote convergence between competition laws and policies and cooperation between competition authorities to improve the effectiveness of competition regulation at the international level.

79. In 2023, the CNMC held the 22<sup>nd</sup> ICN Annual Conference that was hosted in Barcelona. It is the first time that the ICN's flagship event has been organised in our country and participants had the opportunity to benefit from an intense agenda replete with enriching experience-sharing and different sessions on hot topics in the field of competition. On top of that, this edition set an attendance record, with more than 400 participants coming from almost 100 different jurisdictions.

80. The CNMC is represented by its President in the ICN Steering Group. In addition, it participated in several working groups and has been co-chairing the Unilateral Conduct working group since May 2022, continuing to obtain high visibility at the international level and exerting important influence in this area. The CNMC organised a webinar on unilateral conduct in the pharmaceutical sector and contributed to the workshop celebrated in Tokyo. This year the CNMC, as co-chair, launched a specific project on theories of harm and remedies concerning unilateral conduct in the digital sector, as a follow-up to previous work by the JFTC.

#### **4.5. Latin American and Caribbean Forum, Ibero-American Competition Forum and other activities with Ibero-America**

81. The Latin American and Caribbean Competition Forum (FLACC) is a project from the OECD and the Inter-American Development Bank (IDB) to promote the effective implementation of competition policy in Latin America.

82. In September 2023, the CNMC attended the 20<sup>th</sup> Edition of the FLACC in Quito (Ecuador). The CNMC participated in the session on the Gender Inclusive Competition Toolkit and presented written contributions on both topics. On the day prior to the event, the CNMC, together with the Portuguese competition authority—AdC—organised the 2023 Ibero-American Competition Forum and moderated the first roundtable on “Challenges around Unilateral Conduct: Enforcement, Regulation, and Advocacy”.

83. In addition, the CNMC organised the 18<sup>th</sup> edition of the Ibero-American Competition School, a space for learning, collaboration and mutual cooperation between Ibero-American competition authorities and the CNMC.

#### **4.6. UNCTAD**

84. UNCTAD (United Nations Conference on Trade and Development) is the main body of the United Nations General Assembly for discussing issues and promoting initiatives related to trade, investment, and development. One of its

fundamental objectives is to “assist developing countries to integrate into the world economy”.

85. In the field of competition, UNCTAD has specific working groups such as the working group on cross-border cartels, in whose meetings the CNMC has participated. The CNMC also participated in the 21<sup>st</sup> meeting of the Intergovernmental Group of Experts (IGE) on Competition Law and Policy, held in Geneva in July 2023. The CNMC also participated in the Voluntary Peer Review of competition law and policy of the Republic of Paraguay.

#### **4.7. CNMC bilateral relations**

86. In 2023, the CNMC continued to strengthen bilateral ties with other competition authorities and international organisations.

87. Specifically, the 4<sup>th</sup> Bilateral Meeting with the French competition authority was organised on 11 May at the CNMC headquarters. It included a full programme covering cooperation and an exchange of experiences on mergers, anti-competitive practices, consultations and the future of competition policy.

88. Cooperation with several Ibero-American states was strengthened, with the signing of memoranda of understanding with Paraguay's National Competition Commission (CONACOM) in January 2023, with Mexico's Federal Economic Competition Commission (Cofece) in June 2023, and with the Dominican Republic's National Commission for the Defence of Competition (Procompetencia) in December 2023. In addition, the CNMC held several bilateral meetings with Ibero-American authorities throughout the year, including a bilateral meeting with Cofece in June 2023, another bilateral meeting with Procompetencia in July 2023, and, finally, within the framework of the ICN annual conference, with Ecuador's Superintendence of Economic Competition.

89. The CNMC also collaborated with Peru's Indecopi through the EU technical assistance mechanism TAIEX, through which two officials from the Peruvian agency (an economist and a jurist) travelled to Spain to learn more about the procedures and enforcement of competition law by our national authority, with a full schedule of training sessions with CNMC staff.

90. Two other bilateral meetings were also held during the ICN Annual Conference: a bilateral meeting with the Director General and Deputy Director of the DG COMP to discuss issues related to the digital sector, and another high-level meeting with Commissioner Didier Reynders, who temporarily took over competition matters in the College of Commissioners.

91. Finally, it should be noted that in 2023 the Economic Intelligence Unit (EIU) participated in the European Commission's TAIEX TSI PACE project, conducting a study visit to the Romanian Competition Authority on collusion detection and investigation tools in Bucharest (Romania).

## **5. Resources of the Spanish Competition Authority**

### **5.1. Overall resources**

92. It is important to highlight some specific features of the CNMC before looking at its resources. The CNMC is an integrated authority covering

competition law enforcement and competition advocacy functions, together with the supervision of regulated sectors. Its overall personnel and budget data therefore cannot be compared to those of other European competition authorities. Likewise, some adjustments must be made to include within the competition policy figures the allotted part of the overall budget and personnel in cross-cutting services such as legal services, economic analysis, IT services, cabinet, media services, human resources, and so on, that are shared by all the divisions (both competition and regulatory divisions).

93. As established for the 2022 Annual Report, the method followed includes people directly engaged in competition, regardless of the unit or directorate to which they belong in order to provide more accurate information and clearly differentiate between administrative and non-administrative staff members, economic or legal background, gender, and so forth.

94. According to this, a total of 113 non-administrative staff members work directly on competition enforcement: 73 in the Competition Directorate, 25 in the Advocacy Department, six in the Legal Unit, four in the IT Unit (IT experts for inspections), and five in the Economics Unit.

95. To these 113 workers should be added a proportional share of the staff working in the cross-cutting units (cabinet, legal service, general secretariat, etc.) that are not exclusively devoted to competition issues. This means an additional 48 people, who cannot be further differentiated according to gender, professional or academic qualification, or such like, as they represent an estimate.

96. Overall, in 2023, the total number of people working at the CNMC was 534, not including the Council of the CNMC.

### ***5.1.1. Annual budget***

97. The total annual budget available to the CNMC for the year 2023 in terms of competition policy was 16.48 million euros (in 2022, the budget dedicated to competition policy was 15.74 million euros).

98. The CNMC's total budget for 2023 (63.13 million euros) also increased compared to 2022 (60.85 million euros).

### ***5.1.2. Number of employees***

99. As described above, a total of 113 non-administrative staff members work directly on competition activities: 73 in the Competition Directorate, 25 in the Advocacy Department, six in the Legal Unit, four in the IT Unit (IT experts for inspections), and five in the Economic Unit. Of those 113 non-administrative staff, 55 are lawyers; 53 are economists; and five are data scientists.

100. In addition, as mentioned, to these 113 people should be added the proportional share of the staff working in the cross-cutting units (cabinet, legal service, general secretariat, etc.) that are not exclusively devoted to competition issues. As already pointed out, this means an additional 48 people, who cannot be further differentiated according to gender, professional or academic qualification, or such like, as they represent an estimate.

101. In addition, there are 21 administrative staff members.

102. Combining all staff, in 2023, 182 people were working on competition policy at the CNMC.

## 5.2. Human resources applied to enforcement, mergers and advocacy efforts

103. It should be noted that the Competition Directorate has a sectoral organisation (energy and industry, information society and services), so all units work both in anti-competitive practices and merger control enforcement, except for the Cartels and Leniency Unit (10 people). This Unit carries out only enforcement work and not merger analysis.

104. In addition, within the Competition Directorate, there is a Monitoring Unit. This Unit is devoted to monitoring the final execution of CNMC decisions (judicial challenges, effective payment of fines, fulfilment of commitments and conditions, etc.).

The Advocacy Department does not carry out either enforcement or merger analysis activities (25 people). Therefore<sup>12</sup>:

- Enforcement against anti-competitive practices: 88 people.
- Merger control: 78 people (the previous 88 minus the people working at the Cartels and Leniency Unit).
- Advocacy efforts: 25 people.

## 6. Summaries of References to New Reports and Studies on Competition Policy Issues

### 6.1. Market Studies, guides, and other reports

**Table 1. Market Studies and guides**

REFERENCE	DESCRIPTION	DATE OF APPROVAL
<a href="#">E/CNMC/003/23</a>	STUDY ON THE PASS-THROUGH OF VAT REDUCTION IN THE FOOD SECTOR	25/07/2023
<a href="#">G-2020-01</a>	GUIDE ON ASSIGNMENTS TO OWN RESOURCES AND AGREEMENTS	14/02/2023
<a href="#">G-2022-02</a>	COMPETITION AND INFLATION: GUIDE ON HOW COMPETITION AND EFFICIENT REGULATION HELP PROTECT CONSUMER PURCHASING POWER	25/07/2023
<a href="#">G-2020-03</a>	GUIDE TO THE QUANTIFICATION OF DAMAGES FOR INFRINGEMENTS OF COMPETITION LAW	11/07/2023

<sup>12</sup> All this data refers to non-administrative staff.

**Table 2. Ex-post Evaluation Reports**

REFERENCE	DESCRIPTION	DATE OF APPROVAL
<a href="#">EI/03/2023</a>	IMPACT ASSESSMENT OF THE RECOMMENDATIONS ISSUED IN THE REPORT ON THE AID GRANTED THROUGH THE MOVES III PLAN (PRO/CNMC/003/21)	19/12/2023

**Table 3. Report on State Aid**

<a href="#">IAP/CNMC/001/23</a>	CNMC REPORT ON STATE AID IN SPAIN - 2023	14/11/2023
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Table 3. Reports on draft regulations

REFERENCE	DESCRIPTION	DATE OF APPROVAL
<a href="#">IPN/CNMC/052/22</a>	DRAFT ROYAL DECREE BASIC PROCEDURE FOR CERTIFYING THE ENERGY EFFICIENCY OF BUILDINGS	28/02/2023
<a href="#">IPN/CNMC/048/22</a>	DRAFT ROYAL DECREE APPROVING THE TARIFF OF COURT ATTORNEY FEES	28/02/2023
<a href="#">IPN/CNMC/001/23</a>	DRAFT BILL OF INDUSTRY LAW	31/01/2023
<a href="#">IPN/CNMC/002/23</a>	DRAFT ROYAL DECREE AMENDING ANNEXES III AND IV OF ROYAL DECREE 244/2016 OF JUNE 3 IMPLEMENTING LAW 32/2014 OF DECEMBER 22 ON METROLOGY	28/02/2023
<a href="#">IPN/CNMC/06/23</a>	DRAFT ROYAL DECREE APPROVING THE REGULATION ESTABLISHING THE REQUIREMENTS TO BE ADOPTED BY COMPUTER OR ELECTRONIC SYSTEMS AND PROGRAMS THAT SUPPORT THE INVOICING PROCESSES FOR BUSINESS OWNERS AND PROFESSIONALS	28/02/2023
<a href="#">IPN/CNMC/008/23</a>	DRAFT ROYAL DECREE APPROVING THE BY-LAWS OF THE INSTITUTE OF CHARTERED ACCOUNTANTS OF SPAIN	25/04/2023
<a href="#">IPN/CNMC/009/23</a>	DRAFT ROYAL DECREE REGULATING MEDICAL DEVICES FOR IN VITRO DIAGNOSTICS	16/05/2023
<a href="#">IPN/CNMC/11/23</a>	DRAFT BILL ON THE INTEGRAL LAW FOR PROMOTING THE SOCIAL ECONOMY	23/05/2023
<a href="#">IPN/CNMC/012/23</a>	DRAFT ROYAL DECREE AMENDING THE REGULATIONS GOVERNING PRIVATE DRIVER TRAINING SCHOOLS AND THE GENERAL DRIVERS' REGULATIONS	30/05/2023
<a href="#">IPN/CNMC/17/23</a>	DRAFT ROYAL DECREE APPROVING THE TECHNICAL SAFETY STANDARDS FOR DAMS AND THEIR RESERVOIRS AND ESTABLISHING ACADEMIC QUALIFICATIONS FOR THEIR PERFORMANCE	25/07/2023
<a href="#">IPN/CNMC/18/23</a>	DRAFT ROYAL DECREE AMENDING THE ROYAL DECREE REGULATING ASPECTS RELATING TO THE MANUFACTURE, PRESENTATION AND MARKETING OF TOBACCO PRODUCTS AND RELATED PRODUCTS	11/07/2023
<a href="#">IPN/CNMC/20/23</a>	DRAFT ROYAL DECREE ON A CONTROLLED TEST ENVIRONMENT FOR TESTING COMPLIANCE WITH THE PROPOSAL FOR REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL LAYING DOWN HARMONISED STANDARDS IN THE FIELD OF ARTIFICIAL INTELLIGENCE	25/07/2023
<a href="#">IPN/CNMC/21/23</a>	DRAFT ROYAL DECREE ON THE MANAGEMENT OF WASTE FROM TOBACCO PRODUCTS WITH FILTERS AND FILTERS MARKETED FOR USE WITH TOBACCO PRODUCTS	19/09/2023
<a href="#">IPN/CNMC/022/23</a>	DRAFT ROYAL DECREE APPROVING THE REGULATION ON HISTORIC VEHICLES	19/09/2023
<a href="#">IPN/CNMC/024/23</a>	DRAFT ROYAL DECREE APPROVING THE CHANGE IN THE NAME OF THE GENERAL COUNCIL OF OFFICIAL COLLEGES OF AGRICULTURAL TECHNICAL ENGINEERS AND AGRICULTURAL EXPERTS OF SPAIN	19/09/2023
<a href="#">IPN/CNMC/025/23</a>	DRAFT MINISTERIAL ORDER DETERMINING FOR THE YEAR 2022 THE STANDARD COSTS APPLICABLE TO THE ELIGIBLE COSTS REGULATED IN ROYAL DECREE 552/2020, OF 2 JUNE, ON COMPENSATION FOR MARITIME AND AIR TRANSPORT OF GOODS INCLUDED IN ANNEX I OF THE TFEU, WITH ORIGIN OR DESTINATION IN THE CANARY ISLANDS.	24/10/2023
<a href="#">IPN/CNMC/026/23</a>	DRAFT MINISTERIAL ORDER DETERMINING FOR THE YEAR 2022 THE STANDARD COSTS APPLICABLE TO THE ELIGIBLE COSTS REGULATED IN ROYAL DECREE 552/2020, OF JUNE 2, ON COMPENSATION FOR MARITIME AND AIR TRANSPORT OF GOODS NOT INCLUDED IN ANNEX I OF THE TFEU, WITH ORIGIN OR DESTINATION IN THE CANARY ISLANDS.	24/10/2023
<a href="#">IPN/CNMC/029/23</a>	DRAFT ROYAL DECREE ON TIRES AND THE MANAGEMENT OF TIRE WASTE	12/12/2023
<a href="#">IPN/CNMC/031/23</a>	DRAFT ROYAL DECREE AMENDING THE STATUTES OF THE COLEGIO DE INGENIEROS DE CAMINOS CANALES Y PUERTOS (COLLEGE OF CIVIL ENGINEERS)	28/11/2023
<a href="#">IPN/CNMC/032/23</a>	DRAFT ORDER REGULATING THE DURATION, CONTENT AND REQUIREMENTS OF SAFE AND EFFICIENT DRIVING COURSES	12/12/2023

**Table 4. Reports on non-legislative activities**

REFERENCE	DESCRIPTION	DATE OF APPROVAL
<a href="#">INF/CNMC/04/23</a>	CONSULTATION ON THE PARTICIPATION OF ENAIRE GLOBAL SERVICES IN PUBLIC TENDERS	15/03/2023
<a href="#">INF/CNMC/05/23</a>	CANTABRIA CONSULTATION ON CASH DISPENSER SUBSIDY	15/03/2023
<a href="#">INF/CNMC/282/23</a>	CONSULTATION OF THE CITY COUNCIL OF CHICLANA ON DIRECT SUBSIDY TO THE SOCIETY OF GUARANTEES AND GUARANTEES OF ANDALUCIA SOCIETY OF RECIPROCAL GUARANTEE	26/07/2023
<a href="#">INF/CNMC/456/23</a>	FRAMEWORK AGREEMENT FOR SELECTING COMPANIES TO CARRY OUT WORK IN THE BASES, BARRACKS AND ESTABLISHMENTS OF THE ARMY IN THE NATIONAL TERRITORY.	20/12/2023
<a href="#">INF/CNMC/496/23</a>	CONSULTATION ON THE CRITERIA APPLICABLE TO THE COST APPRAISAL REPORTS OF THE COLEGIO DE INGENIEROS DE CAMINOS CANALES Y PUERTOS (ASSOCIATION OF CIVIL ENGINEERS)	29/11/2023
<a href="#">INF/CNMC/497/23</a>	CONSULTATION ON CRITERIA APPLICABLE TO THE COST APPRAISAL REPORTS OF THE ILLUSTRIOUS BAR ASSOCIATION OF MURCIA	20/12/2023