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**DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS
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Executive Summary of the Discussion on Corporate Influence in Competition Policy Making

Annex to the Summary Record of the 146th Meeting of the Competition Committee

This executive summary by the OECD Secretariat contains the key findings the discussion on Corporate Influence in Competition Policymaking held during the 146th meeting of the Competition Committee held on 20 June 2025.

More documents related to this discussion can be found at:
www.oecd.org/en/events/2025/06/corporate-influence-in-competition-policymaking.html

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Executive Summary of the Discussion on Corporate Influence in Competition Policy Making

By the Secretariat¹

The OECD Competition Committee held a short session on Corporate Influence in Competition Policymaking on 20 June 2025. Drawing on the OECD background note and the rich discussion among delegates and experts, several key points emerged.

1. Corporate engagement is necessary for effective policymaking, yet it carries risks of undue influence.

Engaging with stakeholders in the policymaking process is an integral part of good public governance. Delegates agreed that companies' participation in policy processes provides valuable market knowledge, technical expertise and practical insights that enhance the quality and feasibility of competition policies. However, when influence becomes opaque, excessive or manipulative, it can distort enforcement priorities, shape regulatory frameworks in favour of incumbents, and erode confidence in the impartiality of authorities. The discussion highlighted that these risks are not unique to competition policy but can be particularly sensitive in this field given the high economic stakes and the close interface between firms and regulators.

2. Distinguishing between legitimate and beneficial corporate engagement from undue influence can be difficult; authorities may find it helpful to examine conduct and process.

Because policy outcomes reflect multiple factors, delegates stressed that assessing influence ex-post is often impractical. Instead, authorities should examine the transparency, intent, balance and proportionality of engagement processes. Indicators such as disclosure of funding, diversity of stakeholders consulted, and the perceived fairness of decision-making can help identify risk areas. Participants underlined that influence operates on a continuum and that few practices are intrinsically improper; context, safeguards and accountability mechanisms are decisive.

3. Risks of undue influence can arise across the full competition policymaking cycle, from law design to enforcement and public discourse.

Three stages were seen as most exposed to undue influence: 1) legislative and regulatory design, where rules or institutional mandates can be shaped to entrench incumbents; 2) enforcement and prioritisation, where lobbying or selective information may steer the focus of cases or guidelines; and 3) public debate and evidence formation, where sponsored research, think-tank funding, or communication campaigns may bias the knowledge base and frame narratives. Influence across these stages can be also cumulative, with indirect channels, such as financing research or organising capacity-building events, manifesting as significant as direct lobbying.

4. Transparency and disclosure are a common and important measure that can be used to safeguard beneficial and legitimate policymaking.

¹ This executive summary does not necessarily represent the consensus view of the participants of the Global Forum on Competition. It does however identify key points from the discussion at the Roundtable, including from the background note, the presentations of the expert panellists and the participants' oral and written contributions.

There was consensus that transparency and openness is an important first safeguard for both authorities and firms or stakeholders. Publishing consultation processes, disclosing meetings and funding sources, and making public versions of case documents were cited as good practices by delegates and experts. Some jurisdictions have already implemented comprehensive transparency systems or “what-we-heard” reports to communicate how input was considered.

However, participants acknowledged that transparency alone does not guarantee balanced influence: information asymmetries and unequal resources can still tilt outcomes even in open systems. Therefore, transparency should be complemented by active measures to ensure a diversity of stakeholders in competition policymaking processes.

5. Institutional integrity measures and ensuring a diversity of voices in engagement processes can contribute to sound policymaking.

In addition to transparency measures, delegates discussed a range of integrity tools, conflict-of-interest policies, codes of conduct, revolving-door and cooling-off rules, and governance structures that separate decision-making powers. Collegiate or board-based authority models were considered to reduce vulnerability to individual lobbying, provided appointment procedures are transparent and merit-based. Several authorities described the use of advisory boards, ethics officers and ex-post reviews to monitor integrity. Additionally, using broader consultation strategies, reaching SMEs, consumers and civil-society groups, help counterbalance potential resource asymmetries or dominant voices. Authorities described efforts to publish draft guidelines, use online portals for consultation, and issue accessible summaries of decisions. Such practices not only diversify input but also strengthen public confidence in policymaking. The discussion underlined that proportionality is essential: safeguards should not hinder legitimate dialogue but should ensure that engagement occurs under fair and auditable conditions.

6. Academic funding and evidence generation as well as more indirect or subtle influence that goes beyond formal lobbying may warrant closer scrutiny.

Participants noted that private sponsorship of academic and policy research can enrich debate but may also create conflicts of interest if funding is opaque or concentrated among a few actors. Delegates and experts suggested measures such as disclosure of corporate funding in publications, transparency for data-access agreements, and mechanisms to support independent research—potentially through public or pooled funding. Additionally, participants discussed that traditional lobbying rules may not cover modern influence techniques such as think-tank sponsorship, astroturfing, or selective conference funding. Delegates noted that competition authorities increasingly participate in events and training programs financed by private entities, which can shape regulatory perspectives over time.

7. The session underscored proportionality: preserve legitimate and beneficial dialogue while protecting the integrity of competition policymaking.

Across interventions, participants converged on the principle that effective competition policy depends on constructive engagement with stakeholders, yet this engagement must be transparent, inclusive and accountable. Well-designed safeguards, combining disclosure, institutional integrity and communication measures, can promote the policymaking benefits from diverse expertise while reducing the risk of undue influence. Several questions and areas of further research still remain, such as the impact and frequency of undue influence, and the session welcomed continued work and collaboration internationally on this topic.