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**DIRECTORATE FOR FINANCIAL AND ENTERPRISE AFFAIRS  
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**Competition and Consumer Policy in Digital Markets – Note by Singapore**

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## Singapore

### 1. Introduction

1. Digital markets have changed how consumers and businesses interact. They bring innovation, choice and convenience, but they also create new challenges for competition and consumer authorities. In digital markets, conduct that harms competition may also reduce consumer choice, privacy and trust. These issues matter in Singapore, where consumers and businesses are active across sectors such as e-commerce, online travel booking, ride-hailing and digital financial services. As a small and open economy where the digital economy accounted for 18.6% of GDP in 2024<sup>1</sup>, Singapore has a strong interest in ensuring that digital markets remain open, fair and competitive.

2. Competition law seeks to ensure that markets work well and that firms compete to offer better quality, lower prices and more choice. However, competitive pressure may also create incentives for firms to win customers through anti-competitive or unfair trade practices rather than by competing on the merits. That is where competition law and consumer protection law must work together. In digital markets, both are needed to ensure that firms compete on the merits and that consumers can make informed choices.

3. This paper explains how CCS uses its competition and consumer protection powers together to support well-functioning digital markets. It examines CCS's institutional framework, its approach to digital markets, selected interventions and guidance tools, and the overlap between competition and consumer issues in those markets.

### 2. CCS's Institutional Framework

#### 2.1. A Single Authority, Two Complementary Frameworks

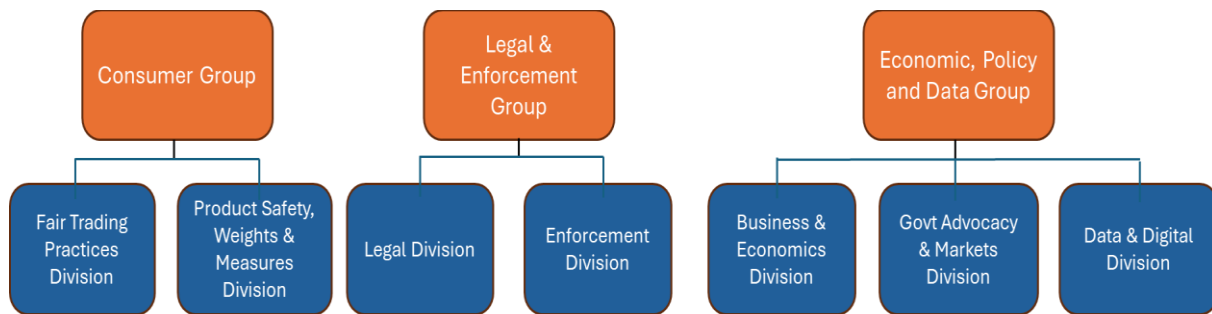
4. CCS was established as Singapore's competition authority in 2005 and took on consumer protection functions in 2018. It administers and enforces the Competition Act 2004 ("**Competition Act**") and the Consumer Protection (Fair Trading) Act 2003 ("**CPFTA**"). In 2025, its consumer mandate was further expanded to include fair trade measurement practices and consumer product safety, through the administration of the Weights and Measures Act 1975 and the Consumer Protection (Trade Descriptions and Safety Requirements) Act 1975. As a single authority with both competition and consumer protection functions, CCS can assess digital conduct in an integrated way and address holistically harms to both competition and consumers. This institutional design is especially useful in digital markets, where the same business practice may affect market outcomes, consumer choice and business incentives at the same time.

#### 2.2. An Integrated Approach to Case Assessment and Prioritisation

5. CCS's integrated approach is also reflected in how case officers are organised across functions, as shown in the diagram below.

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<sup>1</sup> [Singapore Digital Economy Report 2025](#)



6. Cases involving consumer issues are generally handled by teams comprising officers from the Consumer Group and, where needed, the Legal and Enforcement Group; while competition cases are generally handled by teams comprising officers from the Legal and Enforcement Group and the Economics, Policy and Data Group. In digital matters, officers from the Data and Digital Division may be part of, or render support to, the case team. This cross-divisional structure allows CCS to draw on complementary expertise and, where needed, facilitates a coordinated approach to digital matters.

7. When CCS receives a complaint, it first considers whether it raises competition concerns, consumer protection concerns, or both. Where both arise, the matter may be assessed in parallel under the Competition Act and the CPFTA by separate competition and consumer teams, with the teams keeping each other updated on progress. For example, bundling by a dominant firm may raise competition concerns if it forecloses competition, and consumer protection concerns if the firm falsely claims that the product cannot be bought separately. This integrated approach allows CCS to address the full harm caused by the conduct and supports a market in which firms compete on the merits and consumers can make informed choices.

8. The integrated approach also extends to market studies and government advisory work. In these matters, CCS may form a single team comprising officers from different functions from the outset, so that issues can be considered in an integrated way.

9. CCS also supports this integrated model through regular knowledge sharing and cross-divisional collaboration, so that lessons from competition and consumer cases, government advisory work and market studies can inform one another.

10. CCS also prioritises cases carefully, given the breadth of its mandate and the finite resources available to any authority. It considers the scale of harm, the number of consumers or businesses affected, and whether action is likely to improve market outcomes. In consumer cases, firms with significant market power may cause broader harm when they engage in unfair practices, even though market power is not part of the substantive legal test. Prioritising such cases strengthens deterrence and reinforces the principle that market power does not give firms a licence to compete through unfair trade practices.

### 2.3. Building Capabilities for the Digital Age

11. Digital markets require new capabilities, including data science, digital forensics and behavioural insights. CCS has invested in these capabilities, including through the establishment of a dedicated Data and Digital Division, Digital Forensic Unit and a behavioural insights team, so that they can support both competition and consumer work. This is important because digital harm, and the evidence of it, may be embedded in algorithms, user journeys, recommendation tools or large sets of transactional data, and may require technical, data or behavioural expertise in addition to legal analysis. These capabilities are shared across CCS rather than kept in separate silos. This reflects CCS's

view that digital market issues often cut across competition and consumer protection, and are best addressed through a common set of tools and expertise.

### 3. How CCS Approaches Digital Markets in Practice

#### 3.1. Non-Price Parameters in Competition Analysis

12. CCS’s competition analysis looks beyond price as the sole parameter of competition. In digital markets, firms may compete on product safety, data practices and design transparency. These factors matter not only for competition, but also for consumers’ ability to make informed choices. In merger assessments, for example, CCS may consider effects on these non-price dimensions where they are important parameters of competition, as reflected in CCS’s published Merger Guidelines. CCS’s approach reflects the reality that in digital markets, competition harms may also manifest in non-price dimensions.

#### 3.2. Market Studies and Guidance as Tools for Shaping Market Conduct

13. Ex post enforcement is only one part of CCS’s strategy for promoting well-functioning markets. CCS also uses market studies, guidance and advocacy to shape conduct, support compliance and educate businesses and consumers. Together, these tools help CCS address competition and consumer issues in a more joined-up way, while promoting markets in which firms compete fairly and consumers can make informed choices. Two early market studies, on online travel booking in 2019 and e-commerce platforms in 2020, were foundational in shaping CCS’s later work in this area.

14. The 2019 online travel booking market study identified consumer protection concerns such as drip pricing, pre-ticked boxes, strike-through pricing and pressure selling.<sup>2</sup> It also noted competition concerns, including parity clauses and tying or bundling practices, that could affect competition in the sector. Building on these findings, CCS developed guidelines on price transparency to help businesses avoid unfair business practices that mislead consumers.<sup>3</sup> The 2020 e-commerce platforms study identified both competition and consumer issues and led to updates to CCS’s Competition Guidelines to clarify the application of the Competition Act in digital markets.<sup>4</sup> Together, these studies showed how the same market features may raise both competition and consumer protection concerns.

15. A significant later intervention was the 2025 revision of Technical Reference 76 on Guidelines for E-commerce Transactions (“TR76”), a voluntary code developed with industry and other government agencies.<sup>5</sup> The revised TR76 addresses both competition and consumer protection concerns, alongside other e-commerce-related concerns, within a

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<sup>2</sup> [Online Travel Booking Sector in Singapore](#)

<sup>3</sup> [CCCS proposes Guidelines on Price Transparency after Online Travel Study raises Consumer Protection Concerns](#)

<sup>4</sup> [CCCS Market Study on E-commerce Platforms Recommends Update to Competition Guidelines](#)

<sup>5</sup> [Enhanced E-commerce Guidelines to Safeguard Consumer Trust and Foster Competitive E-commerce Market](#). First published in 2020, the TR 76 equips e-commerce businesses with industry best practices on key activities relating to online transactions. The TR 76 was revised in 2022 to include additional anti-scam guidelines for e-retailers and e-commerce marketplaces, to offer better protection for consumers transacting online.

single framework. On the competition side, it sets out principle-based benchmarks for platform conduct, including guidance on exclusivity, tying, transparency in listing labels and search ranking criteria, fair treatment of merchants, and dispute resolution mechanisms. On the consumer side, it addresses fake reviews and dark patterns such as subscription traps and fake countdown timers. It therefore supports a market in which merchants compete fairly and consumers make choices on the basis of clearer and more reliable information. More broadly, TR76 gives platforms and merchants a practical reference point for acceptable conduct and helps to promote good practices among industry players, in an environment where competition and consumer harm often overlap.

16. CCS also launched the AI Markets (“AIM”) toolkit in 2025 in collaboration with Singapore’s Infocomm Media Development Authority.<sup>6</sup> The AIM toolkit is a self-assessment tool that helps AI developers and deployers assess whether their models and business practices comply with the Competition Act and CPFTA. It is based on principles drawn from Singapore’s competition and consumer protection framework, and is intended to support responsible adoption of AI by helping businesses assess compliance and adopt good practices. It also provides practical guidance for businesses adopting AI responsibly. This is increasingly important as AI tools can influence pricing, rankings, recommendations and consumer interactions at scale. In that sense, the toolkit can help firms identify and address competition and consumer risks early, before those risks materialise as competition or consumer harm. To encourage adoption, CCS has also indicated that use of the AIM toolkit could be a mitigating factor in the calculation of financial penalties in the event of an infringement.

### 3.3. When Competition and Consumer Protection Concerns Converge in Digital Markets

17. The same digital conduct may raise concerns under both competition and consumer protection frameworks. One clear example is online choice architecture (“OCA”), which refers to the way digital interfaces are designed to shape user behaviour. OCA may raise concerns under both competition and consumer protection law.

18. From a consumer protection perspective, dark patterns such as subscription traps, drip pricing, false scarcity cues and pre-ticked settings may reduce transparency, impair consumer autonomy, and steer consumers into decisions they may not otherwise make. Unclear ranking, labels or search results can also weaken consumers’ ability to make informed choices.

19. From a competition perspective, OCA practices such as self-preferencing, default bias and opaque ranking may entrench market power, foreclose competition and reduce contestability in digital markets. Where a platform displays its own offerings alongside those of third-party merchants, unclear ranking and labelling may distort competition as well as consumer choice.

20. These OCA practices show why competition and consumer protection must be looked at together in digital markets. Instead of attracting consumers and merchants through genuine quality and value, platforms may use their control over the interface to tilt outcomes in their favour, harming both the competitive process and consumers’ ability to make informed choices.

21. CCS’s cases, including those resolved through voluntary undertakings, also help signal what conduct may be problematic in digital markets and shape expectations around

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<sup>6</sup> [AI Markets \(AIM\) Toolkit](#)

acceptable business practices. In the 2025 Agoda case, CCS raised concerns about the presentation and ranking of search results, the use of badges such as “Agoda Preferred” and “Top Seller”, and countdown timers on Agoda’s Singapore website and mobile application.<sup>7</sup> Agoda gave voluntary undertakings and made changes, including clarifying that properties with the “Agoda Preferred” badge paid additional commission and replacing “Best Match” with “Our Picks”. These changes improved transparency for consumers and reduced the risk that merchants would be disadvantaged by labels or rankings that conveyed an unwarranted impression that certain listings were more suitable or objective than they really were. The case illustrates how relatively small design features can shape both consumer perceptions and competitive conditions on a platform.

### 3.4. Emerging Issues: AI-Generated Fake Reviews and the Misuse of E-Commerce Platforms to Facilitate Cartel Conduct

22. The use of AI tools to generate fake reviews is an emerging issue that illustrates the need for both competition and consumer protection perspectives. In the 2025 Lambency Detailing case<sup>8</sup>, CCS investigated Lambency Detailing for posting fake reviews generated using AI tools, using customers’ information without their knowledge or consent. Fake reviews mislead consumers by giving a false impression of quality. They also distort competition by helping businesses attract customers they may not otherwise have attracted on the merits. In this way, an unfair trade practice may also distort competition by disadvantaging honest businesses.

23. E-commerce platforms may also be exploited to facilitate anti-competitive conduct. In 2025, CCS investigated a case in which sellers used a platform’s in-app chat function to coordinate prices and recruit other sellers into the arrangement. CCS worked with the platform to identify the sellers and used the case to educate businesses and consumers about the risks of collusion in e-commerce settings. The platform also enhanced its reporting mechanism to allow users to report suspected price-fixing conduct. Although this example is primarily a competition matter, it also shows that e-commerce platforms, while sometimes subject to scrutiny themselves, can play an important role in detecting and deterring anti-competitive conduct.

## 4. Conclusion

24. Digital markets will continue to evolve quickly, and the risks they create may cut across both competition and consumer protection frameworks. CCS’s experience shows that a combined mandate is a meaningful advantage in this context. It allows CCS to respond to these risks in an integrated way and to support digital markets in which firms compete on the merits and consumers can make informed choices. As digital business models become more complex and more dependent on data, design and algorithms, this integrated approach will become even more important.

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<sup>7</sup> [CCCS Raises Concerns Over Problematic Features on Agoda’s Website](#)

<sup>8</sup> [Action Taken Against Lambency Detailing for AI-Generated Fake Reviews on Sgcarmart.com](#). Lambency Detailing is a provider of automotive detailing and grooming services in Singapore.