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Working Party No. 2 on Competition and Regulation

Assessing the Impact of Competition Authorities' Activities – Summaries of contributions

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Argentina

In 2023, the National Commission for the Defence of Competition (CNDC, for its acronym in Spanish) conducted for the first time a quantitative estimation of the economic benefits derived from its interventions between 2020 and 2023, based on the *Guide for assessing the Impact of Competition Authorities Activities* published by OECD in 2014. This estimate was presented as part of an institutional management report, addressed to both national and international actors interested in the evolution of competition policy in Argentina during that period.

This contribution describes the methodology adopted to estimate the expected benefits of merger and anticompetitive conduct decisions, applying the recommendations of the aforementioned OECD Guide, especially in terms of estimated price and duration effects of the impacts. It also discusses a number of methodological challenges and possible adaptations, such as the inclusion of cases under appeal, adjustment for inflation, conversion to an international currency and consideration of spillover effects.

The analysis identifies future lines of work that could enrich and broaden the scope of this type of exercise. This includes the potential use of input-output matrices to capture indirect or sectoral spillover effects, as well as the development of standardised coefficients to assess these impacts. These initiatives are part of a developing agenda within the CNDC, aimed at improving the tools for competition enforcement evaluation.

Austria

The Austrian Federal Competition Authority (AFCA) recognizes that the effective assessment of competition authorities' activities is crucial for demonstrating the benefits of competition enforcement, guiding internal improvements, and ensuring public accountability.

As a matter of fact, the AFCA is required to report its enforcement impact at least once a year to the National Competition Commission and the Austrian National Parliament. This report must be unanimously approved by the Parliament and is subsequently published online. The impact-oriented metrics presented include key performance indicators such as: applications to the Cartel Court (2024: 22 applications), fines imposed by the cartel court (2024: EUR 41 Mio), number of national mergers reviewed (2024: 352), number of sector inquiries conducted (2023: 3). This practice of publishing annual reports on the AFCA's work, together with impact-oriented metrics presented before the Parliament, exemplifies a transparent, flexible approach that supports both public accountability and strategic enforcement goals. AFCA's accountability is further demonstrated through its annual impact orientation published by the Ministry for Finance, which highlights the performance of public institutions as part of the Federal Budget process. These evaluations follow various strategic goals, such as measuring the impact of ensuring competition through collecting numbers on investigations, merger controls, and legal proceedings. Furthermore, outreach and awareness-raising activities are also assessed and include e.g. external trainings, the organisation of conferences and knowledge-sharing practices including guidelines and sector inquiries. The AFCA's various international activities complement its outreach efforts and play a key role in fostering exchange with important stakeholders, benefiting both the AFCA's internal audience and the broader competition community.

Regarding the potential update of the assumptions in the 2014 OECD Guide, the AFCA advises caution against frequently revising baseline assumptions. Changing assumptions too often may compromise cross-jurisdictional comparability. For this reason, the AFCA has maintained a consistent metric approach over the years. However, the AFCA supports refining the OECD framework, e.g. by introducing distinctions between vertical and horizontal agreements, including further subcategories such as information sharing, and by adding dominance cases and sector-specific evaluations. Additional guidance on incorporating sector inquiries into impact assessments would also be welcomed.

Standardising elements such as cartel durations could support international comparison, but the AFCA cautions that such models must remain adaptable to national differences in market structure and size. Another area for further OECD guidance is deterrence effects, which are essential despite being difficult to quantify, but could be measured e.g. through merger withdrawals following authority reviews.

Additionally, procedural outcomes from alternative dispute resolution mechanisms such as settlements and appeals may also be considered in the OECD's guidance. A score-based system that assigns weight to each closed case based on the nature and impact of the resolution could capture the effectiveness of such procedures.

Altogether, as competition authorities face increasingly complex enforcement challenges, the AFCA supports a cautious and thoughtful expansion of the OECD guidance. Maintaining stability in baseline assumptions, which supports long-term comparability and at the same time ensuring contextual flexibility will improve global benchmarking and improve the visibility of authority's effectiveness at national level.

BIAC

Business at OECD (BIAC) appreciates the opportunity to make this written contribution to the roundtable on Assessing the Impact of Competition Authorities' Activities. *Business at OECD* supports the OECD's initiative to update its previous Guide, issued in 2014, to help competition authorities assess the expected impact of their activities.¹ This initiative enhances previous OECD discussions on this topic, as well as the work of the International Competition Network's Advocacy Effectiveness Working Group.² *Business at OECD* supports the development of common standards to assess national competition authorities' activities that will also allow for better comparisons across jurisdictions and recognition of best practices. Regular initiatives taken by competition authorities to evaluate their interventions ex ante should facilitate better assessment and communication of the impact of competition authorities' activities and enhance the efficiency and effectiveness of agency operations.

¹ OECD, GUIDE FOR ASSESSING THE IMPACT OF COMPETITION AUTHORITIES' ACTIVITIES (Apr. 2014), available at https://www.oecd.org/en/publications/guide-for-assessing-the-impact-of-competition-authorities-activities_c92c2cd0-en.html.

² OECD, FACTSHEET ON COMPETITION AND MACRO-ECONOMIC OUTCOMES (Oct. 2014), available at https://www.oecd.org/en/publications/factsheet-on-competition-and-macro-economic-outcomes_660b93ab-en.html; OECD, REFERENCE GUIDE ON EX-POST EVALUATION OF COMPETITION AGENCIES' ENFORCEMENT DECISIONS (Apr. 2016), available at https://www.oecd.org/en/publications/reference-guide-on-ex-post-evaluation-of-competition-agencies-enforcement-decisions_262476ff-en.html; OECD, COMPETITION ASSESSMENT TOOLKIT, VOL 3: OPERATIONAL MANUAL (Jan. 2019) (Version 4.0), available at https://www.oecd.org/en/publications/competition-assessment-toolkit-principles-version-4-0-volume-3_1f253011-en.html; OECD, Developments in Competition Impact Assessment Since 2014 – Issues Note, DAF/COMP/WP2(2023)3 (May 17, 2023), [https://one.oecd.org/document/DAF/COMP/WP2\(2023\)3/en/pdf](https://one.oecd.org/document/DAF/COMP/WP2(2023)3/en/pdf); ICN Agency Effectiveness Working Group Project on Planning, Monitoring and Measuring Effectiveness, https://www.internationalcompetitionnetwork.org/wp-content/uploads/2024/06/AEWG-Annual-Work-Plan-2024_2025.pdf.

Brazil

Brazil's contribution on the topic "Assessing the Impact of Competition Authorities' Activities" provides the methodology adopted by the Administrative Council for Economic Defense (CADE) to measure the benefits of its performance and shares experiences with the implementation of metrics from the OECD Guidelines, making suggestions for improvements. Although the Brazilian methodology considers the same parameters to estimate the welfare net gain (revenue, reduction or prevention of overpricing, and duration of the effects on prices), there are particularities in the implementation that reflect CADE's institutional and operational specificities.

Among the main differences, the Brazilian methodology incorporates specific features such as Cease and Desist Agreements and the flexible classification of conducts. Conversely, cases involving individuals, associations, unions, and professional councils are not considered in the assessment, competition advocacy efforts, deterrent effects, intertemporal discounting, and withdrawn mergers or appeals, which limits the measurement of impacts. In addition, CADE makes no systematic ex-post analyses, hindering the development of its own parameters of assessment, and benefit estimates remain limited to quantitative measures based exclusively on price-related assumptions, disregarding qualitative impacts.

This contribution argues that additional guidance from the OECD such as the recommendations in the following sections would be particularly valuable to strengthen the aforementioned methodology. Accordingly, it puts forward a set of suggestions to improve the OECD's approach: (1) refining benefit estimates to include qualitative impacts such as innovation, product and service quality, market diversity, and access; (2) developing alternative metrics to turnover to account for non-business entities; (3) enabling the quantification of competition advocacy efforts; (4) fostering the development of ex-post evaluations; (5) incorporating intertemporal discount rates; (6) building criteria and international benchmarks to estimate deterrent effects; and (7) allowing the inclusion of withdrawn mergers and dismissed appeals.

In conclusion, the Brazilian experience emphasises the importance of adapting and expanding the OECD's methodology to better reflect the variety of cases faced by competition authorities, and to more effectively communicate the value of competition policy to society.

Costa Rica

In Costa Rica, the Commission for the Promotion of Competition (COPROCOM) as the national competition authority and the Superintendence of Telecommunications (SUTEL) as the sectoral competition authority have legal functions and powers that allow them to intervene in the markets both to promote and defend competition.

As a result of the fulfillment of the functions and powers stipulated by law, COPROCOM and SUTEL carry out a series of actions that impact the markets, in order to evaluate the impact of the interventions of the authorities, both institutions have prepared guides.

In October 2024, COPROCOM published the *Guide to the Ex Post Evaluation of the Authority's Decisions*, with the purpose of establishing a methodological framework to assess the impact on the markets of its decisions on merger, anti-competitive practices and market research studies; the Guide is based on international standards promoted by the OECD, and incorporates good practices from other jurisdictions such as the United Kingdom, the United States, Brazil and Mexico.

The Guide describes in detail different methodological approaches that can be used, currently, COPROCOM is in the preparation phase for the implementation of the methodologies contained in the Guide, which includes the identification of possible relevant cases for evaluation, the systematization of internal data that allow their subsequent analysis, and the development of technical capacities to carry out these evaluations. The Commission plans to launch pilot evaluations in 2026, prioritising interventions with a high potential impact on consumer welfare and the functioning of markets.

COPROCOM has been adopting a series of preliminary actions aimed at strengthening its institutional evaluation capacity and preparing the ground for its effective implementation, including: identification of priority cases for evaluation, systematization of internal information, establishment of impact criteria, obligation to report future data; the implementation of evaluations has made it possible to identify the following challenges: availability and quality of data, institutional capacity, attribution of impact; COPROCOM has also committed to advance in: Structuring a pilot evaluation in 2026, strengthening the information and traceability systems of the file, publishing the results of the evaluation and establishing strategic alliances with universities and research centers.

Likewise, during the year 2024, SUTEL published the: *Guide to Expost Analysis of the Impact of SUTEL's Decisions on Competition Matters*, which aims to detail the methodologies to be used by the sectoral authority to estimate the impact of its actions, the Guide includes guidelines for both the performance of ex post evaluations, as well as for the performance of global impact assessments of SUTEL interventions in the field of competition.

This Guide considers the recommendations defined by the OECD in the instrument called: *Guide to Help Competition Authorities Assess the Expected Impact of their Activities*, as well as the comparative experience of similar and current instruments of other leading competition authorities in the field.

SUTEL is currently developing an ex-post analysis of three interventions carried out in the telecommunications market during the period 2021-2024 for anti-competitive practices, by two telecommunications service providers in Costa Rica, it is expected that the completion

of the evaluation will take place in September 2025 and that during the month of October 2025 promotional activities will be carried out and dissemination of this work.

The experience of both authorities shows that ex-post evaluation is not only a diagnostic tool, but also a valuable instrument of institutional learning.

EU

DG Competition considers that the 2014 OECD ‘Guide for helping competition authorities assess the expected impact of their activities’ (‘the Guide’) is a helpful and appropriately flexible tool to help competition authorities across the globe to produce annual customer savings estimates.

Since 2012, DG Competition – relying on a method mostly in line with the Guide – has been estimating every year the customer savings expected to result from its interventions during the previous calendar year in the areas of merger control and cartels. Since 2021, it has done the same for other (non-cartel) antitrust cases. It regularly reports these estimates in its Annual Competition and Annual Activity Reports. On average, annual customer savings generated by its interventions over the period 2012-2024 were in the range of EUR 12 - 20 billion, depending on the assumptions on avoided price increases.

In addition, DG Competition has started a new initiative with its partners in the European Competition Network (ECN) to produce estimates of aggregate customer savings, so as to obtain a fuller picture of customer savings from Commission and national enforcement within the EU. For a 3-year period (2020-2022), the estimated aggregate customer savings from interventions by the EC and the 13 national authorities having provided data amount to an average of around EUR 23 - 38 billion per year, of which around 30% related to the 13 national authorities’ enforcement activities.

While the estimated annual customer savings are significant, they only reflect the expected directly avoided price increases and therefore only a part (‘tip of the iceberg’) of the societal benefits of competition enforcement. For that reason, DG Competition is currently investigating the likely indirect deterrent effects of enforcement on the basis of a survey of lawyers and business representatives. In addition, it has started to collect data on the extent to which effects on innovation and quality have played a key role in Commission enforcement. Both the deterrent and the dynamic effects of enforcement are likely more significant than the static price effects. Finally, DG Competition conducts annual simulations of the macroeconomic impact of the competition policy interventions by the EC.

DG Competition welcomes the excellent background note prepared by the OECD. The note sets out clearly and comprehensively the issues which deserve to be discussed ten years after the adoption of the 2014 Guide.

DG Competition sees a mix of opportunities and risks in updating the OECD guide. In DG Competition’s view, the main opportunity would be to update the assumptions in the guide on the magnitude of the price effects of anticompetitive mergers and cartels. The more recent empirical literature suggests that the assumptions proposed by the 2014 Guide for both cartels and mergers may be too low. An updated guide could also provide guidance on how to assess the benefits of pro-competitive regulation, market studies or advocacy efforts and/or on how to estimate the deterrent effects of enforcement.

At the same time, it is important that the OECD Guide remains simple to implement and flexible. In DG Competition’s view, it should not be overly prescriptive on issues which do not have a major impact on results and where several approaches can be justified. Any change should always balance its benefits and costs, bearing in mind that revising past estimates can be complex and not always possible. Therefore, modifications, if any, should strive to ensure that estimates made and published in the past, based on the 2014 Guide, remain informative and comparable to future estimates.

Finland

The Finnish Competition and Consumer Authority (FCCA) is currently in the initial stages of planning a more structured approach to impact assessment. So far, only selected internal evaluations and merger retrospectives have been conducted. Future plans cover not just mergers and cartels, but also consumer protection, research and advocacy, public procurement supervision and competition neutrality. Past studies have shown the value of impact assessment but also its limitations—especially when predicting market outcomes in advance.

The FCCA's contribution highlights several challenges where updated OECD guidance would be helpful:

- Limited availability of reliable data and metrics
- Difficulty applying standard assumptions to different market situations.
- Lack of tools for assessing non-price outcomes like quality or innovation
- How to manage cases that are later dismissed in court for procedural reasons
- How to assess impact in non-enforcement work
- How to communicate impact in a clear and realistic way

The FCCA welcomes further guidance and shared experiences from other authorities to support its own development work.

France

The role of the *Autorité de la concurrence* ("the *Autorité*") is to guarantee effective competition and ensure the competitive functioning of the markets at national and European level, for the benefit of intermediate and end consumers. The *Autorité* must evaluate its actions to ensure that it carries out its missions properly and intervenes effectively.

For the *Autorité*, this assessment involves identifying the effects achieved in concrete terms as a result of its interventions and attributable to them. These effects are generally case-specific. This *ex-post* assessment measures the effectiveness of the actions undertaken. While *ex-post* assessment examines the impact of a given decision, its main purpose is to enable the *Autorité* to draw lessons from its intervention *a posteriori*, in order to inform its future actions. In particular, this means testing out the economic theories and assumptions on which it bases its interventions. In this way, *ex-post* assessment contributes to reflection on the effectiveness of the actions undertaken. However, its implementation is more arduous, requiring a temporal and intellectual distance from the analysed action and its environment. It involves a thorough process of information gathering and in-depth analysis. In the course of its work, the *Autorité* periodically carries out *ex-post* assessments on specific subjects, such as the opinion on the land passenger transport sector in 2023³, in which, for the first time, it took a systematic look at the implementation and effects of its past recommendations concerning a sector.

Given the constraints of *ex-post* assessments, and to offer a more comprehensive view of the overall impact of its activity, the *Autorité* favours an *ex-ante* approach to evaluating the additional costs avoided by its decisions. The decisions adopted by the *Autorité* to combat anticompetitive practices put an end to the litigious behaviour of sanctioned companies, which might have continued in the absence of this intervention and led to higher prices for consumers or lower quality in the products or services concerned. It is therefore necessary to take into account the additional costs avoided in order to fully reflect the overall impact of the *Autorité's* actions. By mobilising the information available at the time of the decisions, this *ex ante* assessment therefore complements the information on the penalties imposed by the *Autorité* on companies that have infringed competition rules, providing an overall view of the impact of the *Autorité's* action.

Alongside other qualitative and quantitative elements, this assessment of the overall economic impact contributes to greater transparency and better information for public decision-makers and the general public regarding the *Autorité's* actions. Thus, on its own initiative, the *Autorité* undertakes an annual assessment of the overall economic impact of its actions, which has been published in the technical appendix of its annual activity report since 2018⁴. This assessment provides a summary of the approximate order of magnitude of the expected consequences of the *Autorité's* actions. It also allows simpler communication, especially with a non-specialist audience, and can thus help reinforce the legitimacy of its work.

To carry out this assessment, the *Autorité* draws on the assumptions formulated by the OECD in its Guide for helping competition authorities assess the expected impact of their

³ Opinion 23-A-18 of 29 November 2023 on the land passenger transport sector

⁴ The *Autorité de la concurrence's* annual reports and appendices are available at <https://www.autoritedelaconcurrence.fr/en/publications/80>

activities⁵. While this assessment aims to provide a more comprehensive view of the effect of the *Autorité's* actions, it does not reflect the overall impact of all the institution's activities. Lastly, the *Autorité* draws attention to the importance of ensuring the credibility of this assessment, to preserve its usefulness.

⁵ <https://www.oecd.org/content/dam/oecd/en/topics/policy-sub-issues/evaluation-of-competition-interventions/Guide-competition-impact-assessmentENG.pdf>.

Hungary

The Hungarian Competition Authority (Gazdasági Versenyhivatal – GVH) regularly performs simplified calculations of expected consumer savings resulting from its competition cases on a voluntary basis. The OECD Guide (Guide), with which our assessments are consistent, has served as a useful reference point for international best practices. In our experience, not only has the content of the Guide proven fit for purpose, but its open and flexible approach and language have also been particularly beneficial, an aspect we believe is worth preserving in any future revisions.

Having an idea of the expected consumer savings from some of the main activities of the GVH provides GVH leadership with a degree of self-confidence. These results are regularly referenced in public speeches and interviews. Additionally, the aggregated results are presented in the GVH's annual reports submitted to the Hungarian Parliament.

We would welcome an update of the Guide's assumptions on price increase and duration, provided it is based on new and solid empirical findings concerning the suggested default assumptions, and accompanied by an update of the other best practices listed in Annex 1 of the Guide. Should the suggested assumptions or the range of other best practices change, we would certainly consider adjusting our own default assumptions accordingly.

A more differentiated set of default assumptions could potentially enhance the accuracy and credibility of the future assessments. However, any move toward greater sophistication would involve trade-offs. We have found it reasonable to use the same default assumptions for duration across all cases and for price differences across all non-merger cases.

Based on our experience, if the revised Guide moves towards social discounting, it would be very useful to include advice on background and presentation.

Our experience suggests that simplified calculations involving advocacy actions and market studies are more tailor-made and could perhaps be best supported by collecting and sharing assessments through a dedicated and regularly updated platform and events. The work of the Competition Committee on ex-post evaluations could serve as a model.

As for assessing deterrence, we would be most interested in methods other than compliance surveys. One potential option worth exploring is a conservative default multiplier for deterrence.

Our assessments already consider the final outcomes of the judicial review of cases in the calculations, in accordance with the basic logic of the assessment, which identifies consumer savings as avoided consumer loss, caused by the restriction of competition (a potentially problematic proposition when the court found no restriction of competition).

We see the pros for the inclusion of both mergers with remedies and non-merger commitment decisions after the statement of objections (detailing the competitive concerns emerged as a result of the investigation) has been issued. However, in the case of non-merger commitment decisions, this could raise controversies (similar to the inclusion of cases that were finally turned down by court) and might not change the assessment's results much, at least in our case.

We also see the pros for assuming, as a default, a link between the withdrawal of a merger and the competitive concerns raised once the statement of objections has been issued.

Ireland

The Irish Competition and Consumer Protection Commission (CCPC) is the primary body responsible for enforcing competition and consumer protection laws in Ireland. The CCPC also provides information to consumers, and does market studies, research, and advocacy work. This submission, prepared by the CCPC, is a contribution to the OECD Working Party No. 2 meeting on Competition and Regulation roundtable scheduled for 16th June 2025.

The CCPC's submission aims to contribute to the discussion on assessing the impact of competition authorities' interventions by highlighting the CCPC's rationale and approach to estimating the impact of its interventions and suggesting areas for expanding the OECD 2014 guide for helping competition authorities assess the expected impact of their activities.

While there is no legal requirement for the CCPC to estimate the direct financial benefits of its interventions, the CCPC is committed to measuring the impact of its interventions where data and methodology permit. This commitment is part of the CCPC's Strategy Statement 2024-2026, which emphasises the importance of directing resources to activities with significant consumer impact.

The CCPC suggests that the OECD 2014 guidance on impact assessment should be expanded to cover a broader range of intervention activities. This includes methodologies for estimating the direct financial benefits to consumers of the impact of market studies, research, advocacy, and deterrence.

Italy

Since 2011 the AGCM has carried out an impact assessment analysis of expected aggregate savings for consumers; starting in 2021, it began to regularly publish the results of the impact assessment in its annual report, which is presented to Parliament and published online on its website.

Recognising impact analysis as an essential tool to support competition protection and promotion, the AGCM has progressively refined its methodology, which is essentially based on the methodology developed by the OECD in 2014 (for cartel and abuse cases closed with a finding of infringement and mergers – either prohibited or authorised subject to conditions); however, important corrective factors have been introduced to allow the AGCM to also assess cases closed with commitments, as well as others anticompetitive agreements (horizontal non-cartel violations and vertical restrictive agreements) which are not covered by the OECD methodology.

A comparison between the results of the impact assessment obtained in the 2022-24 three-year period by applying the methodology used by the AGCM (customer savings equal to €2,358 million) and those that would have been obtained by adopting the OECD methodology (customer savings equal to €1,422 million), results in a positive differential of €936 million for the three-year period.

This contribution illustrates the reasons and the criteria used for departing from the OECD methodology, while dwelling on the challenges faced in the assessment and potential future developments of impact analysis. Moreover, it identifies possible additional areas to be included in the quantification of the benefits of competition interventions.

Regarding competition advocacy, while acknowledging the challenges posed by the absence of a standard methodology applicable to such activities, in March 2025 the AGCM commissioned an external consultancy company to carry out an impact assessment of its advocacy activities concerning in-house assignments by local municipalities and their duration, initially limited to two specific sectors, waste management and local public transportation.

In conclusion, the AGCM strongly supports the updating of the 2014 OECD methodology to better reflect new developments in authorities' current practices. In this respect, in order to ensure the relevance and the reliability of the whole exercise, the AGCM would welcome a more inclusive methodology that adequately reflects the impact of the Authorities' interventions and effectively accounts for the overall enforcement activity and its contribution to collective well-being.

Latvia

The Latvian Competition Council (CC) describes in this contribution the public benefit methodology it uses, how it has developed, and the main trends over time. Special attention is given to **ad hoc assessments** of major policy reforms, along with concrete examples and key conclusions.

CC has developed a public benefit methodology based on the OECD's 2014 guidelines, adapted to the specifics of the Latvian economy. While it has not been formally challenged, there has been repeated interest from the media and experts about the assumptions used.

The CC uses the results in its public reports and in discussions with the Ministry of Economics and the Ministry of Finance, especially during budget talks. To better reflect the true impact of its activities, the CC calculates a **three-year average** of public benefit. This smooths out yearly changes caused by different case cycles and helps show long-term results in a more stable way.

In 2025, the CC also began using **ad hoc public benefit assessments** for major regulatory reforms. These include changes to the Unfair Trading Practices Prohibition Law (UTPPL) and pharmaceutical price regulation. These reforms were influenced by the CC's market monitoring, and the CC used the OECD Competition Assessment Toolkit to estimate expected gains for consumers.

This shows an important development in how the CC demonstrates value. It is moving beyond enforcement actions to include the wider effects of its recommendations and soft tools. The conclusions highlight the need to continue refining the method, improve data access, and use ad hoc assessments regularly to reflect the CC's full contribution to society.

Lithuania

This note of the Competition Council of the Republic of Lithuania (hereinafter – the Council) provides a detailed account of the Council’s approach to assessing the impact of its activities. Over the past decade, the Council has developed and applied a consistent methodology⁶ to evaluate the outcomes of its enforcement and advocacy work, drawing primarily on internationally recognised frameworks, particularly those developed by the OECD.

These evaluations fulfil a dual function. Externally, they serve as an essential instrument of public accountability, enabling policymakers, stakeholders, and the public to understand the measurable consumer benefits arising from the Council’s interventions. Internally, impact assessments operate as a strategic tool to guide the prioritisation of enforcement initiatives and the optimal allocation of institutional resources. This continuous feedback between evaluation and action ensures that the Council remains not only effective in achieving its statutory objectives, but also responsive to the evolving demands of Lithuania’s economic and legal environment.

This report outlines Lithuania’s current practices in evaluating enforcement impact, details recent case outcomes, and sets out the Council’s position on how the OECD guidance may be enhanced in light of evolving institutional roles and analytical capabilities.

⁶ [Methodology for Assessing the Impact of Activities](#), p. 5–13.

Mexico

The contribution highlights the efforts of the Federal Economic Competition Commission (Cofece) to assess the impact of its interventions through ex-ante and ex-post assessments. These evaluations aim to quantify the economic and social benefits of competition policy, enhance accountability, and inform better decision-making. Cofece has developed robust methodologies to estimate both monetary and non-monetary impacts, such as efficiency gains and quality improvements. Between 2014 and 2024, Cofece's actions generated over 38.9 billion pesos in consumer benefits—about five times its budget. Finally, Cofece proposes updating the OECD's assessment guide to reflect broader types of interventions and improve methodological consistency across jurisdictions.

New Zealand

Like its sister agencies around the world, the New Zealand Commerce Commission (NZCC) is looking for ways to measure the value of its work.

The scope of the NZCC's remit is unusually broad by international standards. This includes enforcing competition and fair trading laws, regulating infrastructure-based monopolies, along with a market regulation function for oligopoly-supplied sectors. Therefore, it uses different measurement approaches to estimate the public benefits of its work across its different functions.

The note provides preliminary, quantitative (\$NZD) estimates of the annual benefits provided by each of the NZCC's functions. It also provides a high-level summary of the methodology used to calculate the estimate for each function.

Romania

The Romanian Competition Council (RCC) continues to apply its methodology for estimating the consumer benefits resulting from its competition policy interventions, based on a conservative approach that focuses exclusively on first-round price effects as defined by the DG Competition and further refined through the European Commission's framework.

In 2023, our analysis was based on selected cases of cartel behavior and abuse of dominance, using assumptions of 10–15% price surcharges and predefined cartel lifespans (1, 3, or 6 years).

In 2024, analysis of seven key markets, including construction and pharmaceuticals, estimated consumer benefits of up to 1.3 billion lei (over 250 million euro) for a three-year cartel duration (baseline) and 2.6 billion lei (over 500 million euro) for a six-year duration (negative scenario). These figures, while conservative, robustly demonstrate the direct impact of RCC's interventions in reducing consumer overcharges.

The Romanian Competition Council, in its annual activity report, includes a chapter on consumer benefits derived from competition policy.

The methodology used to estimate the impact of the RCC inherently has certain limitations. Specifically, the estimated impact value does not fully capture the breadth of the RCC's activities. The current methodology is confined to cases where price increases (observed in cartel cases) serve as relevant indicators for quantifying the benefits of the authority's interventions. Consequently, it is not applicable to all types of interventions undertaken by RCC, even when considering only cases that qualify as cartels (for instance, the cases of cap acquisitions prices (eg. RCC timber case – 2020).

Moreover, methodologies applied by the RCC and those recommended by the OECD do not adequately account for practices that influence market dynamics through non-price mechanisms. For instance, interventions aimed at enhancing market access, promoting innovation, or improving service quality may not result in immediate or measurable price changes but are nonetheless crucial for fostering competitive markets.

RCC welcomes continued discussion at the upcoming roundtable and looks forward to contributing to an updated, harmonized methodology that effectively balances methodological rigor with the practical challenges of empirical evaluation.

While estimating the impact of a competition authority's activity can be a valuable tool for highlighting the benefits to consumers and the economy as a whole, this process should be approached with caution. The complexities of market dynamics and the limitations of current methodologies call for a careful interpretation of such assessments in order to avoid overestimating their precision or applicability.

Saudi Arabia

Established in 2017, the Kingdom of Saudi Arabia's General Authority for Competition (GAC) actively promotes a competitive market through enforcement and advocacy, with a recent study highlighting its significant impact on the KSA's economic development. By analyzing direct consumer benefits from GAC interventions in cartel and merger cases between 2020 and 2024, the paper estimates total annualized consumer savings of SAR 305.4 million (USD 81.4 million) from 2022-2024, representing a nearly four-fold increase compared to earlier periods. This suggests that the economic damages prevented by the GAC's actions likely exceed its expenditures by up to 7.4 times, even though these figures represent a conservative estimate that excludes substantial indirect benefits like deterrence and broader market effects.

Singapore

The Competition and Consumer Commission of Singapore (“CCCS”) employs a quantification of benefits exercise to evaluate the impact of its interventions. This exercise specifically measures benefits generated through CCCS’s interventions. In addition to quantifying the benefits across its enforcement actions and market studies, CCCS has also progressively expanded the quantification of benefits exercise to evaluate the benefits arising from advice to other government agencies and commitments that were provided by businesses.

CCCS currently quantifies the consumer benefits from a range of outcomes, such as infringement decisions, acceptance of commitments, withdrawal of notifications for mergers and other conduct, advice to other government bodies that helped to prevent competition issues, or interventions to address competition concerns found during market studies. CCCS does not quantify the benefits from appeal cases or deterrence for competition cases. Through the exercise, CCCS is able to evaluate the returns on resources allocated to addressing competition concerns and advocate the value of its work to internal and government stakeholders.

CCCS’s methodology often draws upon the guide published by the OECD in its *Guide for helping competition authorities assess the expected impact of their activities*⁷ (“**OECD Guide**”) to quantify its cases, but makes adjustments on a case-by-case basis depending on the circumstances/assumptions in a particular case.

⁷ Guide for helping competition authorities assess the expected impact of their activities, published by OECD in April 2014.

Spain

This contribution by the Spanish National Commission for Markets and Competition⁸ (CNMC) addresses the topic of assessing the impact of enforcement interventions by competition authorities (CAs).

From the enforcement perspective, annual assessments have been conducted in an unofficial manner by CNMC staff since 2016 to estimate direct savings generated by the prosecution of anti-competitive infringements and merger control interventions. The methodology is based on the OECD recommendations (OECD, 2014) and is in line with those used by the European Commission (EC) and other national CAs.

The methodology for impact estimation assumes that each intervention prevents direct adverse effects on consumers in the form of higher prices resulting from anti-competitive infringements (all CNMA decisions regarding infringements of articles 1, 2 and 3 of the Spanish Competition Act that ended with a prohibition with fines or with commitments) and problematic mergers (cases in which the CNMC blocked the mergers or cleared them with remedies).

The estimated savings vary from year to year but confirm that the CNMC's antitrust activity is clearly beneficial for consumers.

A potential update of the 2014 OECD guide regarding impact estimation would help all CAs to improve and expand the assessment of the effectiveness of their competition enforcement activities and to present more effectively these results to parliaments and civil society.

⁸ This contribution has been prepared by the staff of the CNMC but should not be regarded as the official position of the CNMC unless it refers to CNMC approved documents.

Türkiye

The Turkish Competition Authority (TCA) periodically conducts studies to reveal the economic impact of its enforcement activities, as is done by many leading competition authorities around the world. The first impact analysis of the TCA was completed and presented in 2017. In this study, the TCA aimed to estimate consumer benefits resulting from its interventions in cartel cases, abuse of dominance, and mergers and acquisitions that were either prohibited or conditionally cleared with remedies, over a three-year period (2014-2016).

Subsequent impact analyses covering the two-year periods of 2017-2018, 2019-2020, 2021-2022, and finally 2023-2024⁹ were conducted biennially to estimate the measurable economic impacts of the Competition Board's decisions on consumer benefits. Despite not being a statutory requirement, these analyses have been publicly shared on the TCA's official website.

Although the TCA derives no direct benefit from quantifying consumer benefits, conducting impact analyses biennially is considered valuable for achieving its operational objectives and promoting competition advocacy. Furthermore, impact analyses quantify the impacts of the Competition Board's decisions in monetary terms, thus enabling performance monitoring under transparency and accountability principles. Therefore, these studies serve as key competition advocacy tools, demonstrating the importance of the TCA for the Turkish economy, to public and private stakeholders and consumers.

The TCA has closely followed the existing OECD guidance in its impact assessment studies to date and has made extensive reference to the principles and assumptions set out therein. In this respect, the guide is considered to be highly useful at its present extent, including reasonable assumptions recommended regarding price increases and durations by infringement types, and suggested practices to be followed when conducting impact assessments studies. However, it is considered that its guiding role for competition authorities aiming to demonstrate the impacts of their enforcement activities on consumer welfare can be further enhanced by expanding the guidance in several aspects, such as covering other types of competition infringements (e.g. RPM), recommending methodologies that take into account high-inflation environments, and suggestions that can enhance transparency and accountability promoting role of impact assessments.

⁹ Impact Analysis Report 2023-2024, March 2025. https://www.rekabet.gov.tr/Dosya/etki-analizi-raporu-2023-2024_web.pdf (in Turkish).

United States

The Federal Trade Commission (“FTC”) and the Antitrust Division of the U.S. Department of Justice (“Division”) (collectively, the “Agencies”) perform impact assessments, which are estimates of the total savings for consumers that result from their competition enforcement actions and are one metric that they use to measure the value of their enforcement efforts. The Agencies perform impact assessments to provide a degree of transparency and accountability to the President, Congress, and, ultimately, the American people. As they have for many years, the Agencies report the total amount of consumer savings expected to result from their antitrust enforcement actions in annual performance reports and budget requests submitted to Congress. By publishing these metrics, the Agencies increase transparency about the overall impact and value of their work. In this way, these and other metrics can be used by the President, Congress, and the American public to hold the Agencies accountable for taking actions that promote American prosperity.

The Agencies calculate consumer savings on an annual basis. Consumer savings is the estimated amount of money that competition enforcement by the Agencies saved consumers by acting against potentially anticompetitive mergers and business conduct. The Agencies use similar methodologies for estimating the value of consumer savings that result from their enforcement actions. As a general matter, the Agencies use case-specific information, when available, to determine consumer savings. In the absence of case-specific information—due, for instance, to insufficient data—the Agencies rely on a formula based on the volume of commerce in the relevant market and conservative assumptions about the price effect relating to the challenged merger or conduct and the duration of that price effect.

While the Agencies do their best to provide reasonable, if conservative, estimates of consumer savings, the exercise is, by nature, also underinclusive, as they do not account for certain benefits, such as non-price and indirect benefits to consumers, businesses, or workers, that result from Agency enforcement actions. For example, although competition often affects quality, service, or innovation, the Agencies focus their impact assessment on consumer cost savings, that is, measurable price effects, because non-price dimensions of competition can be difficult to quantify in a readily reportable number. Additionally, while the Agencies’ enforcement actions likely deter at least some other anticompetitive mergers and business conduct, resulting in further savings for consumers, the Agencies do not attempt to account for this deterrent effect because it is also difficult to measure. In light of these unmeasured benefits, the Agencies likely underestimate the consumer savings generated from their enforcement actions. Only an ex-post analysis could measure the actual realized impact of the Agencies’ enforcement actions.