The Output®

QUARTERLY BULLETIN

4th Quarter 2018

ACTECON

TCA Fines Meal Ticket/Card Sector Companies Under Reinitiated Investigation

New or Old-Fashioned Approach for The Market Definition: TCA's TveK/D&R Decision

French-Italian (Essilor and Luxottica) Wedding Finally Approved in Turkey

Disney's Acquisition of Parts of Fox Approved by EC Subject to Divestiture Commitment

EC Says "Ja Hej" (Yes, Hello) to Sweden (Com Hem and Tele2)

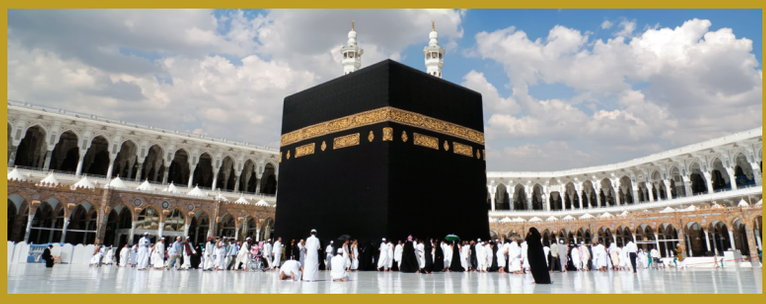
Turkey v. USA: Moving to The second Stage of Dispute Settlement at The WTO

TCA Fines Meal Ticket/Card Sector Companies Under Reinitiated Investigation

On 16 November 2018, the Turkish Competition Authority ***("TCA")*** *concluded an investigation into companies operating in the meal ticket/card sector and determined that three of the six companies investigated violated the Law on the Protection of Competition* ***("Turkish Competition Law")*** *by means of anticompetitive concerted practices.*

In 2010, the TCA initiated a preliminary investigation into six companies operating in the meal ticket/card sector and concluded that a full-fledged investigation was not required. Following the annulment of this decision by the 13th Chamber of the Council of State, the TCA reopened the investigation.

The TCA imposed fines on Sodexo Avantaj ve Ödüllendirme Hizmetleri A.Ş. in the amount of TL 3,207,702.79; on Edenred Kurumsal Çözümler A.Ş. in the amount of TL 3,919,367.39; and on Network Servisleri A.Ş., a joint venture established by the two abovementioned firms, in the amount of TL 624,038.41, due to violation of Article 4 of the Turkish Competition Law (anticompetitive agreements) by means of concerted practices. Multinet Kurumsal Hizmetler A.Ş., Set Kurumsal Hizmetler A.Ş., and Winwin Hizmet Yönetimi Sanayi ve Ticaret A.Ş were found to be not in violation of the law.



TCA Says "Stop" to Anticompetitive Hajj and Umrah Tourism Practices

*On 18 October 2018, the TCA concluded its investigation into the relations between the Association of Turkish Travel Agencies (****"TÜRSAB"****), TÜRSAB Seyahat Acentaları Hizmetleri (Travel Agents Services), the Turser-Tursav Sigorta Acenteliği (Insurance Agency), and Gulf Sigorta (Insurance Agency) and determined that TÜRSAB violated Article 4 of the Turkish Competition Law regarding anticompetitive agreements via a number of practices.*

In particular, TÜRSAB violated the Turkish Competition Law by way of:

1) requiring that agencies organizing Hajj and Umrah pilgrimages buy the compulsory package tour insurance policy from an undertaking that is its subsidiary;
2) discriminating via not taking the amount of money collected under the name of service charge from some agencies; and
3) requiring the agencies buy transport services as well as catering services in Saudi Arabia from undertakings it designated.

An administrative fine of TL 521,679.18 was levied on the association of undertakings concerned. At the same time, no violation was found in the practices of TÜRSAB Travel Agents Services, Turser-Tursav Insurance Agency, and Gulf Insurance.

Article 4 of the Turkish Competition Law states that the agreements and concerted practices of undertakings and the decisions and practices of the associations of undertakings the object or effect or the possible impact of which is, directly or indirectly, to prevent, distort, or restrict competition in a certain market for goods and services, are unlawful and prohibited.

Bids Under SMS Termination Fees in Bulk SMS Tenders by Turkish Mobile Operator Giants: No Violation Found

On 15 November 2018, the TCA concluded its investigation into Turkcell İletişim Hizmetleri A.Ş., Vodafone Telekomünikasyon A.Ş. and TT Mobil İletişim Hizmetleri A.Ş. to determine whether their practices violated Article 6 of the Turkish Competition Law by means of complicating their competitors' activities through offering bids under SMS termination fees in bulk SMS tenders.

Although the TCA determined that the companies concerned held a dominant position, respectively, in *"the market for SMS termination in Turkcell's network,"* *"the market for SMS termination in Vodafone's network,"* and *"the market for SMS termination in TT Mobil's network,"* it ruled that the companies were not in violation of Article 6 of the Turkish Competition Law.

French-Italian (Essilor and Luxottica) Wedding Finally Approved in Turkey

On 1 October 2018, the TCA issued a conditional clearance for the merger of Essilor (a French-based supplier of ophthalmic lenses) and Luxottica (an Italian eyewear company). The merger as originally notified was not approved out of concern that the transaction would result in the creation or strengthening of a dominant position that might impede competition in the market significantly. The parties came up with a commitment package composed of sufficient structural and behavioral remedies to eliminate the TCA's concerns.

The commitment package includes (**i**) structural remedies concerning the divestiture of Merve Optik Sanayi ve Ticaret A.Ş. (eyewear company) , including the obligation of the merged entity not to acquire the rights of distribution of the brands subject to the license agreement between Merve Optik Sanayi ve Ticaret A.Ş. and Marcolin S.p.A (Italian eyewear company); and (**ii**) behavioral remedies, to be re-evaluated by the TCA at the end of a three-year period. More details will be available with the reasoned decision of the TCA in due course.
This transaction is a great example of a multijurisdictional filing which required notification to and close cooperation among competition authorities worldwide, including in particular the European Commission, the U.S. Federal Trade Commission, as well as the Competition authorities of Australia, Brazil, Canada, Chile, China, Israel, New Zealand, Singapore, and South Africa. It also shows that the same transaction may have different outcomes depending on its effect on the competition in the relevant market(s), i.e. while the transaction was granted unconditional approval from the European Commission, it received conditional approval from Turkey.

Preventing Consumers from Choosing Their Providers: Abuse of Dominance by Electrical Companies confirmed

On 1 October 2018, the TCA concluded its investigation into the electrical companies and determined that two out of the six undertakings investigated violated the Turkish Competition Law.

The TCA imposed fines on Aydem Elektrik Perakende Satış A.Ş.(Electric Retail Sales Company) in the amount of TL 19,433,652.71 and on Gediz Elektrik Perakende Satış A.Ş. (Electric Retail Sales Company) in the amount of TL 25,696,400.76 for abuse of dominance in the electricity markets by means of complicating the activities of independent providers and preventing consumers from choosing their providers. In addition to the fines, the companies must terminate their anticompetitive practices.
The other four entities, GDZ Electricity Distribution, ADM Electricity Distribution, Bereket Energy Group, and GDZ Energy Investments, were found to be in compliance with Article 6 of the Turkish Competition Law.

Other cases in electricity sector
Earlier this year the TCA published its short decision concerning the first investigation ever conducted in the electricity sector and imposed a total fine of TL 38 million on Akdeniz Elektrik Dağıtım A.Ş. (AKEDAŞ, the electricity distribution company in the Mediterranean region) and CK Akdeniz Elektrik Perakende Satış A.Ş. (AKEPSAŞ, the incumbent retail electricity sales company which is under the same control structure as the distribution company) for abuse of dominance in the following relevant product markets: the "*electricity distribution services*" market in which AKEDAŞ is active, and the markets for retail electricity sales to (**i**) "*non-eligible customers*", (**ii**) "*industrial customers connected to the integrated system at the distribution level*", (**iii**) "*commercial customers*" and (**iv**) "*residential customers*" in which AKEPSAŞ operates.
The relevant geographic market for all the foregoing product markets was defined as the "*Mediterranean electricity distribution area*". This matter is important for the case at hand since the TCA seems to have abandoned its previous market definition approach in which the relevant geographic market for the retail sales of electricity to commercial and industrial large-scale customers was defined widely as "*Turkey*".
The TCA had previously initiated several preliminary inquiries in the electricity sector but had each time refrained from conducting a full-fledged investigation although it had found that the undertakings that provide both electricity distribution and retail electricity sales services (under separate legal entities within the same control structure) were engaging in certain behaviors that prevent the market from becoming more competitive. The TCA's decisions not to investigate the said behaviors could be mainly explained by the fact that the Energy Market Regulatory Authority was already working on certain sector specific regulations to prevent such conducts. This approach seems to be changing now...

New or Old-Fashioned Approach for The Market Definition: TCA's TveK/D&R Decision

*On 27 August 2018, the TCA published its reasoned decision in relation to the unanimously cleared acquisition D&R (one of the largest retailers of various products such as books, periodicals, music, electronics, accessories, video games and toys) by TveK (another retailer and wholesaler of the relevant products). This is a particularly important and highly anticipated decision for the antitrust practitioners on the following questions: (**i**) whether the TCA defines a distinct market for online retail sales and for stores in shopping malls, and (**ii**) whether the TCA also evaluates the micro geographical markets in depth.*

The TveK/D&R decision reveals, to some extent, the TCA's approach and solution to difficulties to determining relevant markets that caused by the digitalization. Having affirmed that both parties are active in the online sales of the concerned products and the trend towards online shopping, the TCA plausibly stressed that the relationship between traditional and online sales channels, and the importance of having a store in a shopping mall must be evaluated as well.

(a) Traditional Relevant Product Markets Identified

The TCA determined, on the basis of its previous precedents, the overlapping markets as follows: (**i**) horizontally overlapping relevant product markets for *the retail sale of books, periodicals, stationery products, games, toys and hobby products, consumer electronics* and *the wholesale of books*; and (**ii**) vertically overlapping relevant product markets for d*istribution of periodicals and products other than the publications* and *publishing of periodicals and non-periodicals.*

(b) Online Sales vs. In-Store Sales

Despite the lack of a comprehensive analysis for the necessity to distinguish the online market from the traditional market in most of the TCA's previous case law, it suggests that the TCA has considered the factors including extra services provided (*e.g.* informing about all discounts and campaigns, concluding more than one transaction, cancelling the orders without any payment, comparing the prices and enabling the customers to reach the cheapest one), accessibility, saving of time, and ease of use.

With regard to the supply side, as highlighted by the TCA, the in-store sales and online sales could not be deemed substitutable because of the differences between investment amounts required, number of employees, working pattern, etc. To the contrary, the outcome of the TCA's analysis from the demand side perspective introduced that the mentioned sale channels, at least for the defined relevant product markets, are substitutable owing to the lack of a significant difference for the consumers/customers. In this context, the TCA in this decision put special emphasis upon the competitive relation between those channels in an asymmetric manner. In other words, if it is determined that the online sale channel does create a competitive pressure on the traditional sale channel, the two channels are accepted within the same market regardless of whether the traditional sale channel has such a pressure on the online sale channel.

The TCA then assessed the market size, the portions

of both traditional and online sale channels for books within the estimated book sales, the growth rates of both channels on a turnover basis, the price differences between those channels (*i.e.* sale prices has been approx. 35% cheaper in online than one in traditional channel), and the consumers' reasons for choosing online shopping (*i.e.* mainly based on the prices). It should be noted that all of the above evaluations are based on the analysis of book sales and the TCA did not conduct any assessment in terms of other products concerned.

However, the competitors' and publishers' responses to the TCA's information requests appear not to be in harmony. Some of those claimed that those channels could be defined as separate markets, but online sale channel has an effect on the traditional sale channel, whereas others argued that the concerned channels are complementary rather than alternative and thus should be defined as a single market. Eventually, the TCA concluded that it would conduct further analysis in accordance with a single market approach for book sales, *i.e. "market for the retail sale of books"*. Nonetheless, the approach pursued by the TCA seems skeptical for some.

(c) Stores in Shopping Malls vs. Stores on Streets

Similar to the longstanding critics that are valid in Turkey even nowadays with regard to the importance of the venue of a store, the TCA has, to some extent, brought certainty to those discussions in the market for the retail sale of books. Contrary to its *MARS/AFM Decision*, where it was determined that movie theaters at malls or multiplex movie theaters price their services considerably higher than the independent movie theaters and this has led to the conclusion that these two sub-segments should be defined as separate product markets, the TCA resolved not to make any distinction between the bookstores in shopping malls and the bookstores on streets.

This determination of the TCA is mainly based on the following facts: (**i**) although it is undeniable that being placed in a shopping mall brings certain commercial advantages, the location of the store plays a crucial role regardless of being placed in a shopping mall. This can be particularly derived from the evaluations made on a turnover basis which shows that some of the stores on certain streets had achieved significantly higher turnovers; and (**ii**) there has not been any significant difference between the average prices of book sales, the size of the stores in shopping malls and on streets or the quality.

Indeed, the players in the same market also asserted that stores in shopping malls and stores on streets are directly competing with each other. This is because one is not superior to other in terms of benefits and costs, and because the criteria such as customer potential, rental conditions, competitors in the near locations and operational infrastructure are taken into consideration in deciding the place of a store.

(d) Broad Market vs Micro Markets

Depending on the case, the TCA may adopt an approach

to defining the relevant geographical market in the narrowest (*i.e.* micro markets) or broadest (*i.e.* Turkey) term. Particularly for mergers in the retail and movie theatre sectors, the TCA has stressed that the definition of the relevant geographical market needs special attention. In the *MARS/AFM* decision, the TCA noted that the 20-minute drive-time isochrone (the area that covers a diameter that is within the 20-minute drive-time) may also be considered as the relevant geographical market. Then it referred to the 38 micro markets which required in-depth analysis. In *MIGROS/TESCO* the TCA confirmed the narrower market definition and revealed the future favoured approach at least in retail sectors. Problems associated with the urbanization such as traffic, transportation, and parking have an impact on the consumers' preferences in their decisions. Eventually, the TCA conducted its analysis in each of the defined districts.

Similar to the above-mentioned cases, in this decision the TCA defined 47 districts as micro markets by explaining that the parties' activities mainly focus on the traditional retail, that the consumers would consider the distance for shopping purposes, and that this would be valid even if the traditional and online channels are defined as a single market. The TCA mainly referred to the entry barrier that may arise in finding a proper location. Finally, it is also noteworthy that the parties informed the TCA about the stores to be potentially closed or opened in future and this is not a commitment. However, the TCA only stressed the following issues without any further analysis: the number of overlapping markets will be reduced if the above-mentioned circumstances occur; the parties' activities will be overlapped mostly in shopping malls; and that the shopping malls generally rent one or two stores for such operations and this may create entry barriers in case there is not any street to attract consumer traffic similar to the one that exists in shopping malls.

To sum up, the TCA's decision on the notified acquisition is likely to be considered as a landmark decision as it considers online retail sales in the same market as the in-store sales. Further, the TCA has reinforced its micro geographic market assessments.

EC Examines Application of Competition Rules in Agricultural Sector

On 26 October 2018, the EC published a report on the application of competition rules in the agricultural sector. The report primarily focused on (i) the European competition authorities' actions and previous investigations into the agriculture sector, and (ii) derogations from competition rules for producer and interbranch organizations. It concluded that the work of European competition authorities helps farmers obtain better conditions when selling products to large buyers or cooperatives, strengthens their position in the food supply chain, and protects them from the anticompetitive behavior. The period covered by the report was from 1 January 2014 to mid-2017.

The EU competition rules apply to agriculture, save as otherwise provided for in the Common Market Organization Regulation (***"CMO"***). The CMO contains derogations from the application of competition rules, some of which apply in any market situation while others may be applied only in times of crisis. The determination of whether a derogation from competition law applies is to be made on a case-by-case basis.

Most common infringements of competition law in the agricultural sector

Almost half of all of the 178 competition infringements identified by the investigations conducted by the European competition authorities concerned agreements on prices between competing processors to set wholesale prices or between processors and retailers to set retail prices. Other infringements related to agreements on output, information exchange, and sharing of markets. The report found that the enforcement work of European competition authorities **benefitted farmers with better deals for their products**.

Derogations from competition rules for producer and interbranch organisations

- The competition rules may not apply to practices of producer members within recognized producer organizations, or recognized associations of producer organizations, provided that the entity is duly recognized by the Member State and the practices are actually and strictly necessary for and proportionate to the pursuit of the objectives assigned to the organization concerned.
- The CMO contains certain derogations from the application of Article 101(1) Treaty on the Functioning of the European Union(**"TFEU"**), either generally for all sectors or specifically for certain agricultural sectors. Certain activities, for which it can be assumed with sufficient certainty satisfy the conditions of Article 101 (3) TFEU are "*block exempted*" by way of the CMO. This is the case for specialization agreements, which also cover joint production agreements between competitors, subject to a 20% market share threshold (in the relevant market).
- The CMO does not contain any explicit derogation from the application of Article 102 TFEU.

On the basis of the findings in the report, the EC will continue shaping future policy concerning the application of competition rules to the agricultural sector. It may be anticipated that collective agreements will remain under the particular attention of the EC.

Disney's Acquisition of Parts of Fox Approved by EC Subject to Divestiture Commitment

*On 6 November 2018, the concentration between the US based global media companies – Fox and Disney - two of the six major Hollywood film studios and providers of TV channels – was approved conditionally by the European Commission (**"EC"**).*

Following the examination of the effects of the proposed transaction in the market for the wholesale supply of TV channels, the EC found that the competition between the two strong suppliers of "factual channels" (channels which mainly broadcast documentaries and scientific entertainment programs) in several European Economic Area (***"EEA"***) member states would have been eliminated.

To address the EC's concerns and remove the overlap between Disney's and Fox's activities in this market, Disney committed to divest its interests in all factual channels it controls in the EEA.

As regards the markets for (**i**) production and distribution of films for release in movie theatres and (**ii**) distribution of content for home entertainment and licensing of films and other TV content, no competition concerns were found here since significant competition would continue from other companies in the markets identified, such as Sony, Universal, and Warner Bros.

Obstruction During Antitrust Inspection: The EC's Preliminary View

On 25 September 2018, the EC sent a Statement of Objections to the Slovak rail company ZSSK for obstruction during inspection as part of the antitrust inquiry into the rail passenger transportation sector. The EC's preliminary view is that ZSSK obstructed the inspection by providing incorrect information and deleting data from a laptop.

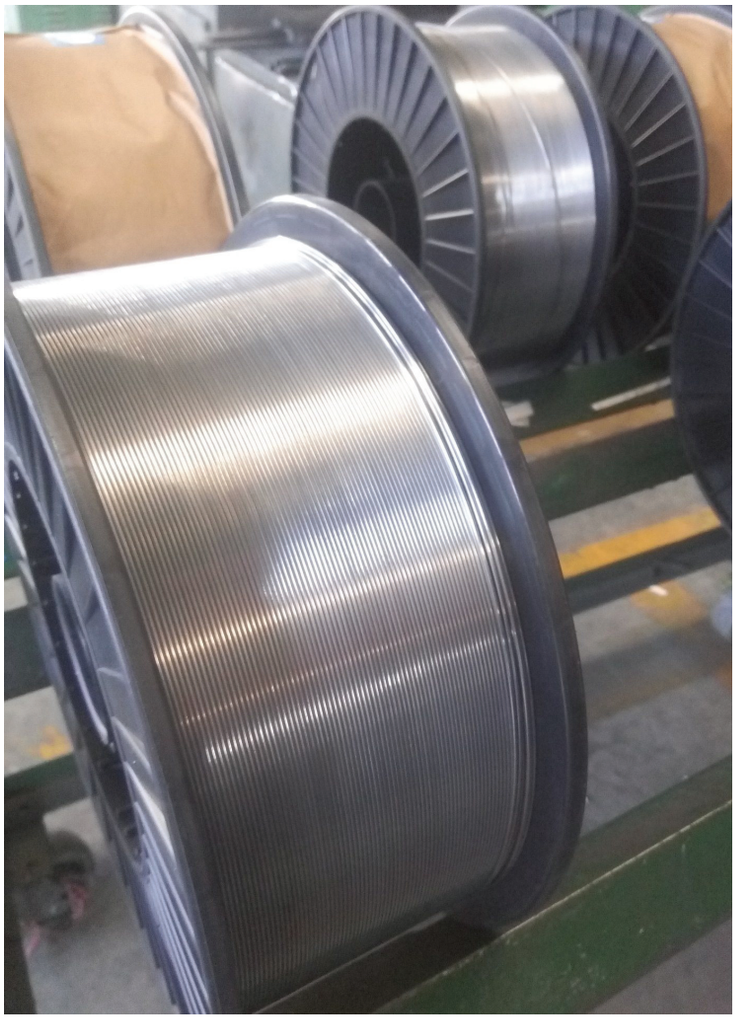
The inspections were conducted in June 2016 upon suspicion that ZSSK had been a party to anticompetitive agreements restricting competing rail passenger transport operators from the market. The EC is concerned that ZSSK may have obstructed the inspection via (**i**) providing incorrect information on the location of the laptop of one of its employees, and (**ii**) failure to provide the requested data from this laptop by allowing its re-installation, which led to the loss of the stored data. Sending the Statement of Objections does not prejudge the outcome of the case. This is a good reminder that companies are under the obligation to provide correct information and full support to the competition authority during inspections. Failure to do so can lead to the imposition of fines of up to one percent of the annual total turnover of the undertakings concerned.

EC Says "Ja Hej" (Yes, Hello) to Sweden (Com Hem and Tele2)

On 8 October 2018, the EC approved unconditionally the acquisition of Com Hem by Tele2. No competition concerns were found as the activities of the Swedish companies concerned are complementary to a large extent: Com Hem's main activities are related to fixed telecommunications and TV, while Tele2 is mainly active in mobile telecommunications.

The activities of the parties in the merger overlap in Sweden's fixed and mobile telecommunication markets. The EC found that the impact of the transaction on these markets would be limited and the companies are not perceived as direct competitors. The existence of other players in the relevant market will sustain competition. The transaction was cleared unconditionally following the Phase I review.

Lesser Duty Rule to Maintain Balance in Market



*On 16 October 2018, the Turkish Ministry of Trade (**"Ministry"**) completed its anti-dumping investigation of imports of cored wire of base metal originating from Vietnam. It was found that imports of the concerned product had been dumped; therefore, anti-dumping duties were imposed. However, the lesser duty rule was applied considering that the products concerned were required for Turkish industry.*

In March 2018, the two Turkish domestic producers of cored wire of base metal used in electric arc welding lodged a complaint with the Ministry alleging that imports of cored wire of base metal originating from Vietnam had been dumped and thus caused injury to the domestic sector. The Ministry found such allegations sufficient to initiate an anti-dumping investigation against products originating from Vietnam categorized under CN Code No. 8311.20.00.00.00, namely cored wire of base metal used in arc welding.

The Ministry ruled that imports of the concerned products had been dumped and caused injury to the domestic sector. However, the Ministry concluded that since the concerned products are required for Turkish industry, as well as taking the supply and demand balance into consideration, a lesser duty rule was imposed.

Consequently, a duty rate of 29.65% was imposed on the Vietnamese companies involved, except for a company that cooperated in the investigation and thereby was granted a lower duty rate of 21.15%.

Another 5 Years for Transmission Belts with Adjusted Duties

On 16 October 2018, the Ministry, following a second expiry review investigation, has imposed an anti-dumping duty of 3.15 USD/kg on transmission belts originating from China, India, and Vietnam. The products concerned have been subject to the Ministry's attention since 2006.

In 2006, upon a complaint submitted by a domestic producer, the Ministry launched an anti-dumping investigation into transmission belt products (under CN Codes 4010.32.00.00.00, 4010.34.00.00.00, and 4010.39.00.00.00). In 2007, the Ministry determined that the imports of the concerned products from said countries had been dumped and imposed anti-dumping duties ranging from 3.50 to 5.04 USD/kg.

Five years later, in 2012, again pursuant to a complaint lodged by domestic producers, the Ministry opened the first expiry review investigation into the concerned products. The Ministry found that the expiry of the existing measures would likely lead to the continuation or recurrence of dumping or injury. Therefore, it ruled for the continuation of the existing measures for an additional five years.

In 2017, the Ministry opened a second expiry review investigation into the concerned products and determined that the expiry of the duties likely would lead to the continuation or recurrence of dumping or injury. The Ministry adjusted the measures and imposed an anti-dumping duty of 3.15 USD/kg on products from all countries subject to investigation.

Turkey v. USA: Moving to The second Stage of Dispute Settlement at The WTO

*Following unsuccessful consultations within the World Trade Organization (**"WTO"**), on 10 October 2018 Turkey requested that the Dispute Settlement Body **("DSB")** of the WTO establish a panel to examine the dispute between Turkey and the USA with respect to certain measures imposed by the USA that adversely affect imports of steel and aluminium from Turkey to the USA.*

Inter alia, those measures are (**i**) additional ad valorem rates of duty on imports of certain steel and aluminium products, and (**ii**) the exemption of certain selected WTO members from the measures. These measures adversely affect exports of such products from Turkey to the USA.

As the first stage of the dispute settlement mechanism within the WTO, in August 2018 Turkey requested consultations, which were held in October 2018 with a view to reaching a mutually satisfactory solution. However, these consultations failed to resolve the dispute.

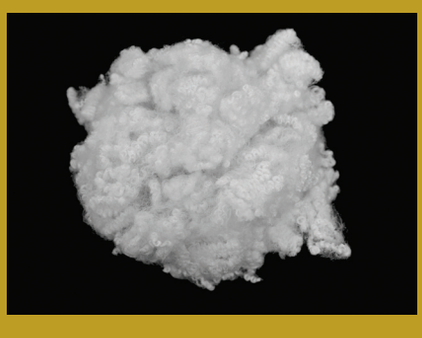
In accordance with WTO dispute settlement rules, therefore, Turkey requested that the DSB establish a panel to examine the matter. Turkey proceeded to identify the specific measures at issue and provided a brief summary of the legal basis of the complaint. Turkey claimed that the measures were inconsistent with a number of provisions of the WTO's Agreement on Safeguards and the General Agreement on Tariffs and Trade 1994.

Among other grounds, the measures are inconsistent with the non-discrimination principle via violation of the Most-Favoured Nation Treatment because the USA failed to accord immediately and unconditionally any advantage, favour, privilege or immunity granted to products originating in other countries, with respect to customs duties and charges and quantitative import restrictions imposed on or in connection with importation and with respect to all rules and formalities in connection with importation, to like products originating in Turkey. The USA did so by selectively applying additional import duties on certain steel and aluminium products originating in different members countries, including by providing exemptions or applying alternative measures to certain countries. The USA further did so by applying exclusively to Turkey duties higher than those applied to any other WTO Member subject to these duties.

Have Staple Fibers been Circumvented Through Nepal and Bangladesh?

On 16 October 2018, the Ministry concluded an anti-circumvention investigation into staple fibers originating from Nepal and Bangladesh. While the study found that the Nepalese companies in question were not involved in circumvention, a duty was imposed on Bangladeshi companies (with one exemption).

In 2009, upon a complaint lodged by the domestic industry, the Ministry opened an anti-dumping investigation into staples fibers (under CN Code 5508, 55.09 [excluding 5509.52; 5509.61; 5509.91], 55.10 [excluding 5510.20 and 55.11]) originating from China, India, and Indonesia. The Ministry imposed anti-dumping duties ranging from 0.23 to 0.80 USD/kg. Those measures were kept in force following an expiry review investigation conducted in 2015.



In 2016, the Ministry opened an expiry review investigation upon allegations that imports from China (subject to the 2009 anti-dumping investigation and 2015 expiry review investigation) had been circumvented by imports originating from Taiwan. The Ministry found that the imports realized from Taiwan had been used as a tool to circumvent the current measures and therefore extended the current measures in force with respect to both China and Taiwan.

This time, the Ministry dealt with another circumvention allegation concerning imports originating from Nepal and Bangladesh. It found that imports from Nepal, made by producers in Nepal, had not been used as a tool to circumvent measures. As for companies in Bangladesh, the Ministry imposed an 0.80 USD/kg per duty on imports realized by Bangladeshi firms, except for one, which was exempted from the duties since it was a producer/exporter located in Bangladesh and had not been found to be involved in the circumvention of the law.

Merger Control in Turkey 2018 – Practical Law

ACTECON authored the Merger Control section of the Practical Law Global Merger Control Guide 2018, which is available at http://www.actecon.com/en-us/reports-and-publications

Other Publications

- Turkish Competition Authority to Reinvent Effects Doctrine in the Pharmaceutical Industry: Roche Decision http://competitionlawblog.kluwercompetitionlaw.com/

- Google Fined: This Time by the Turkish Competition Watchdog http://competitionlawblog.kluwercompetitionlaw.com/

- New or Old-Fashioned Approach for the Market Definition: The Turkish Competition Authority's TveK/D&R Decision http://competitionlawblog.kluwercompetitionlaw.com/

- The Turkish Competition Authority Fines An Online Platform Service Provider For Excessive Pricing *(Sahibinden)* http://www.concurrences.com/en/bulletin/news-issues/november-2018-en/

Çamlıca Köşkü - Francalacı Sokak No: 28 Arnavutköy - Beşiktaş 34345 İstanbul - Turkey
+90 (212) 211 50 11
+90 (212) 211 32 22
info@actecon.com www.actecon.com

ACTECON is a corporately-governed firm combining competition law, regulatory affairs and international trade remedies. We offer effective strategies from law & economics perspective, ensuring that strategic business objectives, practices, and economic activities comply with competition law, international trade rules and regulations.