



# CCS' Enforcement Framework

## Intelligence, Prioritisation & Strategies

Harikumar S P, DD(LE); 9 September 2014

# Presentation Outline

## Ex-Officio Enforcement

Ex-Officio: Market Intelligence & Business Analytics



## Prioritisation-Setting

High-risk Industries: Priority Matrix & Enforcement Strategies



## Strategy Formulation

Analytics, Surveillance & Intelligence



# Ex-Officio Enforcement Work

## Ex-Officio Enforcement



### Intelligence Unit

- Cartel Detection Framework
- Business Analytics Unit
- Intelligence and Enforcement tie-ups with ASEAN counterparts

# Ex-Officio Enforcement Work

## Ex-Officio Enforcement

### Phase

1. Develop cartel detection framework/roadmap to identify and prioritise high-risk sectors
2. Set up priority matrix and select 5 priority sectors for CCS' detection focus
3. Prepare sector programs/strategies for the top priority sector

# Expanded Enforcement Work

## Cartel Detection Framework – Sector Roadmap

Six main sector categories	Sector structure	Sector organisation	Conduct indicators
Food & Consumer Services	- Turnover	- Local trade organisation	- Complaints
Science & Technology	- Nr of parties	- Internat. trade organisations	- Notifications
Construction & Real Estate	- C1	- Procurement level	- Prelim, Enquiries & Investigations
Transport & Logistics	- C3	- Level of sector regulation	- Market Studies
Information & Business Services	- HHI		- Cartel cases elsewhere
Financial Services	- Entries/exits		

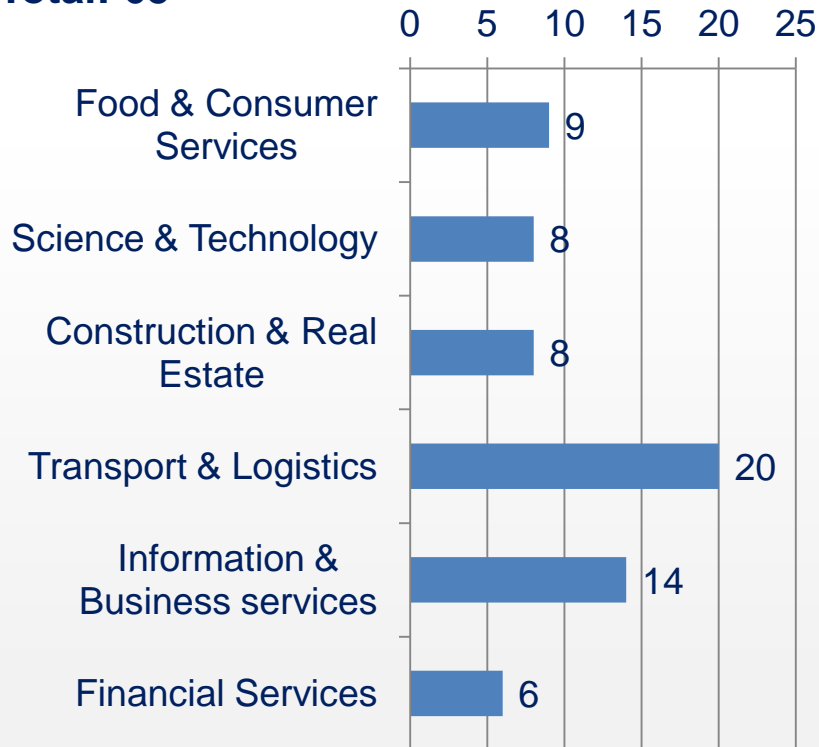


# Ex-Officio Enforcement Work

## Section 34 Conduct Indicators

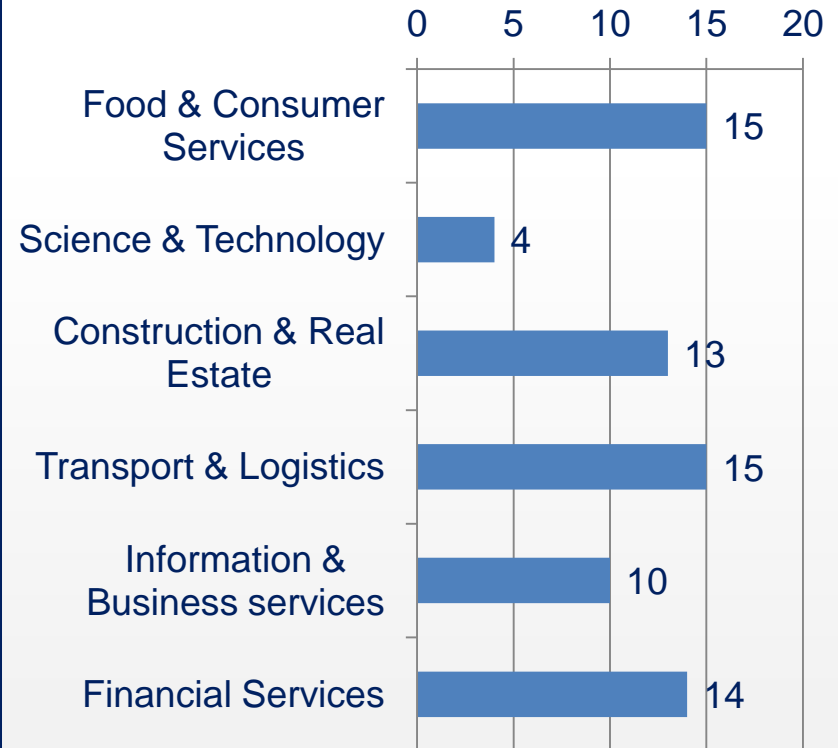
### Investigations, Preliminary enquiries & market studies

**Total: 65**



### Complaints & Notifications

**Total: 71**



# Prioritisation Setting

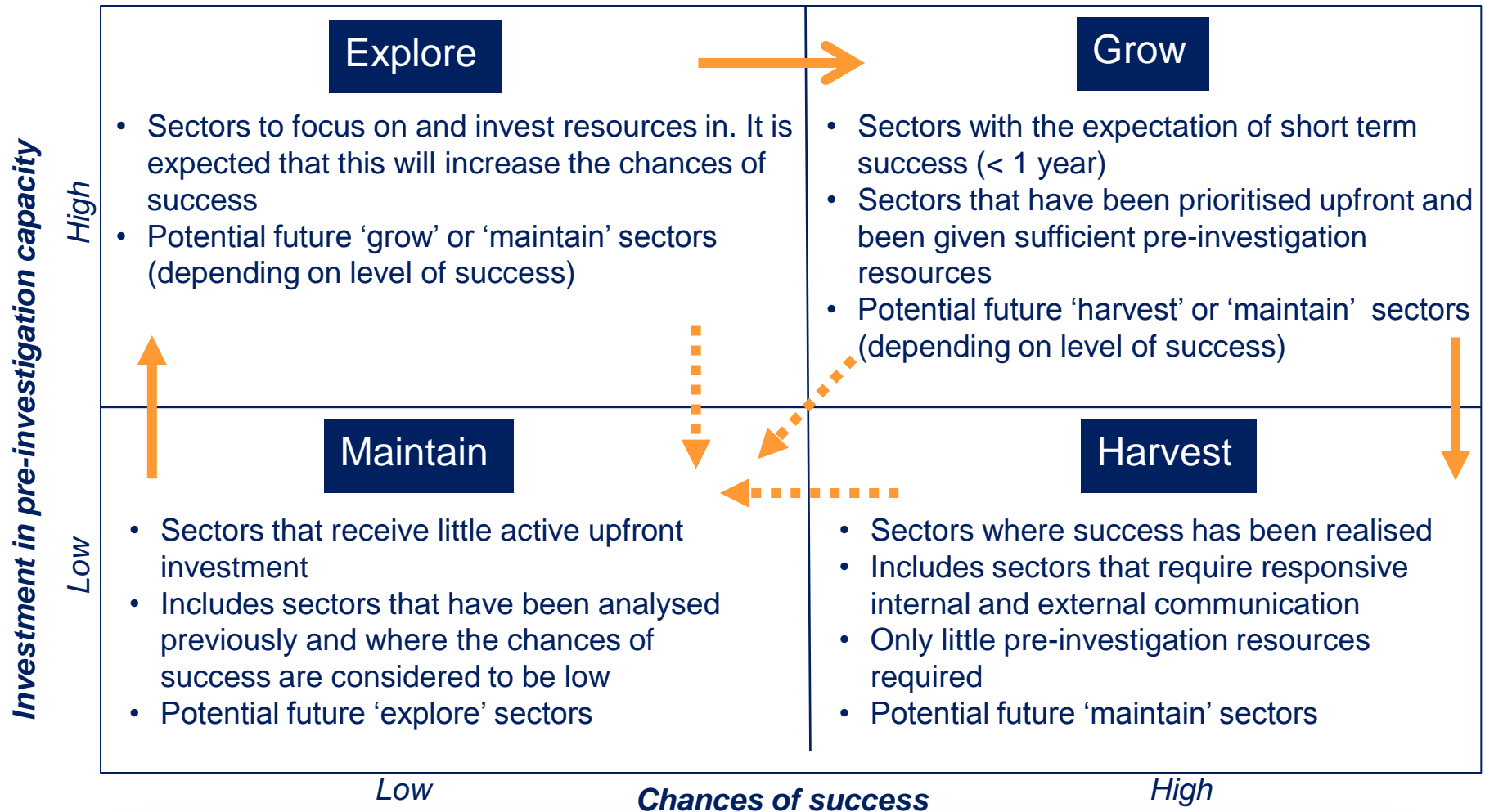
## Priority Setting Factors

- Cartel cases in other jurisdictions impacting Singapore
- Sector expertise, complaints & past engagements
- Sector organisation and level of procurement
- Economic size, consumer interest, strategic importance
- Current initiatives/focus of other competition authorities
- Involvement of international or Asian players in cartels overseas





# Prioritisation Setting: Matrix





# Strategies: Business Analytics

## Sector structure & dynamics

- Size and market dynamics (growth, entries/exits, profitability)
- Type of product & services
- Position in the value chain - suppliers & customers
- Barriers to entry & exit
- Direct (potential) substitutes
- List of players & market shares

# Strategies: Intelligence Unit

## Cartels in other jurisdictions

- Jurisdiction
- Type of infringement
- Parties involved/fined
- Evidence found
- Any other relevant information
- Impact on Singapore markets

# Strategies: Intelligence Unit

## Potential contacts

- Sector mavericks, newcomers & players leaving the industry
- Large customers (potentially government bodies)
- Government authorities
- Previous employees
- (Previous) Supervisory Board members
- Past complainants
- People active on social/internet fora



Competition  
Commission  

---

S I N G A P O R E

**Thank you**

9 September 2014