



Competition Council
Republic of Latvia

ANNUAL REPORT 2025

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CHAIRWOMAN'S FOREWORD



Looking back at 2025, we can see that the work of the Competition Council (CC) can be described by a focused approach to achieving specific results, while developing innovative and proactive solutions for detecting and correcting competition infringements. Data analytics, digitalisation, closer industry cooperation, and more open and transparent communication with the public play an increasingly important role in our institution's work. 2025 showed that supervising competition is becoming not only more effective but also more modern!

Last year saw the CC create new monitoring tools and analytical approaches on a substantial scale. The CC developed the Latvian industry competition assessment report and a screening tool for monitoring cartels in public procurements, while also continuing its work on the e-merger report submission tool. Meanwhile, for the first time in CC practice, an infringement case was opened on the basis of data monitoring and web data analysis, leading to the first investigation that

was coordinated with the competition institutions of Estonia and Lithuania. In the field of merger control, modern merger transaction assessment tools such as the upward pricing pressure test and the gross upward pricing pressure index were applied for the first time. Many other competition institutions already use these tools, making it possible for them to assess the motivation of merging parties to raise their prices or to predict price increases after the merger transaction.

Last year also saw improvements in the operational efficiency of the institution, strengthening its economic and technological capacity without increasing the size of its staff. The internal organisation of the CC took place, in order to strengthen its ability to analyse economically complex cases, to investigate infringements in digital spaces more effectively, and to be able to provide prompt, high-quality support to contracting authorities in damage assessment affairs, resulting in the creation of a chief economist position and the addition of an IT investigator specialist to the team, as well as the introduction of a new function to support public contracting authorities in assessing damage resulting from competition infringements.

Particular attention last year was paid to engagement with businesses and the public. The CC organised a Competition Law Week event, continued the School of Competition Law initiative, held discussions with industry representatives, and actively worked on public communication. In 2025, the CC became more visible and open to the public, through more activity in discussions in the media, where it explained its positions and decisions, while also strengthening its communication on social media to raise awareness of competition issues.

The institution revised its priorities in 2025, setting specific performance indicators. Seven high-priority infringement investigations and merger binding regulation compliance control cases were brought to a conclusion during the year, resulting in fines totalling more than 2.5 million euros, a 17-time increase compared to the previous year. Out of the most important decisions, it is worth highlighting the first decision pertaining to a breach of the Prohibition of Unfair Trading Practices Law that made it clear that the CC would not tolerate such violations. Worthy of mention is also a utility construction cartel, with the CC discovering prohibited agreements in 33 public procurements. It is also important to note that four parties in the case reached a settlement agreement with the CC, admitting their participation in the cartel and committing to pay the fine imposed by the CC, amounting to more than 500 thousand euros, making it possible for the CC to observe the principle of procedural economy. The CC's decision in the abuse of dominant position case against Limited Company SIA Mārupes komunālie pakalpojumi should be mentioned, in which the CC found an infringement that restricted competition in the market for the replacement (and sealing) of water meters and the installation of additional water meters in Mārupe Municipality. This decision has brought direct benefits to the people living in Mārupe Municipality, as they can once again have additional water meters, reducing the cost of water consumed if they do not use sewer services.

I should also highlight the case concerning AS RĪGAS SILTUMS procurements on the heating line construction and repair market. Although the CC did not find any infringements in that case, its investigation and prevention activities resulted in a drastic improvement for the competitive environment: it is no longer closed off, the number of tenderers in the procurements has increased, and information on the procurements is publicly available. In the long run, this will benefit both the company and its clients.

An overall look at the results achieved shows that they greatly exceeded those of the previous year. The number of applications received reached 540, about 55% more year-on-year, which means that a growing share of the public trusts the CC and is aware of its activities. For example, in the field of mergers, the number of in-depth merger investigations also significantly increased last year, with a total of four in-depth merger cases currently under review by the CC, 2 more than in 2024.

I am very proud that the CC's work over the past three years resulted in a public benefit of some € 44 million, with an increase of nine million compared to last year. In other words, every euro allocated to the institution returned a public benefit of more than 9 euros.

2025 saw a number of cornerstones laid for further developments, reducing the bureaucratic burden caused by regulations, introducing digital tools for supervising competition, and introducing improvements in regular industry competition assessments. These areas will continue to be an important part of the CC's work in 2026.

The main operational priorities for 2026 are: the detection and prevention of the most severe infringements of competition legislation, in-depth supervision of markets in industries that affect substantial public interests, as well as modernisation and digitalisation of the institution's processes. The CC has also defined specific performance indicators it seeks to achieve in order to ensure consistent work and measurable outcomes.

Our main goal is to protect fairness in the competitive environment, because only a strong and fair competitive environment can serve as the basis for innovation and economic growth.



IEVA ŠMITE
Konkurences padomes priekšsēdētāja

2025 IN FIGURES

Decisions

Prohibited agreements	2
Infringements detected	1
Abuse of dominant position (ADP)	1
Infringements detected	1
Unfair trading practices	1
Infringements detected	1
Procedural infringements	2
Infringements detected	2
Company mergers	
Mergers allowed	17
In-depth studies conducted	4
Allowed with binding provisions	1
Follow-up of binding provisions	1
Total number of decisions	25

Market study

Market supervisions completed	3
Market studies initiated	3

Infringement statistics

Fines imposed on companies (EUR)	2 537 454, 56
Fines paid to the national budget (EUR)	1 525 702
Companies fined	8
Settlements reached with companies agreeing to refrain from appealing the decision	4
Court proceedings completed	2
Institution decisions upheld	2

Prevention and 'Consult First'

Warning procedures	15
Number of legal entities warned	75
Negotiation procedures on competition neutrality	6
Public entities undertaking to correct legal infringements	6

Applications and opinions issued

Applications received	540
Examined applications, based on which a Council decision was adopted, providing protection against possible infringements of competition legislation	38
In-depth assessment of applications through additional studies	65
Opinions issued to contracting authorities on possible competition infringements in procurements	18
Opinions issued on public entity participation in a company (Section 88 of the State Administration Structure Law (SASL))	37
Explanations of other actions by public entities	133
Other replies given	130
Opinions issued on sectoral regulations proposals	37

Consultations and guidelines

Businesses and the non-governmental sector consulted on competition legislation	87
Pre-merger consultations for companies	46
Guidelines and self-assessment tools	4

Benefit to the public: 44 million euros per year on average

The average benefit of CC activities to the public, preventing distortions of competition, supervising markets, proposing changes in them that promote competition, and monitoring the implementation of large mergers, over a three-year period (2023–2025). Given the institution's budget during the reporting period, each euro allocated to the institution generated a public benefit of some EUR 9.62.

1 euro = 9,62 euros



COMPETITION COUNCIL: INSTITUTION PROFILE

In a free and fair competitive environment, companies seek to become more efficient and to develop their products and services, offering them to the consumer with ever better variety, quality, innovation, prices, and other benefits, in order to win the battle for consumer preferences.

The CC is an institution of direct administration under the supervision of the Cabinet of Ministers that operates in accordance with the Competition Law as well as other laws and regulations. The CC is established by the Cabinet of Ministers, and it exerts its institutional oversight through the Minister for Economics.

The tasks and powers of the CC are specified in the Competition Law, Advertising Law, Prohibition of Unfair Trading Practices Law, as well as the law of the European Union and other laws and regulations.

Key values: rule of law, professionalism, independence, development, and openness.

Purpose

Ensure that every market participant can engage in economic activity in conditions of free and fair competition, working in the public interest to foster competition in all areas of the economy.

Vision

The Competition Council is an effective institution that is open to and trusted by the public, committed to active, effective involvement in market development processes and to the protection of market participants' right to fair competition, achieving significant improvements in the competitive environment.

Operating objectives

- ▶ **Detection and prevention of prohibited agreements:** companies do not engage in cartels or other prohibited agreements
- ▶ **Prevention of abuse of dominant position:** large companies that dominate the market do not abuse their market power

- ▶ **Supervision of mergers:** no mergers that lead to market concentration and may negatively affect the interests of consumers and business partners
- ▶ **Supervision of public entities:** national and local governments and their companies do not discriminate against private market participants
- ▶ **Monitoring for unfair trading practices:** market participants throughout the agricultural and food supply chain do not engage in unfair trading practices, nor do non-food retailers abuse their purchasing power against suppliers
- ▶ **Supervision of laws:** laws, regulations, and other decisions and actions of national or local institutions do not restrict the development of free and fair competition
- ▶ **Promotion of competition:** competition is fostered in markets, including regulated markets where competition is limited or non-existent
- ▶ **Informing the public:** the public receives extensive information about the impact of competition on the functioning of markets and the well-being of citizens

Institution resources



State financing

5 202 107 euros



33 years of operation of the Authority



61 knowledgeable and motivated employees

CC operational strategy for 2023–2029

The CC has defined three priorities to achieve its overarching goal:

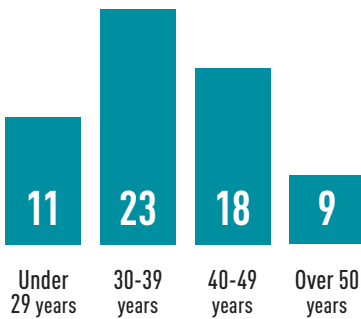
- 1) professional, committed, growth-oriented team;
- 2) result-oriented day-to-day operations and cooperation, ensuring the detection of significant limitations of competition and the promotion of competition;
- 3) innovative and sustainable working environment.

COMPETITION COUNCIL TEAM

The CC consists of a decision-making body, which is its council, an executive body, as well as its support units. As of the end of 2025, the institution had 61 staff members, 53 of which were public officials and eight, regular employees.

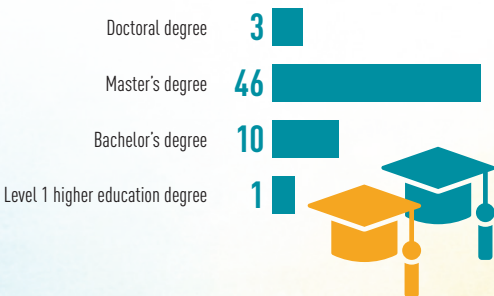
Staff turnover was 39% in 2025. 25 persons left the civil service and terminated their employment, while 15 were employed.

Age:



The average age of CC employees was 40. 59% (36) were women and 41% (25) were men.

Education:



5 Council members

assess documents prepared by the Executive Body in examining its cases and in market supervision, and adopt the institution's final decisions. The council acts similarly to a court of first instance. The council consists of four members and a chairperson who manages the work of the institution.

1 Head of Executive Body

ensures a uniform organising, planning, and management of the activities of the Executive Body and provides legal and conceptual support in investigations and proceedings to the staff of the Executive Body.

21 investigators

conduct infringement investigations, research market events, assess competition distortions in laws and regulations and in the activities of public entities, and provide preventive education and advice to various target groups, including through lectures and seminars.

14 lawyers

legal consultants prepare the legal grounds for the council's decisions, represent the institution before courts, prepare draft laws and regulations, assess whether documents prepared by other institutions distort competition, and propose solutions.

8 economists

prepare the economic grounds for the council's decisions and studies, research and develop new methods of econometric analysis, examine reports on mergers between market participants, investigate illegal mergers by market participants, and analyse and assess the economic environment at the micro level.

7 support functions

staff members who communicate with the public and coordinate international cooperation, handle budget management, human resources and document management, and implement internal audit recommendations. They participate in the institution's planning processes, as well as organise the everyday functioning of the institution and its other activities.

3 IT support providers

handle the digitalisation of the institution's data processing and analysis processes through the implementation of information technology development projects and the strengthening of investigative capacity through the processing of digital evidence in cases.

2 data analysts

in charge of developing data analysis at the institution, ensuring the use and refinement of academic and practice-based and recognised data analysis methods through in-depth collection, processing, and analysis of big data.

IMPROVEMENTS IN COMPETITION LEGISLATION AND THE ELIMINATION OF RESTRICTIONS IN LAWS AND REGULATIONS PREPARED BY OTHER INSTITUTIONS

In 2025, in cooperation with the Ministry of Economics as the policymaker, the CC brought forward a number of legislative initiatives aimed at improving competition legislation, strengthening the protection of competition, ensuring the effectiveness of regulations, and reducing the administrative burden on market participants. The CC's initiatives included refinements in the Competition Law as well as regulations governing unfair trading practices. The CC actively participated in cross-institutional discussions and in Cabinet of Ministers and Parliament meetings, submitting proposals on draft industry legislation prepared by other institutions that included provisions obstructing the development of competition or restricting competition.

Liability of officials for competition legislation infringements

One of the most important initiatives was the drafting of amendments to the Competition Law, establishing the personal liability of market participant company officials for competition legislation infringements. According to the draft amendments, company management and supervisory board members, proxies, commercial proxies, and other responsible officials whose actions or omissions have contributed to the involvement of the company in a prohibited agreement as part of a procurement, may be prevented from holding office for a period of up to 3 years. The draft amendments have been submitted and are currently being reviewed by the Parliament.

Raised thresholds for submitting merger reports and more options for submitting abbreviated merger reports

The CC continued its work on improving merger control regulations. In order to reduce the administrative and financial burden that businesses face, the CC Advisory Council reviewed amendments to the Competition Law, and supported their submission to the Parliament, which envisage raising the thresholds for the requirement to submit merger reports and more options for submitting abbreviated merger reports in mergers between competitors and between market participants at different stages of the supply chain of the

goods. The right of merging parties to appeal in the case of merger requests that are below-threshold was also updated. These regulatory changes will make it possible for merging market participants to save time and financial resources by submitting an abbreviated rather than a full merger report; they will also update the rights of merging parties, while balancing them with the duty of the CC to effectively supervise mergers that may have a negative impact on competition and consumers.

Harmonisation of regulations of individual national-level agreements not subject to prohibition with European Union regulations

In order to harmonise national competition legislation with EU competition legislation, the CC began working on the changes necessary to ensure that certain vertical and horizontal agreements at a national level that are not subject to a prohibition on agreements are treated identically to agreements which may affect trade among EU member states. Thus, it is planned that the European Union regulations in this area will apply directly and independently of the scope of the concluded agreements, achieving full harmonisation with European Union competition legislation and fostering predictability and a uniform understanding of the types of cooperation allowed for market participants.

Strengthening competition neutrality regulations

2025 saw extensive discussions involving ministries, other government institutions, local governments, and social partners (business organisations) aimed at revising the existing regulations for the involvement of public entities in business activities, as well as current regulations on competition neutrality. The discussions looked for an optimal solution to balance the more extensive legitimate capacity for public entities to acquire ownership in companies by reducing the bureaucratic formalities with the duty to conduct a mandatory and proportionate assessment of feasibility and economic viability, including the impact on competition. At the same time, the CC proposed to strengthen competition neutrality regulations for whenever public entities fail to fulfil their duty to ensure free and fair competition, with more liability for infringements set for public entities and the possibility to claim compensation for damage. The Parliament also started its review of the amendments to the regulations.

Improvements in unfair trading practices regulations

In 2025, retailers and producers, jointly with institutions in charge, signed a Memorandum on Food Products Trade, addressing a number of key matters in the food supply chain,

including the availability of low-priced goods and increasing the share of locally sourced goods at the point of sale. At the same time, discussions continued at a regulatory level concerning matters that promote fair cooperation between buyers and suppliers. This resulted in amendments to the Prohibition of Unfair Trading Practices Law submitted to the Parliament at the end of the year, with a number of proposals, including clear deadlines for product range changes, refining the rules governing the definition of contractual penalties, and set payment deadlines for fresh fruit, berries, and vegetables.

Proposals to remove restrictions in industry regulations

In 2025, the CC actively worked in the field of removing restrictions of competition and ensuring compliance with the principles of free and fair competition, providing a total of 37 opinions on draft industry laws and regulations prepared by other institutions, in areas such as finance, retail, waste management, utilities, healthcare, etc. The CC's opinions were taken into account in 48% of the cases. In total, the CC participated in 60 cross-institutional meetings involving policymakers to discuss the potential impact of regulatory changes in various sectors on competition. ■

Māris Spička, Head of the Competition Council Executive Body:

‘In 2025, we took a major step towards filling a gap in Latvia’s competition legislation system: the liability of natural individuals. After extensive discussions that took place during the drafting of the amendments to the Competition Law, they have been submitted to the legislator for review. These amendments aim to prevent responsible company officials from taking part in the most serious competition infringements — cartel agreements in procurements — and to facilitate cooperation with our institution in detecting such infringements.

Latvia already has the most permissible merger control regulations in the Baltics and one of the most permissible in the European Union, and it is one of the most important parameters for businesses when choosing where to make their investments. Based on the practical experience gained reviewing merger transactions, assessing concentration risks, and taking economic growth and inflation rates into account, the CC has prepared proposals for regulatory changes that will further reduce the administrative and financial burden of companies taking part in merger transactions.’



PROHIBITED AGREEMENTS

A total of 5 case investigations took place for different markets in 2025, including:

- 2 cases were closed;
- 1 case on the coffee machine market will be closed in early 2026;
- 2 new infringement investigation cases were opened, concerning a possible prohibited agreement in the funeral and landfill leachate treatment sectors.

The case concerning an alleged prohibited agreement in the coffee machine market is important for several reasons. It is the first case in the CC's history to be initiated on the basis of data obtained using the price monitoring tool developed by the institution. This investigation is also the first to involve procedural activities taking place in all three Baltic states at the same time, with the participation of representatives of the competition institutions in Estonia and Lithuania. Such coordinated action strengthened practical cooperation and the sharing of information between the Baltic competition institutions in cases that extended across the borders.

The reporting period also saw extensive procedural activities in a case concerning an alleged prohibited agreement in the funeral sector. Information available to the CC showed that at least eight companies may have exchanged commercially sensitive information and illegally agreed on the conditions of participation in procurements organised by public entities.

Prohibited agreement case:

In 2025, the CC discovered one prohibited agreement in the form of a horizontal cartel in the activities of five construction companies participating in procurements for utility line repair and construction throughout all of Latvia.

Utility line cartel



On the basis of information provided by SIA Rīgas namu pārvaldnieks and additional evidence gained during the investigation, the CC found a prohibited agreement in the activities of Limited Company (SIA)

SILTUMTEHSERVISS and SIA Apkure IM, as well as SIA ADAPTERIS, SIA AlpeX, and SIA Infrakom. The investigation revealed that the cartel was organised in two groups, namely between SIA ADAPTERIS, SIA ALPEX, and SIA INFRAKOM, as well as between SIA SILTUMTEHSERVISS and SIA APKURE IM, coordinating their participation in public procurements. The cartel was found to have existed from 2021–2024, significantly distorting competition in more than 30 procurements for the construction and repair of utility lines across Latvia. In the case, the CC imposed a fine of **EUR 513,508.08**. None of the parties in the case appealed the decision; a settlement agreement was concluded with four of the parties, significantly freeing up the resources of the CC's staff (for example, in the event of potential litigation). In this case, an agreement was also reached with the parties on the payment of a fine.



Another prohibited agreement investigation case is related to the procurements of AS RĪGAS SILTUMS on the heating line construction and repair market. Although the CC decided to close the case **without finding an infringement**, the market situation improved significantly after the CC infringement investigation opened and the procedural activities took place: the procurement environment is no longer closed off, the number of tenderers participating in procurements has increased, and in the long run, this is beneficial for both the company and its clients.

Education activities

13 educational and other events were held in order to improve the knowledge of key issues related to horizontal and vertical market agreements among market participants, procurement organisers, and other interested parties, including the elimination of tenderers from

procurements due to possible competition legislation infringements; some of these events took place in cooperation with the **Procurement Monitoring Bureau**, as well as in **mutually improving cooperation with the Consumer Rights Protection Centre** and the **Corruption Prevention and Combating Bureau**.

Consult First

In 2025, a number of alternative infringement procedures took place without formally opening cases, based on the CC's case prioritisation strategy and the Consult First principle. In **six** cases of possible prohibited agreements, the CC warned **24** parties and educated them in competition legislation.

PPL opinions for procurement contracting authorities

In addition to prohibited horizontal and vertical agreements between competitors, the CC paid particular attention to the investigation of applications related to the Public Procurement Law, with contracting authorities seeking the opinion of the CC in cases where they saw strong indications of coordinated activities by tenderers in a procurement.

In 2025, the CC issued **18 opinions to contracting authorities** covering detected indications of the possible existence of agreements aimed at obstructing, restricting, or distorting competition in specific procurements, in view of which the contracting authority would be entitled to eliminate the tenderers from the procurement.

Leniency programme effectiveness survey

In 2025, a survey of lawyers was carried out concerning the use of the leniency programme and its effectiveness in Latvia. The purpose of the survey was to find out what motivates companies to cooperate with the CC and what the reasons are for businesses refraining from cooperating with the CC as part of the leniency programme. The CC used the results of the survey to draw conclusions on what needs improving in order to motivate businesses more to cooperate with the CC leniency programme, as well as on the necessary improvements and actions to be taken to that effect by the CC.

Cooperation with the European Commission

2025 also saw active **cooperation with the Ministry of Economics in representing the interests of the Republic of Latvia** and highlighting single-market issues that are important and affect smaller EU markets at the **Territorial Supply Constraints** event organised by the European Commission's (EC) DG GROW.

Inga Modere-Pūpolberga, Head of the Prohibited Agreements Department:

'While 2025 was full of challenges, the Prohibited Agreements Department team was able to adapt to a rapidly changing environment and not only deliver significant results within a limited timeframe, but also provide an effective foundation for the future work of the department. This has only been possible thanks to our tightly-knit and professional team!

In addition to the areas and cases already mentioned in this report that remain the department's priorities, the number of applications on various aspects of prohibited agreements received from institutions as well as private individuals, and assessed, increased by more than 280% year-on-year. The growing interest and variety of questions received demonstrate that different education and cooperation measures, as well as the lessons learnt from the research already completed create added value not only for achieving the priorities set by the CC, but also for the interests of the public as a whole.'

ABUSE OF DOMINANT POSITION

In 2025, the CC adopted one decision on the **abuse of dominant position**. The CC found that SIA Mārupes komunālie pakalpojumi had pursued **exploitative and exclusionary practices** that affected the market for the replacement (sealing) of water meters and installation of additional water meters, also creating an unjustified financial burden for its customers, in the form of a service that they did not use. Meanwhile, the CC actively continues its work on **other investigation cases** into abuses of dominant position by market participants.

In 2025, the **Consult First** principle was actively used to prevent possible abuses of dominant position and streamline the institution's limited resources at the same time.

Last year, the institution also carried out a number of investigations into possible abuses of dominant position, with more than a third of all applications (37%) on which the CC adopted a decision concerning possible abuses of dominant position (see Annex for a summary of the applications).



Infringement in the actions of SIA Mārupes komunālie pakalpojumi

On 26 June 2025, the CC adopted a decision, in which the institution found that SIA Mārupes komunālie pakalpojumi (MKP) had abused its dominant position and restricted competition on the market for the installation (and sealing) of additional water meters and replacement of water meters in Mārupe Municipality, also forcing its clients, without justification, to pay for its sewer service even when it was not actually used.

In its decision, the CC concluded that MKP was holding a dominant position on the centralised water supply and centralised sewer services market, as well as on the related market for the installation and replacement of water meters. MKP is the sole provider of water management services in the area, based on a delegation agreement with the municipal government.

The CC found that between 14 January 2022 and 12 June 2023, MKP closed the market without justification, preventing its clients from installing additional meters themselves or through other certified service providers, prescribing that only MKP itself could provide such a service. Meanwhile, on 12 June 2023, MKP discontinued the additional service, as a result of which its clients were forced to pay for the sewer service even if no water was discharged into the sewer, for example, when water was used for utility purposes or irrigation. This meant that the clients had to pay almost three times more for the service they actually received.

Taking the duration and gravity of the infringements found into account, the CC imposed a fine of EUR 78,055.79 on MKP, with a legal obligation to restore the provision of the additional service within three months and to ensure that additional meters could be installed both by the clients themselves and by other certified service providers. MKP is also obligated to publish information on the updated service provision arrangements that is accessible to its clients.

Preventive removal of competition restrictions

During the previous year, a number of preventive measures were completed pertaining to the restriction of competition that particular market participants faced in certain sectors. Meanwhile, in order to foster the Consult First principle, expanded sector-wide preventive measures were implemented for all market participants:



Restriction of competition in the dancesport sector

The CC assessed the rules for changing dancesport clubs for children established by the Latvian Dancesport Federation (LDSF) and found that the transfer conditions and possible compensation payments prescribed in these rules could be disproportionate and restrict competition on the dancesport service market. The investigation was initiated following a complaint by a private individual and resulted in the CC urging the LDSF to revise its rules on changing dancesport clubs for children. Following the CC recommendations, the LDSF removed the compensation payment option, shortened the transfer period to three months, and updated the procedure for applying

the rules.

In the opinion of the CC, these amendments improved the competitive situation on the dancesport service market. In 2025, the CC informed the sports industry of the applicability of competition legislation to the activities of federations and sports clubs, stressing that excessive transfer restrictions, unjustified payments or agreements between clubs can restrict competition, urging sports organisations to report possible restrictions of competition.

Restriction of competition in the waste management sector



The CC assessed the fees charged for the use of sorted waste collection site infrastructure by a municipal waste management company and found that producer responsibility system operators (PRSO) were charged the same fees regardless of their operating in different management systems. The CC informed the company that such fees must be economically justified, based on the service in question, and differentiated according to the business and obligations of the specific PRSO. Having reviewed CC's conclusions, the company amended its methodology for determining its fees, addressing the prima facie competition legislation concerns.

In 2025, the CC preventively contacted all municipal waste management companies to remind them of their duty to comply with competition legislation when setting fees for the use of sorted waste collection site infrastructure. The CC emphasised that the companies were holding a dominant position within their municipal contracts, and as such, being inevitable business partners with PRSO, which meant that the methodologies for setting the fees must be transparent and based only on economically justified, applicable costs. An ex-post assessment of the matter is additionally planned for 2026.



Ieva Dāboliņa, Deputy Head of the Market Surveillance and Research Department:

'Abuse of dominant position is one of the main focuses of activity of the Market Supervision and Research Department. 2025 showed that conventional competition legislation instruments are still relevant, especially in sectors with concentrated market structure or where services are provided on the basis of delegation by the

municipal government.

However, besides investigating cases and detecting infringements, an increasingly important role is played by preventive and education measures. Providing timely explanations about what competition legislation requires is essential, building an understanding of what is acceptable and what is not among businesses and throughout industries, and fostering responsible competition on the market. Our goal is to identify potential risks in time and to take action that prevents infringements as early as possible, precluding long-term negative consequences for consumers or market development.

Meanwhile, the development of digital markets substantially affects the work of the department, as assessing dominant position becomes more and more complex due to the effects of data, algorithm, and platform ecosystems. In this context, the application of competition legislation and the Digital Markets Act requires high analytical capacity and close international coordination with the EC. One future priority for the department will be to strengthen its analytical competence, deepen its economic and data analysis, and maintain consistent monitoring in sectors with an elevated risk of abuse of dominant position.'

DIGITAL MARKETS SURVEY AND DIGITAL MARKETS ACT MONITORING

Promoting competitive digital markets remained one of the CC's strategic priorities in 2025, with a particular focus on effective enforcement of the Digital Markets Act (DMA), as well as on monitoring the conditions of competition in a rapidly changing digital environment.

On an international level, 2025 saw a continuation of the work with the EC, the Organisation for Economic Cooperation and Development (OECD), and competition institutions in other member states analysing digital market development trends. In 2025, the CC actively participated in the analytical work conducted as part of the Technical Support Instrument (TSI) Competition Market Study: Digital Sector project, assessing the impact of major digital platforms in Latvia and comparing it with the situation in Lithuania and Poland. The approach developed as part of the project will make it possible for the CC to proactively identify the actions of the platforms that may affect competition and set monitoring priorities in good time in order to mitigate risks to competition at an early stage. It is also planned to prepare practical recommendations for the CC to implement to increase effectiveness in monitoring digital markets.

Furthermore, in 2025, the CC actively performed the function assigned to it by amendments to the Competition Law: monitoring the implementation of DMA in cooperation with the EC. The CC ensured its regular representation on the Digital Markets Advisory Committee, participating in discussions on gatekeeper obligation compliance, mechanisms for ensuring compliance, and the assessment of the status of new gatekeepers. In the CC's view, an essential role was played not only by formal supervision activities but also by preventive dialogue with market participants aimed at the early minimisation of potential competition risks. Meanwhile, the CC actively participated in the DMA assessment process, contributing to discussions on improving its regulations and facilitating its more effective implementation.

At the national level, 2025 saw continued strengthening of institutional cooperation with the Consumer Rights Protection Centre for a coordinated approach to monitoring digital markets. Particular attention was paid to the effective application of the Digital Services Act (DSA) and to refining the mechanisms for sharing information. In the opinion of the CC, close

cooperation between institutions overseeing digital market regulations is a prerequisite for the effective supervision of the digital economy and for the balanced protection of competition and the interests of the consumer.

In 2025, given the growing impact of digital technologies on the economy, the CC continued assessing the applications it received on possible infringements of competition legislation on digital markets, analysing the business models of platforms and their impact on market participants and consumers. At the same time, the CC also received applications on possible gatekeeper obligation infringements, which moved the focus of its supervision from general market research to the analysis of specific DMA provisions and their application in practice.

As part of its supervision of digital markets in 2025, the CC focused on assessing the conditions for platform access, analysing the ability of companies to access consumers, including on platforms for app distribution, online ads, and ride-sharing services. In cooperation with the EC, the CC also assessed the applications it received concerning possible infringements of gatekeeper obligations under DMA, improving cooperation mechanisms to achieve more efficiency in sharing information and processing applications.

This assessment took place in close cooperation with the EC to ensure a coordinated approach, regular exchange of information, and a common understanding of the obligations and compliance of gatekeepers at the EU level.

In addition to its supervisory and analytical work in 2025, the CC organised seminars and information events aimed not only at lawyers but also at businesses and consumers that are affected by the activities of digital platforms. The purpose of these events was to raise awareness of the requirements of competition legislation and DMA, to explain the duties of the platforms, and to improve the understanding of infringements in the digital sector to minimise the risks of infringements at an early stage.

Thus, 2025 saw a strengthening of the supervision of digital markets as a targeted supervisory process, with a particular focus on the practical and effective application of DMA.

MERGERS OF COMPANIES

One of the critical tasks of the CC is to assess mergers between major companies to prevent possible negative effects on competition and consumers.

In 2025, the CC assessed 19 reported mergers. **In 18 of these cases**, the CC ruled to permit the merger, while in **one case**, the CC decided to **permit the merger, with binding regulations**.

In 2025, there were mergers in various sectors such as wholesale and retail trade, transport and storage, financial and insurance activities, manufacturing, real estate transactions, and administrative and support services.

The market participants involved paid EUR 98,000 in merger assessment fees to the national budget in 2025. In order to facilitate the submission of merger reports by companies, the CC conducted **46 pre-merger consultations**.

The majority, about 80%, of the **mergers took the CC less than one month to assess**, while in four cases, the CC conducted in-depth merger control (Phase 2 mergers), twice as many as in 2024.

The CC permitted SIA Circle K Latvia to acquire decisive influence over 26 fuel stations across Latvia owned by SIA ASTARTE-NAFTA. In order to prevent the potential risk of competition restrictions on the market in Dobele, the CC imposed binding regulations on the transaction, requiring that the fuel station taken over in Dobele must be operated as an automatic fuel station, with the fuel price comparable to other automatic fuel stations on local markets with active competition. Having assessed the impact of the transaction and the effectiveness of the binding regulations, the CC found no significant harm to competition and decided to permit the merger with binding regulations. However, it should be noted that after the CC decision, the merging parties decided not to go through with the transaction.

The CC permitted



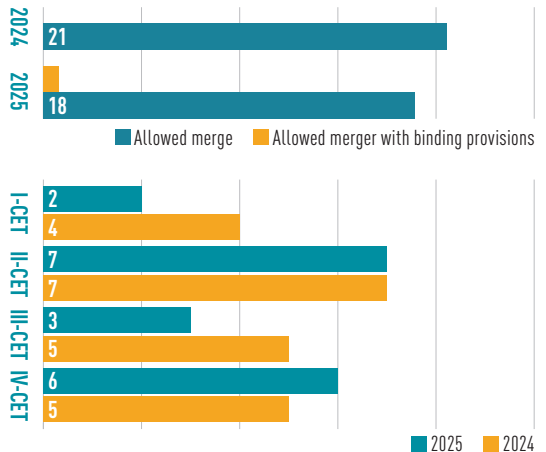
ERGO International AG to acquire sole decisive influence over ADB Gjensidige, having assessed the impact of the merger on the health insurance and non-life insurance markets in Latvia. The operations of the merging parties overlapped across a number of insurance segments, including mandatory third-party liability vehicle insurance, comprehensive vehicle insurance, property and health insurance, as well as the relatively small railway, cargo, and sea vessel insurance markets. For the markets where the share of the merged company was close to or above 25%, the CC carried out an in-depth analysis, assessing the proximity of competition, ability to substitute, and coordination risks, as well as analysing public procurements in the health insurance sector. Having assessed the available information, the CC did not find that the merger would lead to the establishment or strengthening of a dominant position in Latvia, or to any significant harm to competition, deciding to permit the transaction.

At its own initiative, the CC also assessed



the transaction of AS SENTOR FARM APTIEKAS for the acquisition of the SIA MURJĀNIS pharmacy in Mālpils, finding that as a result of the transaction, SENTOR temporarily became the sole provider of retail pharmaceutical services in that area, thus preventing competition on the local market. However, given the fact that the pharmacy was later sold to another market participant, restoring competition, the CC concluded that no further legal action was necessary in this case. ■

Types of decisions, and their quarterly breakdown



Artūrs Kuka, Head of Economic Analysis and Merger Department:

'In the field of merger control, 2025 was a very active year, demonstrating the CC's ability to react in a targeted and timely manner. We assessed 19 reported mergers in various

sectors, taking most of the decisions within a short time, while doubling the number of in-depth investigations compared to the previous year. A major step forward was the implementation of the new proactive merger monitoring system, which made it possible to systematically monitor changes in ownership and identify any potentially unreported transactions in time. In the first year alone, we inspected 30 cases in detail, strengthening preventive supervision and sending a clear signal to the market about its duty to comply with merger control requirements. This means that our work is increasingly based not just on our reacting to events, but also on data-driven proactive monitoring that aims to protect competition and the interests of consumers.'

SUPERVISION OF UNFAIR TRADING PRACTICES

In 2025, the CC significantly strengthened its supervision in the food retail sector, improving the familiarity of suppliers with the provisions of the Prohibition of Unfair Trading Practices Law (PUTPL) and their level of trust in the CC.

The year saw the adoption of the first PUTPL infringement decision, finding an infringement committed by SIA MAXIMA Latvija.

EDUCATION ACTIVITIES

Information publication on perishable goods

Brochure on the applicability of PUTPL

22 explanations and consultations provided on unfair trading practices

11 interviews/comments made on food retail trade

4 articles

3 webinars on the application of PUTPL to buyers and suppliers

ANNUAL SUPPLIER SURVEY

Information and experience

83% knew what institutions to contact about unfair trading practices (compared to 51% the year before)

72% had not experienced unfair trading practices engaged in by buyers


Attitudes towards the supervisory institution

85% trusted the CC

15% expressed a lack of trust

Unfair trade practices in the actions of SIA MAXIMA Latvija (MAXIMA)

For the first time since the legal regulations took effect, the CC adopted a decision on a PUTPL infringement, finding a violation in the actions of MAXIMA, engaging in unfair trading practices in its relations with suppliers.

 The CC found that between 1 November 2021 and 7 August 2024, MAXIMA abused its market power by unilaterally setting product purchase prices for a number of agricultural and food suppliers. Such unilateral action took place through protracted and systematic pressure exerted on agricultural and food suppliers, which, among other things, involved delays in the approval of product purchase prices and a sustained refusal to purchase goods. The company was fined **more than EUR 1.8 million** for the infringement.

Warning of traders

12 applications on the interpretation and possible breaches of PUTPL were assessed in 2025. The applications included requests for explanations

on the conduct of buyers of agricultural and food products and its compliance with PUTPL, as well as various questions on the prices of foodstuffs and observations made by the public in retail shops.

Consultation and education

Education measures conducted by the CC played an essential role in increasing the level of information among suppliers. In 2025, the CC prepared **4** thematic articles, organised **3** webinars concerning the application of PUTPL to suppliers and buyers, and held **8** working group presentations on PUTPL and the institution's latest news. A brochure about the application of PUTPL and a publication with information on perishable goods were also prepared. **22** individual explanation consultations were provided, a seminar was held at a university, and **11** interviews and comments on food retail affairs were given.

The CC also organised meetings with industry associations to provide feedback on the results of the supplier survey and to discuss the industry's problems and possible solutions.

Market supervision

A market supervision activity looking at the practices related to payment deadlines in the supply chain for fresh fruit, vegetables, and berries was concluded in 2025. The supervision activity revealed that, despite the deadlines set in the contracts, payments to suppliers were delayed by a period of just a few days to almost 300 days, thus shifting the financial burden to the suppliers without any justification. Given these findings, the CC has initiated a number of infringement cases against the buyers.

The CC also conducted an annual supplier survey to assess the effectiveness of the measures implemented by the CC, and to determine how well the law functions in actual relationships between buyers and suppliers.

A supplier survey conducted in 2025 showed that **83%** of the respondents knew which institution to contact for PUTPL matters, as compared to **51%** the year before. At the same time, **85%** of the respondents indicated that they trusted the CC as a supervisory institution in charge of PUTPL matters, confirming the effectiveness of the CC's supervisory and educational activities up to that point.

Participation in drafting the Memorandum on Food Products

Working in conjunction with the Ministry of Economics, the CC provided substantial support in the drafting of the Memorandum on Food Products, including that related to the development of the price comparison tool and the collection and analysis of national share data from retailers, also in the context of PUTPL amendments and other food retail policy initiatives. ■

Sanita Uljane, Head of the Market Surveillance and Research Department:

'In 2025, the CC significantly strengthened its monitoring of unfair trading practices in the retail trade of agricultural and food products. The level of information about applicable regulations among suppliers has also grown, as did their trust in the CC as an institution in charge of supervising PUTPL compliance. The first decision adopted regarding a PUTPL infringement since the law took effect confirms that it is effectively applied in practice, and that market participants are held accountable for violating the requirements of the law. At the same time, we continue to actively provide consultations and education for market participants in the industry, seeking to mitigate the risks of unfair trading practices and foster fair, balanced, and transparent relationships between buyers and suppliers.'



INFLUENCE OF PUBLIC ENTITY ACTIVITIES ON COMPETITION

Throughout 2025, the CC received 137 applications related to the activities of public entities: national and municipal authorities and companies owned by them.

Competition neutrality compliance

Since the 1 January 2020 amendments to the Competition Law, giving the CC broader powers to act against **distortions of market competition caused by public entities**, the institution has implemented a number of measures to improve the understanding of competition neutrality in public entities and companies owned by public entities.

During the reporting period, the CC concluded negotiations on compliance with competition neutrality regulations in six cases (twice as many as in 2024): with Jūrmala State City Municipality in two instances, as well as with Valmiera Municipality, Jelgava State City Municipality, as well as Dienvidkurzeme Municipality and its company SIA Grobiņas HES.



During the reporting period, the CC also concluded negotiations with Valmiera Municipality in relation to the procurements it held for the provision of public transport services in Valmiera, rectifying the competition neutrality deficiencies identified.



As a result of CC negotiations, Jūrmala State City Municipality amended its binding regulations, removing the barriers for mobile food service providers entering the market that had been found in them.



In the second instance of the CC conducting negotiations with Jūrmala State City Municipality, the matter concerned residential building management contracts that had not been concluded as a result of a procurement procedure, with the CC finding the municipality's conclusion that a public procurement procedure would not have been appropriate in the given situation to be reasonable.



The CC carried out negotiations with Jelgava State City Municipality in relation to the requirements for the scope of a car rental procurement set in such a way that only a specific car brand could qualify for the procurement.



Negotiations were also concluded with Dienvidkurzeme Municipality and SIA Grobiņas HES concerning the procurements they ran for grounds and improvements, and the purchase of motor vehicles.

Involvement of national and municipal institutions in business activities

Whenever they establish new ownership or reassess their existing ownership in companies, public entities are required to carry out an assessment of their planned operations, in accordance with Section 88 of SASL, in order to avoid the risks of the public entities engaging in commercial activities without justification, making it more difficult or even impossible for private businesses to operate in the market.

During the reporting period, the CC issued 37 opinions on the retention of public ownership in companies under Section 88 of the State Administration Structure Law.

Laws and regulations promoting competition

In 2025, the CC **issued 37 opinions** to legislators in order to prevent possible restrictions of competition that could be caused by regulations, offering objections or proposals regarding the compliance of draft laws and regulations prepared by other institutions with the principles of free competition in industries such as finance, retail, waste management, utility services, healthcare, etc.

48% of all proposals and objections submitted by the CC were taken into account.

In order to encourage the adoption of regulations that promote competition, representatives of the CC **defended the principles of fair competition at 60 events**, including at the Cabinet of Ministers, the Parliament, etc.

Antis Apsītis, Head of the Competition Promotion Department:

'2025 was marked by a particular increase in the quality and depth of discussions on competition neutrality and public participation. Meanwhile, we continued our consistent educational work in competition neutrality, so that a better understanding of the matter among public entities and the general public can contribute to the timely detection of problems and to their constructive resolution.'



MARKET SUPERVISION

The purpose of market supervision is to gain detailed insights into various sectors of the economy, to identify the competitive situation within them, and to find ways to improve the situation.

In 2025, the CC completed three market supervision activities, including assessments and proposals for eliminating restrictions to competition.

- ▶ The CC concluded its **scrap metal market supervision**, identifying significant barriers to market entry for new companies, and found that the number of businesses operating in the sector had almost halved over the past decade.
- ▶ The CC completed its **market supervision of payment date enforcement practices in the supply chain of fresh fruit, vegetables, and berries in Latvia**, concluding that buyers leveraged their market power to impose excessively late payment dates, shifting the financial burden onto suppliers.
- ▶ The CC concluded its market supervision of **public procurements organised by Dienvidkurzeme Municipality**, identifying substantial restrictions of competition in them.

Scrap metal market supervision



The market supervision was initiated in response to applications submitted by market participants in which they reported existing problems in the sector, including those pertaining to regulations, market

structure, and access to infrastructure. The purpose of the market supervision was to assess the competitive situation on the market and to analyse the structure of that particular market in Latvia, identifying the active scrap metal procurement market participants (mainly ferrous and non-ferrous scrap metal market) and determining the impact of activities of existing market participants on competition.

The market supervision revealed that the market for ferrous and non-ferrous scrap metal in Latvia was still represented by a relatively large number of companies. However, that number had almost halved in the previous decade, which may reduce competition in the long run. The CC also found that companies of TOLMETS group owned almost half of all active scrap yards, which accounted for 57.8% of the sector's total turnover in 2023. Such market power, strengthened by the scale advantages of TOLMETS group and its strong vertical integration, with TOLMETS group controlling the entire chain of operations from scrap collection to its sale, makes it significantly more difficult for smaller market participants to compete in fair conditions.

▶ Market supervision also discovered barriers for new companies entering the scrap metal procurement market

Regulatory requirements, including the procedure for receiving permits and the necessary level of financial guarantees, were time-consuming and financially burdensome, while setting up scrap yards often meant difficulties due to regulatory constraints and opposition by the public. It also requires significant upfront investment that returns over a long time and involves the purchase of specialised equipment. It is additionally difficult for new companies entering the scrap metal procurement market



due to the fact that the market is dominated by a company that can offer more favourable business terms due to the scale of its scrap metal processing. This reduces the ability of smaller market participants to compete effectively and can affect the dynamics of the market.

Market supervision of payment date enforcement practices in the supply chain of fresh fruit, vegetables, and berries in Latvia

The main purpose of market supervision was to conduct an in-depth analysis of the payment date enforcement practices in the supply chain of perishable goods, assessing whether the payment date requirements set by PUTPL are observed in the transactions between buyers and suppliers.

▶ Small farms are slow to establish cooperatives

Market supervision revealed that most fruit, berry and vegetable growers in Latvia were small farms, with their numbers declining, mainly due to the closure of these farms. At the same time, the establishment of new cooperatives in the sector was found to be slow, while the lack of infrastructure (e.g., storage capacity) limited the development of these farms and their export potential. For this reason, the CC urged growers to consider options for establishing cooperatives to improve resource utilisation, logistics, and negotiation positions with buyers.

▶ Inaccurate payment date criteria in contracts

The CC found that contracts did not always use the day of delivery of the goods as a reference point for determining payment dates, which is required by PUTPL. Inaccurate wording in payment date provisions can create risks in the cooperation between suppliers and buyers, which is why the CC urged buyers to comply with regulations in preparing their procurements and to ensure the correct calculation of payment dates.

▶ Late payments in retail and wholesale trade

Market supervision revealed indications of payments being made late in some cases, even if the deadlines specified in the contracts formally complied with PUTPL. The observed delay in payments ranged from a few days to several months after the delivery of the goods. Given these findings, the CC urged buyers to ensure timely payments and initiated a number of infringement cases.

▶ Different treatment of Latvian and foreign suppliers

The CC found that some contracts set stricter contractual fines and insurance requirements for Latvian suppliers than for foreign suppliers. The CC called buyers to give equal access to all suppliers and to revise the contractual fine provisions following the principles of good faith and fairness.

► **Industry involvement and future steps**



The CC urged industry associations to be more active in representing the interests of growers, to collect information about payment date compliance, and to report breaches of PUTPL. The CC also encouraged building cross-institutional cooperation with industry associations and national government institutions, aiming to improve data collection, coordination, and building a support policy in the food and agriculture sector.

Market supervision of procurements held by Dienvidkurzeme Municipality

The CC found that public procurements for the purchase and lease of motor vehicles conducted by Dienvidkurzeme Municipality (Municipality), the Municipal Administration institution of that municipality (Municipal Administration), as well as public

procurements held for the maintenance and improvements of the grounds of Municipal Limited Company (SIA) GROBIŅAS HES, for a long time had requirements that restricted competition and narrowed the scope of tenderers, resulting in the same companies winning the procurements over multiple years.

► **Competition-restricting requirements in motor vehicle procurements held by the Municipality and Municipal Administration**

In the procurements for the maintenance and improvement of the grounds of Municipal SIA GROBIŅAS HES held in 2023–2025, the CC found a provision requiring the service provider's machinery storage facility to be within a range of 10–15 km from its registered office. The CC deemed such a requirement disproportionate for routine, scheduled work, restricting competition without due justification by excluding companies that could provide more economical solutions.

COURT PROCEEDINGS PERTAINING TO COMPETITION COUNCIL DECISIONS

In 2025, significant resources were allocated to the representation of the institution in courts. At the end of the reporting period, there were 14 active proceedings in courts of various instances, with the CC represented at 12 hearings in total. During the year, courts ruled in favour of the CC or partially in favour of the CC in six cases, and CC decisions were upheld in all fully concluded court proceedings.

During the reporting period, courts upheld CC decisions in cases concerning unfair contractual fines for food suppliers, as well as breaches of prohibited agreements when companies shared commercially sensitive information in procurement processes. Two opinions were issued to the Constitutional Court, and there are matters to be examined in pre-litigation proceedings at the Court of Justice of the European Union in relation to decisions adopted by the CC.

At the same time, in the building contractor cartel case, the Senate of the Supreme Court judged against the CC, overruling the decision of the Administrative District Court and handing the case over for new review.

A total of EUR 1,525,702 was paid to the State Treasury in 2025.

Key court proceedings



Senate rejects the MKP motion for provisional protection

On 14 November 2025, the Senate of the Supreme Court cancelled the decision of the District

Administrative Court and rejected the SIA Mārupes komunālie pakalpojumi motion requesting provisional protection. The company was thus required to comply with the CC decision: to resume the additional service and to make it possible for clients to also install additional water meters or replace them using the services of other certified merchants, informing the clients of this publicly.

** On 26 June 2025, the CC adopted a decision, in which the institution found that SIA Mārupes komunālie pakalpojumi had abused its dominant position and restricted competition on the market for the installation of additional water meters and replacement of water meters in Mārupe Municipality, imposing a fine of EUR 78,055.79 and a legal obligation to eliminate the distortions in competition.*



On 22 December 2025, the Senate of the Republic of Latvia refused to initiate cassation proceedings in the case appealing the CC decision of 7 August 2014

regarding the actions of AS KIA Auto and its parent company AS Tallinna Kaubamāja. This brought to an end more than 11 years of litigation, upholding the CC decision that found an infringement of competition legislation in these companies, imposing an unjustified restriction on the ability of their clients to conduct the maintenance and repairs of their motor vehicles with independent service providers during the warranty period. The two companies were jointly fined EUR 134,514.43.

Decisions on procedural infringements

In 2025, two additional procedural infringement decisions were adopted due to the failure of companies to cooperate with the CC during its procedural activities. The CC imposed fines on the companies for these infringements.

In the first case, the CC decision was related to the failure of SIA Sēme, a participant in a case, to cooperate during procedural activities, denying online access to the computer of its management board member and refusing to provide explanations to CC officials. The company was fined more than EUR 46 thousand for obstructing the investigation.

In the second case, a procedural infringement decision was adopted against SIA SILTUMTEHSERVISS for a failure to cooperate during procedural activities, in the form of deleting information necessary for the investigation of the case by the CC. Given the importance of these procedural activities in detecting infringements, the company was fined more than EUR 26 thousand for obstructing the investigation.



Andris Eglons, Head of the Legal Department:

"The 2025 court proceedings resulted in important case law findings in the area of substantive competition law, providing an answer to a long-discovered problem. Specifically, the District Administrative Court ruling in the case concerning AS KIA Auto warranty conditions,

upheld by the Senate, finally brought clarity to the previously controversial issue of the right of car manufacturers to restrict warranty conditions if the repairs were performed by an independent provider. The District Court confirmed the CC's position in that a vertical agreement requiring or directing car owners to only carry out repairs and maintenance with dealers authorised by the manufacturer and to use original spare parts for routine maintenance in order for the warranty to remain valid qualified as a restriction of competition based on its consequences, as defined in Section 11(1)(7) of the Competition Law. The Court emphasised that, in a situation where the parties to the agreement have a market share of almost 100% in the given market, the potential effects restricting competition are sufficiently significant to limit the access of independent repairs providers and equivalent spare part manufacturers to the market, which ultimately harms consumers by narrowing their choice and preventing downward pressure on repair service prices."

COMMUNICATION AND COOPERATION



Cooperation

110 cross-institutional meetings
87 meetings with businesses and NGOs



Education

54 educational events
10 School of Competition Law webinars, educating 1800 participants



Communication

48 interviews
3 press conferences
120 press releases

In 2025, CC representatives participated in **54 educational events organised by the institution or other organisations**.

In order to promote the development of a fair competition environment, the CC held **110 cross-institutional cooperation meetings**, with the participation of representatives of various institutions. The CC conducted **87 meetings with businesses and NGOs**, discussing developments and challenges in competition in various sectors, aiming to promote compliance with the principles of fair competition. The institution also held information seminars on various aspects of enforcing competition law for these target groups.

In 2025, CC representatives gave **48 interviews** with the media, and **3 press conferences** were held.

The CC continues to reach a wider audience

In 2025, the CC continued actively using various communication channels to reach its audiences.

120 press releases were prepared in total. On social media platforms, a total of **230** publications on Facebook and LinkedIn and more than **100** publications on X were produced in 2025. Thus, in 2025, the CC reached an **audience** of around **310 thousand** on these platforms, a year-on-year increase of **almost 100 thousand**.

Education measures for improving the competitive environment

The latest 2024 public opinion poll showed that prohibited agreements (cartels) in public procurements were still considered the main obstacle to the development of Latvia's competitive environment, followed by companies abusing their dominant position, with third place held by decisions and actions of national and municipal governments that unjustifiably distort competition.

Thus, in 2025, the institution focused its key education resources on priority target groups: **entrepreneurs, legal representatives of companies, procurement organisers, and public entities**.

10 webinars took place as part of the School of Competition Law initiative

launched by the CC, educating some **1800** market participants and their representatives. Topics covered include prohibited agreements, competition neutrality, reassessment of public ownership of companies, unfair trading practices, the preparation of merger reports, abuse of dominant position, etc. Feedback provided by participants afterwards revealed that the training provided by the CC was mostly viewed as very good and valuable. Particular attention this year was paid to the **new function of the CC**: supporting public contracting authorities in determining damage caused by competition infringements, **with more than 200 participants provided with education on this topic**.

In 2025, seeking to improve the understanding of competition legislation among businesses and public entities, the CC **prepared six information materials**, including a methodological publication on cooperation between CC and public contracting authorities in recovering losses caused by competition legislation infringements, guidelines on marketing at public events organised and supported by municipal governments, information material on criteria for recognising fresh fruit, vegetables, and potatoes as perishable agricultural and food products, as well as information publications on closing a competition legislation infringement case with a written commitment and binding regulations.

The CC also organised several events for a number of institutions with the aim of improving the knowledge of its cooperation partners in competition legislation and to inform them of opportunities to participate in the detection of competition legislation infringements. For example, for the second year in a row, the CC hosted its partners as part of an EU Anti-Fraud Coordination Service (AFCOS) shadowing initiative. The event was attended by the CC's partners from the Central Finance and Contracting Agency, Procurement Monitoring Bureau, State Revenue Service, Ministry of Finance, Rural Support Service, and State Police.



For the second year in a row, the CC hosted its partners as part of an EU Anti-Fraud Coordination Service (AFCOS) shadowing initiative.



CC chairwoman Ieva Šmite was interviewed on the TV3 news programme '900 sekundes', discussing the latest topics at the Competition Council



CC chairwoman Ieva Šmite took part in the discussion 'State Capital: Driver for Innovation or Guarantor of Stability?' at the Innovation Forum organised by the State Innovative Company Initiative (SIC)



CC chairwoman Ieva Šmite took part in the Procurement Forum, the largest procurement sector event in Latvia, bringing together industry professionals, experts, procurement policymakers, representatives of national and municipal government institutions, and businesses: both clients and suppliers.



Continuing with the established tradition, the CC organised the CC Winter Holiday Charity Auction, donating the proceeds to the High Five! charity marathon.

Competition Week Competition Law Week

On 10–14 November, the CC organised a Competition Law Week, highlighting the importance of competition legislation in fostering a fair business environment and monitoring effective competition. It involved a number of important events for competition law practitioners, representatives of the public sector, experts, and entrepreneurs, including a conference on competition neutrality, as well as the Lawyer Forum, which has become an annual tradition.

At the opening event of the Competition Law Week on 10 November, CC chair Ieva Šmite presented the institution's most important performance indicators over the past years, marking the next-period priorities for the CC. At the same time, an overview was made of the latest competition developments in Lithuania and Estonia, emphasising the importance of the Baltic states cooperating in strengthening the supervision of competition.

The event also included a presentation of the Sectoral Competition Assessment Report, drafted by the CC, which will serve as an important tool for monitoring the competitive situation in various sectors and markets.

The opening day also featured an 'Is There Competition in the Banking Sector?' panel discussion, discussing the competitive dynamics of the financial sector and possible challenges in its development.

Around 40 participants attended the opening event in person, and **some 500 people watched it live online**.

On 13 November, a conference on competition neutrality took place as part of the Competition Law Week. The event offered an overview of the achievements of the past five years, highlighting key cases, negotiations, and statistics, as well as the practical matters and challenges of upholding competition neutrality.

The panel discussion included an analysis of the effectiveness of competition neutrality regulations, talking about its possible future development.

The conference was attended by around **70 participants** in person, and **some 300 people watched the event online**.

On 14 November, the CC's 10th Lawyer Form concluded the Competition Law Week, discussing a number of current matters pertaining to the application of competition legislation. Its participants explored the results of the tolerance programme survey, discussed the possible existence of cartels on the job market, and discussed the legal aspects of boycotts and the practice of damage recovery in competition legislation infringement cases. An artificial intelligence tool for analysing CC decisions was also presented at the end of the forum.

The Lawyer Forum was attended in person by about 50 people.



The Baltic Competition Conference was held during the Competition Law Week. For two days, it brought together leading officials of competition institutions from Latvia, Lithuania, and Estonia.



Competition Law Week included the Competition Neutrality Conference. The panel discussion included an analysis of the effectiveness of competition neutrality regulations, talking about its possible future development.



At the Competition Law Week opening event the CC presented the Industry Competition Assessment Report.



On 14 November, the CC's 10th Lawyer Form concluded the Competition Law Week, discussing a number of current matters pertaining to the application of competition legislation.

Building a culture of competition among young audiences

In 2025, the CC continued raising awareness about its activities and competition policy among school and university students.

In conjunction with ELSA Latvia, the CC organised the **Lawyers@Work** education event for law students to learn more about the operations and structure of the CC, as well as the daily duties of a lawyer working at the CC.

In the spring, the CC participated in the **Shadow Day** event, letting schoolchildren explore the daily workings of the Competition Promotion Department, the importance of competition regulations, and the role of the institution in ensuring fair competition conditions. During the Shadow Day, the schoolchildren also found out about the CC's work in monitoring the conduct of national and local governments and improving regulations in order to promote fair competition.

In 2025, the CC also continued its cooperation with higher education institutions, holding 5 lectures at various universities in Latvia.

For example, at the **Faculty of Law of the University of Latvia**, CC representatives gave a guest talk for master students as part of a course on the law governing market, competition, and economic activity, providing insights into the everyday work of CC lawyers, their most recent decisions and litigations, and actively participating in discussions and assessing student reports.



Raising the awareness of the importance of competition and the activities of the institution among schoolchildren, the CC participated in the 2025 Shadow Day event, introducing schoolchildren to the daily duties of the Competition Promotion Department.

International cooperation

In 2025, CC representatives raised the visibility of Latvia and strengthened the international position of the institution by **attending 58 international events**, such as W@CompetitionNordic, CompLaw: Nordic, Fordham Heads of Authority Roundtable, and other conferences.

On 19–23 May 2025, a delegation of the Antimonopoly Committee of Ukraine visited Latvia for an exchange visit, aiming to strengthen institutional capacity and gain practical insights into the implementation of competition and state assistance policy in a member state of the European Union. Throughout the week, CC officials educated their colleagues from Ukraine on various competition legislation and policy issues essential to strengthening the legal environment in line with EU standards.

On 10 September, Latvia hosted a visit by representatives of the EC Directorate-General for Competition (DG Comp) to discuss current topics in Latvian competition policy and the EC's plans for the application of competition legislation. Also in September, OECD experts assessed the effectiveness of the CC and Latvia's competition policy, meeting representatives of the CC, ministries, partner institutions, social partners, and others. The final assessment report is expected to be presented in June 2026.

The 21st **Baltic Competition Conference** took place on 11–12 November 2025. For two days, it brought together **leading officials of competition institutions from Latvia, Lithuania, and Estonia**, as well as their lawyers and experts, to share experience, look for more effective solutions in future cooperation, and strengthen the supervision of competition in the Baltic region.

The CC also participated in two TSI projects held by the OECD, joined by several other competition institutions from EU member states:

2025 saw the continuation of active work on the TSI project: a study of digital markets in different countries, implemented together with the OECD, the EC, Poland, and the other Baltic states;

In September 2025, the new TSI project was launched in Paris, aimed at strengthening the detection and reporting of prohibited agreements in public procurements. It is currently being developed in conjunction with the EC, the OECD, and several EU member states.

In 2025, in addition to educational activities, the CC drafted or contributed to **102 international documents**, sharing its experience in applying competition legislation.

The CC experts actively participated in 40 EC Competition Network working groups, which included making presentations.

The CC also hosted a meeting with the students from the **Riga Graduate School of Law (RGSL)**, as CC employees, RGSL graduates themselves, shared their experience on the knowledge gained during their studies and its practical application in CC activities.



In order to expand the students' knowledge on the practical application of competition legislation, CC officials gave a guest talk to the students of the master's degree programme at the Faculty of Law of the University of Latvia.



Students from the Riga Graduate School of Law visited the CC for sharing practical experience and strengthening the links between academia and public administration.



On 4 December, by a unanimous vote of the OECD Competition Committee member states, CC Council member Kārlis Piļēns was elected for a third consecutive term in the OECD Competition Committee Bureau, continuing the ongoing work on international competition policy into 2026.



Participation of the CC chairwoman Ieva Šmite in the DG Meeting in Italy on 26–27 November.



Baltic Competition Conference, held this year in Latvia, bringing together competition institution officials from Latvia, Lithuania, and Estonia.



Antimonopoly Committee of Ukraine delegation visit to Latvia on 19–23 May.

INNOVATION AND DIGITALISATION

In 2025, the CC achieved significant development in innovative supervision and investigation tools through new approaches to detecting infringements and through strategic projects in the field of data analysis and strengthening competition.

Innovative approach to investigating infringement cases



The CC initiated its first infringement case involving the use of the institution's data monitoring tool.

The investigation concerns the coffee machine distribution market and possible prohibited agreement infringements. This case marked the first time in the history of the institution that simultaneous inspections were carried out in all three Baltic states, with the participation of colleagues from the competition institutions of Lithuania and Estonia.

Latvian Industry Competition Assessment Report



The Latvian Industry Competition Assessment Report is the first mapping of competition of its kind, systematically analysing 210 industries, more than 116,000 companies, and 486,000 annual accounts.

This offers an objective basis for understanding market development trends and the areas where competition works in the public interest.

The report provides an accurate assessment of the level of competition by measuring market concentration, trends, and performance across the entire economy using a single methodology, clearly showing the industries where competition is strong and where it is weakening.

The full Industry Competition Assessment Report will be published in Q1 2026 and will become an annual report, systematically strengthening Latvia's competitive environment.

Submission of e-merger reports



The option to submit e-merger reports is a CC project that will make it easier and more convenient for market

participants to submit their merger reports, saving time and financial resources.

Stage 1 of the project was completed in 2025 and work on the tool will continue in 2026.

Screening tool for monitoring cartels



The screening tool for monitoring cartels is an innovative project involving close cooperation between the CC, the Corruption Prevention and Combating Bureau, the University of Latvia, and Riga Technical University. A specialised screening tool is being developed as part of this four-party agreement, aimed at effectively detecting and preventing cartels in public procurements.

The project envisages the introduction of the new tool based on a detailed analysis of public procurement data in the context of cartels by the end of this year. The tool uses best practices and experience based on the operating models of the EC and other institutions supervising competition, in particular, the successful solutions implemented in Denmark and Finland. It will be an important vehicle for strengthening the supervision of competition in Latvia and building a fairer market environment.

Monitoring of unreported mergers

In 2025, aiming to identify unreported mergers that may have a negative impact on competition and consumers, the CC introduced a proactive merger monitoring system that tracks all company ownership changes that are lodged in state registers.

Since the monitoring began, dozens of initial checks have taken place every day, identifying those whose circumstances necessitate additional clarification. The CC detected 30 such cases in 2025, for which additional inspections were carried out. No merger requirements set in the Competition Law were found to have been breached by market participants in any of these cases.

COMPETITION COUNCIL GOVERNANCE

CC performance indicators

As a whole, in 2025, the CC achieved the performance indicators set for the institution under the budget sub-programme 'Competition policy implementation'.

For a number of performance indicators, including infringement investigations, investigative measures to ensure the neutrality of competition, assessments of market participants in terms of the impact of proposed mergers on the competitive environment, share of CC decisions upheld, preparation of expert reports and proposals, public education, and international cooperation activities, the target values were exceeded.

Indicator name / Measure name	Planned value	Fulfilment
High-priority market studies <i>Number of high-priority measures</i>	14	14
Investigation measures (cases and supervision) to ensure neutrality of competition <i>Total number of measures</i>	9	12
Assessments of the impact of mergers and agreements of market participants on the competitive environment <i>Number of cases/high-priority cases</i>	16	19
incl. in-depth studies in merger cases <i>Total number of measures</i>	6	4
Measures based on applications received, providing protection against possible infringements of competition legislation <i>Applications examined, based on which a Council decision was adopted</i>	40	38
Restrictions prevented in the activities of public entities (share of positive results achieved relative to the total number of actions taken) <i>Percentage share (calculated once a year)</i>	30 %	48 %
In-depth analyses of data (online evidence) obtained from inspections <i>Quantity (calculated once a year)</i>	10	28
Completed administrative court proceedings and percentage of institution decisions upheld <i>Percentage share (calculated once a year)</i>	82 %	100 %
Provision of opinions to the Advisory Committee for European Commission decision-making <i>Total number of measures</i>	3	3
Public procurements assessed and opinions issued at the request of the contracting authority <i>Number of opinions</i>	24	18
Measures to promote competition ideas (explanations, opinions, proposals, drafting of legislation and guidelines, educational activities) <i>Number of documents</i>	230	310
Role and international visibility of the CC strengthened (number of publications and speaking events) <i>Total number of measures</i>	51	62
Staff turnover (number of employees leaving relative to the total number of employees) <i>Percentage share (calculated once a year)</i>	15 %	39 %
Staff loyalty (percentage share of staff members that, in the survey, reported an intention to continue their employment at the institution in the next two years) <i>Percentage share (calculated once a year)</i>	85 %	82 %
Public benefit from pursuing the competition policy <i>Millions of euros (three-year average)</i>	30	44

FUNDING ALLOCATED TO THE COMPETITION COUNCIL AND ITS UTILISATION

Through its activities, the institution implements the sub-programme 'Competition Policy Implementation' (26.02.00) of the budget programme 'Ensuring of Fair Competition, Protection of Internal Market, and Consumer Protection' (26.00.00).

No.	Financial indicators	During the previous year (actual fulfilment)	During the reporting year		
			approved by law	approved by law (with amendments)	actual fulfilment
1.	Financial resources for covering costs (total)	3 707 114	5 202 107	5 504 016	4 407 630
1.1.	grants	3 707 114	5 202 107	5 504 016	4 407 630
2.	Costs (total)	3 707 114	5 202 107	5 504 016	4 407 630
2.1.	maintenance costs (total)	3 605 445	4 488 107	4 186 617	3 773 229
2.1.1.	regular costs	3 605 417	4 488 107	4 186 617	3 773 229
2.1.3.	subsidies, grants, and social benefits	28	0	0	0
2.2.	capital investment costs	101 669	714 000	1 317 399	634 401

COMPETITION COUNCIL

PRIORITY TASKS FOR 2026

For 2026, the CC has set as its main priorities the detection and prevention of the most severe infringements of competition legislation, in-depth supervision of markets in industries that affect substantial public interests, and the modernisation and digitisation of the institution's processes. At the same time, the CC will continue reducing the bureaucratic burden caused by regulations and strengthening the understanding of competition culture among the general public. In setting these five priorities, the CC has also defined specific performance indicators it seeks to achieve in order to ensure consistent work and measurable outcomes.

The institution set three priorities for the implementation of the CC operational strategy (2023–2029) and achieving its overarching goal:

- ▶ team consisting of professional, committed, and growth-oriented employees;
- ▶ result-oriented day-to-day operations and cooperation, ensuring the detection of significant impediments to competition and the promotion of competition;
- ▶ innovative and sustainable working environment.

In line with these three priorities, the CC has set several priority tasks for 2026.

1. Detecting and preventing the most severe competition legislation infringements

In 2026, the CC plans to review and adopt decisions on at least 10 high-priority infringement cases, with a particular focus on cartels in public procurements, the food retail sector, and breaches of competition neutrality. The CC also intends to maintain a high quality of its decisions, anticipating that at least 82% of CC decisions will enter into effect, including those that are contested and reviewed by courts of various instances.

In addition, the CC will continue addressing less severe competition legislation infringements through warnings and preventive measures. The CC has set a target of at least 75% of restrictions of competition rectified preventively, without the need to initiate infringement cases.

In fulfilling these objectives, the CC also aims to deliver substantial public benefit, with an average of at least 30 million euros over three years.

2. Market supervision

The CC's second priority is the in-depth supervision of markets. In 2026, the CC plans to complete its market supervision activities in the food retail, healthcare, waste management, energy, and financial sectors, as well as in the public procurements pertaining to the IT sector.

The goal of the CC is to achieve change that promotes competition on the markets analysed through market supervision, which is why the institution has set itself the target of at least 50% of the recommendations made by the CC being taken into account and implemented in practice.

3. Modernised and digitalised institution processes

The CC will continue to digitalise its processes and engage in data analysis-based market supervision in order to bolster its efficiency and achieve the timely detection of competition risks in various sectors.

The Industry Competitiveness Report will be particularly important in 2026 as the first data-driven economic indicator analysis tool that will provide a comprehensive overview of the competitive situation and business environment in the country, broken down by individual sectors. The report's conclusions and proposals for individual sectors will be presented in the first quarter of 2026. Until then, the CC plans to meet representatives of the sectors involved as well as other stakeholders to discuss improvements in the report and the potential for using the data. A full report is expected to be published in the second quarter of 2026.

At the same time, the CC will develop a cartel screening tool that will use artificial intelligence to analyse public procurement documents. The project is developed in conjunction with the Corruption Prevention and Combating Bureau, University of Latvia, and Riga Technical University. A prototype of the screening tool has already been developed, and currently, its refinement and testing, as well as machine learning are taking place. Testing the tool in the real procurement environment is slated to start in the second quarter of 2026, with plans to complete it by the end of the year.

The CC also continues its work on digitalising the submission of merger reports. The purpose of this project is to facilitate the process of submitting merger, saving businesses both time and financial resources. It is planned to start implementing the project in 2027, subject to allocated funding.

Furthermore, the CC continues the implementation of the e-case, raising European Union funding for this purpose. This project is scheduled to be completed by December 2029.

4. Reducing the bureaucratic burden at the regulatory level and streamlining the monitoring of competition legislation

The CC plans to propose at least two legislative initiatives in 2026, aiming to reduce the bureaucratic burden at the regulatory level and increase the efficiency of regulations in competition legislation.

The progress on the amendments to the Competition Law is planned to continue this year, setting more liability for company officials for participating in competition infringements. Amendments to PUTPL are also envisaged, with the goal of limiting deadlines for product range changes, refining the rules governing the definition of contractual penalties and payment deadlines for fresh fruit, berries, and vegetables. Meanwhile, merger regulations are to be improved with higher thresholds for submitting merger reports and the expanded applicability of abbreviated reports. The CC also intends to harmonise with EU regulation national regulations on certain vertical and horizontal agreements that are not subject to prohibitions on agreements.

The CC will, furthermore, continue working on the development of competition neutrality regulations, aiming to set simpler and clearer conditions and assessments of the acquisition or retention of public ownership in companies, while increasing liability for infringements and the possibility to claim damage compensation in the event of breaches of competition neutrality.

The CC will continue actively making objections and proposals regarding regulations prepared by other institutions, aiming to reduce restrictions on competition in draft laws and regulations, setting as a goal that at least 30% of CC proposals are taken into account.

5. Efektīva konkurences kultūra/ sabiedrības izglītošana

The CC intends to increase the public awareness of the importance of fair competition, thus setting itself a target of at least a 5% increase in public awareness of the importance of fair competition compared to the 2024 opinion poll results. The CC also seeks to continue actively informing the public about the results of its operations, thus expanding its social media audience and its number of followers on social media.

Meanwhile, for 2026, there are plans to hold press conferences on the most important CC decisions, training events for various audiences, and a Competition Law Week event, as well as to participate in international events. ■

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Konkurences padome



Competition Council
Republic of Latvia

ANNUAL REPORT

2025

**SUMMARY OF APPLICATIONS,
FOR WHICH A CC COUNCIL DECISION
WAS ADOPTED**

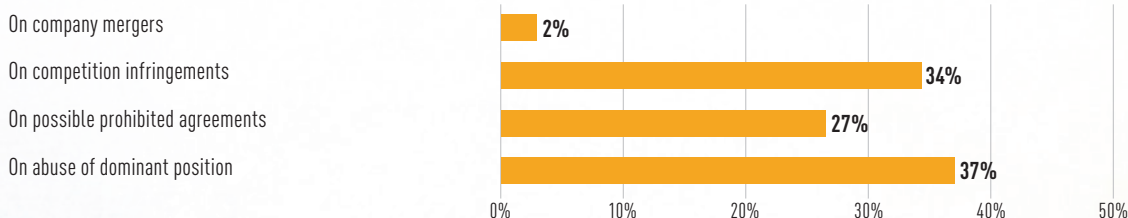
DECISIONS ADOPTED ON APPLICATIONS RECEIVED

The decision-making body of the CC, its Council, adopts decisions on complaints received by the institution, ruling to initiate an infringement case, market supervision, or an investigation of practices that restrict competition. However, if there are no indications of an infringement, the Council may decide not to initiate a case, giving the applicant a reasoned reply on the substance of the problem raised in the complaint.

Given the limited resources of the CC, the institution is entitled to set priorities for applications. In the case of less serious infringements whereby the activity in question or market participants involved do not have a significant impact on competition and the market, deficiencies can be corrected not through the opening of a case and the imposition of punishments, but rather using preventive tools in the form of warning and negotiation procedures.

In 2025, the CC adopted 38 decisions on applications alleging competition legislation infringements received by the institution. More than a third of all of these applications (37%) concerned alleged abuses of dominant position, slightly more than a third (34%) involved competition neutrality matters, and more than a quarter (27%) were about alleged prohibited agreements. Mergers accounted for 2% of all applications.

Application topic breakdown



Prohibited agreement applications

Agricultural raw materials trade



The CC received an application from a company regarding the collection and publishing of mineral fertiliser price information. Having examined the application, the CC found that the conduct in question was that of a sole individual and did not involve any actions coordinated with other market participants. As a result, the CC did not detect any indications of a prohibited agreement as defined in Section 11 of the Competition Law.

Repair and maintenance services



The CC received an application from a company alleging a prohibited agreement as part of a procurement procedure for repair and maintenance services. The conduct of multiple tenderers was used as grounds for the suspicions, including the withdrawal of one tender without an explanation and the submission of another tender after the deadline, with only one tenderer submitting a final tender as a result.

Having assessed the circumstances provided in the application and the information available, the CC did not find indications that would, as a whole, justifiably suggest a possible prohibited agreement between the tenderers of the procurement under Section 11(1) of the Competition Law. Thus, there were no grounds found for initiating an infringement case.

Provision of catering services



The CC received an application from a company alleging a prohibited agreement as part of the conditions for participation in a procurement procedure for the provision of catering services. Having assessed the circumstances specified in the application, the CC concluded that the information in question was widely available to the public, including to the parties that allegedly infringed the Competition Law.

In view of the above, the CC decided not to initiate a Competition Law infringement investigation case, as the investigation would not be useful, with a high risk of potential evidence having already been deleted, thus preventing the possibility to obtain objective information regarding the alleged infringement.

Retail trade sector — possible price coordination



The CC received an application from a private individual regarding an alleged cartel agreement in the retail trade sector, including the possible coordination of prices by market participants. Having examined the application, the CC did not detect any indications of a possible prohibited agreement as defined in Section 11 of the Competition Law. Thus, there were no grounds found for initiating an infringement case.

Measuring instruments and their delivery



The CC received an application from a company alleging a cartel agreement in relation to its participation in a public procurement. Having examined the application, the CC did not detect any signs of a possible prohibited agreement among the tenderers within the procurement. Thus, there were no grounds found for initiating an infringement case.

Real estate management



The CC received an application from a private individual alleging an infringement of Section 11 of the Competition Law in the field of real estate management. Having examined the application, the CC did not detect any signs of a possible prohibited agreement among market participants. Thus, there were no grounds found for initiating an infringement

case.

Wholesale of pharmaceutical and medical products — microorganism detection test kits



The CC received an application from a company alleging an infringement of Section 11 of the Competition Law in the field of wholesale of pharmaceutical and medical products. The facts mentioned in the application were not deemed direct or indirect signs sufficient to constitute a set of evidence for a possible prohibited agreement. There were no other indications found that would give a prima facie reason to find signs of a prohibited agreement and to decide to initiate an infringement investigation case.

Delivery of toys



The CC received an application from a company alleging an infringement of Section 11 of the Competition Law in the field of the delivery of toys. Having examined the application, the CC did not detect any signs of a possible prohibited agreement among market participants. Thus, there were no grounds found for initiating an infringement case.

Complaints on the abuse of dominant position

Management and administration of residential buildings



The CC received an application from a company concerning the provision of management and administration services for residential buildings, including the failure to supply hot water in multiple residential buildings and the limited ability of house owners to choose the repair contractor and make decisions on repairs and their costs.

Having assessed the circumstances specified in the application, the CC concluded that the service provider in question was not in a dominant position on the market for residential building management and administration services, for which reason its activities were not to be considered as falling under the prohibition set in Section 13(1) of the Competition Law. However, the information was sent to the corresponding municipal government for awareness purposes, in accordance with the municipal government's competencies.

Passenger air transport



The CC received an application from a private individual concerning the situation in passenger air transport reporting a single carrier becoming the only direct flight operator on a particular route, with a resulting substantial increase in pricing.

Having assessed the circumstances described in the application, the CC concluded that there were options for substituting the service on the market in question, enabling consumers to choose alternative flights, taking the price, duration of travel, departure time, and other relevant criteria into account. Thus, the CC did not consider it useful to further investigate the situation, not finding any prima facie grounds for the application of Section 13 of the Competition Law.

Taxi services sector



The CC received an application from a private individual alleging an infringement of Section 13 of the Competition Law on the taxi services market, including the possible use of predatory pricing and implementation of a bonus system granting discounts in certain conditions.

Having assessed the circumstances described in the application, the CC concluded that there were several service providers operating within the market in question and that, at the same time, there were a number of mobile apps available as usable options for commercial passenger transport. The CC did not find prima facie that any of the market participants was in a dominant position and concluded that bonus systems based on objective criteria (such as the number

of trips or the technical condition of the vehicle) could be aimed at improving the quality of the service and did not in themselves suggest an infringement.

As a result, the CC did not find any prima facie grounds for applying Section 13 of the Competition Law. At the same time, the CC reported that it continued monitoring the market for car-sharing services.

Warranty repair services



The CC received an application from a company alleging the provision of poor-quality warranty repair services. Having assessed the situation, the CC concluded that in the view of the competition between different car manufacturers and distributors, and the options for substitute warranty service options, even outside one country, the service provider in question was not in a dominant position on the primary or secondary markets.

The CC further noted that even in a situation where the after-sale market could be more narrowly defined, consumers had access to sufficient information and options to make economically sound decisions on the primary market and to change their vehicle if necessary. As a result, the CC did not find any prima facie grounds for applying Section 13(1) of the Competition Law.

Telecommunications



The CC received an application from a private individual alleging abuse of a dominant position in the telecommunications sector. Having assessed the circumstances specified in the application, the CC concluded that the service provider in question was not in a dominant position on the internet services market or on the television service market, at a retail level, in Latvia.

As a result, the CC did not find any grounds for imposing the prohibition specified in Section 13(1) of the Competition Law, with the service provider free to set the prices of its own services.

Real estate management



The CC received an application regarding an alleged abuse of a dominant position in the real estate management sector. Having assessed the circumstances indicated in the application, the CC found that the market participant in question did not appear to be dominant on the commercial real estate lease and management market, at least within the specific city.

Consequently, the prohibition of abuse of dominant position specified in Section 13 of the Competition Law does not apply to the market participant in question.

Operation of mobile apps



The CC received an application from a private individual alleging abuse of a dominant position in the mobile app sector. The objections indicated in the application were associated with the possibility of installing apps from an alternative app store tool.

Having assessed publicly available information and regulatory practice, the CC found that users can technically install apps and app store tools, even if provided by third-party sources. As a result, the CC did not find any prima facie indications of an infringement as defined in Section 13 of the Competition Law.

Management of the use of musical works in public performances at events



The CC received an application from a company alleging abuse of a dominant position in the management of a public performance of musical works. Having assessed the circumstances described in the application, the CC concluded that the organisation in question used digital technologies in

its administrative processes, including content recognition solutions comparable to practices adopted in other countries that contribute to the efficiency of these processes.

The CC did not make any prima facie findings of the administrative and digital approaches used being unreasonably costly or inefficient. As a result, the CC did not identify any indications of an infringement as defined in Section 13 of the Competition Law.

Commercial passenger transport by taxi/car platform provision



The CC received an application from a company alleging abuse of a dominant position in the commercial passenger transport platform sector, in relation to, among other things, system errors and unilateral changes in pricing and payment conditions.

Having assessed the information specified in the application, the CC did not find any prima facie indications of an infringement as defined in Section 13 of the Competition Law. The CC noted that the relationship between the platform and the carrier is governed by contractual provisions, including the use of a dynamic payment rate depending on demand, supply, and other objective factors that the carrier accepts when joining the platform.

Applications regarding the neutrality of competition infringements

Refusal to extend the Ozoli peat bog lease period



The CC provided additional clarifications to Kuldīga Municipality government pertaining to the refusal to extend the lease period for the Ozoli peat bog with a company.

The CC concluded that there was no civil-law relationship based on the lease agreement between the parties, and that any disputes were to be settled through civil proceedings.

Procedural infringements in leasing out municipal premises



The CC assessed the conduct of the Dienvidkurzeme Municipality government in relation to the leasing out municipal premises to a state-owned company. The circumstances specified in the application, as well as additional information obtained from the municipal government were taken into account in the assessment.

Based on the above, the CC concluded that, although the municipal government's conduct did not prima facie comply with the requirements of regulations, the conduct was to be associated with the intention of ensuring the in-person availability of a particular service within the given territory. At the same time, the CC did not find that the municipal government's conduct had led to an adverse effect on competition.

Provision of public transport services



The CC assessed a situation regarding the provision of public transport services in Valmiera Municipality, reviewing an application by SIA Liepājas autobusu parks, alleging the possible delaying of the public procurement procedure in the interests of a company owned by that municipality. The assessment carried out by the CC revealed that substantial public interest was negatively affected in the case in question.

The CC held discussions with the Valmiera Municipality government, as a result of which the government undertook to implement measures ensuring the timely preparation and conduct of public procurements in the future, respecting the principle of neutrality of competition.

Management and administration of residential buildings



The CC assessed an application by SIA Nensi regarding the conduct of Jelgava Real Estate Administration in the management and administration of residential buildings, alleging a possibly non-transparent service provider selection process.

In its assessment, the CC drew attention to the importance of respecting the principle of neutrality of competition and called for ensuring transparency in the selection of service providers, also informing the residents of residential buildings of the criteria and procedure for selecting service providers. The CC pointed out the need to comply with the requirements of Section 14.1 of the Competition Law.

Construction



The CC assessed an application by SIA Lidl Latvija regarding the conduct of Riga State City Council in the field of construction, alleging the use of different requirements for competing construction designs.

As part of its assessment, the CC sent a letter to SIA Lidl Latvija and the Ministry of Economics, urging them to consider the necessity of amending laws and regulations in order to ensure the application of regulations that is equal and compliant with the principle of neutrality of competition.

Telecommunications



The CC assessed an application by SIA Bite Latvija regarding the conduct of Riga State City Council in the field of telecommunications, alleging that the requirements of a procurement were defined such that they created advantages for the current contractor.

Having conducted its assessment, the CC did not see the need to open a case against the public entity. The CC additionally sent an advocacy letter to Riga State City Municipality, drawing its attention to the need to promote competition in future procurements and asking it to provide the CC with information about the measures taken in this respect.

Applications regarding multiple infringements of competition legislation

Retail sale in non-specialised stores



The CC received an application from a private individual alleging an infringement of competition legislation in the retail trade sector, including a possible prohibited agreement and abuse of a dominant position, pointing

to different pricing practices adopted by retail chains in different countries.

Having assessed the circumstances provided in the application, the CC did not find, subject to Section 8 of the Competition Law, sufficient grounds for initiating a case for the infringement of competition legislation under the competition restricting practices referred to in Sections 11 or 13 of the Competition Law.

Roofing



The CC received an application from a company regarding a possible infringement of competition legislation on the roofing market, including a possible infringement of the prohibition of the agreements specified in Section 11 of the Competition Law and abuse of a dominant position, as specified in Section 13 of the Competition Law.

Having assessed the circumstances indicated in the application, the CC found prima facie that the market participant in question did not appear to be in a dominant position on the high-strength profiled galvanised steel roofing in Latvia. Furthermore, the CC pointed out that even if the dominant position did exist, there were no prima facie indications of its abuse within the meaning of Section 13 of the Competition Law.

The CC also did not find any indications of possible prohibited agreements, as defined in Section 11 of the Competition Law. Thus, there were no grounds found for initiating an infringement case.

Aesthetic medicine



The CC received an application from an association regarding a possible breach of competition legislation on the aesthetic medicine market, with a possible prohibited agreement specified in Section 11 of the Competition Law and abuse of a dominant position, as specified in Section 13 of the Competition Law.

Having assessed the circumstances specified in the application, the CC concluded that the industry was heavily regulated, with the Medical Treatment Law requiring the Latvian Medical Association to certify medical professionals. As a result, the CC found that the problems presented in the application were related to the regulatory activities inherent to the industry and did not see prima facie grounds for applying Section 11 or 13 of the Competition Law.

Furthermore, in the opinion of the CC, the provision of alternative certification options, including the recognition of international courses and certificates, is not within the competence of the CC.