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Pakistan: The challenges in competition enforcement

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ABSTRACT

In February 2022, the Supreme Court of Pakistan admitted appeals on the constitutionality of the Pakistani competition regime, which is likely to decide the future of competition enforcement in the country. This article traces a brief history of the Pakistani competition regime, its performance in the last fifteen years and the obstacles that have arisen in this regard to fully understand the significance of these proceedings.

En février 2022, la Cour suprême du Pakistan a admis des recours sur la constitutionnalité du régime de concurrence pakistanais, recours, ayant de potentielles conséquences sur l'avenir du droit national de la concurrence. Cet article présente un bref historique du régime de concurrence pakistanais, ses performances au cours des quinze dernières années et les obstacles, permettant ainsi une meilleure compréhension de ces procédures.

1. Pakistan's interest in regulating monopolies dates to the 1970s when it adopted the Monopolies and Restrictive Trade Practices (Control and Prevention) Ordinance 1970 and established a Monopoly Control Authority to carry out its purposes. This Ordinance was inspired by the UK Monopolies and Restrictive Practices (Inquiry and Control) Act 1948 and was expected to usher in a new era of economic growth and development for the country. However, shortly after its adoption, the 1970 Ordinance was amended in quick succession to support the newly devised nationalisation programme and later to encourage foreign direct investment, and the Monopoly Control Authority was soon reduced to an administrative agency lacking any meaningful powers of enforcement.

2. Pakistan next revisited the need for regulating monopolies after joining the World Trade Organisation in January 1995. An in-house assessment of its anti-monopoly regime revealed its shortcomings, whilst the increasing engagement with the WTO helped Pakistan realise the need to improve the competitiveness of its domestic markets to remain relevant in an increasingly globalised economy. Consequently, after the WTO's Doha Ministerial Conference in 2001, Pakistan sought support from UNCTAD to develop a modern competition legislation and, in 2006, obtained technical assistance from the World Bank for drafting a new competition law and policy framework for the country. These efforts culminated in Pakistan adopting the Competition Ordinance 2007 as the country's first modern competition legislation.

3. This article explores the circumstances in which Pakistan adopted the 2007 Ordinance, the factors that led Pakistan to replace the 2007 Ordinance ultimately with the Competition Act 2010 (which is presently in force in the country), and the impact these developments have had on competition enforcement in the country. To this end, the article examines the performance of the competition enforcement system in Pakistan, comprising the Competition Commission of Pakistan (CCP), the Competition Appellate Tribunal (hereinafter the "Tribunal") and the Supreme Court of Pakistan as the first, second and third-tier competition enforcement authorities in the country. The article also highlights the relationship between the competition enforcement system and Pakistan's pre-existing legal system and explores why this has posed some of the greatest challenges to competition enforcement in the country.

I. Competition law(s) in Pakistan: An uncertain history

4. By January 2007, the World Bank-led team entrusted to propose a new competition legislation for Pakistan had finished its deliberations and commissioned the Brussels-based firm Jones Day to prepare a draft of the

legislation. This draft, with some input from the Pakistani Ministry of Finance, was submitted directly to then-President General Pervez Musharraf, who promulgated it as an ordinance in exercise of his powers under Article 89 of the Constitution of Pakistan. In the ordinary course, an ordinance so promulgated lapses after 120 days unless ratified by the Parliament. However, the 2007 Ordinance was “saved” under the Constitution (Amendment) Order 2007 issued by the President in the aftermath of the national emergency he had declared weeks after promulgating the 2007 Ordinance.

5. In 2009, the Sindh High Court Bar Association challenged before the Supreme Court of Pakistan the legality of the declaration of emergency and all orders issued by the President in pursuance of it. In its order, the Supreme Court struck down the Proclamation of Emergency Order as well as the constitutional amendment order that had saved the 2007 Ordinance. The Supreme Court also directed that within four months of the date of its order, the government place before the Parliament all ordinances that were deprived of legal cover due to the nullification of the constitutional amendment. However, instead of placing the 2007 Ordinance before the Parliament, the government promulgated the Competition Ordinance 2009 in November 2009, immediately after the expiry of the four-month period stipulated by the Supreme Court, with the expectation that it would be ratified by the Parliament before it lapsed.

6. Four months later, however, the government was still not ready to approach the Parliament, and in April 2010, two weeks after the Competition Ordinance 2009 lapsed, it promulgated the Competition Ordinance 2010. In August 2010, the draft Competition bill was finally placed before the Parliament, and in October 2010, after consultations with industry specialists and stakeholders that lasted for nearly three months, the Parliament finally enacted the Competition Act 2010. There was no difference between the substantive provisions of the 2010 Act, as well as those relating to the composition and operations of the CCP, and those provided in the ordinances that had preceded it; however, in a departure from its earlier versions, the Act provided for a Competition Appellate Tribunal to hear appeals from the orders of the CCP.

II. Evolution of the Pakistani competition enforcement model 2007–2010

7. The competition enforcement model outlined in the 2007 Ordinance envisaged a national competition authority—the CCP and a single independent appellate

authority, the Supreme Court of Pakistan. The CCP was to be an integrated administrative agency modelled on the EU Commission with powers to perform investigative, enforcement, and adjudicative functions. However, unlike the EU Commission, the CCP had the power to constitute an internal appellate bench to hear appeals from orders of single members or officers of the CCP. Orders of the appellate bench could be appealed to the Supreme Court. This model remained unchanged until the 2010 Ordinance, which replaced the Supreme Court with the high court.

8. The 2010 Act further amended the competition enforcement model somewhat more substantially. It introduced an independent, quasi-judicial appellate authority, the Tribunal, to hear appeals from orders of the CCP and stipulated that appeals from the orders of the Tribunal lie to the Supreme Court. In doing so, Pakistan aligned itself with the English hybrid model—where the Competition and Markets Authority makes the decision, which may be scrutinised by the Competition Appellate Tribunal, whose orders may be appealed to the Court of Appeal on points of law or quantum of penalties—which had already been adopted in India in its 2007 amendment to the Indian Competition Act 2002.

9. The two-tier enforcement model prescribed in the 2007 Ordinance not only bypassed the high court contrary to the Pakistani Constitution but also allowed the CCP to act as an adversarial/prosecutorial with extensive penal powers often and without due regard for the fundamental rights of the undertakings that came before it. Adding a layer of scrutiny to the enforcement model in 2010 not only allowed a panel of retired judges and technocrats with knowledge and understanding of competition principles to evaluate the orders of the CCP but also aligned the enforcement model with the Pakistani Constitution. Importantly, although neither model expressly refers to the high courts, they continued to play a role in competition enforcement in exercise of their inherent jurisdiction to hear constitutional challenges against the competition legislation or actions of the CCP.

III. The Competition Commission of Pakistan, its powers and decisions

10. The CCP is established under section 12 of the Competition Act 2010 (and of the ordinances preceding it) as an autonomous, collegiate, body corporate comprising of not less than five and not more than seven full-time members (section 14). Members are appointed by the government in consultation with the chairman of the CCP and must have a minimum of ten years in any relevant field, including industry, commerce, economics, finance, law, accountancy, or public administration, and only two of these may be government employees

(section 14 read with Rule 3 of the Competition Commission (Salary, Terms and Conditions of Chairman and Members) Rules, 2009). The chairman, along with the members, is responsible for administering the affairs of the CCP (section 15).

1. CCP's powers of enforcement

11. The CCP has powers under the Act, as it had under the ordinances in force before it, to proceed against all undertakings (as defined in section 2(1)(q) of the Act) and to take cognisance of all actions or matters that take place in and distort competition within Pakistan (section 1(3)). In addition to the traditional competition concerns of prohibiting abuse of dominant position (section 3), anti-competitive agreements (section 4) and mergers that substantially lessen competition by creating or strengthening a dominant position in the relevant market (section 11), the CCP also has the power under the Act to take cognisance of the non-competition concern of any deceptive marketing practices engaged in by undertakings (section 10).

12. The CCP has considerable powers of sanctioning under the Act (section 38). It may penalise an undertaking, its director, officer, or employee for:

- engaging in an activity prohibited under the Act;
- failing to comply with its orders;
- failing to provide it information or providing false information, or otherwise knowingly abusing, interfering with, impeding, imperilling, or obstructing it in any manner.

It may only impose these penalties after providing the undertaking an opportunity of being heard and may express these as a lump sum or as a percentage of the turnover of the undertaking, subject to maximum limits provided in the Act. The CCP also has the power to take a lenient view and to impose lesser penalties (section 39 read with Competition (Leniency) Regulations 2019). An undertaking's failure to comply with an order of the CCP constitutes a criminal offence punishable with imprisonment of up to one year or a further fine.

2. An overview of CCP's performance 2007–2022

13. In the nearly fifteen years that it has been operational, the CCP has nearly equally divided its focus between its competition and non-competition activities: it has issued 52 orders in respect of abuse of dominance (section 3) and prohibited agreements (section 4) cumulatively and 52 orders in respect of deceptive marketing practices (section 10) alone. The majority of CCP's competition enforcement orders (32) relate to section 4 prohibited agreements and relatively fewer (20) to section 3 abuse of dominance. In all these orders, the CCP relies extensively on EU and US competition jurisprudence in interpreting the provisions of the Act. Also during this period, the CCP has reviewed 438 mergers; however, only

10 of these have made it to a Phase II review, wherein the CCP evaluates the proposed merger in depth to determine whether it will significantly lessen competition or strengthen a dominant position in the relevant market. The CCP has approved all ten Phase II merger review cases with or without conditions.

3. CCP's major orders

14. In the vast majority of section 3 abuse of dominance cases that it has decided, the CCP has primarily focused on what it refers to as “*unfair trading conditions*.” It has also issued orders in respect of tie-in arrangements and instances of refusals to deal. Some of the orders issued by the CCP in respect of these practices were detailed and well reasoned, whilst others were more cursory. For instance, the CCP's orders in the *Urea Manufacturers* and the *Utility Stores* cases carefully delineate the relevant product and geographic markets and examine whether the undertakings were individually or collectively dominant and whether they had abused this dominance. In other orders, such as in the *Indus Motors*, *Tetra Pak* and *Wateen* cases, the CCP's analysis was somewhat more superficial, and there was little discussion of the relevant market or the appreciability of the effect of the allegedly abusive activity on the Pakistani economy.

15. In its orders in respect of prohibited agreements (section 4), the CCP must decide the object or effect of the agreements. In its decision in *Pakistan Banking Association* case, the CCP held that it need not examine the effect of an agreement that had an anti-competitive object. It reaffirmed this position in its decision in the *Institute of Chartered Accountants of Pakistan* case. Later in the *Karachi Stock Exchange* case, the CCP expanded on the concept of the “object” (of an agreement) and categorised a price-fixing cartel as a “per se violation” of the Act. However, in the *1-Link Guarantee Limited & Member Banks* and the *Dredging Companies* cases, the CCP appeared to reverse its position when it called for a rule of reason enquiry for the effects of price-fixing cartels and bidding consortia, respectively. Less than a year later, in the *PESCO* case, the CCP once again declared collusive bidding to be anti-competitive by object, albeit without distinguishing the *Dredging Companies* case or citing any precedents in support of its arguments.

16. The CCP also recently approved a merger after a Phase II review between the cab aggregators Uber and Careem on the basis that “*application-based ridesharing services [are distinct] from all other modes of transport in Pakistan*” due to their “*characteristics, price and intended usage*.” In the course of this review, the CCP considered the two-sided structure of ridesharing apps, network effects, and multi-homing and applied the traditional small but significant non-transitory increase in price (SSNIP) test to establish the limits of the relevant market and concluded that the acquisition would substantially lessen competition in the market. However, the CCP approved the merger with conditions by focusing on the perceived economic benefits of such mergers generally and with reference to the “mitigating factors” and the “efficiencies” that the merger was likely to produce.

IV. CCP's interactions with competition enforcement authorities and general courts

17. Shortly after it had commenced operations in 2008, undertakings aggrieved by the show cause notices and orders issued by the CCP brought petitions against it before different high courts throughout the country instead of exercising (and exhausting) their right of appeal before the Supreme Court. These petitions challenged the constitutionality of certain provisions of the 2007 Ordinance and CCP's authority to take actions in exercise of these provisions, arguing that these provisions were ultra vires the Constitution and in violation of the fundamental rights stipulated in the Constitution. The courts accepted the majority of these petitions without investigating the specific grounds raised in them and issued interim orders restraining the CCP from proceeding against the undertakings while the petitions remained pending.

18. An important petition of this period was filed by Liquefied Petroleum Gas Association of Pakistan (LPGAP's petition WP 9518/2009) in respect of a show cause notice issued by the CCP. The Lahore High Court, by its order dated 27.5.2009, granted an interim injunction in favour of LPGAP and suspended the operation of the show cause notice issued by the CCP. It also held that petitions against actions or orders of the CCP could validly be filed before any high court in the jurisdiction of which the petitioner carried on its business or in which the effect of CCP's actions was most likely to be felt. The CCP challenged this order before the Supreme Court through CP 1022/2009. By its order of 26 May 2009, the Supreme Court set aside the interim injunction issued by the Lahore High Court on CCP's undertaking that it would not take any adverse action against the aggrieved parties while the petitions remained pending and remanded the matter to the high court for further orders.

19. The number of petitions filed against the CCP was expected to decline once the Competition Act 2010 had been duly enacted by the Parliament and had provided for the establishment of the Competition Appellate Tribunal. However, the government did not appoint the first member of the Tribunal until mid-2011 and the technical members only in 2012, nearly a year after the appointment of the chairman. The Tribunal had been functional for only about five months when one member retired and the other resigned. It took the government nearly two more years to reconstitute the Tribunal, and it was only in 2015, nearly four years after it had first been constituted, that the Tribunal made the Competition Appellate Tribunal Rules 2015, in which it prescribed the procedure for filing appeals and the conduct of proceedings before it.

20. The fact that the Tribunal was only intermittently available between 2010 and 2015 meant that undertakings aggrieved by the orders of the CCP had no option but to challenge these before the general courts. These petitions continued to compound while the petitions filed in the earlier period remained undecided. For instance, the restraining order granted by the Sindh High Court in proceedings brought by Mirpurkhas Sugar Mills (CP D-110/2010) was relied upon in several other petitions, and the Sindh High Court granted injunctions in all of these. Although the CCP challenged a number of these orders before the Supreme Court, the Supreme Court only directed the high courts to hear the petitions expeditiously rather than directing that these may be dismissed altogether.

21. When the Competition Appellate Tribunal was first operationalised, it decided one appeal in 2013 in the *I-Link Guarantee Limited* case, whereby it dismissed the final order issued by the CCP. The CCP has since appealed this order before the Supreme Court. Since 2015, the Tribunal has been functioning and hearing appeals against CCP's orders with some regularity. The majority of the appeals filed before the Tribunal are against CCP's final rather than interim orders and mostly in respect of its orders in deceptive marketing practices rather than competition enforcement cases. The Competition Appellate Tribunal does not maintain a website; therefore, its orders are not readily available. However, a review of its orders published in the law reports suggests that the Tribunal has been largely deferential to the CCP rather than robustly challenging its findings.

V. Is it all up to the Supreme Court now?

22. By its order dated 26 October 2020 in WP 9518/2009, *LPG Association of Pakistan v. Federation of Pakistan*, the Lahore High Court finally decided the petition brought by the LPGAP more than eleven years earlier. This order decided several constitutional matters related to competition law and regulation in the country and also disposed of 90 other competition-related petitions that had been pending before it in sectors as diverse as healthcare, oil and gas, food, cement and power, and in doing so resolved the stalemate between the CCP and the courts and opened up the possibility of recovery of penalties and a more meaningful dialogue between the courts and competition enforcement authorities. However, the order of the Lahore High Court has since been appealed before the Supreme Court both by the CCP and the petitioners. In a hearing held in February 2022, the Supreme Court admitted the appeals for hearing but has not made any progress in this regard since then.

23. The core issue before the Supreme Court is whether the Competition Act 2010 violates the Constitution by creating a parallel judicial system as it invests the CCP and the Tribunal with judicial powers. The Supreme Court is also likely to address the related questions of the Parliament's legislative competence to enact the Act and

of the executive to promulgate the ordinances; whether the CCP is a regulatory or adjudicatory body; and the appropriateness of the Lahore High Court's reliance on the 2019 decision of the Supreme Court of India in *Mahindra Electric Mobility v. CCI*. The decision of the Supreme Court in this regard is likely to have far-reaching implications for the future of competition enforcement in the country.

24. While the questions of legislative competence, the nature of the CCP and the relevance of Indian precedents are within the generalist competence of the Supreme Court, its opinion with regard to the legality of the competition enforcement model in force in the country may only be formed in light of the four main models of competition enforcement prevalent around the world and after recognising that the Pakistani competition enforcement system started off as an EU-style model in which the generalist court reviews the orders of the competition authority and evolved into a model where a specialist court reviews the orders and actions of the competition agency prevalent not only in the UK but also adopted by India.

25. It is important that in arriving at its decision about the constitutionality of the Competition Act and the competition enforcement system in Pakistan, the Supreme Court appreciates that there is no one single best competition model of competition enforcement and that it is important for Pakistan to strike an appropriate balance between internationally accepted competition enforcement models and the exigencies of the Pakistani legal system. At present, the Pakistani competition authorities have adopted versions of the EU and UK models without introducing the necessary safeguards adopted by agencies operating in the EU and UK to ensure that their proceedings are fair and transparent.

26. To this end, the Supreme Court may direct the government to ensure that appointments to the CCP may be made through a transparent process entrusted to an independent body rather than by the government in consultation with the CCP chairman. The Supreme Court may further direct the government to ensure that the Competition Appellate Tribunal is properly constituted and maintained to allow undertakings a meaningful appellate remedy. The Supreme Court may also require the Tribunal to make rules for appointments that stipulate the appropriate qualifications and ongoing training for its members, as this is important for the Tribunal to undertake a rigorous and meaningful review of CCP's decisions. The Tribunal must also maintain a website in the interests of transparency and for its decisions to be available for the information of the public. ■

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