

# COMPETITION POLICY PRIORITIES FOR 2025

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In 2025, Autoridade da Concorrência (AdC) will keep its focus on vigorous enforcement of competition law and on promoting competition in the markets, to enhance consumers welfare.

By pursuing its mission, AdC will contribute to address the current societal challenges, such as the so-called twin green and digital transition.

Furthermore, and following a set of influent reports on European competitiveness (e.g., the [Draghi Report](#) and the [Letta Report](#), or the European Commission report on "*Protecting Competition in a changing world*"), the AdC will contribute to promoting economic growth, investment and innovation, including by means of advocacy, aiming at removing barriers to entry and expansion in several sectors of the domestic economy. This last aspect is particularly important as it becomes clear that the design of industrial policies must incorporate competition principles.

2025 will be a year marked by important developments on competition policy within the European Union, specifically as regards ongoing legislative reviews and the implementation of more recent legal instruments, such as the Digital Markets Act (DMA) and the Foreign Subsidies Regulation (FSR), which will also be reflected in the activities of the AdC. At the same time, the AdC will continue to follow the ongoing discussion regarding the European Commission guidelines on exclusionary abusive practices.

Within this context, the priorities of competition policy for 2025 will be summarised as follows:

**Investigating** the most harmful **anticompetitive practices**, such as **cartels**, increasing ***ex officio* detection**, thus contributing for the **green and digital transition**.

Pursuing a solid and timely assessment of **mergers between companies**, along with investigating "**gun-jumping**" and focusing on **ancillary restraints**

Launching a **new cycle of outreach and dialogue with key economic sectors** to increase awareness regarding the benefits of competition and compliance

Fostering **the role of competition in promoting contestability in digital markets**, namely within the sector of **generative AI**, in close cooperation with the European Union

Implementing **innovative IT forensic tools, which incorporate AI**, to detect anticompetitive practices and support investigation by the AdC teams

Implementing **new methodologies of internal coordination** to consolidate the **economic and legal robustness of AdC investigations**, in addition to the internal **checks and balances**

In 2025, the AdC will continue to align its action with the interest of citizens and the economy, directing the investigation activity towards **anticompetitive practices** that have **the greatest negative impact on the economy** and consumer welfare, particularly **cartels** and other horizontal practices, namely those that affect public procurement and labour markets. These are two main areas, affecting the life of citizens, namely as taxpayers and workers.

As regards the **abuses of a dominant position**, the AdC will prioritise the detection and investigation of sectors with greater economic relevance and impact for consumers. The AdC will also pursue the investigation of **vertical restraints** and **decisions by associations of undertakings**.

The capacity of **proactively detecting infractions** will be reinforced by the **implementation of new models of internal organization**, which promote further agility, and by the widespread use of IT forensic tools, some of which

created by the AdC. Simultaneously, the AdC will continue to foster the use, by companies, of the **leniency programme**.

As for **merger control**, the AdC will pursue a timely and solid assessment of notified transactions. On the other hand, and besides investigating failures on the duty of prior notification to AdC or **gun jumping**, AdC will grant special attention to **ancillary restraints**, particularly by drafting guidelines. As for the legal framework, AdC will further reflect on the suitability of the existing legal regime applicable to merger control to the challenges posed namely as regards markets characterised by a high innovation dynamics.

In 2025, the AdC will launch new initiatives for promoting competition, by starting a **cycle of outreach and dialogue with key economic sectors**. As for these initiatives, the AdC will reinforce public and private agents' perception regarding the importance of fighting against bid-rigging in public procurement, competition in labour markets and the interaction between competition and sustainability, among other topics.

2025 will also bring the conclusion of the **"20 Years, 20 Cities – Competition next to you!"** sessions, which have been enabling the AdC to have fruitful contact with the business community, public entities and citizens in the Districts and Autonomous Regions.

The AdC will continue to contribute to the understanding, at a global level, of the implications to the competition policy arising from the **development of generative Artificial Intelligence (AI)**. The AdC has started to monitor this sector with the publication of the *issues paper* "Competition and generative Artificial Intelligence (AI)" in 2023. In 2025, the **short papers series on generative AI**, launched in 2024, will be pursued. The short papers series intends to foster the enforcement of competition law to promote contestability and prevent that market bottlenecks materialize into a consolidation of market power.

Also in this area, **developments in the digital economy** will be overseen, not only within the perspective of identifying potential constraints to competition, but also aiming at enforcing the **Digital Markets Act (DMA)**, in close cooperation with the European Commission.

As for promoting competition, the AdC will also develop studies and monitor relevant economic sectors, such as transport and energy.

Within its internal organization, the AdC will implement innovative **IT forensic tools that incorporate AI**, with the purpose of fostering the detection of

anticompetitive practices and supporting investigations. The development of these tools intends to generate a widespread and intuitive use by the AdC teams, within several domains of competition law enforcement, which will reinforce the implementation of data collection tools to identify and investigate anticompetitive practices, such as web scrapping and screening.

Finally, in 2025, new methodologies of internal coordination to consolidate the **economic and legal robustness** of AdC investigations will be fully implemented, in addition to the existing **internal checks and balances**.

In short, in 2025, the activity of AdC will be guided by the mission of public interest to protect and promote competition, by ensuring fair and equative, impartial, rigorous, and transparent action.

20 December 2024.