



AUTORITÉ DE LA
CONCURRENCE

GRAND-DUCHÉ DE LUXEMBOURG

ANNUAL REPORT 2024

WORD FROM THE PRESIDENT



By continuing our institutional transformation as an **independent public institution** since 1 January 2023, we were able to address significant internal governance and organisational challenges throughout 2024. We had to adapt our **procedures and resources** to our new responsibilities, rethink internal management, invest in the continuous training of our teams and align our processes with a strengthened legal framework based on international best practices. Furthermore, the Competition Authority attaches paramount importance to maintaining irreproachable **transparency and integrity** in the performance of its tasks, a guarantee of trust for the public and economic actors. Strengthening our operational capacities – in particular by recruiting specialised talent and optimising our organisation – puts us firmly in a position to tackle current challenges with rigour and neutrality.

The **regulation of digital markets** is one of those major challenges on which the Authority has seen its role significantly increased in 2023 and 2024. The legislator has entrusted us with **new key responsibilities** with the implementation of the *Digital Markets Act* (DMA) and the *Digital Services Act* (DSA). The DMA, the centrepiece of the European Digital Agenda, aims to prevent abuses of power by large platforms by ensuring that they behave fairly and that their position as gatekeepers in digital markets

remains contestable; i.e. they do not block the entry of new competitors. For its part, the DSA sets out a harmonised framework to empower online actors and **clean up the digital space**. Its main objective is to prevent the dissemination of illegal or harmful content on platforms, in order to ensure the safety of users and protect their fundamental rights online.

In practice, the Authority has been designated as the **National Digital Services Coordinator** under the DSA. As such, it ensures that providers of intermediary services established in Luxembourg comply with the due diligence and transparency obligations imposed by this innovative regulation. It also assists the European Commission in the correct application of the DMA vis-à-vis *gatekeepers* designated at EU level. These new digital prerogatives provide the Authority with a broader view of the range of online market practices and enhance its ability to detect and correct abuses in emerging markets. Being able to intervene in both traditional competition and the regulation of digital services is now essential to ensure a **safe, fair and competitive** online environment, to the benefit of the Luxembourg economy and its consumers.

In parallel to the digital challenges, the Authority continued its efforts to adapt to its new legal arsenal to ensure the **protection of farmers and small suppliers** from abuses of power by certain dominant buyers; the protection of **whistleblowers**; and to support the Commission in detecting and countering possible distortions of competition caused by **foreign subsidies** granted by third States to companies participating in European public procurement. It also monitors assiduously the progress of parliamentary work aimed at introducing a **merger control** regime at national level.

Beyond national borders, the Authority has stepped up its **European and international cooperation** to best fulfil its tasks. At European level, we actively contribute to the work of the *European Competition Network* (ECN) by taking part in information exchanges and advisory committees with our European counterparts. These regular interactions – be they meetings of Directors-General, thematic expert groups or advisory committees on cartels, abuses of dominant position and future mergers – ensure that the Grand Duchy's voice and expertise are heard in major discussions influencing European competition policy.

Internationally, the Authority has strengthened its presence in **multilateral competition networks**. Our active participation in the *International Competition Network* (ICN) demonstrates Luxembourg's willingness to contribute to the exchange of best practices and the convergence of approaches between more than 140 jurisdictions around the world. We also were keen to attend the *Organisation for Economic Co-operation and Development* (OECD) Global Competition Forum in Paris on 2 and 3 December. These meetings, bringing together more than 100 competition authorities from all continents, provide a valuable platform for discussion on emerging trends and innovative public policies in the field of competition. Feedback from our foreign counterparts allows us to continuously strengthen our own expertise.

In addition, the Authority has increased **strategic partnerships** and bilateral exchanges. In 2024, we had the honour of hosting the *DACHLieLux* meeting in Luxembourg, bringing together the German-speaking competition authorities of the EU and EFTA (Austria, Germany, Switzerland, Liechtenstein, Luxembourg). This event provided an opportunity for in-depth discussions on common practices and challenges, and helped forge closer collaborative ties with our counterparts in the region. Similarly, we have initiated enhanced cooperation with the French Competition Authority, with the participation of our lawyers in a training programme with this sister institution. These exchanges of skills and knowledge, as well as regular contacts with other European partners, demonstrate our commitment to **learning from and sharing our best practices**. They are part of a process of continuous improvement and the construction of an **international competition community** united in the face of global challenges.

As a result of all these developments – **enlargement of tasks, increased cooperation and internal modernisation** – the Authority is now more than ever a **key player in modern economic regulation**. We address these new challenges by remaining firmly committed to our core values of **neutrality, expertise** and service to the **public interest**. The neutrality of our interventions, the independence of our analyses and the rigour of our procedures are the guarantors of fair and credible decisions. Our aim remains to put this expertise at the service of a competitive, innovative and fair economy. Indeed, healthy competition in transparent markets is an indispensable driver of prosperity for Luxembourg businesses and consumers alike. With the unwavering commitment of its teams and the support of its partners, the Authority will continue to make every effort to promote a dynamic and balanced competition culture that ensures sustainable growth.

I wish you an enriching reading of this 2024 Annual Report. It not only details the **achievements** of the past year and the **challenges** faced, but also outlines our **future prospects** in order to continue, together, the essential task of preserving a free and competitive market in Luxembourg. By browsing these pages, everyone will be able to measure the progress made and the Authority's determination to remain a pillar of economic regulation at the service of all. I would therefore like to thank my teams for their remarkable dynamism, sense of initiative and resilience in constantly adapting to the versatility required by their functions.

Pierre Barthelmé

President of the Competition Authority
the Grand Duchy of Luxembourg

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I. PRESENTATION OF THE COMPETITION AUTHORITY

ORGANIC LAW AND MISSIONS

Since the entry into force of the Law of 30 November 2022 on competition¹ on 1 January 2023, the Competition Authority of the Grand Duchy of Luxembourg has been an independent public institution with legal personality and financial and administrative autonomy.

It thus takes over the role of the former Competition Council in applying national and European legislation on the prohibition of practices and agreements restricting competition and the abuse of dominant position.

Far from dealing exclusively with competition law issues, the Authority has seen its range of competences increase over time. Its tasks now extend to the new challenges and economic realities related to digitalisation, the high concentration of the mass retail sector, the free provision of services and the need to protect whistleblowers.

In accordance with its Organic Law as amended¹, the Authority now covers three main areas of competence, namely: competition law, digital market regulation and unfair trading practices in the agri-food supply chain. In addition, it defends the collective interests of undertakings with regard to freedom of establishment and freedom to provide services, and the protection of whistle-blowers in all the above areas.

COMPETITION LAW

In the field of **competition law**, the Authority's tasks include:

- ✓ to investigate and penalise anti-competitive practices such as agreements restricting competition or abuse of a dominant position;
- ✓ carrying out analysis (opinions and sector inquiries) and awareness-raising activities;
- ✓ assist, where necessary, the European Commission in monitoring foreign subsidies distorting the functioning of the internal market².

DIGITAL MARKETS

In the field of **digital markets**, the Authority's tasks include:

- ✓ defending the collective interests of business users of online platforms (Platform to Business - P2B);³
- ✓ assisting, when necessary, the European Commission in ensuring compliance with the Digital Markets Act (DMA);⁴
- ✓ supervising providers of online intermediation services as Luxembourg's Digital Services Coordinator (DSA)⁵.

¹Amended Law of 30 November 2022 on competition
<https://legilux.public.lu/eli/etat/leg/loi/2022/11/30/a588/consolide/20230404>

² Law of 29 March 2023 [...] on the implementation of Regulation (EU) 2022/2560 on foreign subsidies distorting the internal market
<https://www.legilux.public.lu/eli/etat/leg/loi/2023/03/29/a181/jo>

³ Amended Law of 5 March 2021 on the implementation of Regulation (EU) 2019/1150 [...] promoting fairness and transparency for business users of online intermediation services
<http://data.legilux.public.lu/eli/etat/leg/loi/2021/03/05/a185>

⁴ Law of 29 March 2023 amending the Law of 30 November 2022 on competition with a view to implementing Regulation (EU) 2022/1925 on digital markets
<https://www.legilux.public.lu/eli/etat/leg/loi/2023/03/29/a181/jo>

⁵ Draft law implementing Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services
<https://www.chd.lu/en/dossier/8309>

AGRI-FOOD SUPPLY CHAIN

As regards the **agricultural and food supply chain**, one of the Authority's tasks is to protect farmers and small operators from the **unfair trading practices (UTPs)** of their more powerful buyers⁶.

COLLECTIVE INTERESTS OF UNDERTAKINGS

With regard to the **freedom of establishment** and the **free provision of services**, the Authority's task is to protect the collective interests of companies in the internal market⁷.

WHISTLEBLOWERS

With regard to the **reporting of breaches of European and national law in a professional context**, the Authority's tasks include receiving and processing external reports from whistleblowers in all areas falling within its remit⁸.

NEW MISSIONS

In addition to its pre-existing tasks, the new competences it acquired in 2023 and the new obligations related to the transformation of the former Council into an independent public institution, the Authority underwent a further expansion of its remit in 2024 in the area of digital markets. It also prepared for the introduction of a merger control regime, which had not yet been completed by the end of 2024.

DIGITAL SERVICES ACT (DSA)

Regulation (EU) 2022/2065 on a Single Market for Digital Services (DSA) has been applicable to very large online platforms and very large search engines since 25 August 2023 and fully in force since **17 February 2024**.

It aims to **combat the dissemination of illegal or harmful content on the internet** by setting certain obligations for all **providers of intermediary services** (including online platforms).

*Draft law n°8309*⁹ aimed at clarifying its implementation had not yet been voted by the end of 2024. However, the government did not wait for the legislative process to be completed and appointed the Authority as the *Digital Services Coordinator* in February 2024. The Authority therefore ensures that intermediary service providers established in Luxembourg comply with their obligations under the DSA.

MERGER CONTROL

Draft Law No 8296, tabled by the Government on 23 August 2023, provides for the introduction of prior control of mergers under Luxembourg law.

At the end of 2024, it had not yet been put to the vote in the Chamber of Deputies. Nevertheless, the Authority's teams carry out diligent legislative monitoring in order to be ready to take on these future tasks.

⁶ Law of 1 June 2021 on business-to-business relations in the agricultural and food supply chain
<https://legilux.public.lu/eli/etat/leg/loi/2021/06/01/a403/jo>

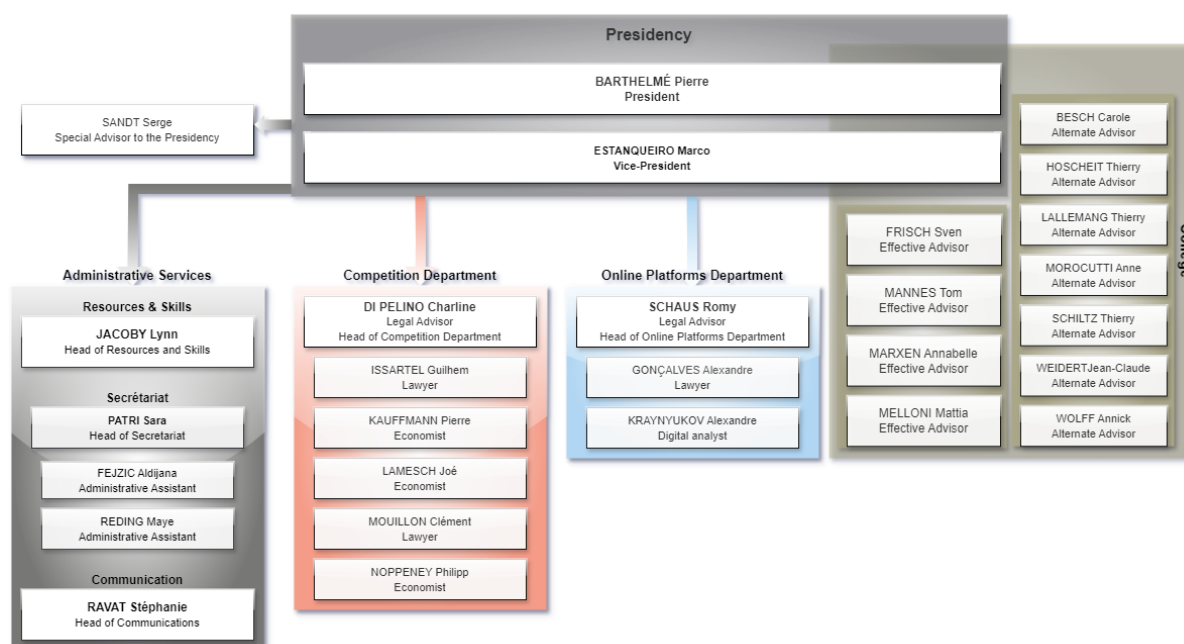
⁷ Amended Law of 24 May 2011 on services in the internal market
<https://legilux.public.lu/eli/etat/leg/loi/2011/05/24/n1/consolide/20211206>

⁸ Law of 16 May 2023 transposing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law
<https://legilux.public.lu/eli/etat/leg/law/2023/05/16/a232/jo>

⁹ The Law of 4 April 2025 implementing Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services entered into force on 11 April 2025.
<https://legilux.public.lu/eli/etat/leg/loi/2025/04/04/a125/jo>

STRUCTURE OF THE AUTHORITY

ORGANISATION CHART OF THE COMPETITION AUTHORITY AS AT 31 DECEMBER 2024



Members of the College

7-YEAR RENEWABLE MANDATES

President

Pierre Barthelmé (01/01/2023-31/12/2029)

Effective advisers

Mattia Melloni (01/01/2023-31/12/2029)
 Tom Mannes (01/02/2023-31/01/2030)
 Sven Frisch (01/03/2023-28/02/2030)
 Annabelle Marxen (15/07/2023-14/07/2030)

Vice-President

Marco Estanqueiro (01/01/2023-31/12/2029)

Alternate members

Pierre Calmes (01/01/2023-14/09/2024)
 Thierry Hoscheit (01/01/2023-31/12/2029)
 Thierry Lallemand (01/01/2023-31/12/2029)
 Anick Wolff (01/01/2023-31/12/2029)
 Jean-Claude Weidert (01/06/2023-31/05/2030)
 Carole Besch (01/11/2023-31/10/2030)
 Anne Morocutti (01/11/2023-31/10/2030)
 Thierry Schiltz (01/11/2023-31/10/2030)

Non-governmental advisors (NGAs)
RENEWABLE 2-YEAR MANDATES

Marc Barennes	(02/01/2023-24/09/2024)
Thierry Reisch	(02/01/2023-24/09/2024)
Vivian Earthman	(02/01/2023-24/09/2024)
Melanie Thill-Tayara	(25/09/2024-24/09/2026)
Laura A. Mendez Rodriguez	(25/09/2024-24/09/2026)
Charles Pommies	(25/09/2024-24/09/2026)



Core staff members of the Authority

As at 31 December 2024, the Authority's core staff consisted of 15 civil servants and State employees, including:

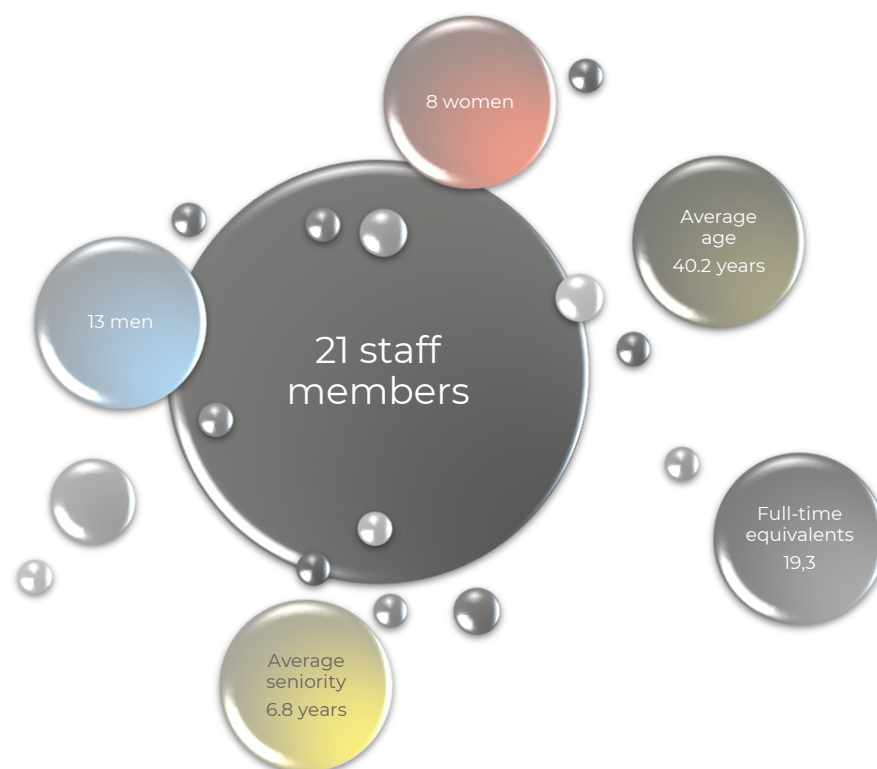
- 1 advisor attached to the Presidency;
- 5 department heads;
- 7 agents conducting analysis and investigation work;
- 2 agents providing assistance and support.

In 2024, the Authority also welcomed:

- an intern in international studies, and
- a student.

SOCIAL ASSESSMENT

NUMBER OF STAFF

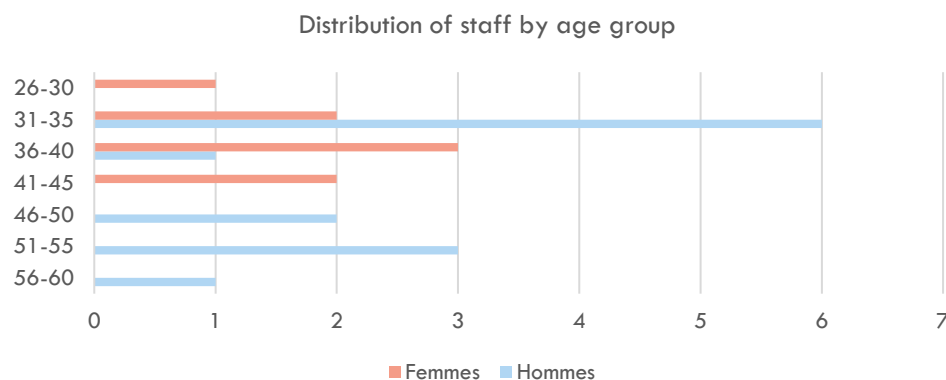


At 31 December 2024, the Authority had a total of **21 permanent staff members**, of whom:

- the 15 civil servants and State employees making up the **core staff**, as well as
- the 6 civil servants who are **permanent members of the College** (President, Vice-President and four effective advisors).

In addition to the Authority's permanent staff, there are:

- the 7 **alternate advisors**, mainly from the judiciary, who are called upon to sit in the collegiate decision-making bodies, and
- the 3 '**non-governmental advisors**', who represent the Authority within the *International Competition Network*.



II. ADMINISTRATIVE SERVICES

In 2024, following the entry into force of the Law of 30 November 2022 on competition, the Authority continued its structural reorganisation to take over the administrative tasks previously carried out by the Ministry of the Economy and the Ministry of the Civil Service.

In order to adapt to the expansion of the Authority's competences, the Resources and Skills Department coordinated the relocation of the teams to new premises and launched a recruitment process.

The Secretariat has digitised and organised the Authority's archives in advance in order to comply with its legal obligations from September 2025.

Finally, the Communication Service continued the work on redesigning the website and launched the redefinition of the Authority's visual identity as well as the work on drawing up a work programme.

RESOURCES AND SKILLS

BUDGET¹⁰

3.729.000€

RELOCATION OF THE COMPETITION AUTHORITY

In order to support the reorganisation of its services around its new competences, the Authority moved [into new offices](#) as of 1 February 2024.

With an equivalent surface area, these new premises are located close to the previous offices, on the outskirts of Place de Paris in Luxembourg. Their disposition is more adapted to the widening of the Authority's fields of intervention.

Thanks to a more balanced distribution of spaces, they make it possible to accommodate teams in a working environment adapted to each department.



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RECRUITMENT

In order to complete its teams, the Authority has announced several job openings with a view to recruiting new staff or taking on trainees:

- ✓ [Competition Lawyer / Digital Markets / Agri-Food Chain](#)
- ✓ [Competition Law Investigator](#)
- ✓ [Digital Markets Investigator \(employee A1\)](#)
- ✓ [Digital Markets Investigator \(employee A2\)](#)
- ✓ [Internship in Competition Law \(4-12 weeks\)](#)
- ✓ [Internship in communication \(4 to 6 months\)](#)



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In 2024, the Authority welcomed:

- ✓ an economist with relevant multidisciplinary experience to integrate the *Digital Markets Service (Online Platforms)* as a digital analyst;

¹⁰ Budgetary resources according to the State budget voted for 2024
<https://legilux.public.lu/eli/etat/leg/loi/2024/04/26/a165/jo>

- ✓ a special advisor attached to the Presidency, responsible for assisting the activities of the Authority's collegiate bodies and providing legal advice and representation to the Authority;
- ✓ a trainee in international relations studies at the University of Montreal for a mission with the Communications Department;
- ✓ a student to support the Authority's document archiving and filing work.

Due to the high qualifications required, the specific nature of the Authority's areas of competence and its multidisciplinary nature, as well as the restrictive conditions laid down by the status of civil servants and State employees, the Authority was unable to recruit suitable candidates for all the positions advertised.

As at 31 December 2024, the teams were therefore largely understaffed in relation to the missions to be covered.

ORGANISATIONAL MANAGEMENT

ARCHIVING

In collaboration with the [Archives nationales de Luxembourg](#), the archiving delegate set up a structured organisation of the Authority's archives by identifying, classifying and digitising all the documents inherited from the Competition Council.

This work has enabled the Authority to comply with its legal obligations regarding archiving, preservation and accessibility. They provided an opportunity to draw up a filing plan and to determine the procedures or the destruction and retention of documents based on legal retention periods and applicable administrative retention periods.

AC BOARD

The Head of Resources and Skills, with the assistance of the Secretariat, the Centre des technologies de l'information de l'Etat (CTIE) and a Luxembourg company specialised in information systems engineering, has set up a monitoring and project management dashboard called the *AC Board*.

Similar to the *Ecoboard* model of the Ministry of the Economy, this project management tool allows to:

- ✓ follow up the investigation work;
- ✓ simplify the creation of projects, the allocation of tasks and the procedures for validating/signing documents;
- ✓ reduce the time spent by staff on worksheet reporting tasks;
- ✓ simplify and optimise the monitoring and balanced distribution of tasks by the Presidency and the Resources and Skills Department.

WORK PROGRAMME

The Authority has started to prepare its work programme for the period 2025-2028.

After a first draft setting out the tasks and the context in which the Authority operates and the values that characterise it, the Communication Department organised a consultation on the SWOT model with all staff members in order to identify, in particular, the institution's strengths and weaknesses.

The Resources and Skills Department then formed a project management team to organise various workshops with all departments.

In this context, the Presidency focused on proposing a strategic vision defining what the Authority aspires to be by 2028.

The workshop participants, for their part, analysed the results of the SWOT consultation in order to identify the development keys that will define the Authority's strategic objectives, and then the operational objectives that will follow in order to achieve the proposed vision.

COMMUNICATION AND AWARENESS-RAISING (ADVOCACY)

INTERNAL COMMUNICATION

In 2024, the Authority put in place different tools to improve internal communication and simplify the organisation of collaborative work.

Intranet

The Authority, with the assistance of the CTIE, has set up an intranet platform to facilitate the dissemination of information to the teams by offering a central access point to:

- ✓ the various tools available to employees;
- ✓ administrative and financial procedures;
- ✓ the procedures for monitoring and handling cases;
- ✓ procedures relating to the management of human resources;
- ✓ internal news.

Sharepoint Collaborative Suite

The Authority has set up a Sharepoint collaborative suite, secured by the CTIE, enabling teams to share and synchronise working documents in real time.

The platform also makes it possible to define and control the access levels of each person according to their involvement at each stage of the procedures.

Communication plan

The Communications Department has proposed an internal and external communication plan which is being adopted.

The project includes in particular:

- ✓ a description of the current activities, specifying the relevant channels and styles according to the type of message and the targets involved, and
- ✓ various improvement projects in internal communication (internal newsletter, dashboard, legal watch, strategy and editorial charter, etc.) and external communication (remodelling of the website, new visual identity, definition of templates, strategy and editorial charter, etc.).

EXTERNAL COMMUNICATION

Internet presence

Online procedures on *guichet.lu* and via *MyGuichet.lu*

The Authority continued its collaboration with *guichet.lu* and *MyGuichet.lu* in order to make its approaches available to the public in French, English and German.

On 15 October, the Authority, in collaboration with the CTIE, proposed a new assistant on *MyGuichet.lu* allowing users of online platforms to [lodge complaints for non-compliance with the DSA](#).

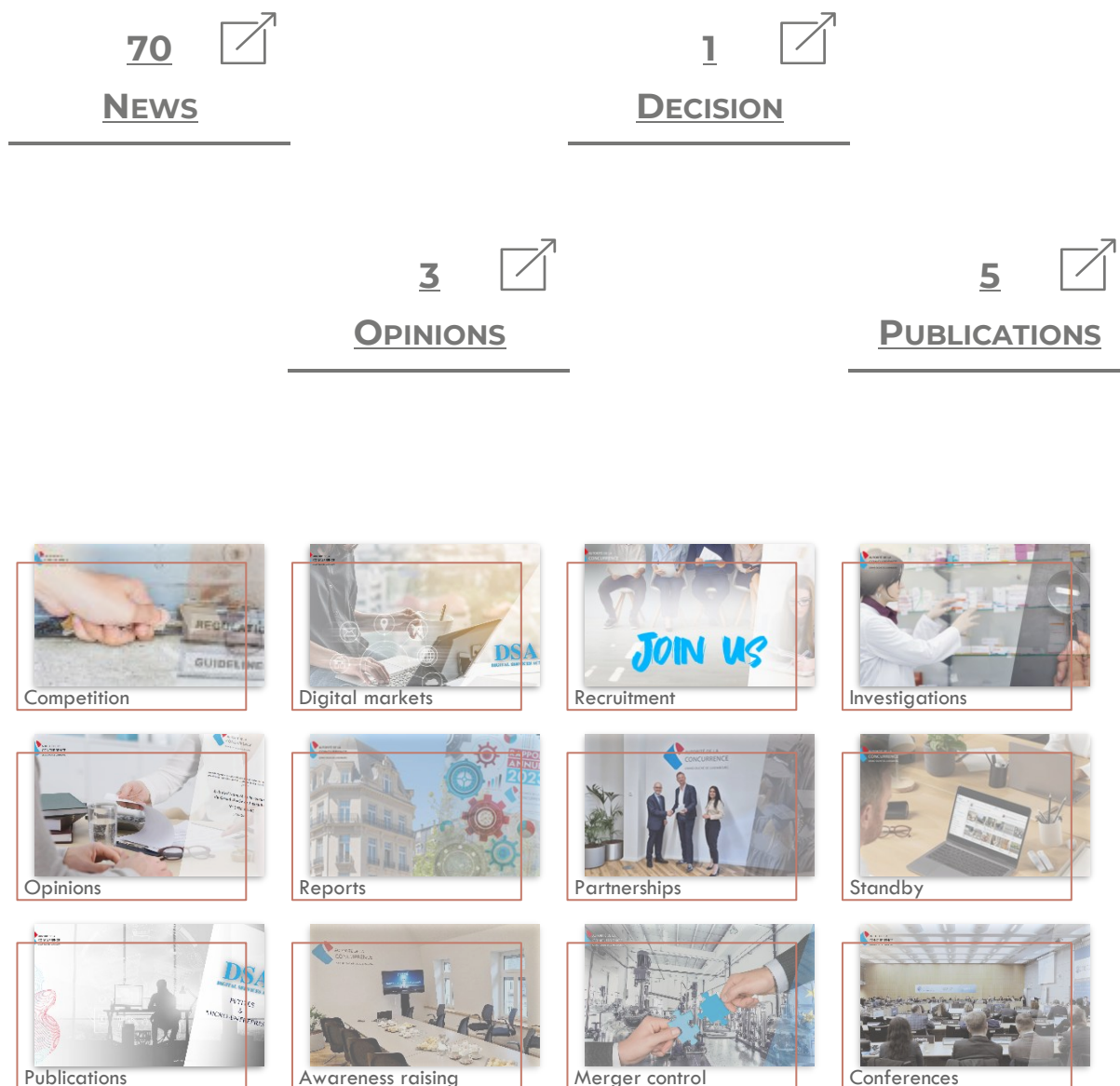


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Following a preparatory restructuring of the content distribution and editorial style of its website, the Authority concluded a service contract with the CTIE in order to carry out a comprehensive overhaul of the website www.competition.lu. The website is already hosted in the CTIE's infrastructure and will comply with the government's [RENEW web quality guidelines](#) and the Luxembourg State's website strategy.

The Authority has thus started the structural and graphic redesign of its entire site.

At the same time, the Communications Department continued to update the existing site, in particular by disseminating:



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SUBSCRIBERS



Newsletter November-December 2024

Season's greetings | AI Conference | OECD Global Competition Forum | Meta Fine | TikTok Romania | DSA: Risk Assessment Reports - Proposed Data Access Regulations for Researchers - Regulations Transparency Reports



Newsletter October 2024

Martine Hansen / Luxembourg Competition Day / Public Procurement Day / DSA - Online Complaints Service / Conference on EU competition law / 50th EU Competition Day / Disinfo Day / DMA - X / CJEU - FIFA



Newsletter August-September 2024

DSA: SME / AI guide: LIST-Authority / ECN partnership: COM guidelines on exclusionary abuses / DACHLielux: deutschsprachige Wettbewerbsbehörden / DSA: Report on the European elections / DSA: Guidelines on the protection of minors online



Newsletter July 2024

Recruitment within the Authority / DSA: XVideos - X - XNXX / DMA: TikTok - Meta



Newsletter June 2024

Annual report 2023 / Inspections Pharma-parapharma / Lex Delles / Midi de la concurrence / Fake news guide / Partnership Sciences Po / Trento Summer School / ECN-DMA / DMA-Apple



Newsletter May 2024

AI / Reviews - carsharing & public markets / Mondelēz / Meta / Whistleblowers / Booking / X



Newsletter April 2024

Unlautere Handelspraktiken / OAI Commitments / Amazon Fine / ECA Meeting / EU Competition Day / TikTok / Shein



Newsletter March 2024


Amazon must publish its advertising ledger / Acquisition of Heintz Drinks by National Brewery / DSA Workshops / DMA Investigations against Alphabet, Apple and Meta / Proceedings against AliExpress & Meta

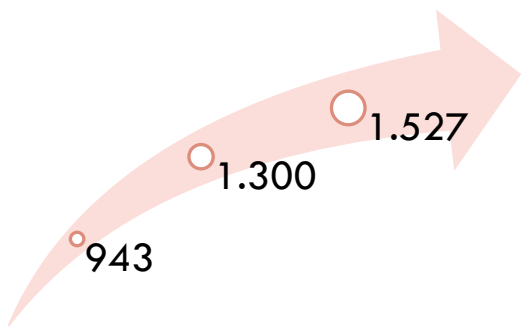


Newsletter February 2024

DSA case / Relocation of the Autorité de la concurrence / Unlautere Handelspraktiken

LinkedIn

+ 62% 
FOLLOWERS¹¹



EVOLUTION OF THE NUMBER OF FOLLOWERS ON LINKEDIN FROM 2022 TO 2024



FOLLOWERS ALL OVER THE WORLD

¹¹ Evolution of the number of followers from the end of 2022 to the end of 2024

INFORMATION SESSIONS AND TRAINING PROVIDED BY THE AUTHORITY

Visits from Ministers

Minister of the Economy

On 6 June, the [Authority met with the Minister of the Economy](#), SMEs, Energy and Tourism, Lex Delles, to present its various fields of activity.

The Minister took the time to visit the new premises and to meet each of the Authority's staff members.

He paid particular attention to the new challenges ahead to contribute to a well-functioning economy.



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Minister of Consumer Protection

On 18 October, the [Authority met with the Minister for Consumer Protection](#), Martine Hansen, in order to review the respective responsibilities and areas of cooperation between the Ministry and the Authority with a view to strengthening consumer protection.

The Minister stressed her willingness to expand existing cooperation. The Ministry and the Authority will soon draw up a cooperation agreement and have already planned various working meetings with the common objective of strengthening consumer protection.



© Consumer Protection Directorate

Midi de la concurrence

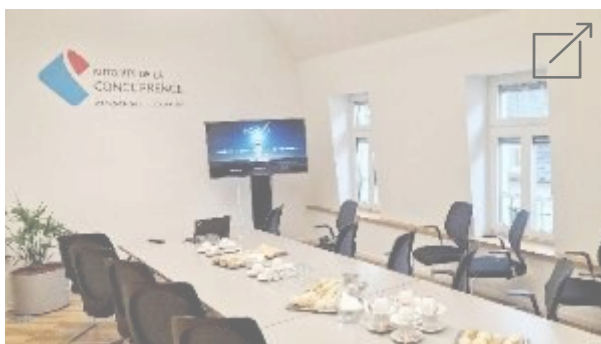
As part of the 'Midi de la concurrence' series of events, the Authority offers training and information sessions on topical issues in its areas of competence.

Vertical restraints in competition law

On 24 May, the Authority received Franck Wijckmans, lawyer at the Brussels Bar, assessor for the Belgian Competition Authority and professor at the Brussels School of Competition, for a [about vertical restraints](#).

As an expert advisor for DG Competition, Frank Wijckmans co-authored an expert report on the revision of the Vertical Restraints Exemption Regulation.

During this information session, participants benefited from his expertise to deepen their knowledge of Regulation 2022/720.



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Partnership with the Strasbourg Institute for Political Studies (IEP)

On 6 June, the [Authority and Sciences Po Strasbourg concluded a partnership agreement](#) to continue their collaboration on competition law education, internships and research activities.

For several years, Charline Di Pelino, Legal Advisor to the Authority, has been teaching the course '*Simulation of competition law proceedings*' as part of the Master 2 – *European Economic and Regulatory Law* programme at Sciences Po Strasbourg.

This Moot Court seminar allows students to analyse a case from the investigation stage through to the decision-making phase. The Authority also regularly welcomes students from this programme for end-of-study internships. However, in 2024, the Authority was unable to take on any interns from this programme due to its move to new premises and internal reorganisation.



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Through this agreement, the University of Strasbourg and the Authority have confirmed their partnership concerning these teaching and internship activities. They will also develop their collaboration to carry out competition law research projects in line with market developments, in particular in the digital sector, and their impact on competition.

Course at the Faculty of Law, Economics and Management of Nancy (University of Lorraine)

For several years, the Authority has been offering students from the [Master II in International and European Affairs \(JAIE\)](#) and the [Magistère de Juriste d'Affaires européen \(JAE\)](#) a course in European competition law taught by Mattia Melloni, Effective Advisor to the Authority's College.

These collaborations are also an opportunity for final-year students to complete their end-of-study internship with the Authority.

In 2024, the Authority was unable to take on interns from this course due to its move to new premises and internal reorganisation.

Training day on public procurement

On 15 October, the Authority intervened at the [training day on public procurement](#) organised in Mamer by the Ministry of Home Affairs.

This training day for municipal employees involved in public procurement was an opportunity for the Authority to raise awareness among municipal officials of the [risks of collusion and cartels](#) in public procurement.

Pierre Kauffmann and Philipp Noppeney, investigators at the Authority, also provided them with some tools to prevent and detect such anti-competitive practices.



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CONFERENCES

Summer School on advanced aspects of competition law and economics in the EU - Moena-Trento, Italy

From 16 to 20 June, the Authority, represented by Mattia Melloni, Effective Advisor, intervened at the [Summerschool 2024 of the University of Trento](#) (Italy) on advanced aspects of competition law and economics in the EU.

This 9th edition was a unique learning experience as well as a great opportunity to network.

For a whole week, competition authorities, advisors, lawyers, judges, academics and journalists from all over Europe took part in various courses, conferences and events, ranging from the historical foundations of competition law, through compliance and enforcement of antitrust rules, to future developments in competition law.



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European Competition Day (ECD) - Brussels

On 26 April, the Authority, represented by its Vice-President Marco Estanqueiro, attended the [European Competition Day](#) organised in Brussels by the Federal Public Service Economy (FPS Economy) and the Belgian Competition Authority.

These conferences, organised during each Presidency of the Council of the European Union, bring together representatives of national competition authorities, the European Commission, ministries, politicians, businesses and experts in the field of competition policy.

They aim to raise awareness of the importance and impact of competition rules on the economy and society.



© FPS Economy, retouched by Competition Authority

European Competition Day (ECD) - Budapest

On 21 and 22 October, the Authority, represented by its Special Legal Advisor Serge Sandt, attended the [European Competition Day](#) organised in Budapest by the Hungarian Presidency of the Council of the EU.

Participants discussed several topics:

- ✓ Panel 1: 20 years of European competition law in Hungary
- ✓ Panel 2: DMA and competition law
- ✓ Panel 3: AI and competition law
- ✓ Thematic speech: Sustainability and Antitrust



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Conference on AI and its opportunities for the civil service

On 7 and 8 November, the Authority, represented by its Vice-President Marco Estanqueiro, attended the conference *'Artificial intelligence and data management in the civil service: Challenges and Opportunities for Senior Officials and the Transformation of their Organizations'* organized by the Ministry of the Civil Service.

This conference brought together senior Luxembourg and Belgian officials, as well as experts from various backgrounds, around the subject of artificial intelligence and its impact on public agencies and services to citizens.



Luxembourg Competition Law Day

On 16 October 2024, the Authority took part in the 6th *Luxembourg Competition Law Day* organised by the Luxembourg Association for the Study of Competition Law (ALEDC) and the Chamber of Commerce in order to raise awareness of the current competition challenges.

During his *keynote speech*, President Pierre Barthelmé gave a brief overview of the development of the competition authority since it became an independent public institution on 1 January 2023. He then looked at recent events impacting competition law, in particular the ruling of the Court of Justice of the European Union in the *Illumina-Grail* case and the *report on the future of EU competitiveness* by Mario Draghi, former President of the European Central Bank.



© E. Claude, Focalize for the Chamber of Commerce

Sven Frisch, effective advisor to the Authority, took part in the round table to shed light on the impact of the *Towercast* and *Illumina-Grail* rulings on merger control.

ERA Annual Conference on European Competition Law

On 24 and 25 October, the Authority, represented by its President Pierre Barthelmé, its Vice-President Marco Estanqueiro and its Special Legal Advisor Serge Sandt, attended the annual conference on European competition law organised in Trier by the Academy of European Law (Europäischen RechtsAkademie Trier - ERA).

The annual conference aims to provide legal practitioners with a comprehensive update of the most important developments of the past year in the field of competition law and merger control, both at European and national level.



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COMPETITION

ANNUAL REPORT 2024



III. COMPETITION

Competition law contributes to the proper functioning of markets by ensuring **free competition**. In a competitive market, companies are encouraged to constantly innovate to offer consumers the best possible products and services at the most advantageous prices.

The Competition Authority monitors undertakings' compliance with the rules of free competition and can penalise anti-competitive practices, such as abuse of a dominant position or cartels.

In this context, in 2024, the Authority ensured:

- analysis and consultation missions (opinions and sector inquiries);
- the investigation and sanctioning of anti-competitive practices;
- certain merger control tasks via referrals to the European Commission;
- the representation of Luxembourg within the European Competition Network; as well as
- other forms of cooperation at European and international level.

In the field of competition law, the Authority supervises **all the undertakings that make up Luxembourg's economic fabric**, namely:



around **42 000 companies in the non-financial market economy**¹²



around **1,500 companies in the financial and insurance sectors**¹³ operating in Luxembourg



all **foreign companies producing goods and services** with economic activities in Luxembourg

COMPETITION DEPARTMENT

In order to ensure continuity on competition matters while adapting its resources to its new tasks, particularly regarding the regulation of online platforms, the Authority has continued to reorganise its teams to create a fully-fledged 'Competition Department', separate from its other departments.

As at 31 December, the service consisted of a legal advisor responsible for the department, and five investigators, including two lawyers and three economists.

¹² STATEC – Luxembourg in 2024 figures (latest data available in 2021)
<https://statistiques.public.lu/en/actualites/2024/luxembourg-en-chiffres-2024.html>

¹³ STATEC – Luxembourg in 2024 figures (latest data available in 2023)
<https://statistiques.public.lu/en/actualites/2024/luxembourg-en-chiffres-2024.html>

ANALYSIS AND CONSULTATION ACTIVITIES

SECTOR INQUIRIES

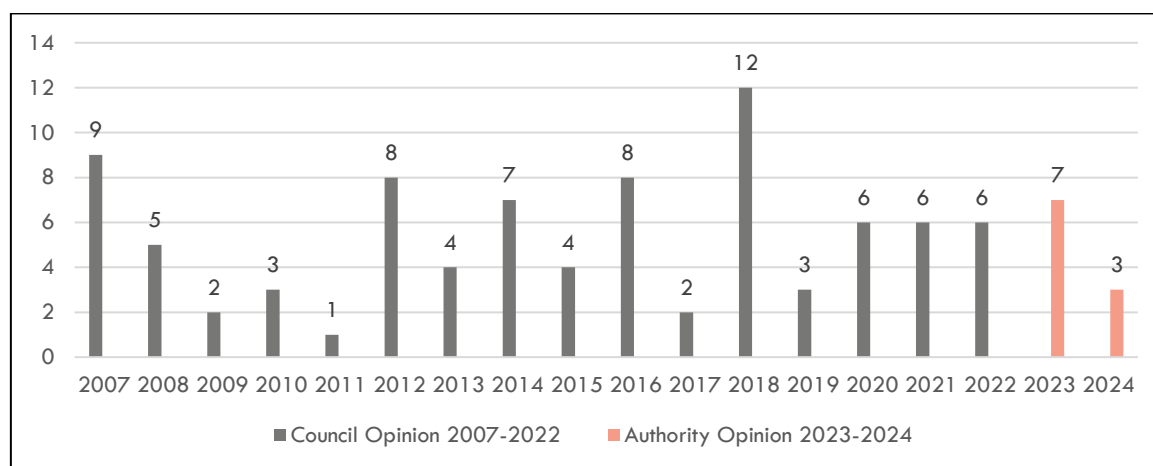
Under Article 65 of the Competition Act, the Authority may conduct an investigation into a particular sector of the economy or a particular type of agreement in different sectors where trade developments, price rigidity or other circumstances suggest that competition may be restricted or distorted. Following the investigation, the Authority may publish a report setting out its findings.

For reasons of confidentiality, the present report does not mention ongoing sector inquiries.

LEGAL OPINIONS ON MATTERS RELATING TO COMPETITION

Under Article 64 of the Competition Act, the Authority may issue opinions, on its own initiative or at the request of a Minister, on any matter relating to competition.

In 2024, the Authority issued opinions on various bills and draft regulations.



NUMBER OF OPINIONS ADOPTED BY THE COUNCIL/AUTHORITY BETWEEN 2007 AND 2024

Digital Services Act Implementation Bill

In its [opinion of 16 February 2024 on Bill 8309](#) implementing Regulation (EU) 2022/2065 on Digital Services (DSA), the Authority agreed with the bill subject to some procedural clarifications.

The Authority welcomed its designation as Digital Services Coordinator, which it considers relevant given its expertise in the supervision of digital market gatekeepers (Digital Markets Act - DMA), the protection of businesses using online platforms (Platform to Business - P2B) and competition law.

However, the Authority made proposals to clarify and precise the procedure for handling complaints and the conditions under which action may be taken. The Authority also reiterated the need to have the appropriate human and technical resources to fulfil its missions as Digital Services Coordinator.



In its opinion of 17 April 2024 on the draft Grand-Ducal Regulation amending the implementing regulation to the Law of 8 April 2018 on public procurement, the Authority expressed several reservations.

anges in that index should, on the contrary, be weighed
 iple and the resulting efficiency gains.

In its [opinion of 8 May 2024 on the bill on car-sharing on public roads](#), the Authority welcomed the proposal to provide a transparent and non-discriminatory legal framework for car-sharing to promote shared mobility and optimise urban redevelopment.

INVESTIGATION AND SANCTIONING OF ANTI-COMPETITIVE PRACTICES

The Authority has the power to take binding decisions to enforce competition law. In particular, it may take decisions compelling undertakings to end an infringement and imposing sanctions, decisions accepting commitments and decisions imposing interim measures. The purpose of these decisions is to prevent or bring to an end anti-competitive practice.

The Authority has investigative powers to investigate and sanction possible anti-competitive practices.

INVESTIGATIONS

Inspections in the pharmaceutical and parapharmaceutical sectors

On 11 and 12 June, officials from the Authority, with the support of the Judicial Police Service, and under the authority and supervision of an investigating judge, carried out unannounced inspections at the premises of various companies suspected of anticompetitive practices in the pharmaceutical and parapharmaceutical sectors.

These inspections are a preliminary step in the investigation process about potentially anticompetitive practices. They do not mean that the undertakings concerned are guilty of anti-competitive conduct and do not prejudice the outcome of the investigation, in accordance with the rights of the defence.



DEVELOPMENT OF AN AI-BASED DIGITAL ASSISTANT

On 24 September, the Luxembourg Institute of Science and Technology (LIST) and the Authority joined forces to develop an artificial intelligence-based digital assistant designed to improve the effectiveness and efficiency of competition law enforcement.

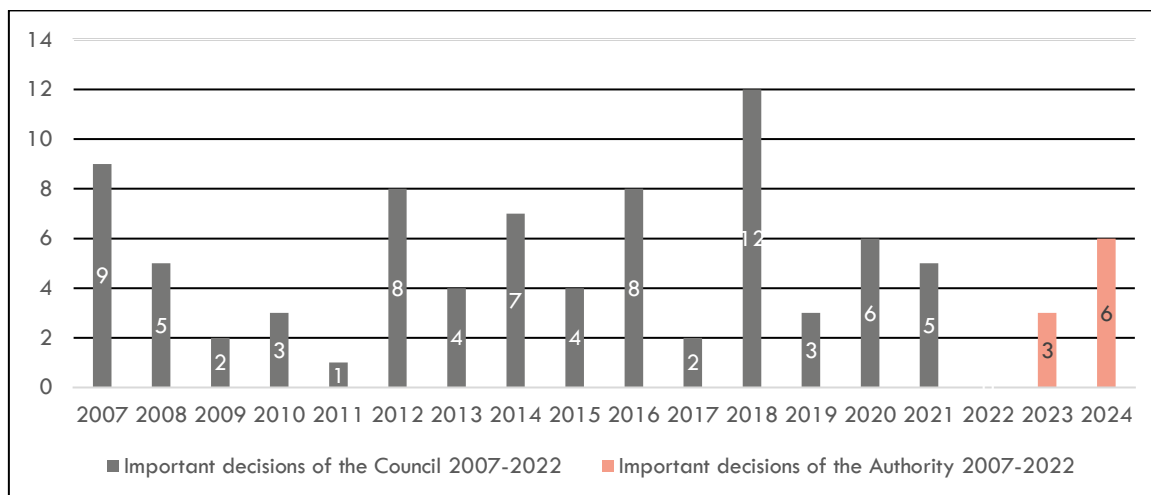
This partnership is the result of a shared vision to harness the potential of AI to advance the legal landscape. In the face of growing volumes of data crucial to competition law, traditional methods of investigation have become increasingly cumbersome. The collaboration between the Authority and LIST aims to address these challenges by integrating advanced AI tools into the legal workflow.



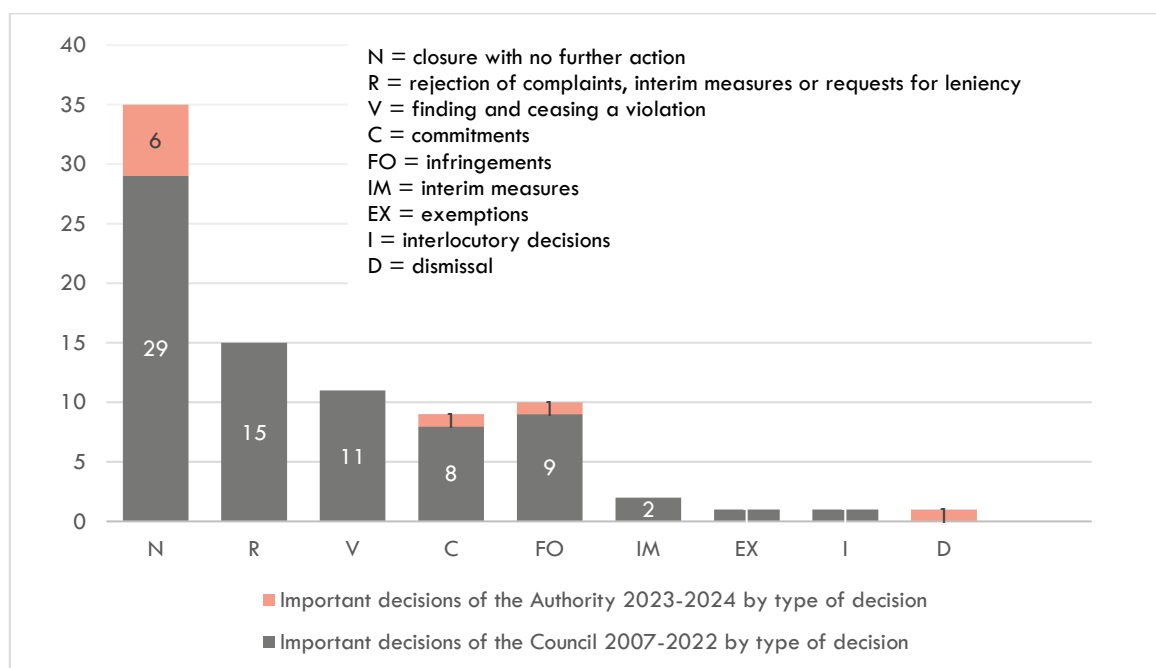
By combining AI-based LIST tools and methodologies with the Authority's in-depth legal expertise and control mechanisms, this collaboration could set a precedent for the future of law enforcement by public authorities in Luxembourg.

DECISIONS

Among the decisions issued in 2024, the Authority notably issued six important decisions.



NUMBER OF IMPORTANT DECISIONS ADOPTED BETWEEN 2007 AND 2024



IMPORTANT DECISIONS ADOPTED BETWEEN 2007 AND 2024 BY TYPE OF DECISION

Commitment decision – OAI

On 25 March 2024, the Authority accepted and rendered binding the commitments proposed by the Ordre des architectes et des ingénieurs-conseils (OAI) to address its competition concerns.

The OAI had made available to its members documents including, on the one hand, optional hourly rates and, on the other hand, the method for calculating fees to be applied in public works contracts.

On 8 March 2021, the investigating councillor sent a statement of objections to the OAI, stating that by disseminating these documents, the Order had adopted decisions by an association of undertakings with the object of preventing, restricting or distorting competition.

On 11 October 2023, the OAI proposed commitments to address the competition concerns raised by the investigating councillor.



Closure without further action – Allegations of abuse of a dominant position

On 23 April 2024, the investigating councillor closed an investigation into a complaint that a multinational undertaking had abused of its dominant position.

The case concerned allegations of excessive and discriminatory prices and unfair trading conditions imposed on small Luxembourg producers.

In his decision, the investigating councillor found that the investigation had not revealed any indications of a violation of the prohibition against abuses of a dominant position. With regard, in particular, to the allegations of excessive pricing, the investigating councillor applied the two-step test developed in the CJEU's *United Brands* case-law.

First, the investigating councillor verified whether the prices charged by the undertakings concerned were unfair in themselves. In this regard, he noted in particular that the prices in question had not increased sharply and significantly in previous years and did not enable that undertaking to achieve particularly high margins.

Second, the investigating councillor checked whether the prices were unfair in comparison with various benchmarks, including the prices applied in a comparable Member State (after adjustment based on purchasing power parity indices). The investigating councillor's examination revealed that some of the prices applicable in Luxembourg were lower than those applicable in those Member State. The prices that were higher in Luxembourg were explained by differences in transport costs.

No appeal was lodged against this decision under Article 35(3) of the amended Law of 30 November 2022 on competition.

Closure without further action – Security and surveillance services

By decision of 13 November 2024, the case opened in 2020 in the security and surveillance services sector was closed without further action. Following a statement of objections in 2023, the file had been referred back for additional investigation.

However, the additional investigation did not establish any infringement of competition law, in particular Article 4(1) of the amended Law of 30 November 2022 on competition and Article 101(1) of the Treaty on the Functioning of the European Union (TFEU).

MERGER CONTROL

In 2024, pursuant to Article 22(1) of Regulation 139/2004 on the control of concentrations between undertakings, the Authority referred to the European Commission transactions that were liable to affect trade between Member States and threatened to significantly affect competition in Luxembourg.

Request for referral of the acquisition of Boissons Heintz by Brasserie Nationale

On 7 February 2024, the Authority sent a request to the European Commission to examine the acquisition of Boissons Heintz by Brasserie Nationale under EU merger control rules.

In its request, the Authority argued, *inter alia*, that this acquisition threatened to significantly affect competition in Luxembourg by combining the country's two main wholesale beverage distributors. According to the Authority, the acquisition was also liable to affect trade between Member States by hindering the access by foreign beverage producers (beer and mineral water in particular) to the relevant Luxembourg markets.

On 15 March 2024, the European Commission accepted the [Authority's referral request](#), deciding to examine the acquisition of Boissons Heintz by Brasserie Nationale and requesting the latter to notify the transaction.

Intervention before the General Court of the European Union in Case T-289/24

On 3 June 2024, Brasserie Nationale and its distribution subsidiary Munhowen brought an [action before the General Court of the European Union against the European Commission's decision of 15 March 2024](#) to examine Brasserie Nationale's acquisition of Boissons Heintz under European merger control rules.

On 30 August 2024, the Authority requested leave to intervene in support of the forms of order sought by the European Commission, which requested the General Court of the European Union dismiss the action brought by Brasserie Nationale and Munhowen.

By [order of 3 October 2024](#), the President of the Sixth Chamber of the General Court of the European Union granted the Authority leave to intervene. The President of the Sixth Chamber held that the Authority had a direct interest in the outcome of the case since that case had a significant impact on the exercise of the powers conferred on the Authority by Luxembourg legislation.

The Authority is the first national competition authority to be granted leave to intervene before the General Court of the European Union.

REPRESENTATION WITHIN THE EUROPEAN COMPETITION NETWORK (ECN)

The Authority actively participates in the implementation of EU competition policy by representing the Grand Duchy of Luxembourg in the [European Competition Network \(ECN\)](#).

The ECN brings together the national competition authorities of the Member States of the European Union and the European Commission.

The ECN's work within the various horizontal and sectoral expert groups is steered by meetings of the directors-general, which are prepared during plenary meetings.

MEETINGS OF DIRECTORS-GENERAL (DGs)

Meetings of *Directors-General* (DGs' Meetings) bring together the presidents/directors of National Competition Authorities (NCAs) and the Director-General of DG Competition, who chairs the meetings. Representatives of national ministries responsible for competition policy may also be invited to parts of these meetings, for discussions on general policy.

The DGs' meetings examine strategic issues relating to the application of competition rules, cooperation and competition policy. They also approve working documents submitted by the plenary and prepared by the ECN's working groups and sectoral subgroups.

ECN Joint Statement – Draft Guidelines on exclusionary abuses

During the DGs' Meeting on 20-21 June in Split, Croatia, the ECN adopted a joint statement on the European Commission's initiative to adopt guidelines on exclusionary abuse practices by dominant undertakings.

The Authority subsequently reiterated its [support for the draft guidelines](#), in which it was actively involved as a member of the ECN.

These guidelines aim to strengthen the framework for the application of Article 102 TFEU, by ensuring that actions against abusive exclusionary abuses by dominant undertakings are meaningful, effective and consistent.



PLENARY MEETINGS

The purpose of the ECN plenary meetings is to discuss the work of the ECN working groups and to adopt common policies.

ECN HORIZONTAL EXPERT GROUPS

These groups bring together representatives of each NCA and the European Commission on specific topics, with the aim of promoting greater consistency in their decision-making practice.

Working Group on Cooperation Issues and Due Process

This group assesses the procedures of each NCA and areas of convergence to ensure increased effectiveness in the implementation of Articles 101 and 102 TFEU.

Working Group on Cartels

This group aims to build and consolidate a genuine European anti-cartel policy with each NCA.

Working Groups 101 TFEU and 102 TFEU

These groups address specific and topical topics for NCAs in relation to horizontal or vertical anti-competitive practices and abusive behaviour.

Working Group on Mergers

This group promotes the exchange of views on merger control and discussions on the NCAs' and the Commission's experience.

Chief Economists Working Group

This group analyses the economic aspects of competition law and their role in the work of the authorities.

Digital Markets Working Group

This group addresses the issues raised by the handling of cases involving companies and digital platforms.

Working Group on the Digital Markets Act

This group coordinates the work to implement the Digital Markets Act (DMA):

- process for designating individual gatekeepers
- cooperation between the Commission and the Member States
- coordination between the new regulation and traditional competition cases.

ECN "SECTORAL" EXPERT SUBGROUPS

The ECN also has different working groups focusing on specific economic areas or sectors:

- ✓ Agri-food sector
- ✓ Pharmaceutical and health sector
- ✓ Banking and financial sector
- ✓ Environment sector
- ✓ Telecommunications sector
- ✓ Energy sector

COOPERATION AT EUROPEAN AND INTERNATIONAL LEVEL

ADVISORY COMMITTEE ON RESTRICTIVE PRACTICES AND DOMINANT POSITIONS

The Advisory Committee on Restrictive Practices and Dominant Positions is the forum where experts from the various competition authorities examine certain cases as well as general issues of European competition law.

It thus contributes to the maintenance of a consistent application of European competition rules.

In 2024, the Authority was appointed 'rapporteur' for the presentation of Case AT.40632, *Mondelez trade restrictions*, to the members of the Advisory Committee.

ADVISORY COMMITTEE ON MERGERS

The Advisory Committee on Mergers assists the Commission in the application of the [Merger Regulation](#). It is consulted prior to any final decision or decision to impose a fine.

Composed of representatives of the competent authorities of the Member States, it also contributes to the maintenance of a consistent application of European competition rules.

EUROPEAN ASSOCIATION OF COMPETITION AUTHORITIES (ECA)

On 22 and 23 April, the Authority, represented by its Vice-President, Marco Estanqueiro, attended the annual [ECA Meeting](#) organised in London by the Competition and Markets Authority on the following topics:

- Dynamic Mergers,
- AI foundation models and AI as a tool for enforcers, and
- An alternative competition tool : the CMA's experience using the market investigation tool and developments in other jurisdictions.



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Founded in 2001, the [European Association of Competition Authorities](#) (ECA), is an informal association that serves as a forum for discussion by the competition authorities of the European Economic Area (EEA), which includes the European Commission, the authorities of the Member States of the European Union and of the EFTA States (European Free Trade Association) Norway, Iceland and Liechtenstein, and the EFTA Supervisory Authority.

ECA's purpose is to improve cooperation between competition authorities and to contribute to the efficient use of national and European competition rules.

DACHLIELUX

On 29 and 30 August, the Authority had the pleasure of welcoming the [German-speaking national competition authorities of the European Union](#) (EU) and of the European Free Trade Association (EFTA).

These days of exchanges were marked by in-depth discussions on best practices, innovative projects, as well as on the recent challenges faced by our respective institutions. A great opportunity to strengthen cooperation to ensure effective and dynamic competition within our respective territories.



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FRENCH COMPETITION AUTHORITY

On 1, 2, 10 and 11 October, Charline Di Pelino, legal advisor and head of the Competition Department, and Guilhem Issartel, lawyer and investigator in the Department, had the opportunity to benefit from the experience of the French Competition Authority by participating in the initial training seminar given to its newcomers.

This collaboration allowed them to discover how the various departments of this neighbouring authority work and are organised, and to draw inspiration from this to improve internal procedures and training within the Luxembourg Authority.

ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)

The OECD addresses competition issues through the meetings of the *Competition Committee* and the *Global Competition Forum*.

The [Competition Committee](#) encourages exchanges of views and analysis on competition policy issues.

The OECD's [Global Forum on Competition](#) brings together competition officials from more than 100 authorities and organisations around the world to discuss key issues and recent trends in competition law.

OECD – Global Competition Forum

On 2 and 3 December, the Authority, represented by its President Pierre Barthelmé and Special Legal Advisor Serge Sandt, attended the [OECD Global Forum on Competition](#) in Paris.

Since 2001, the OECD Global Forum on Competition has brought together senior officials from more than 100 competition authorities from around the world.

Participants debate and discuss key topics on the global competition agenda. The programme includes roundtables, presentations by renowned experts, and peer reviews.



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INTERNATIONAL COMPETITION NETWORK (ICN)

At international level, the Authority actively participates in the work of the *International Competition Network*.

The ICN brings together different national competition authorities at global level and serves as a forum for discussion on competition law enforcement topics.



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ONLINE PLATFORMS

ANNUAL REPORT 2024

IV. ONLINE PLATFORMS

In 2024, the Authority once again saw its remit in the area of online platform regulation expand with its designation as Digital Services Coordinator.

Since 2021, the Authority has been responsible for ensuring compliance with Regulation (EU) 2019/1150 on relations between platforms and businesses ([Platform to Business - P2B](#))¹⁴. In this context, it defends the collective interests of business users of online platforms and search engines.

Since 2023, the Authority has been assisting the European Commission, where necessary, in ensuring compliance by digital market gatekeepers with Regulation (EU) 2022/1925 on digital markets ([Digital Markets Act - DMA](#))¹⁵.

The Authority has also devoted a large part of its 2023 and 2024 activity to reorganising itself to ensure the regulation of platforms for a safe online environment following the entry into force of Regulation (EU) 2022/2065 on digital services ([Digital Services Act - DSA](#)). In this context, it assumes the role of Digital Services Coordinator for Luxembourg.

As regards digital markets regulation, the Authority therefore supervises, coordinates and protects a large number of players, namely:



approximately 240 Luxembourg platforms concerned by the DSA¹⁶



business users of online platforms (P2B)



professionals and consumers vis-à-vis GAFAM (DMA)



Internet users and minors with regard to illegal content on the Internet (DSA)

ONLINE PLATFORMS DEPARTMENT

In order to carry out its new tasks in an efficient and coordinated manner, in particular with regard to the implementation of the DSA, the Authority continued to reorganise its teams to create a fully-fledged 'Digital Markets' department, renamed the 'Online Platforms' service at the end of 2024.

As at 31 December, the service consisted of a legal advisor responsible for the department, a lawyer specifically assigned to the DSA, and a digital analyst with a background in economics.

¹⁴ Law of 5 March 2021 on certain arrangements for implementing Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services
<https://legilux.public.lu/eli/etat/leg/loi/2021/03/05/a185/consolide/20230101>

¹⁵ Law of 29 March 2023 for the implementation of the Digital Markets Act
<https://legilux.public.lu/eli/etat/leg/loi/2023/03/29/a181/loi>

¹⁶ Estimate of the Ministry of Economy (11 September 2023)
https://meco.gouvernement.lu/en/actualites/gouvernement%2Bfr%2Bactualites%2Btoutes_actualites%2Bcommuniqu%C3%A9s%2B2023%2B09-septembre%2B11-fayot-paquet-ue-espace-numerique.html

PLATFORM TO BUSINESS (P2B)

Providers of online platforms or search engines must comply with the obligations of the P2B Regulation vis-à-vis EU businesses using these platforms to sell their goods or services to EU consumers.

This Regulation aims to [create a fair, transparent and predictable business environment for companies using online platforms](#). Platforms play a crucial role for millions of businesses. Their position as intermediaries between businesses and consumers nevertheless entails a risk of harmful commercial practices, against which businesses do not always have recourse.

Providers of online platforms or search engines must therefore comply with certain obligations regarding their terms and conditions and commercial practices.

Businesses or users of business websites who consider that they have been harmed by a practice prohibited by law may bring an action for an injunction before the Authority.

DIGITAL MARKETS ACT (DMA)

Since 6 March, major internet platforms have been required to comply with the provisions of the Digital Markets Act (DMA).

The aim of this regulation is to [rebalance the relationship between large digital platforms and business users](#) in order to foster the development of small platforms and stimulate competition for the benefit of consumers.

The DMA thus establishes harmonised rules to prevent unfair behaviour by large online platforms acting as "gatekeepers" to digital markets. In addition to the competition rules that allow for ex post sanctions for abuse of dominant positions, the DMA sets out certain ex ante obligations that large digital platforms must comply with in order to ensure fair competition.

The European Commission is the only authority empowered to enforce the rules of the DMA and has extensive powers to investigate, monitor and enforce the rules set out in the DMA.

However, the Authority and other national competition authorities cooperate with the European Commission in a coordinated approach.

DIGITAL MARKETS ADVISORY COMMITTEE

Established on 13 January 2023, the [Digital Markets Advisory Committee](#) assists the Commission in the application of the [Digital Markets Act \(DMA\)](#).

Each Member State is represented by a delegation of experts from the competent national authorities.

In 2024, the Authority participated in the [5th meeting of the Committee on 1 February](#), the [6th meeting of the Committee on 20 March](#) and the 4-October meeting.

EXCHANGE PROGRAMME OF THE EUROPEAN COMPETITION NETWORK

As part of the European Competition Network (ECN) exchange programme, Philipp Noppeney, a lawyer in the Authority's Competition Department, spent three months within the European Commission's Directorate-General for Competition (DG COMP).

He was assigned to the unit responsible for implementing the Digital Markets Act (DMA). This exchange coincided with the date on which the obligations imposed by the DMA became applicable to the main undertakings designated as gatekeepers.

DIGITAL SERVICES ACT (DSA)

Applicable to certain digital players since 25 August 2023, the DSA has been fully in force since 17 February 2024.

It aims to [combat the dissemination of illegal or harmful content online](#). Hate speech, content of sexual abuse of minors, sale of counterfeit goods: what is illegal offline must also be illegal online.

Intermediary service providers (network infrastructure, hosting, online platforms or search engines, etc.) must therefore comply with obligations corresponding to their role, size and impact in the digital ecosystem.

In 2024, with the bill determining the modalities of implementation of the DSA still pending in the Chamber of Deputies, the Authority did not yet have the necessary powers to investigate, monitor and enforce the rules set out in the DSA.

However, it was already acting as Digital Services Coordinator in Luxembourg. A platform user who considered that there had been an infringement of the DSA Regulation could therefore already lodge a complaint with the Competition Authority.

The European Commission is responsible for ensuring compliance with the DSA by very large online platforms and very large online search engines.

IMPLEMENTATION OF THE DSA

The DSC's role

As the Digital Services Coordinator (DSC) for Luxembourg, the Authority oversees platforms for a safe online environment in line with the DSA.

It also receives and handles complaints from users of online platforms.

Online complaint handling tool

On 15 October, the Authority, together with the *Centre des technologies de l'information de l'État (CTIE)*, launched a new assistant on *MyGuichet.lu*.

This tool allows users of online platforms who believe that there has been a breach of the DSA to lodge a [complaint for non-compliance with the DSA](#).



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Statistics

Complaints

Total number of complaints received	17
Total number of complaints sent to other DSCs	3 (DSC IE)
Total number of complaints received from other DSCs	5 (1 DSC DE, 3 DSC NL, 1 DSC SE)

In 2024, the Competition Authority received 17 complaints for alleged breaches of the DSA.

12 of them were sent through the complaint form set up by the Authority, while 5 of them were transferred to the Authority by other European Digital Services Coordinators (DSCs).

Those five complaints came from the Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen (DSC DE, 1 complaint), the Autoriteit Consument en Markt (DSC NL, 3 complaints) and the Post-och telestyrelsen (DSC SE, 1 complaint).

In addition, pursuant to Article 53 of the DSA, the Authority forwarded 3 complaints to the Coimisiún na Meán (DSC IE, 3 complaints).

Some complaints received did not fall within the Authority's remits under the DSA. The behaviours reported by the complaints concerned the following areas:

- ✓ Misleading and manipulative presentation of the service (dark patterns),
- ✓ Non-compliant content removal or user account blocking;
- ✓ Lack of point of contact for the intermediary service provider;

- ✓ Lack of or problems in the use of the mechanism for reporting illegal content put in place by the intermediary service provider.

As the law implementing the DSA was adopted on 2 April 2025, these complaints did not lead to the opening of an investigation in 2024.

Orders

Total number of orders received	0
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Article 9 of the DSA defines the obligations of intermediary service providers when they receive a decision from national judicial or administrative authorities requiring them to take action against illegal content.

Firstly, when a provider receives such an order, it must inform the issuing authority (or any other authority specified in the order) of any action taken in response to the order. The provider shall also specify whether and when the requested measures have been taken. The article also sets out the conditions under which national authorities may take such decisions.

The authority that issued the order, or any other specified authority, must communicate the order and any information relating to its implementation to the digital services coordinator of the Member State of the authority that issued the order. The DSC then communicates this information to all other digital services coordinators.

Article 10 of the DSA requires intermediary service providers to inform the competent national judicial or administrative authority, or any other authority specified in the injunction, without delay upon receiving an order requesting them to provide specific information about the individual recipients of their services, of the receipt of the order and of its effect.

The article also sets out the conditions applicable to orders issued by national authorities. Like Article 9 of the DSA, Article 10 of the DSA also sets out the conditions applicable to orders issued by national authorities. The authority that issued the order (or any other designated authority) must also communicate the order and any information relating to its execution to the digital services coordinator of the Member State of the authority that issued the order. The digital services coordinator shall then communicate this information to all other digital services coordinators.

In 2024, the Authority did not receive any orders.

Certifications

Trusted Flaggers

Under Article 22 of the DSA, trusted flaggers are empowered to detect potentially illegal content and alert online platforms. They are experts in detecting certain types of illegal content online, such as hate speech or terrorist content, and in notifying online platforms of such content.

The notifications they submit must be treated as a priority by online platforms, as they are expected to be more accurate than those submitted by ordinary users. The digital services coordinator of the Member State where the applicant entity is established grants the status of trusted flagger. The DSC shall supervise the application process and ensure that entities fulfil the conditions set out in Article 22 of the DSA.

In 2024, the Authority received an application from an organisation requesting the award of the trusted flagger status.

Vetted Researchers

Vetted researchers are researchers who have the right to access non-public data for their research on very large online platforms and very large search engines that contribute to the detection, identification and understanding of systemic risks or measures to mitigate them. Some examples of systemic risks include the dissemination of illegal content, negative effects on the exercise of fundamental rights, civic discourse, electoral discourse, gender-based violence, and the protection of health, minors or well-being.

In order to obtain access to relevant data, the digital services coordinator of the Member State of establishment of a very large online platform or a very large specific search engine may grant the status of authorised researcher where the researcher has demonstrated that they meet the conditions laid down in Article 40(8) of the DSA.

The DSCs are currently awaiting the publication of a delegated act on access to data by the European Commission, expected in 2025.

It clarifies the procedures leading to the sharing of data by very large online platforms and very large search engines with authorised researchers. It also specifies the conditions for providing such data and establishes a DSA data access portal that will serve as a one-stop shop for researchers, data providers and coordinators for digital services. Consequently, no approved researcher status was granted in 2024.

Out-of-court dispute settlement bodies

Out-of-court dispute settlement bodies offer users the possibility of resolving disputes relating to content moderation with online platforms.

Online platforms must inform users of the possibility of recourse to an out-of-court dispute settlement body when they communicate their decision on content moderation to them.

Under Article 21 of the DSA, after examining a request submitted by a body, the Digital Services Coordinator for the establishment may certify that body if it meets the requirements set out in Article 21.

The Authority did not certify any out-of-court dispute settlement bodies in 2024.

NATIONAL COORDINATION ACTIVITIES

As the digital services coordinator for Luxembourg, the Authority is responsible for coordinating cooperation between the competent national authorities. As illegal content is defined by Luxembourg national law, numerous national laws and competent authorities are involved in the DSA.

With this in view, the Authority organised two collective brainstorming workshops bringing together several Luxembourg national authorities with the aim of determining future cooperation between stakeholders in the context of the application of the DSA.

First workshop

On 7 March, the Authority organised a workshop about ‘How can authorities work together to ensure optimal protection of citizens?’ within the framework of the DSA.

In cooperation with stakeholders, the Authority spent the whole morning working towards establishing an efficient ecosystem in Luxembourg, enabling users of digital services to effectively enforce their rights.



Second workshop

On 28 March, the Authority organised a second workshop about the implementation of the DSA – what resources, tools and means?’ within the framework of the DSA.

In cooperation with stakeholders, the Authority focused on identifying the flows imposed by the DSA in order to map the relevant actors.

This analytical work will ultimately lead to an efficient referral of users of digital services to the competent authority.



EUROPEAN COOPERATION

Collaboration with other authorities

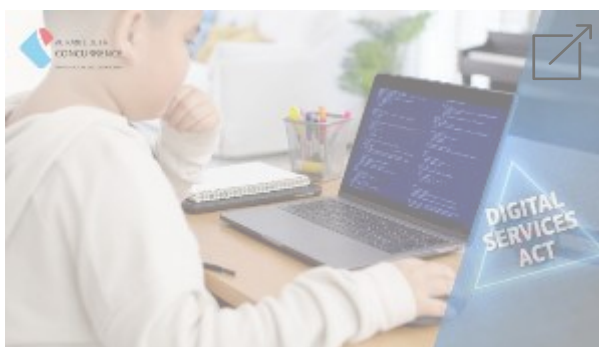
Beyond the mutual transmission of complaints, the Authority has collaborated with other digital services coordinators in several ways, such as responding to requests for information or bilateral exchanges with the competent authorities of other Member States on specific topics, such as trusted flaggers.

Monitoring and supporting the Commission's activities

In 2024, the Authority supported the activity of the European Commission in relation to the DSA by regularly sharing its communications on, inter alia, the designation of very large online platforms, the opening of formal procedures or public consultations under the DSA.

On 2 August, it thus shared, on its website and on its social networks, the call for contributions to [the Guidelines on the protection of minors online](#).

On 26 November, it also shared the consultation on [researchers' access to data from very large online platforms](#) to enable Luxembourg citizens to contribute to the efficiency of the DSA implementation work.



European Board for Digital Services

Provided for in Article 61 of the DSA, the European Board for Digital Services aims to contribute to a safe, predictable and reliable online environment that fosters innovation while ensuring the protection of fundamental rights.

Through the Board, the European Commission and the Digital Services Coordinators work together as a coherent team, taking a European approach to the implementation of the DSA.

The Board thus plays a key role in ensuring the consistent application of the DSA throughout the European Union, to the benefit of all European citizens, society and the economy. The Committee is the platform for discussion of all relevant issues and priorities concerning the application of the DSA. Close and trust-based cooperation and coordination, taking into account the specific impact of intermediary services in each Member State, is essential for effective and consistent application across the European Union. It is important that the Digital Services Coordinators participating in the Board actively contribute to this process.

The members of the Board shall support, advise and assist the European Commission and the other Digital Services Coordinators in their supervisory tasks. They shall exchange views and expertise, consult external experts where necessary and contribute to the analysis of emerging issues related to digital services in the internal market. Participation in the Committee therefore requires an active role in collaboration and joint work to ensure compliance with the DSA, taking into account the specific context of each Member State.

Contribution to the report on the European elections

On 29 July, the Board published a report according to which [no major incidents of disinformation disrupted the European elections](#).

The Authority contributed to the preparation of the report as the DSC for Luxembourg.

This report provides an overview of the measures taken by the European Commission and national DSCs to monitor compliance with the DSA, as well as the actions undertaken under the Code of Practice against Disinformation and by the European Digital Media Observatory (EDMO) in the context of the European elections.



As part of its remits, the Authority participates in the eight working groups set up within the European Board for Digital Services.

Working Group 1 – Horizontal and legal issues

[Working Group 1](#) focuses on interpreting definitions and determining the scope of application of digital services legislation. It also addresses various general legal issues, including fees charged by digital services coordinators. The group also participates in discussions on cooperation with civil society.

The European Commission and the DSC IT chair this working group. It met three times in 2024: on 16 September, 22 October and 27 November.

Working Group 2 – Working together

[Working Group 2](#) examines general working arrangements, including the Board's rules of procedure and cross-border cooperation between competent authorities. It is also responsible for preparing work on annual reports and the early detection of systemic risks, in particular on the handling of complaints and reports. In addition, it examines possibilities for strengthening the capacity of relevant stakeholders to implement the DSA.

The European Commission and the DSC NL chair this working group. It met four times in 2024: on 18 September, 16 October, 13 November and 16 December.

Working Group 3 – Content moderation and data access

[Working Group 3](#) analyses transparency processes and rules relating to trusted flaggers, out-of-court dispute settlement bodies and access to data under Article 40 of the DSA. It supports the Commission's work on developing guidance on these topics. In addition, the working group deals with issues related to intellectual property rights.

The European Commission and the DSC FR chair this working group. It met six times in 2024: on 19 September, 18 October, 14 November, 15 November, 6 December and 10 December.

Working Group 4 – Integrity of the Information Space

[Working Group 4](#) engages in exchanges and discussions on electoral processes, foreign information manipulation and interference, misinformation and disinformation, and other issues related to civic speech.

The European Commission and the DSC SK chair this working group. It met four times in 2024: on 10 September, 14 October, 7 November and 18 November.

Working Group 5 – Consumer protection and online marketplaces

[Working Group 5](#) deals with the interaction between digital services legislation and consumer protection legislation, in particular with regard to Articles 30 to 32 of the digital services legislation. This includes cooperation with consumer protection, customs, market surveillance and other competent authorities.

The European Commission and the DSC DE chair this working group. It met three times in 2024: on 12 September, 15 October and 27 November.

Working Group 6 – Protection of minors

[Working Group 6](#) looks at issues related to the protection of minors, especially Article 28 of the DSA and how it relates to adult content and media literacy. It also supports the Commission's guidelines under Article 28. The Age Verification Task Force has been integrated into this working group.

The European Commission and the DSC IE chair this working group. It met four times in 2024: on 19 September, 15 October, 13 November and 10 December.

Working Group 7 – Orders and criminal issues

[Working Group 7](#) provides for exchanges and discussions on cooperation with law enforcement authorities and on illegal content. This includes injunctions under Articles 9, 10 and 18 of the DSA.

The European Commission and the DSC AT chair this working group. It met four times in 2024: on 13 September, 30 October, 28 November and 13 December.

Working Group 8 – IT issues

[Working Group 8](#) is responsible for discussions on commonly used IT systems, the maintenance and further development of AGORA (the information-sharing platform for Digital Services coordinators) and discussions on future developments in communication and information technology.

The European Commission chairs this working group. It met on 17 September and 10 December.

European Board for Digital Services plenary meetings

In 2024, the [European Board for Digital Services](#) met 12 times: on 19 February, 15 March, 25 April, 28 May, 20 June, 12 July, 9 August, 25 September, 25 October, 19 November, 6 December and 12 December.

These meetings provided an essential platform to discuss the implementation and enforcement of the DSA across the European Union. The meetings allowed its members to engage in in-depth deliberations on various issues and priorities related to the digital services landscape. Each meeting played an important role in advancing the collective goals of ensuring a safe, transparent and innovative digital environment across the EU.

AWARENESS-RAISING ACTIVITIES

The Authority devotes a large part of its activity to raising awareness and informing businesses and consumers about the scope of its competences.

In this context, it regularly relays [relevant communications from the Commission or the EUCJ](#) to raise awareness of the provisions of the DSA among the public and platforms.

It has also participated in or organised various events and published various information pages or brochures specific to the regulation of digital markets.

Ministerial visits

Minister for the Economy

On 6 June, the Authority [welcomed the Minister of the Economy](#), SMEs, Energy and Tourism, Lex Delles, to present its various fields of activity.

After a visit to the premises and a meeting with the Authority's staff, the discussion focused on the new challenges ahead to contribute to the smooth functioning of the economy.

Far from being limited exclusively to competition law issues, the Authority has seen its range of competences broaden over time, adapting to legislation in the face of current economic challenges and realities, particularly those related to digital issues.



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Minister for Consumer Protection

On 18 October, [the Authority welcomed the Minister for Consumer Protection](#), Martine Hansen, to discuss the respective responsibilities and areas of cooperation between the Ministry and the Authority with a view to strengthening consumer protection.

The President of the Authority presented the various areas of competence of the Authority, in particular its tasks within the framework of the DSA.

The Minister emphasised her desire to expand existing cooperation. The Ministry and the Authority will soon draw up a cooperation agreement and have already planned various working meetings with the common aim of strengthening consumer protection.



Conferences

Conference "Digital Services Act and Digital Markets Act"

On 20 February, the Chamber of Commerce organised a conference on the theme '[Digital Services Act and Digital Markets Act: the new rules of the European Digital Services Package and its implementation in Luxembourg](#)'.

President Pierre Barthelmé and the "Digital Markets" department participated in order to raise awareness among companies of the obligations and opportunities arising from the new European regulations.

Around 300 participants accepted the invitation from Carlo Thelen, Director General of the Chamber of Commerce. During the introductory session, the President of the Authority Pierre Barthelmé gave an [overview of](#)



[the state of competition in the face of the digital challenge](#), analysing in detail the characteristics of digital markets, the evolution of the regulatory framework and the governance established at national level.

At the second round table, Romy Schaus, Head of the Authority's *Digital Markets* Department, outlined the measures taken by her department to prepare and assist companies in implementing the new regulation.

Disinfo Day and Networking Event

On 15 October, the Authority attended the [Disinfo Day and Networking Event](#) organised by REMEDIS and EDMO BELUX at RTL Luxembourg's premises.

This event brought together researchers, professionals, journalists and experts around the fight against disinformation in the digital age.

Participants discussed how artificial intelligence (AI) can be both a source of disinformation and misinformation and how generative AI is likely to amplify these problems.

They also discussed human and AI-based methods for detecting misinformation, as well as the emotional mechanisms behind its spread.

In addition, the event was an opportunity to review existing fact-checking tools, such as True Media, Vera.ai or Originality. Participants also noted that deepfake images, sounds and videos generated by AI-generated deepfake images, sounds and videos exposed fact-checkers to the risk of being manipulated themselves.



Publications

DSA Guide: new rules for digital actors

On 10 January, the Authority, designated *Digital Services Coordinator*, published on its website [practical information on the new rules applicable to digital actors](#) and a detailed downloadable guide to inform stakeholders about their respective obligations.

As of 17 February 2024, digital players had to comply with the rules laid down by the Digital Services Act (DSA).



DSA: new guide "Protecting your digital environment"

On 27 May, the Authority published its [guide 'Protecting your digital environment'](#) to help internet users easily identify disinformation and take action against potentially illegal content such as hate speech and deep fakes.

In a context where fake news and illegal content are spreading rapidly, especially during election periods, it was essential to support users in identifying and reporting such content.



On 30 September, the Authority published a [practical guide listing the obligations of each intermediary services provider](#) to best support small digital undertakings affected by the DSA.

The Regulation provides for certain reductions in the obligations to be complied with by small and micro-enterprises depending, in particular, on the type of intermediary services provided.

The Authority's Guide therefore lists the obligations to be complied with for each type of provider of intermediary services meeting the criteria of small or micro-enterprise.





AGRI-FOOD SUPPLY CHAIN

ANNUAL REPORT 2024



V. AGRI-FOOD SUPPLY CHAIN

In addition to its tasks in the field of competition law, the Competition Authority is competent to defend the interests of **suppliers in the agricultural and food supply chain** vis-à-vis their more powerful buyers.

Some large operators in the agricultural and food supply chain with significant bargaining power over their suppliers may be tempted to abuse their position to impose unfair trading practices.

To better protect farmers and small operators from such practices, the [Law of 1 June 2021 on business-to-business relations in the agricultural and food supply chain](#) prohibits certain unfair trading practices between suppliers and buyers of agricultural and food products and lists certain practices that can only be authorised with clear prior agreement. This law transposes Directive [\(EU\) 2019/633 on unfair commercial practices in business-to-business relationships in the agricultural and food supply chain](#) into Luxembourg law.

A supplier who considers himself to be the victim of unfair trading practice prohibited by law may lodge a [complaint with the Authority](#).

The Authority is therefore competent to defend the collective interests of all potential suppliers of companies which may be the subject to investigations, namely:



around 20 major food distributors¹⁷ with a turnover of more than €2 million



around 60 establishments (wholesalers, importers, processors, cooperatives, agricultural associations, etc.) identified as intermediaries



some **1,870 farm businesses**¹⁸ (agriculture, viticulture, horticulture, etc.)



some **241 small food businesses**¹⁹ all potentially protected by law.

AGRI-FOOD CHAIN DEPARTMENT

Given the resources available and the distribution of the workload for each of its areas of competence, the Authority has not set up a separate department to deal with complaints about unfair trading practices in the agricultural and food supply chain.

The work is carried out by two staff members when needed.

¹⁷ Competition Council - Questionnaire on the Law of June 2021 on business-to-business relations in the agricultural and food supply chain (2022)

¹⁸ Chamber of Agriculture - Luxembourg agriculture in figures (2021)
<https://www.lwk.lu/fr/consommateur/lagriculture-luxembourgeoise-en-chiffres>

¹⁹ Chamber of Crafts - Key figures for Crafts 2022
<https://www.cdm.lu/mediatheque/media/chiffres-cles-de-l-artisanat-2022>

In 2024, the Authority did not receive any formal complaints about possible unfair trading practices in the agricultural and food supply chain.

The particularly small size of the domestic market and the high concentration of buyers with significant bargaining power could discourage small operators from reporting possible situations of concern. The Authority has therefore chosen to strengthen its awareness-raising and cooperation activities, in particular at national level.

COOPERATION AT NATIONAL LEVEL

RAISING AWARENESS AMONG PLAYERS IN THE SECTOR ON GUICHET.LU

In 2024, the Authority continued its collaboration with the editorial team of *guichet.lu*, which has been disseminating, since 2023, the steps open to operators in the agricultural and food supply chain to lodge a complaint with the Authority against their more powerful buyers.

This gives suppliers access to the necessary information in French, German and English.

COOPERATION WITH THE MINISTRY OF AGRICULTURE, FOOD AND VITICULTURE

On 30 September, the Authority participated in an exchange of views with representatives of the [Rural Economy Department of the Ministry of Agriculture, Food and Viticulture](#), concerning, inter alia, the monitoring of the Agri-Food Chain Observatory (AFCO) and the Unfair Trading Practices (UTP) Enforcement Network.

On 18 October 2024, the Authority also received the Minister for Agriculture and Consumer Protection, Martine Hansen, to discuss the respective competences and areas of cooperation between the Ministry and the Authority. In this context, the Authority presented its activities in combating unfair trading practices that may affect small and medium-sized enterprises and producers in the agricultural and food supply chain.

COOPERATION AT EUROPEAN LEVEL

UNFAIR TRADING PRACTICES ENFORCEMENT NETWORK

On 19 June, the Authority participated in a joint meeting of law enforcement officials and investigators in the framework of the Unfair Trading Practices (UTP) Enforcement Network.

EU AGRICULTURAL AND FOOD SUPPLY CHAIN OBSERVATORY

On 17 July and 15 October, the Authority attended the meetings of the [EU Agri-Food Chain Observatory](#).

GERMAN FEDERAL OFFICE FOR AGRICULTURE AND FOOD

The Authority provided assistance to the German Federal Office for Agriculture and Food (Bundesanstalt für Landwirtschaft und Ernährung) in a case concerning potential unfair trading practices in agri-food supply.



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WHISTLE- BLOWERS

ANNUAL REPORT 2024

VI. WHISTLEBLOWERS

Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law aims to create a uniform EU legal framework to protect whistleblowers in certain areas of EU action.

In accordance with the law of 16 May 2023 transposing this directive, whistleblowers who report breaches of the law of which they have become aware in a professional context are protected against all forms of retaliation.

Luxembourg has 22 competent authorities to collect such reports, each within its area of expertise, including the Competition Authority.

The Authority handle reports from any **whistleblower** who has obtained information in a **professional context** (current, past or future work relationship), whether they are an employee, a civil servant, self-employed or a service provider in a professional relationship with one of the stakeholders, concerning breaches falling within one of its fields of competence, namely:



in **the field of competition law**, in the case of anti-competitive practices such as cartels or abuse of a dominant position



in the field of **digital markets**, in the event of harm to the collective interests of business users of online platforms (P2B) or of a breach of the Digital Service Act (DSA)



in the field of **agricultural and food supply**, in the event of unfair trading practices (UTP) by buyers vis-à-vis their less powerful suppliers



on **freedom of establishment and free provision of services** for the defence of the collective interests of undertakings in the internal market

WHISTLEBLOWER DEPARTMENT

In view of the multidisciplinary approach needed to ensure the protection of whistleblowers and the resources available, the Authority has not set up a fully-fledged department to handle reports.

The Authority has put in place a specific and secure procedure to process the reports it receives.

ALERT PLATFORM OF THE COMPETITION AUTHORITY

Since September 2023, the Authority, in collaboration with the *Centre des technologies de l'information de l'État* (CTIE), has made available on *MyGuichet.lu* the first assistant for collecting, without authentication, of whistleblower reports in the areas falling within its remit.

Whistleblowers can report these breaches either internally through the channels set up by their company/administration or externally to one of the 22 competent authorities in Luxembourg if an internal report could harm them.

The [Competition Authority's alert platform](#) thus enables anonymous reports to be collected securely.

COLLECTION AND PROCESSING OF ALERTS

10

REPORTS

In 2024, the Authority has received **10 alerts**, 8 of which were submitted via its alert platform and 2 by e-mail.

Some of these reports were either transferred to other competent authorities or dismissed due to lack of relevance, lack of substance or failure to respond to requests for additional information.

The Authority shall not disclose the substance of cases or the follow-up given to them.

NETWORK OF COMPETENT AUTHORITIES RESPONSIBLE FOR THE IMPLEMENTATION OF THE LAW ON THE PROTECTION OF WHISTLEBLOWERS

The Network of Competent Authorities for the Implementation of the Law on the Protection of Whistleblowers set up by the Reporting Office brings together representatives of the competent authorities responsible for collecting and handling reports from whistleblowers in accordance with the Law of 16 May 2023 on the Protection of Whistleblowers. It enables the various competent authorities to discuss common topics related to the application of the Law on the Protection of Whistleblowers.

On 3 June, the network met to analyse recent developments in whistleblower protection. Participants presented the CSSF whistleblowing procedure, the OECD whistleblower protection recommendations of the OECD Working Group on Bribery and the guidelines for the implementation of internal reporting channels in the state civil service and the obligations of public officials.

On 9 July, the Authority actively participated in the meetings of the 'controls and fines' and 'communication' working groups set up by the Reporting Office. The Working Group on Administrative Controls and Fines focused on defining its work programme and operating procedures. The second group met at a kick-off meeting with the Office's communication agency in order to coordinate its awareness-raising strategy on the protection of whistleblowers.



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