

Enforcement Mechanism for Market Regulation under Anti-Monopoly Laws in Pakistan and China

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Abstract:

This paper discusses the enforcement mechanisms of anti-monopoly laws in Pakistan and China, focusing on their enforcement, existing challenges, and institutional frameworks. The study begins by providing an overview of the anti-monopoly laws in the two concerned countries, highlighted by Pakistan's Competition Act, 2010, and China's Anti-Monopoly Law (AML) 2022. It then explores the roles of the respective regulatory bodies, comparing the powers, responsibilities, and enforcement actions of the Competition Commission of Pakistan (CCP) and the State Administration for Market Regulation (SAMR). The analysis centres on significant enforcement mechanisms, investigations into anti-competitive practices, penalties, and merger control, while also addressing the challenges faced by each country in implementing these laws, such as political intervention, institutional constraints, and sector-specific issues. Through a comparative analysis, the essay assesses the strengths and weaknesses of the enforcement frameworks in both nations, advocating for necessary changes to enhance future anti-monopoly regulation. The findings are summarized in the conclusion, offering suggestions for further market regulation under Pakistan's anti-monopoly laws and China's Competition Law.

Keywords: Competition Commission of Pakistan (CCP), competition analysis, SAMR, Challenges

Introduction

The anti-monopoly laws play a significant role in promoting fair competition, protecting consumers, and more. These laws prohibit anti-competitive behavior and ensure market health by curtailing monopolies in both Pakistan and China. Effective market regulation enforces anti-monopoly laws to address unfair trade practices, enhance economic efficiency, and foster innovation.

Market regulation and anti-monopoly laws are equally crucial for maintaining fair competition on both the Pakistani and Chinese macroeconomic platforms. Thus, these laws are designed to prevent anti-competitive practices, including monopolies or cartels, which can harm consumers and stifle innovation. The promotion of fair competition, consumer welfare, and economic growth relies on the enforcement of anti-monopoly laws.

1. Anti-Monopoly Laws in Pakistan

The Competition Act 2010¹ is the prime enactment touching the competition law framework in and around Pakistan which seeks to foster and preserve competition in the market through prohibition of anti-competitive processes. Written to keep monopolistic tendencies in check, prevent cartel formations, and protect consumers from predatory pricing and unfair trade practices based on market dominance and abuse².

¹ The Competition Act 2010 Retrieved from <https://www.cc.gov.pk>

² Bach, D., & Moreau, P. (2017). The role of the Competition Commission of Pakistan in regulating monopolistic practices. *Journal of Competition Law and Policy*, 9(2), 24-41.

This Act establishes the primary enforcement body, the Competition Commission of Pakistan (CCP), which was established under this Act to promote competition and deal with law violations.

2. The Role of the Competition Commission of Pakistan (CCP)

Anti-competitive behavior in Pakistan is investigated and remedied by the CCP. It stands as a single body with wide powers to ensure that the market remains competitive. The CCP is empowered to investigate, impose penalties, regulate mergers and acquisitions, grant immunities and exemptions, and advocate. The Competition Act 2010 is the primary enactment concerning the competition law framework in and around Pakistan, aiming to foster and preserve market competition through the prohibition of anti-competitive practices. It is designed to curb monopolistic tendencies, prevent cartel formations, and protect consumers from predatory pricing and unfair trade practices rooted in market dominance and abuse. This Act establishes the primary enforcement body, the Competition Commission of Pakistan (CCP), which was created under this Act to promote competition and address legal violations. competitive practices. The CCP can fine firms, order them to stop practicing certain ways, or recommend that mergers and acquisitions be dissolution or modified if they will harm competition. The CCP is the principal authority to enforce the competition law in Pakistan, with power to investigate anti-competitive practices and powers sanction.³ Its structure consists of a chairperson and some others, whereas the agency has been criticized for its low resources and capacity in handling a complicated case⁴.

The commission's key functions:

In Pakistan, the CCP is the primary enforcement agency for promoting competition and removing anti-competitive practices.

Investigation and Penalties of anti-competitive practices: It also involves investigating suspected monopolies, price fixing cartels, or abuse of dominance. Section 28 allows the CCP to investigate practices that may be anti-competitive. Section 29 also allows the CCP to conduct dawn raids and search and seizure operations so that it can gather evidence.

The CCP has the power to initiate investigations into suspected anti-competitive behavior. The CCP has the power to fine an offending company at a level of up to 10 percent of the company's annual turnover. If offending firms, the CCP can impose fines from the rules of abuse of dominance to cartel behavior.

Enforcement of competition laws: The CCP can take corrective actions concerning companies in violation of the Law, including directing such companies to stop and desist from doing such activities, and imposing penalties thereon. If entities are found guilty of anti-competitive practices can be fined, penalized, and sanctioned by the CCP under Sections 28 and 29 of The Competition Act, 2010.

Advocacy and market surveillance: In addition, the CCP conducts research, creates market assessments and promotes policies that back fair competition.

Merger and acquisition Control: Section 11 and 12 of the Competition Act 2010 states CCP can check mergers and acquisitions to ensure a substantial to reduce competition And Allows the CCP to impose conditions on mergers and acquisitions to guard against foreclosing competition. But companies are also obligated to inform the CCP on certain transactions, and, if what they are dealing with is deemed a major threat to the competition in the market, the commission can prohibit or modify such transactions⁵.

3. Enforcement Process under the Competition Act 2010⁶

The CCP's enforcement process typically involves the following steps:

1. Complaint: Section 28 of the Act says a Complaint is filed with the CCP alleging a competition law offense.

2. Investigation: Section 29 of the Act says the CCP investigates the complaint and gathers evidence.

³ Amber, Darr. (2020). 2. Cartels & the Politics of Competition Enforcement in Pakistan. Social Science Research Network, doi: 10.2139/SSRN.3726614

⁴ Sayyeda, Fatima. (2012). 5. Competition law in Pakistan: brief history, aspirations and characteristics. Commonwealth Law Bulletin, doi: 10.1080/03050718.2012.646734

⁵ Bach, D., & Moreau, P. (2017). The role of the Competition Commission of Pakistan in regulating monopolistic practices. Journal of Competition Law and Policy, 9(2), 24-41.

⁶ Qadir, R. (2018). Competition Law in Pakistan: Challenges and Opportunities. Pakistan Law Review, 10(2), 1-15.

- 3. Show Cause Notice:** Section 30 of the Act says **that** Wherever there are anti-competitive practices, the CCP sends in a show cause notice to an entity.
- 4. Hearing:** Section 31 of the Act says the entity concerned is allowed to present its case.
- 5. Decision:** Section 32 of the Act states that the CCP decides on the evidence and the hearing.
- 6. Penalty:** Section 38 of the Act states that If the entity is guilty, the CCP will impose a penalty, which includes fines, penalties, and other sanctions.

4. Challenges in the Enforcement of Anti-Monopoly Laws in Pakistan

Despite having a legal framework for market regulation, the enforcement of anti-monopoly laws in Pakistan faces numerous challenges including:

1. Limited Resources: The CCP is limited in terms of resources, therefore it cannot particularly focus on investigating and prosecuting anti-competitive practices well. Nevertheless, investigations may involve a greater financial cost and there is associated reputational damage when firms fail to comply with competition laws⁷.

2. Lack of Awareness: Businesses and consumers alike are unaware of competition laws and the CCP.⁸

3. Inadequate Legislation: Many critics have criticized how the Competition Act, 2010, is inadequate and does not give the CCP.⁹

4. Political interference: One overwhelming problem is the political interference. Furthermore, investigations are often compromised by political pressures to be independent, especially when such pressures relate to an investigation of powerful corporate interests or state-owned enterprises (SOE). Additionally, Pakistan lacks sufficient resources to oversee and monitor all market segments adequately¹⁰.

5. Market surveillance: Another challenge is market surveillance and the absence of real-time monitoring tools to fight anti-competitive behavior. Enforcement is further complicated by the complexity of merger cases and the dominance of a handful of powerful companies in key sectors.

Among the historical underperformance of the CCP compared to the CCI, the CCP has been described as marginally effective.¹¹

Political interference, lack of public awareness, and insufficient legal backing of its decisions are factors that influence its operations¹². The CCP's actions have also suffered from the limited capacity of the judiciary to deal with complex competition law cases.

2. Anti-Monopoly Laws in China

China's Competition Regulation Framework is based on the cornerstone of its Anti-Monopoly Law (AML), which was enacted in 2008 and amended in 2022. The AML was intended to stop monopoly behavior, guard consumers, and encourage competition in the Chinese market. China Anti-Monopoly Law 2022 has granted the power to enforce this law to several regulatory agencies, in particular, the State Administration for Market Regulation (SAMR), among others.

The cases in which it is applied incorporate monopolistic pricing, abuse of dominant market positions, and anti-competitive agreements. It also regulates mergers and acquisitions which could have the effect of substantially affecting the market competition. Led by the SAMR, but working hand in hand with other

⁷ Nishan, E, Hyder, Soomro., Wang, Yu-hui. (2020). 4. Competition Law in Pakistan and China: A Comparative Study. Journal of Programming Languages, doi: 10.5539/JPLV14N2P1

⁸ Malik, A. (2020). The Role of Competition Commission of Pakistan in Promoting Competition. Journal of Competition Law and Economics, 16(1), 1-20.

⁹ Khan, A. (2019). Competition Law in Pakistan: An Overview. Journal of Law and Commerce, 37(1), 1-15.

¹⁰ Javed, R. (2020). The effectiveness of Pakistan's anti-monopoly law: An evaluation of the Competition Commission of Pakistan. International Journal of Law and Management, 62(3), 112-126.

¹¹ (2023). 1. Enforcing Indian and Pakistani Competition Acts. doi: 10.1017/9781009247184.005

¹² Amber, Darr. (2020). 2. Cartels & the Politics of Competition Enforcement in Pakistan. Social Science Research Network, doi: 10.2139/SSRN.3726614

government bodies such as the National Development and Reform Commission (NDRC) and the Ministry of Commerce (MOFCOM), the law is enforced.

1. Key Laws and Regulations in China

Several laws and regulations govern market regulation in China, including:

- 1. Anti-Monopoly Law (2022):** It bans the perpetration of monopolistic practices, including price fixing and rating.
- 2. Anti-Unfair Competition Law 1993:** Prevents unfair competitive conduct including false advertising and trade secret misrepresentation.
- 3. Price Law 1997:** Price fixing and pricing discriminatory.

• Recent Developments in China's Enforcement Mechanism

Recently, China amended its Anti Monopoly Law introduced new approaches for resale price maintenance and spoke agreements and strengthened enforcement against internet platforms. The amended law encountered a 'stop the clock' mechanism in merger review as well as a new criminal violation.

2. SAMR and Other Regulatory Bodies in China

The AML is enforced through the main agency of SAMR which is empowered to conduct investigations into monopolistic behavior, impose penalties and break up or alter anti-competitive mergers¹³.

However, other government agencies also play a role in enforcement:

NDRC: Investing primarily in price-related violations of the AML such as price-fixing cartels.

MOFCOM: Handles responsibility for examining the bearing of mergers and acquisitions on market competition and for compliance with the AML.

3. Enforcement mechanisms in China

Investigation of anti-competitive practices:

The SAMR has the power to investigate different anti-competitive practices, including price fixing, market division and abuse of dominance. The process of investigation involves collecting documents, hearing them and making public announcements of violations.

Penalties and sanctions:

Unlike AML in China, which could also lead to significant penalties—including fines of up to 10 percent of a company's revenue for the preceding year and orders for corrective action. AMC assists directors in discharging their responsibilities by elevating risk concerns from a legal perspective to accountancy.

Merger and acquisition review: The SAMR can prevent and impose conditions on mergers breaching market fairness¹⁴. Companies that are merging or acquiring must file to SAMR which can block or require changes to the transaction if it would harm competition.¹⁵

Focus on Digital Economy: Especially the digital sector has been a primary target for enforcement actions, including data interoperability and platform competition¹⁶.

4. Enforcement Process

According to Anti Anti-Monopoly Law 2022, and State Administration for Market Regulation, 2020, the SAMR's enforcement process typically involves the following steps:

- 1. Complaint:** A complaint is filed with the SAMR alleging anti-competitive practices.
- 2. Investigation:** SAMR conducts investigations including on-site inspections and interviews into possible anti-competitive practices to collect evidence.

¹³ Wang, Y. (2020). The enforcement of China's Anti-Monopoly Law and its implications for global competition policy. *Global Competition Review*, 12(5), 34-45.

¹⁴ Wang, Y. (2020). The enforcement of China's Anti-Monopoly Law and its implications for global competition policy. *Global Competition Review*, 12(5), 34-45.

¹⁵ Zhang, J. (2019). China's merger control under the Anti-Monopoly Law: Challenges and opportunities. *Asian Competition Law Review*, 8(1), 78-92.

¹⁶ China's Antimonopoly Law Enforcement in the Digital Economy. (2022) *The Antitrust bulletin*, doi: 10.1177/0003603x221126141

3. Notice of Penalty: The SAMR issues a notice of penalty to the entity concerned if the evidence of anti-competitive practices is found by it

4. Hearing: According to Anti Anti-Monopoly Law, 2022, the entity concerned is given a chance to make its presentation in a hearing.

5. Decision: The decision of the SAMR is based on the evidence presented and the hearing.

6. Penalty: Anti Anti-Monopoly Law, 2022 states that if the entity is found guilty the penalty imposed can be fines or other sanctions and penalties. Companies that did not take part in anti-competitive practices can be fined or penalized by SAMR. SAMR also has law enforcement powers and can impose administrative sanctions such as business license revocation.

5. Challenges in the Enforcement of Anti-Monopoly Laws in China

China has a good set of antitrust laws but has difficulty dealing with state-owned enterprises (SOEs). Fortunately, government support may be on the side of these companies, and the competition may be less regulated. Additionally, digital platforms and e-commerce have experienced rapid growth, resulting in new challenges for competition law enforcement in a high-speed evolving business environment, where traditional regulatory frameworks cannot always closely follow¹⁷.

Despite SAMR's efforts, there are challenges and limitations to effective enforcement, including:

1. Limited Resources: SAMR has been exercising limited capacity due to a shortage of adequate resources when implementing market regulations.

2. Complexity of Cases: Merger and acquisition cases are hard and demanding to prosecute and may take a long time.

3. Legal and Practical Challenges: However, the enforcement process has several challenges, including the absence of quasi-judicial powers and issues of transparency.¹⁸

4. Inadequate Guidance: advice given regarding anti-monopoly laws and regulations, which may not be sufficient for companies to grasp the responsibilities they are supposed to fulfill. This can make it challenging for the companies to fully observe legal demands on anti-monopoly policies.

3. Comparative Analysis of Enforcement Mechanisms in Pakistan and China

Pakistan and China have both set up enforcement bodies for anti-monopoly laws, being the CCP and the SAMR in China. Nevertheless, the two agencies differ in the extent of jurisdiction and authority.

1. Institutional Framework

Chinese AML have been seen to contribute to state-owned enterprises and respond to national industrial strategies that may not be effective for multinational companies¹⁹. However, Pakistan's enforcement is relatively more inclined towards making the market for supplies competitive for all the contenders or players.

In Pakistan, the CCP is the only agency that has been assigned to implement competition laws while in China there are various agencies (SAMR, NDRC & MOFCOM) that share the same duty. Thus, while presenting a wider range of agencies in China, it can enhance cooperation and cover the issue in question more effectively, it may also produce conflict of jurisdictions.²⁰

2. Penalties and Sanctions

Although both enforcement agencies have similar powers and jurisdictions,

Both countries have implemented severe consequences for anti-competitive practices; Pakistan's Competition Act provides for fines up to 10% of the firm's annual revenue. China's AML levies fines throughout the country, ranging up to 10 percent of the annually generated revenues

¹⁷ Huang, F., & Zhang, X. (2021). Challenges in the enforcement of China's Anti-Monopoly Law: Focus on state-owned enterprises. *China Economic Review*, 70(4), 450-463.

¹⁸ Alamat, Florist. (2022). 3. Research on Enforcement Mechanism of Antitrust Law from the Perspective of Comparing Chinese and American Legislation. doi: 10.1007/978-981-19-5727-7_58

¹⁹ Daniel, C., K., Chow. (2015). 4. How China's Enforcement of Its Anti-Monopoly Law Poses Risks to Multinational Companies. *Social Science Research Network*, doi: 10.2139/SSRN.2599518

²⁰ Clifford Chance. (2023). Antitrust in China and across the region.

<https://www.cliffordchance.com/content/dam/cliffordchance/briefings/2023/04/asia-pacific-quarterly-antitrust-briefing-q1-2023.pdf>

However, enforcement in China is provided with more serious resources, and the scope of powers of its agencies is wider.

3. Political and Institutional Challenges

In far more frequent and significant occurrences in Pakistan, political interference over the years has led to certain inefficiencies of the CCP, most particularly in high-profile matters. In China, political power prevails where there is more interference primarily in matters concerning state-owned businesses, which receive less or no attention²¹.

The enforcement agencies of both countries are ill-equipped with inadequate resources to carry out their duties and there is no coordination between institutions.

4. The Merger and Acquisition Control

The laws of both Pakistan and China prevent mergers and acquisitions involving entities that may impact the course of competition. However, the Chinese system is more elaborate and has agencies such as the Ministry of Commerce and MOFCOM that have the responsibility to analyze mergers and acquisitions. Whereas its counterpart, Pakistan has relatively limited CCP capacity to scrutinize intricate merger matters, it frequently misses opportunities to prevent or modify merger transactions.

5. Judicial review:

Pakistan has a more elaborate system of courts, a more easily and comprehensible structure of courts, and a more developed tradition of judicial review of the anti-monopoly decisions while China is still quite limited in dealing effectively with competition law cases.

6. Legal Frameworks

China's AML bans anti-competitive practices, and its enforcement still relies on a mechanism of administrative penalties with no criminal sanction for cartels. This has meant that some agencies have tightened the screws so to say while others have not, which is evident from the variation in the fines issued by the NDRC and SAIC²².

In Pakistan, the Competition Act has the same objective of preventing monopolistic conduct within the carrying out of its functions which again is a challenge. The leniency programs are confined to administrative liability which may not effectively discourage the violations²³.

7. Compliance and Cultural Factors

Each country employs leniency programs to encourage voluntary compliance with competition laws, allowing companies to report violations in exchange for reduced penalties. Both legal frameworks emphasize safeguarding consumer interests and promoting market competition, which is essential for economic growth and social justice.²⁴

8. Use of Evidence:

In Pakistan, evidence produced at investigative stages could be used in the legal processes which increases the legal credibility of enforcement actions. Nonetheless, China may refrain from employing this kind of evidence as part of a more protectionist attitude toward its industries²⁵.

This summary focuses on the comparative enforcement of competition laws in Pakistan and China. Each country effectively has embraced contemporary competition laws to check anti-competitive behavior

²¹ Huang, F., & Zhang, X. (2021). Challenges in the enforcement of China's Anti-Monopoly Law: Focus on state-owned enterprises. *China Economic Review*, 70(4), 450-463.

²² Jingyuan, Ma. (2020). 4. Enforcement of Competition Law—Economic Analysis of Antitrust Sanctions. doi: 10.1007/978-981-15-5105-5_10

²³ Nishan-e-Hyder, Soomro., Wang, Yuhui. (2023). 1. Appraisal of existing evidences of competition law and policy: Bilateral legislative developments of Sino-Pak. *Heliyon*, doi: 10.1016/j.heliyon.2023.e18935

²⁴ <https://doi.org/10.1016/j.heliyon.2023.e18935>

²⁵ Daniel, C., K., Chow. (2015). 4. How China's Enforcement of Its Anti-Monopoly Law Poses Risks to Multinational Companies. *Social Science Research Network*, doi: 10.2139/SSRN.2599518

and encourage fair competition in the market. Both nations regulate these aspects of market dominance, mergers, acquisitions, and leniency programs. Nonetheless, its realization is still problematic, especially in the case of making new legislation effective, as it needs new peculiar forms of organization and coordination with the existing legal frameworks²⁶. Competition authorities of both countries have actively cooperated with counterparts and signed memorandums of understanding as well as exchanged their experiences and participated in international forums to enhance the enforcement of competition laws

Conclusion

Consequently, even though both Pakistan and China have legal provisions regulating monopolistic conduct, these laws are only as effective as the political influence, institutional capacity, or capability to deal with emergent industries. China's AML and the multi-agency enforcement system provide much broader anti-money laundering tools, yet problems with the state-controlled companies and emerging vertical antitrust concerns in the digital economy are addressed rather not in a same effective manner. Pakistan Competition Act 2010 is developing as it has perfect legislation, but political interference and due to lack of funds, the act can't work well. The two countries can only achieve these by enhancing their institutional capacity, an independent judiciary and adjusting competition laws to cater to the current existing markets. Primarily, the application of legal provisions against monopoly will enhance competitiveness, fairness and dynamism of the market environment to the advantage of consumers and other players in business.

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