

Annual Report 2010-11

Annexe I – Reporting on better regulation

Simplification and Burden Minimisation Plan 2011 – A summary of better regulation compliance measures carried out by the OFT in 2010-11 and planned measures for 2011-12

1 INTRODUCTION

- 1.1 The Government is committed to delivering less regulation, better regulation and regulation as a last resort¹. The OFT is happy to align itself with that objective. We are a strategic body using diagnostic, enforcement and advocacy powers to promote competition, choice and consumer welfare. We analyse and study markets, undertake enforcement action targeted at breaches of competition law and provide information and advice.
- 1.2 We have no powers to issue regulations, generally applicable rules or legally binding guidance. We do publish guidance, but its purpose is to provide advice and information about the laws we enforce, and it is not legally enforceable in its own right. We have certain administrative discretions in relation to the legislative regimes we administer, but all our activity under these regimes is aimed at giving effect to the law as it is established by statute, and in instruments made by central Government under statute².
- 1.3 However, while we are not a source of legislative regulation, we fully recognise that some of our functions – **consumer enforcement, consumer credit licensing, and anti-money laundering supervision** - are regulatory in nature. Such functions inevitably have the potential, depending on how they are exercised in practice, to add to or reduce the cost and volume of regulation in the UK economy. It is the OFT's clear and publicly stated intention to exercise all its functions in such a way as to minimise unnecessary burdens. In performing these functions we are bound to have regard to principles set out in section 21 of the Legislative and Regulatory Reform Act 2006, and to the Regulators' compliance Code.
- 1.4 Our mission of making markets work well for consumers includes ensuring that our interventions do not impose unnecessary costs on

¹ The Government's regulatory policy is outlined in [Reducing regulation made simple](#) (HM Government, Dec 2010).

² The nature of the OFT's functions, therefore, places limits on the scope for the OFT to participate in Government's 'One-in, One-out' and sunseting policies which we understand are designed to stabilise or reduce the flow of regulation at source.

business, subject to delivering our overall objectives. Burdens on business will typically be passed to consumers in the form of higher prices, lower quality or reduced choice. So, where we perform direct regulatory functions – such as credit licensing – we adopt a risk based approach, ensuring that we focus our resources on those areas where harm is most significant, therefore keeping costs and burdens to business as low as possible.

- 1.5 Through increased transparency, improved engagement with organisations potentially impacted by our work and independent evaluation of our activities we aim to ensure that we are fully aware of the impact of our work on business.
- 1.6 A key theme across our work in 2010-11, which will continue through 2011-12 and has been welcomed by business³, was **influencing and changing the behaviour of businesses, consumers and Government to make markets work well**. This included undertaking work to gain a better understanding of the factors which drive business compliance in order to help businesses comply with both consumer protection and competition law, encouraging business compliance through our work on self-regulation and our Consumer Codes Approval Scheme, informing and educating consumers and providing advice to Government on restrictions in public markets that may have unintended consequences on competition.
- 1.7 The table in Part 2 of this annexe sets out:
 - The actions that the OFT has undertaken during 2010-11 to meet its better regulation obligations generally, and particularly to comply with the requirement under Part 4 of the Regulatory Enforcement and Sanctions Act 2008 (RES Act), voluntarily accepted by OFT, to keep performance of its *regulatory functions* under review and secure that they do not impose or maintain unnecessary burdens on business, and
 - The actions that the OFT intends to carry out in 2011-12 to continue to meet those obligations.
- 1.8 The OFT's regulatory functions are: consumer enforcement, consumer credit licensing and anti-money laundering supervision.
- 1.9 Part 3 of this annexe includes a summary of some of the further measures that the OFT has taken to continue to address the better

³ Feedback obtained in relation to OFT's consultation on its priorities for 2011-12

regulation agenda more generally, in relation to its non-regulatory work⁴.

⁴ Functions performed under competition law are expressly excluded from Part 4 of the RES Act and the Regulators' Compliance Code

2 TABLE OF SIMPLIFICATION AND BURDEN MINIMISATION MEASURES

OVERARCHING INITIATIVES				
Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
1	Transparency	To Provide better information about the work we do, what we are doing, how long it is likely to take and how we will engage with stakeholders so as to minimise burdens and increase our accountability.	<ul style="list-style-type: none"> In May 2010 we relaunched our website, including a dedicated transparency section, facilitating transparency through defined 'landing pages'. We published our Transparency statement, which took effect from July 2010, setting out our commitment to those involved and interested in our work in terms of how we will engage and what information we will provide through the life of a project. In December 2010 we published our 2011-15 (SR10) Business Plan outlining our contribution to the Government's system of democratic accountability, including our 'Transparency: information strategy'. <p>Feedback from our consultation on our priorities for 2011-12 shows that business has welcomed increased transparency.</p>	<p>We will continue to act in accordance with the commitments set out in our Transparency statement.</p> <p>We will seek to identify what further information and data to make available, including in accordance with our SR10 Business Plan commitments.</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
2	Stakeholder engagement	To increase mutual understanding between the OFT and businesses, consumers and other stakeholders, and to hear any concerns about unnecessary burdens.	<ul style="list-style-type: none"> We continued our systematic engagement with the organisations that have an ongoing interest in our work. We maintained dialogue with business groups, including through regular high-level meetings, discussing policy, compliance and other areas of common interest. We engaged closely with business in relation to consumer protection compliance work including the development of our <i>Sale of Goods Act</i> hub. Between December 2010 and April 2011 we carried out widespread consultation on our priorities for the forthcoming year, and amended our Annual Plan for 2011-12 as a result of feedback obtained. <p>Further details of our stakeholder engagement work are set out in the main body of our Annual Report 2010-11.</p>	<p>Promoting business compliance is a key area of our work over 2011-12. Details of our work can be found in our Annual Plan 2011-12.</p> <p>We will continue our dialogue with business and consumer organisations on areas of mutual interest. For example, we will work closely with business to develop simplified guidance on the Distance Selling Regulations.</p> <p>We will use different levers to help businesses comply building on recent reports on Drivers of Compliance and our statement of approach to promoting compliance with consumer law.</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
3	Prioritisation	To ensure that we make appropriate decisions about which projects and programmes of work we undertake across areas of our responsibility where we have discretion to choose whether or not to act, so as to focus our interventions on areas which pose the greatest threat to competitive, open and well-functioning markets.	<p>Our published prioritisation principles describe the factors we consider and balance when we make decisions on our priorities. Those principles are:</p> <ul style="list-style-type: none"> • Impact: what would be the likely direct and indirect effect on consumer welfare, and what would be the expected additional economic impact on efficiency/productivity? • Strategic significance: does the work fit with OFT's strategy and objectives, is the OFT best placed to act and what would be the impact of the new work on the balance of OFT's current portfolio of work? • Risks: what is the likelihood of a successful outcome? • Resources: what are the resource implications of doing the work, are the resource requirements proportionate to the benefits and will any savings be created for the OFT by enabling us to meet our objectives more efficiently? 	<p>We will continue to use the prioritisation principles to inform our decisions about which work to take forward where we have discretion to choose.</p> <p>Recent changes to the OFT's group structures, including the establishment of a new Pipeline and Performance Group, merging four of the enforcement teams and delayering the organisation will help to ensure more effective prioritisation.</p> <p>We will undertake a project on 'vulnerability' to further inform how we prioritise our work, seeking input from stakeholders.</p>
4	Evaluation	To evaluate whether the OFT delivers its objectives proportionately to costs and burdens, and to help the OFT target and follow up its work to maximise benefit to consumers.	<p>Our performance target with HM Treasury commits us to delivering direct financial benefits to consumers of at least five times our cost to the taxpayer. Our performance against this target is monitored by our positive impact estimates, with the most recent estimates, being published in July 2011, showing a benefit to cost ratio of 7:1.</p> <p>In 2010-11, we evaluated the impact of a range of our interventions, including the impact of three codes within the OFT's Consumer Codes Approval Scheme and an evaluation of our 2005 <i>Care homes</i> market study.</p>	<p>We are committed to gaining a better understanding of the impact of our work on consumers and the economy, and this is reflected in our SR10 Business Plan and Annual Plan 2011-12. These refer to our use of impact indicators, including the estimation of direct savings to consumers and associated benefit to cost ratio, and to the publication of at least one independently-audited in-depth ex-post evaluation of an intervention.</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
5	Impact estimation and monitoring	To provide estimates of the likely impact of prospective interventions, including burdens on business, so as to inform prioritisation decisions and ensure that interventions are risk-based and well-targeted.	<p>These in-depth ex-post evaluations assess the impact resulting from our interventions and consider, when appropriate, the impact on businesses. By helping us to gain a better understanding of the impact of our interventions on markets, they also inform our future work and how it is conducted.</p> <p>We publish the outcomes of our evaluations on our website at: http://www.oft.gov.uk/advice_and_resources/resource_base/evaluation/</p> <p>During initial prioritisation we attempt to estimate the likely impact of intervention, with the estimates updated in the course of the project and after completion. As part of impact estimation, teams are advised to consider the impact of any intervention on businesses.</p>	As part of our work we will continue to embed impact estimation and monitoring in our day to day activities, will undertake in-depth research on the impact of specific interventions and will aim to gain a better understanding of the wider impact of our work (including on deterrence and growth).

CONSUMER ENFORCEMENT

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
6	Market-wide, targeted analysis of consumer problems	To facilitate better targeting of, and more consistent, consumer enforcement action.	<p>Details of the market studies we carried out can be found in the main body of the Annual Report. These included studies into Consumer Contracts, Advertising of Prices and Online Targeting of Prices. We also published a strategy for protecting consumers online.</p> <p>These reports, along with targeted enforcement action, help identify key areas of consumer harm where targeted consumer enforcement action may be necessary. Following the Consumer Contracts market study, we produced a practice note for businesses to help them establish clear and fair contract terms.</p>	We will continue to use market studies where appropriate to inform our understanding of consumer problems and issues in markets. And we will continue to engage with businesses to improve compliance through the most appropriate means, including through targeted enforcement action as necessary.
7	Civil Sanctions Pilot	To facilitate increasingly proportionate action by allowing access to alternatives to prosecution to secure compliance with consumer law and to encourage traders to voluntarily to offer redress to consumers who suffer detriment as a result of unsafe products, or unfair misleading business	In December 2010 the OFT and the Local Better Regulation Office published a consultation on their proposed approach to the use of new powers which would enable OFT and a number of participating local authority Trading Standards Services (TSS) to trial a range of new civil sanctions as an alternative to criminal prosecution.	We plan to take part in the pilot, however at the time of writing the roll out of civil sanctions powers has been paused across departments subject to further Government discussions.

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
		practices.		
8	Consumer protection enforcement principles	To ensure that the OFT's consumer protection enforcement complies with the principles of better regulation and the Regulators' Compliance Code, and does not impose unnecessary burdens on business	<p>We have undertaken to review our Statement of consumer protection enforcement principles on an annual basis. We reviewed the principles and published a revised version reflecting our current practices in March 2010.</p> <p>In light of the potential roll out of the civil sanctions pilot (subject to further Government discussion of this matter) we have delayed consultation until 2011-12 in order that the statement of consumer protection enforcement principles can be refreshed to take account of the approach to the use of new powers.</p>	We will continue to review the principles on an annual basis, consulting with stakeholders to ensure that the principles and our enforcement practice are fully in line with our better regulation obligations.
9	Use of intelligence	To improve overall outcomes of work carried out by the OFT (and, where possible, its enforcement partners such as TSS) by increasing the use of	We launched a database in March 2010 that allows the OFT and TSS to collate, analyse and share intelligence, based on a partnership with the TSS Regional Intelligence Network. We also negotiated with the Association of Chief Police Officers to allow TSS direct access to the Police National Computer (PNC). Access to the PNC will be rolled out to TSS in 2011-12. This will provide TSS with quick and	<p>The role of the OFT's new Pipeline and Performance Group is to enhance OFT's ability to identify, prioritise and resource actions needed to address market issues, be they competition or consumer focused.</p> <p>This will include improving the use of</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
		intelligence to ensure that interventions are risk-based and well-targeted.	<p>accurate intelligence on criminal activity.</p> <p>In relation to consumer credit work we created a dedicated team with responsibility for gathering, analysing and disseminating intelligence relevant to the regulation of consumer credit business, liaising with stakeholders to share intelligence, and ensuring that any regulatory interventions taken on the basis of such intelligence had appropriate regard for better regulation considerations. (See item 13 below)</p>	<p>intelligence, enhancing and increasing ideas for possible OFT action, improving the information used to select cases and monitoring use of resource to enhance efficiency and impact.</p> <p>In relation to credit work, better gathering and use of intelligence will allow for earlier and more effective intervention with a view to preventing or limiting potential for subsequent consumer detriment.</p>
10	Compliance partnerships	To maximise compliance with the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) and the Business Protection from Misleading Marketing Regulations 2008 (BPRs) through means other than formal enforcement action.	<p>Over 2009-10 we prepared a set of principles to apply when working with compliance partners to maximise compliance with the CPRs and BPRs.</p> <p>Our Compliance Partners have tried and tested systems for dealing with non-compliance and include self-regulatory bodies, statutory enforcers, industry funded self-regulatory and co-regulatory bodies, code scheme operators (OFT approved and non-OFT approved), trade and business associations. This approach fits within the context of our wider consumer enforcement protection enforcement principles. The adoption of a risk-based approach allows the OFT and our partners to apply the principles of proportionality and to make the best use of resources through a mix of incentives, support and enforcement.</p>	Continued application of the principles to relevant cases.

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
11	Self-regulation	To promote and safeguard consumers' interests without resort to formal enforcement mechanisms, by helping them identify traders who promise to treat them fairly and to encourage businesses to improve their levels of customer service beyond the basic requirements of consumer law.	<p>The Enterprise Act 2002 gives the OFT powers to approve and promote consumer codes of practice that meet the OFT's core criteria. The OFT's Consumer Codes Approval Scheme (CCAS) aims to promote and safeguard consumers' interests by helping consumers identify better businesses and to encourage businesses to raise their standards of customer service.</p> <p>In June 2010, the Institute of Professional Willwriters achieved OFT approval for its code under the CCAS.</p> <p>Details of codes of practice that have achieved approval under the CCAS are set out on our website at: http://www.of.gov.uk/OFTwork/ccas/</p>	<p>Our Policy statement on the role of self-regulation in OFT's consumer protection work explains how we consider opportunities for working with self-regulatory mechanisms.</p> <p>In relation to CCAS, over 2011-12 we will continue to work with existing code applicants to progress codes to completion of Stage one or Stage two approval of the CCAS. We will continue to work with existing code sponsors to monitor the effectiveness of their codes. However, until there is greater clarity over Government plans for CCAS we have decided to suspend the scheme to new applicants.</p>
12	Consumer education and campaigns	To enable consumers to better protect their consumer interests and thereby improve consumer welfare generally without resort to formal enforcement action.	<p>Influencing and changing the behaviour of business, consumers and Government was a key theme across our work.</p> <p>We ran a number of consumer awareness raising campaigns. These included:</p> <ul style="list-style-type: none"> • <i>Just tick it</i> – a campaign aiming to raise consumers' awareness of scam ticket websites • <i>Know your consumer rights</i> campaign focusing on buying used cars • <i>Doorstep selling</i>, focussing on rogue traders, run in partnership with local authority Trading Standards Services. <p>We also provide <i>Skilled to go</i> – a consumer education</p>	<p>As part of our work to influence and change behaviour our consumer campaigns activity across 2011-12 will primarily support recent market studies, such as advertising of prices, online consumer protection and 'Skilled to go' the OFT's educational resource for teachers.</p> <p>We will provide advice to consumers, especially those who are vulnerable, in relation to consumer credit regulation. Our work will also include the provision of timely advice and warnings around unscrupulous business practices.</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed actions in 2011-12
			<p>toolkit for use by teachers and local authority Trading Standards Services.</p> <p>The Central Office of Information conducted an evaluation of OFT's <i>Skilled to go</i> consumer education programme, together with OFT's <i>Just tick it</i> marketing campaign. Their report (published in April 2011) explores the return on investment of these initiatives.</p> <p>The main body of the annual report and item 2 above outline actions we took to help businesses comply with the law, including the launch of a Sale of Goods Act hub.</p>	<p>Item 2 above sets out actions we will undertake to help businesses comply with the law, including developing simplified guidance on the Distance Selling Regulations.</p>

CONSUMER CREDIT LICENSING

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed Actions in 2011-12
13	Consumer credit regulatory strategy	To further increase the effectiveness of our regulation of consumer credit businesses through better/earlier use of intelligence, targeted enforcement, liaison and consultation with our stakeholders and limiting any burdens on businesses to what is necessary to protect the interests of consumers.	<ul style="list-style-type: none"> We created a dedicated team with responsibility for gathering, analysing and disseminating intelligence relevant to the regulation of consumer credit business, liaising with stakeholders to share intelligence, and ensuring that any regulatory interventions taken on the basis of such intelligence had appropriate regard for better regulation considerations. We consulted with our stakeholders, in line with the Code of Practice on Consultation, on the standards we expect from consumer credit businesses when lending, with regards to responding to requests from consumers for copy documents, and when seeking to recover consumer credit debts. 	<p>We will work closely with other Government departments in relation to consumer credit regulation as part of the development of policy in this area and in respect of proposals for transfer of responsibility from OFT to the Financial Conduct Authority. We are also working with HM Treasury and the Financial Services Authority to ensure that the timing and handling of any transfer of second charge lending ensures high quality and focused regulation is maintained, whilst minimising transitional costs, disruption, complexity and uncertainty for businesses and consumers.</p> <p>We aim to improve standards of businesses engaged in high risk credit activities and will work in partnership with the wider credit community – individual businesses, trade associations, consumer groups and other regulators and public bodies – to promote appropriate standards of behaviour and informed and empowered consumers.</p> <p>We will continue to make use of recently strengthened credit enforcement tools focusing on high risk activities. Better gathering and</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed Actions in 2011-12
14	Improvement in online application facilities	To reduce administrative burdens on businesses by enabling them easily to complete the full application for a consumer credit licence online	<ul style="list-style-type: none"> All application forms can now be completed and submitted on-line: "pop-up" guidance on forms is improved continually. A major revision of OFT website material for licence applicants/holders was undertaken. This included a review of navigation. After consultation and testing with user groups, this major development has now gone live. It now includes provision of feedback facilities 	<p>use of intelligence will allow for earlier and more effective intervention with a view to preventing or limiting potential for subsequent consumer detriment.</p> <p>We will undertake one compliance review in a credit sector, subject to prioritisation considerations.</p> <p>We will review feedback and make further improvements as viable and cost beneficial for licensees and licence applicants</p>

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed Actions in 2011-12
15	Providing guidance on consumer credit issues	To provide clarity to stakeholders, reducing regulatory risk for businesses, by facilitating improvements in standards in regulated consumer credit sectors on the basis of consultation and transparency rather than enforcement	<ul style="list-style-type: none"> We published revised/updated guidance for creditors on those practices that we consider may constitute irresponsible lending practices in both August 2010 and February 2011. We also produced an associated 'Q & A' document We published guidance on a creditor's duty under regulated consumer credit and consumer hire agreements to give debtors and hirers copy documents and statements of account on request We published draft guidance for consultation on the operation of the Group licensing regime We published for consultation draft guidance on what we would expect from creditors when lending to those who do, or may have, some form of mental capacity limitation. We published for consultation draft revised debt collection guidance for all businesses engaged in the recovery of consumer credit debts. 	<p>Over 2011-12 we will:</p> <ul style="list-style-type: none"> Consult on, and subsequently issue, guidance for credit brokers and credit intermediaries Consult on, and subsequently issue, revised/updated guidance for those providing debt management and credit repair services Publish revised group licensing guidance Publish mental capacity guidance Publish revised/update debt collection guidance Consult on, and subsequently issue, guidance on the OFT's consumer credit licensing 'names policy' Consult on, and subsequently issue, guidance for debt administrators

ANTI-MONEY LAUNDERING

Item	Work area	Relevant objectives	Actions in 2010-11	Proposed Actions in 2011-12
16	Anti-money laundering (AML) regulations	To assist the OFT's supervised businesses to comply with requirements through advice and published guidance and to monitor compliance and take proportionate enforcement action in the event of non-compliance in line with the Regulators' Compliance Code and the principles of better regulation.	<p>Businesses supervised by OFT under the Regulations are required to register with us. We publish guidance for businesses on both the need to register and the registration form. The online guidance is regularly reviewed. In addition, we operate a dedicated AML Helpline, offering advice to businesses and responding to queries by telephone, e-mail and letter.</p> <p>In addition to the need to register and to pay an initial fee on registration, businesses are required to pay annual fees for their ongoing supervision. At all stages we have sought to keep fees as low as possible commensurate with enabling the OFT to carry out its statutory role.</p> <p>OFT ended 2009/10 with an unintended income surplus of approximately £633,000. The surplus arose as OFT's costs in the year were less than estimated. In order to ensure that the saving be passed on to the supervised population, all firms who contributed to the surplus were granted a discount – equivalent to their share of the surplus – on their annual fee for 2010/11. All registered businesses were invoiced for this annual fee in March 2011.</p> <p>We published Enforcement Principles covering our role in supervising business. The emphasis is on helping businesses comply with the Money Laundering Regulations. Formal action will usually be reserved for the most serious cases of non-compliance and in cases where businesses cannot</p>	<p>We will finalise our Business As Usual supervisory approach in the light of consultation responses, changes to the regulatory landscape and the need to keep costs and burdens on business to a minimum. We will be discussing key issues with industry representatives - an example is a full penalties policy.</p> <p>The OFT's approach to fees structure has been published as has its interim approach to imposing penalties on businesses who carry on supervised activity whilst unregistered. A further statement will be issued on the OFT's interim approach to imposing penalties for other breaches of the Regulations.</p> <p>A statement on the OFT's future supervisory approach will be issued in 2011/12.</p> <p>We will also review our guidance on the Regulations and update as necessary.</p> <p>We will finalise guidance to business on what they can expect during visits to check on and improve compliance with the Regulations. This is currently being tested during visits to supervised businesses - with</p>

be persuaded to comply.

In February 2010, we launched a consultation on our future approach to supervision. The [consultation](#) – which covered identifying those who have not registered with us, monitoring and enforcement, penalties, and future fee structures – gave firms that fall under our supervision the opportunity to have their say on the best way for us to meet the obligations set out in the Regulations.

businesses being invited to comment on the guidance.

3 THE OFT'S NON-REGULATORY CONTRIBUTION TO SIMPLIFICATION

The following activities were undertaken in the course of the OFT's work during 2010-11 that do not fall within the definition of regulatory functions for the purposes of better regulation legislation. They therefore cannot be seen as meeting any statutory obligation in that connection. However, they provide an illustration of activities that reflect OFT's broad commitment to the principles of good regulation:

- Guidance containing advice and information for businesses was published in relation to:
 - Good practice in the design and presentation of consumer survey evidence in merger inquiries (joint guidance with the Competition Commission)
 - Competition Act 1998 (CA98) procedures. This gives businesses and their advisors better clarity around our processes and should help us deliver our investigations more quickly and efficiently.
 - In response to comments made to the OFT during the consultation on draft CA98 procedural guidance we will implement a one-year trial of a Procedural Adjudicator role. The purpose of the trial is to provide a swift, efficient and cost effective mechanism for resolving disputes between parties and the case teams in respect of certain procedural matters.
- Draft guidance containing advice and information for businesses was published for consultation in relation to:
 - *Company Directors and Competition and How your business can achieve compliance*, providing practical advice on how businesses can promote a compliance culture and mitigate the risks of infringing competition law
- Through our competition advocacy work we provided advice to Government on restrictions in public markets that may have unintended consequences on competition. The OFT, when considering public restrictions and/or evolving Government policies, aims to guide policy makers so that new or existing regulations do not have unintended consequences that stifle competition and/or raise costs disproportionately.
- We evaluated the impact of our competition enforcement activities in the construction sector.