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## Global Forum on Competition

### IMPROVING INTERNATIONAL CO-OPERATION IN CARTEL INVESTIGATIONS

#### Contribution from Colombia

-- Session II --

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## IMPROVING INTERNATIONAL CO-OPERATION IN CARTEL INVESTIGATIONS

-- Colombia --

### Introduction

1. Cooperation among competition authorities in the fight against international cartels is fundamental from multiple perspectives. First of all, it is important given that multinational corporations celebrate large and relevant agreements that have cross-border action fields. Therefore, to understand the way collusions attempt against markets, it is important to identify the corporation's *modus operandi* and to determine the impact of such behaviors in a specific country; this is only possible if it is visualized from a continental or even inter-oceanic perspective. Second of all, cooperation among competition authorities is strategic to unmask those agreements that have a negative effect on free competition considering that, in most cases, the accumulation of information that can be gathered by consolidating evidence supplied by various competition authorities is a crucial element in order to understand the incentives and purposes that generate such conducts. Extensive evidence is reflected on forceful, strong, robust arguments applicable when issuing a sanction to a group of corporations that have entered into agreements that limit free competition in a specific jurisdiction.

2. Based on the preceding, the Colombian Competition Authority (Superintendence of Industry and Commerce or SIC) faces a challenge that must be taken care of immediately. The Superintendence of Industry and Commerce must advance by putting into action the previously subscribed cooperation agreements against anticompetitive cartels and must develop new mechanisms of communication with competition authorities in the rest of the continent in order to combine efforts and prevent unlawful cross-border arrangements that generate exclusionary and exploitative effects in Colombian markets.

3. Institutional cooperation may also be deemed as an essential tool in the identification of cross-border cases of collusive practices when regional or continental databases are created. This is so because collusive agreements may be replicated in countries with similar economic and demographic characteristics.

4. With the use of a communication system capable of articulating the efforts that competition authorities carry out in order to prevent and detect agreements that affect competition, a sufficiently ample learning process will take place that will dissuade the execution of anticompetitive arrangements in every country by the enforcing the type of analysis used to expose them.

5. This casuistic memory can only be achieved through efficient and effective communication mechanisms that allow the understanding of analysis tools and final decisions issued against agreements that have a negative effect on the markets protected by different authorities.

6. Therefore it's important to take into account that within the context of each agreement subscribed by the Colombian Competition Authority, the determined and effective support of multilateral organizations such as the UNCTAD and the OECD constitute a direct and extensive opportunity aimed to enhance initiatives that advance towards the consolidation of a permanent communication agenda between competition authorities in the region.

7. Now we will go through the questionnaire and the points of consideration that compose the contributions for the Forum on the improvement of the international cooperation in cartels investigations that will take place in February, 2012, in the city of Paris, in the order they were presented.

## 1. Existing tools of international cooperation

*1.1 Identify any formal mechanisms and/or co-operation agreements you have entered into with a foreign country or antitrust authority, the type of agreement (MLAT, MOU, RTA, etc) and the powers available under this agreement. For example, does the agreement allow your authority to conduct searches and inspections on behalf of a competition authority from another jurisdiction?*

8. Considering the challenges mentioned in the introduction of this document, the Colombian Competition Authority has subscribed important cooperation agreements with multilateral institutions and homologue entities in terms of competition.

9. Formally speaking, the Superintendence of Industry and Commerce has subscribed agreements with COMPAL, UNCTAD, the European Union Technical Assistance Program for Colombian Commerce (through the Ministry of Commerce, Industry and Tourism), Ministry of Industries and Productivity of Ecuador, CNC of Spain, ACODECO, Regional Center for Competition and Ministry of Industry and Commerce of Paraguay. The following table describes the type of agreement and the scope for every cooperation mechanism in force:

Institution	Type of Agreement	Summarized Description
Ministry of Industries and Productivity of Ecuador	Memorandum of Understanding	<ol style="list-style-type: none"> <li>1. Exchange information and documentation.</li> <li>2. Execute courses, conferences and workshops in competition and consumer protection issues.</li> <li>3. Provide information related to studies and plans especially designed by the parts to optimize the promotion of competition and consumer protection.</li> </ol>
Regional Center for Competition of Latin America	Agreement	Develop activities to increase the operative and technical capacity of its members by attending their demands and needs. The goal of the activities carried out by the CRC will be to benefit simultaneously the major number of members possible and take the maximum advantage of economies of scale and reach that could be derived from them.
United Nations Conference on Trade and Development. (UNCTAD)	Memorandum of Understanding	<ol style="list-style-type: none"> <li>1. Fortify the SIC in technical aspects and capacities related to competition and consumer protection issues.</li> <li>2. Strengthen the competition advocacy, the diffusion of consumer rights and the mechanisms to guarantee that both areas remain in force.</li> <li>3. Establish conditions for the free development of markets through sector studies and recommendations in the design of the public policies.</li> </ol>
Authority for Consumer Protection and Competition Defense (ACODECO) of Panama	Covenant	<ol style="list-style-type: none"> <li>1. Determine general bases for institutional coordination for the establishment of permanent mechanisms of cooperation to ensure the economic liberty, promote the cooperation among competition authorities, help prevent and identify possible anticompetitive practices, as well as to exchange perspectives, institutional policies, knowledge and experiences.</li> <li>2. Exchange information and documentation for the efficient compliance of the object of the covenant subject to its reserved nature.</li> </ol>

Authority for Consumer Protection and Competition Defense (ACODECO) of Panama (Cont.)

3. Subject to an agreement among the Parties, offer courses and conferences in order to publicize the programs developed and disseminate the rights granted by law.
4. Provide information regarding studies, plans and programs especially designed by the Parties, in an individual manner to optimize the defense and promotion of the economic competition.
5. Appoint the personnel responsible for the planning of the promotion and diffusion of each one of the objectives of the Covenant.
6. Report, in case of having any knowledge, the existence of anticompetitive practices among economic agents that can have effects in the markets of the country with which the Covenant is subscribed.

National Institute for the Defense of Competition and the Protection of Intellectual Property (INDECOPI) of Peru

Memorandum of Understanding

1. Elevate the level of consumer, businessmen and elements of competition law protection by means of strategic alliances in the above-mentioned areas that allow the parties to share experiences, good practices, doctrinal and jurisprudential guidelines in order to improve policies in intellectual property, consumer defense and competition protection.
2. Promote the joint development of projects and exchange information and experiences that allow the development of policies of continuous improvement in each institution.
3. Render technical assistance in order to strengthen professional, operational and technical capacities of both parties.
4. Exchange information and documentation for the efficient compliance of the object of the Memorandum of Understanding subject to its reserved nature.
5. Carry out courses, conferences, workshops and internships on all subjects required by the parties regarding intellectual property, consumer defense and competition protection.
6. Provide information related to studies, plans and programs especially designed by the parties, in an individual way, to optimize intellectual property, consumer defense and competition protection.

Mexican Program for international Cooperation for Development

Memorandum of Understanding

1. Acquire knowledge of the Mexican experience in the development and execution of mechanisms to prosecute practices with cross border effects that restrict competition in NAFTA' s markets and other free commerce treaties, through practical cases, expert analysis and work documents.
2. Assimilate the advantages and difficulties that arise when designing and setting in motion competition law in the context of free commerce treaties.
3. Train officials responsible for the enforcement of free trade regulations.
4. Strengthen mechanisms to verify the compliance of regulations regarding competition protection.
5. Improve the current practical know-how related to competition.
6. Exchange material, studies and information used for the solution of cases.

***1.2 Please describe the informal mechanisms your competition authority has in place for cooperating with other jurisdictions, and how these have helped in cartel investigations. For example, has your authority conducted any joint inspections jointly with another competition authority?***

10. Although the informal mechanisms for cooperation with other jurisdictions used by the Superintendence of Industry and Commerce do not include the execution of joint investigations or the identification and prosecution of anticompetitive cartels yet, there is a constant and increasing

communication with our peers on neighboring countries based mainly on exchanged experiences in investigations of this type. As an example, officials and experts in competition protection have visited us from the United States of America and Brazil, among others, with whom a productive and constant contact has been maintained.

11. Likewise, we have received immediate cooperation on different matters related to the interpretation and application of competition regulations via telephone communication and by e-mail.

12. We understand that the situations and problems we face have been previously solved in other jurisdictions in multiple occasions. These experiences are precisely what constitute the main informal channel of cooperation in the fight against anticompetitive cartels.

## 2. Types of co-operation

***2.1 What type of co-operation does your agency request from other agencies in cartel investigations? What type of co-operation is received? At what stage of the proceedings does this co-operation take place and on what issues? For example, is co-operation related to the exchange of relevant information, the organization and execution of dawn raids, the setting of fines or to the discussion of substantive issues, such as market definition, theory of harm, etc?***

13. Currently, regarding cooperation related to competition protection, especially regarding the institution strengthening for the prosecution of anticompetitive cartels, the Superintendence of Industry and Commerce of Industry and Commerce receives substantial support from the COMPAL Program, the European Union Technical Assistance Program for Colombian Commerce, USAID and the UNCTAD.

14. The COMPAL Program has been a mayor support by contributing with three market researches of great importance: electronic commerce, energy and gas. Additionally, this Program has provided us a series of reports with recommendations regarding the adoption of different analysis methods and economic techniques to identify collusive practices and abuse of dominant position, as well as technical advices composed by an international academically recognized consultant, known that for his important trajectory in the enforcement of competition policies in Latin America.

15. The European Union Technical Assistance Program for Colombian Commerce has aided the Superintendence of Industry and Commerce by providing consultants for the modernization and incorporation of better practices in competition protection, as well as redesigning institutional components for external and internal client attention, diffusion of issues regarding competition in markets, technical strengthening of various segments of the economy whose surveillance was delegated to the Superintendence of Industry and Commerce by virtue the Law 1340, the improvement of the technical and response capacity on investigations concerning restrictive practices and the strengthening of the procedure of competition advocacy.

16. Finally, given the determined support provided by this program, the Superintendence of Industry and Commerce had the support of important consultants who carried out diagnosis concerning the implementation of the leniency program in the institution.

17. As it can be extracted from the preceding, international cooperation received by Colombia has been focused, to this moment, in endowing the officials of the competition authority with sufficient tools that allow them to evaluate the situations where cartels may appear in a more technical and updated manner. Just as well, bearing in consideration the introduction of international figures such as the leniency programs, the Superintendence of Industry and Commerce has sought to extract experiences from countries where such policies have shown positive results.

18. Disregarding the foregoing, the cooperation received so far does not enter the dimension of a joint activity between competition authorities of different jurisdictions in specific investigations. In other words, the boundaries of knowledge and experience exchange has not reached the setting where joint raids or evidence recollection abroad are carried out in order to attack international cartels or determine sanctions.

**2.2 *How does the co-operation take place? For example, is it by telephone, email or through face-to-face meetings? How successful has the co-operation been? What aspects of co-operation have worked particularly well and what has been less successful?***

19. Co-operation between different competition authorities has taken place through different channels: teleconferences, e-mails and face-to-face meetings. Generally, these communications have been very important in order to gain knowledge on other experiences and criteria to analyze and conclude different antitrust investigations.

### **3. International vs. regional co-operation**

**3.1 *Which competition authorities you co-operate with the most? How often do you co-operate? Do you cooperate more with authorities located geographically close-by?***

20. Even though the Superintendence of Industry and Commerce counts with informal cooperation via telephone communications, e-mail and virtual meetings with authorities in Europe, the United States of America, the United Kingdom and some countries in Latin America, it is clear that the competition agency from which we have received constant and important contributions is the Spanish National Commission of Competition (CNC). In fact, as an important joint effort of this institution with the Inter-American Development Bank (IDB), on a yearly basis, an official commission from the Colombian Competition Authority receive instruction and information related to the latest methodologies and cases studied by the CNC. This forum is an important element of cooperation received by Colombia.

21. On a regional scope we have strengthened cooperation ties with the Peruvian INDECOPI, the Brazilian CADE and the Chilean Fiscalía Nacional Económica de Chile. The fact that South American countries face similar circumstances concerning the structure of their markets, its participants and the difficulties the countries face when prosecuting cartels cannot be denied. For this reason, cooperation with these authorities is constant and it is based on experiences and training exchange.

22. Similarly, we have constant communication with the Mexican Federal Competition Commission, with whom we have shared general information on different markets (such as telecommunication market) and received training on cases concerning cartels (such as the one that took place in the cement industry) and the banking system, which are excellent examples of sectors with antitrust issues that replicate with ease in the rest of the region. The Superintendence of Industry and Commerce also seeks to share its experiences with younger regional agencies of Central America or even in countries where there is an initiative to create one.

23. Although it is true that the cooperation described above has been executed more frequently for approximately the last 8 years, it is evident that the countries in the region should work towards the increase of cooperation in the fight against cross-border cartels, which should be reflected, primary, on formal investigations.

**3.2 *Are you part of a regional competition network? If so, to what extent has this network assisted in the cartel investigations you have carried out?***

24. The Colombian Competition Authority, as stated above, is part of the Regional Latin America Centre of Competition. Nevertheless, we have no experience in cartel investigation analyzed by this

Centre. We hope that this effort of cooperation would be a good support in the future to analyze this kind of anticompetitive behaviors.

**3.3 *If you are a new/young agency to what extent do you co-operate with your neighboring competition authorities, other new competition authorities in the region, and/or mature agencies either in the region or overseas? If you are a mature agency, which are the competition authorities with which you co-operate most, and how do you respond to and prioritize requests received from newer agencies?***

25. The Colombian process of consolidation of a national policy in competition is one of the oldest in Latin America. It started with the expedition of the Law 155 of 1959, by virtue of which the general regime regarding restrictive commercial practices and preliminary control of integrations was established. The application of this law was limited given the organization of the Colombian economy during the following three decades after the adoption of that law.

26. The application of a new competition policy was boosted at the beginning of the nineties by several reasons, among which the State's constitutional duty to protect the free competition and the political decision to initiate a process of economic opening can be emphasized. As a result, the Decree 2153 of 1992 was issued in compliance with transitory article 20 of the 1991 Colombian Political Constitution, becoming the base of a new competition policy in the country. The abovementioned decree restructured the Superintendence of Industry and Commerce of Industry and Commerce and listed the classification of the anticompetitive behaviors.

27. The last great advance of Colombian competition policy was the promulgation of the Law 1340 of 2009, which updated the regulation concerning competition protection and introduced tools implemented successfully by international authorities such as the leniency program and giving the possibility for a third party to intervene when it has a direct interest in the investigation of a restrictive commercial practice. The decree also appointed the Superintendence of Industry and Commerce as the sole competition authority in national markets.

28. Based on the previously said, the Superintendence of Industry and Commerce can be considered a mature competition authority in the region and, at the same time, a young authority worldwide. The Superintendence of Industry and Commerce can be considered on one hand a recipient of cooperation offered by agencies with greater trajectory and experience, and on the other a strategic provider of said cooperation and policies to other Central and South American countries.

29. As for cooperation received, it should be said that the main cooperative international authorities are the Federal Trade Commission, the European Competition Commission and the Brazilian CADE. Nevertheless, there has been informal contact with other authorities in the region via informal media. Also, as it has been previously stated, this type of cooperation focuses on training on theoretical aspects of the competition law or in the specific market research.

30. As for the activities carried out by the Superintendence of Industry and Commerce as a catalyst of cooperation toward Latin-American countries, the entity has offered different countries in Central America preparation in this matter. Interesting discussions were generated around the analytical tools used in Colombia to determine the abuse of dominant position in the market as an important antitrust tool.

#### **4. Identifying gaps and improving the current frameworks**

**4.1 *What are the current challenges faced by your competition authority in cartel investigations which have a cross-border dimension (e.g. anti-competitive cross-border effects or evidence located in foreign jurisdictions)? To what extent would international co-operation with other competition authorities overcome these challenges?***

31. Once again, it should be mentioned on this point that the Superintendence of Industry and Commerce has not developed any joint investigation with another country in order to discover and/or to sanction a cross-border cartel yet. Nevertheless, the former does not mean that the need to initiate the necessary activities to develop investigations of this type does not exist.

32. To reach this goal, the first and main challenge consists in studying possible markets or sectors in which cross-border cartels may be more plausible, making it imperative for cooperating agencies to exchange information as for the elaboration of studies.

33. Besides, a complete identification of the agents that compose the cartel and that normally shield in policy failures that appear in the fight of these infractions should be sought. Another challenge to overcome in these activities is the recollection and recognition of the evidence collected in other countries susceptible to be useful in national investigations, as well as the possibility to transfer evidence gathered in Colombia to any other country in the region.

**4.2 *How do you deal with co-operation in cartel cases that encompass both criminal and civil enforcement regimes? For example, how do you ensure that the privilege against self-incrimination is respected when using the information exchanged with other agencies in criminal proceedings against individuals? If you have a civil system in place for cartel enforcement, have you faced any particular problems coordinating with those jurisdictions with a criminal enforcement system and vice versa? What issues have arisen and how do the different systems affect the quality and/or intensity of coordination?***

34. In Colombia, the only anticompetitive agreement that can infringe criminal regulations in addition to competition law is collusion in tenders. In this sense, it is important clarify that up to now no testimonial evidence has been practiced in cartel prosecution.

35. Nevertheless, if Colombia had to face the aforesaid situation, it would be imperative to include in treaties or memorandums of understanding the parameters and protocols to be followed in evidence reception from other countries, in order to guarantee the investigated party's right to defense.

**4.3 *How do you think your current system could be improved in relation to the way in which international cartels are investigated? In what way could liaising with competition authorities in other jurisdictions be improved?***

36. The start of any cooperation activity directed to investigate international cartels should start from the identification of relevant markets susceptible to be subject of anticompetitive conducts. For this to happen, it would be crucial to subscribe Memorandums of Understanding with neighboring countries aimed to perform sectorial studies geographically expanded to the territory of the countries involved.

37. This mechanism would allow the cooperating countries to have a general knowledge of the agents, their participations and their behavior in the market. The process of gathering information on companies under a certain country's control and surveillance would be in charge of each country, but the parameters of such process and the analysis of the results would be carried out jointly by the parties.

38. Another instrument that is currently being implemented by some countries is the transmission of information concerning imposed sanctions and decisions regarding the commencement of investigations, through points of contact in each country (officials of each agency). This is done in order to determine if an initiated investigation in one country can have direct and/or indirect impact on a neighboring country. A third phase consists of the actual exchange of evidence gathered in each country. Nevertheless, this phase can only be reached once the abovementioned steps are consolidated.

**4.4 *Have there been any instances in which a cartel investigation or case could have benefited from information or co-operation from a foreign competition agency, but your agency did not request such assistance because you knew that it could not or would not be granted?***

39. No, there have not been any.

## **5. Information sharing**

**5.1 *What are the main barriers to information sharing that you have encountered when requesting information from another jurisdiction? Please provide examples. How have these affected cartel investigations in your jurisdiction? Have you managed to obtain the information using any other means?***

40. The main barrier to exchange of confidential information is internal data protection regulations from each country. Nevertheless, it should be reminded that the Superintendence of Industry and Commerce has not carried out any official request of specific information collected by other competition authorities in the region in internal investigations aimed at the transfer of it to an internal procedure.

**5.2 *Are there any legal constraints which would prevent your agency from providing information related to a domestic or international cartel to the competition authority of another jurisdiction? What are these constraints? Do you have any legislation preventing information exchange?***

41. The industrial secret or the confidentiality duty of administrative authorities in procedures aimed to sanction a company does not find emulation in the Colombian “Código Contencioso Administrativo” (Administrative Litigious Code, hereinafter C.C.A.). As the law contains no reference to the matter, we face a legal abyss.

42. Because of the preceding, the only dispositions that could be applicable through analogy are those contained in Title I, Chapter III of the C.C.A. concerning the right to petition information, given that the Administration has the obligation to supply documents and therefore enable the petitioner to know its content with the only exception of information described as reserved, status that only can be granted according to the Law (articles 23 and 74 of the constitution and I articulate 17 to 25 of the C.C.A).

43. Disregarding the foregoing, article 260 of Decision 486 of 2000 (regulation issued by the Andean Community of Nations, incorporated in our legal system) indicates that any information that has not been disclosed, legitimately possessed by individuals or corporate bodies, that may be used in a productive, industrial or commercial activity and may be susceptible to be transmitted to a third constitutes a business secret as long as such information is:

- Secret, which means that the information as a whole or one of its parts is not known neither easily accessible by those who do not handle such information.
- Because it is a secret, it has commercial value.
- Its legitimate owner must have taken all the necessary measures to maintain this information in secret.

44. The information deemed as a business secret can refer to the nature, characteristic or purposes of products; to the methods or processes of production; or to the media or form of distribution or commercialization of products or services provided.

45. The previous definition is important for administrative authorities based on the content of the second clause of article 261 of Agreement 486 of 2000, given that any information with the abovementioned characteristics that is provided in a procedure has to be considered as business secret and cannot be considered of public knowledge.

46. Therefore, even when the regulation analyzed does not grant these documents reserved status, it imposes a duty to officials that have may access to them that makes them responsible to guard the documents from third parties. Therefore, the stealth obligation entails that the information supplied can only be analyzed with the purpose of obtaining licenses, permissions, authorizations, registrations or any another administrative resolution in favor of the interested.

47. Specifically, article 15 of Law 1340 of 2009 foresees the protection of business secrets or any other information deemed as legally reserved in investigations carried out by this Superintendence of Industry and Commerce. Just as well, it establishes that revealing such information constitutes a serious disciplinary fault for the responsible official.

48. As a conclusion, because the information is not of public knowledge, it escapes the possibility of being requested by any person or even by a competition authority of a neighboring country.

**5.3 *To what extent can your authority rely on information gathered in another competition authority's investigation in your own investigation?***

49. Any type of evidence that supports the existence of a cartel under the Colombian law should be argued against by the investigated corporation or individual and properly linked to a specific investigation. In this sense, although it is possible justify a decision on documents that contain general information concerning a market or its conditions, even if it is obtained from the internet, the same does not occur with information contained on an investigation carried out by a competition agency of a neighbor country. In order to do this, international treaties that allow transferring evidence must exist.

**5.4 *Does your jurisdiction/agency have any legislation, rules or guidelines regulating the protection of confidential information which is exchanged with an agency in another jurisdiction? What safeguards do you have in place for the protection of confidential information when co-operating with foreign government agencies?***

50. No, it does not have any.

**5.5 *What is your policy for exchanging information with other jurisdictions that has been provided as part of an amnesty/leniency programme? Do you request (and receive) waivers from companies being investigated in order to facilitate information exchange with other agencies investigating the same cartel? In practice do you request waivers as part of the leniency application? How important are waivers, and the information received from other investigating authorities as a result, to the effectiveness of the cartel investigation?***

51. Even though the clemency figure was included as one of the novelties in Law 1340 of 2009, the Superintendence of Industry and Commerce has not carried out this type of procedures so far. Therefore, it is imperative to initially strengthen this program in the country before implementing international cooperation policies in the matter.

**5.6 Do you have any particular safeguards in place for information that has been given under an amnesty/leniency programme?**

52. In every investigation carried out by the Superintendence of Industry and Commerce there is a reserved file where all the information included is deemed as confidential and there is a public file where reserved information is suppressed. No additional security protocols to protect informers in the clemency program exist yet.

**6. International co-operation within other policy areas**

**6.1 Are you aware of any other law enforcement areas in your jurisdiction (for example tax, bribery or money laundering) which face similar challenges in international co-operation as those faced by competition authorities in cross-border cartel cases?**

53. Authorities such as the Fiscalía General de la Nación (Criminal Prosecution Office) faces similar challenges in investigations related with money laundering and corruption. In addition, the National Tax and Customs Direction (DIAN) does so in matters regarding the tax system. Other control entities such as the Procuraduría General de la Nación are involved in these activities as well.

54. Nevertheless, the abovementioned authorities investigate and sanction conducts considered as crimes by national and international authorities, field that counts with a well nourished activity with regards on cooperation between countries.

55. As an example of the above mentioned, the Colombian Constitutional Court in 2006 declared the legality of the "CONVENTION OF THE UNITED NATIONS AGAINST CORRUPTION", adopted by the General Assembly of the United Nations, in New York, October 31, 2003. In said Convention, themes related to the protection of complainants were included as extradition, reciprocal judicial assistance and joint investigations, among others.

**6.2 Does your authority liaise with any other regulatory authorities to discuss common problems/solutions?**

56. No, it does not.