



that needed to be tweaked to improve results. This learning-by-doing sharing provided useful pointers for the PCC. Topics that were discussed during the individual sessions as well as during the final discussions included the meaning in practice of full and continuous co-operation, the links between leniency and criminal liability, and between leniency and private enforcement.

The second day was dedicated to fining and other sanctions, and after the OECD overview, the PCC made an excellent presentation on its current draft of the guidelines. All the sessions by each one of the visiting agencies as well as the final discussion reviewed the experiences in the method of calculating fines and the issue of relevant turnover and discretion of the agency, parental liability, inability to pay allegations, amongst others.

This was a novel workshop that worked very well indeed, the discussions were detailed and lively, with the PCC staff fully engaged. The work before the event was crucial to its

usefulness as it allowed the speakers to have an understanding of the ongoing work of the PCC and then to provide comments throughout the workshop.

Some OECD and ICN material on fines and leniency used and referenced during the workshop:

- OECD Recommendation of the Council concerning Effective Action against Hard Core Cartels (1998)
- OECD Sanctions in Antitrust Cases (2016)
- OECD Policy Roundtable 2012 – Leniency for Subsequent Applicants
- ICN Anti-Cartel Enforcement Manual Chapter 2 – drafting and implementing an effective leniency policy