

ANNUAL REPORT 2024

COMPETITION COUNCIL
OF THE REPUBLIC OF MOLDOVA

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ABBREVIATIONS AND ACRONYMS

CPAs	Central Public Authorities
LPAs	Local Public Authorities
ICN	International Competition Network
ME	Municipal Enterprise
SE	State Enterprise
Competition Law	Competition Law No. 183 as of 11.07.2012
Law on State Aid	Law no.139 as of 15.06.2012 on State Aid
OECD	Organization for Economic Cooperation and Development
WTO	World Trade Organization
Peer-Review	External audit of the Competition Council
JSK	Joint-stock company
SGEI	Services of General Economic Interest
SIA RAS	Automated Information System “Register of State Aid of the Republic of Moldova”
LLC	Limited Liability Company
TAIEX	Technical Assistance and Information Exchange Instrument of European Union
EU	European Union
UNCTAD	United Nations Conference on Trade and Development
UOKiK	Office of Competition and Consumer Protection of Poland
USAID	United States Agency for International Development

FOREWORD

The year 2024 was an important and fruitful year for the Competition Council of the Republic of Moldova. Despite being marked by several challenges and a difficult economic context, the institution continued its mission to ensure compliance with competition legislation, the functioning of markets, and to protect fair competition for the benefit of consumers, undertakings, and the national economy.

The annual report we present offers an overview of the Competition Council's activities in 2024 — a year in which we continued to focus on the effective enforcement of competition and state aid rules, as well as fulfilling other responsibilities within our mandate. Through rigorous investigations, the promotion of the principles of free competition, and active interinstitutional cooperation, we have succeeded in strengthening public and business confidence in the competition authority and in contributing to a better understanding of the role of fair competition in economic development.

In 2024, the Competition Council concluded two of the largest and most complex investigations carried out in recent years. One of these targeted the petroleum products market, a sector essential to the national economy. The Plenum of the Competition Council found that six companies active in the retail sale of fuels under investigation had coordinated their pricing policies, thus infringing competition legislation. As a result, the authority imposed a record fine of over 480 million MDL — the largest in its history.

The second major decision concerned the market for a basic product for household consumption — sunflower oil. The investigation revealed the existence of an anticompetitive agreement between the country's leading producer of sunflower oil and its distributor. Following these findings, the Competition Council imposed total fines of over 192 million MDL on the two companies.

In total, during the reporting period, the total amount of fines imposed by the Competition Council's decisions was 684,104,862.16 MDL. It is important to emphasize that this amount should not be seen as a benchmark for the future, as it results from investigations of an exceptional nature, considering the importance of the markets analyzed and the size of the companies involved.

Nonetheless, this total amount clearly reflects the institution's strategic prioritization of investigating the most serious infringements of competition legislation, which have a significant impact on markets and consumers.

In addition to these major investigations, we addressed numerous other significant cases, such as rigged tenders, obstruction of inspections, and misleading the competition authority. Through these actions, we send a clear message: the competition authority will not tolerate either substantial infringements of the Competition Law or procedural infringements, and strict compliance with legislation, in all its complexity, will remain a constant priority for the institution.

It is important to note that, in recent times, the Competition Council has begun to examine more in-depth certain economic concentration operations with potentially significant impacts on the market, while simultaneously simplifying the notification procedures for simpler concentrations that do not present risks of distorting competition.

Regarding the representation of the Competition Council before the courts, the trend observed in previous years has continued, with national courts confirming the legality of the decisions adopted by the authority. At the same time, through their judgments, the courts have contributed to clarifying important procedural aspects related to the conduct of investigations carried out by the Council.

The year 2024 was also marked by extensive preparations for the bilateral screening sessions at the European Commission. The areas of competition and state aid represent fundamental pillars of the European common market, whose integration is essential for the economy of the Republic of Moldova. The Competition Council's team undertook an enormous volume of work, actively engaging in assessing national legislation from the perspective of its compatibility with the EU acquis.

In the context of the legislative harmonization process, we contributed to the evaluation of several important state aid schemes. Firstly, the Competition Council representatives were involved in the harmonization of the legal framework governing the operation of free economic zones in the Republic of Moldova. We authorized the state aid scheme in the field of renewable energy and actively cooperated with other public institutions to ensure the compatibility of other support measures with a normal competitive environment, aimed at contributing to the development of a competitive and transparent economy.

In 2024, the Competition Council underwent a restructuring of its organizational structure, aiming to strengthen institutional resources and develop new areas of activity, such as unfair commercial practices.

The workload related to reviewing draft normative acts from the perspective of their impact on the competitive environment has demonstrated a substantial increase. During the reporting period, the Competition Council issued 198 opinions on draft normative acts covering various areas of activity.

We continued to place particular emphasis on the professional development of the Competition Council's staff. In this regard, we organized multiple training sessions, workshops, and professional development sessions, benefiting from the expertise and experience of colleagues from EU member states. Our objective remains to create a team of well-trained specialists capable of efficiently and competently managing complex cases and responding to the demands of a modern competitive market.

In this context, the launch of the Twinning project at the end of 2024 represents an important milestone in the institutional development of the Competition Council. The project is implemented in partnership with the competition authorities of Romania, Poland, and Lithuania, providing vital technical support for strengthening institutional capacities, optimizing internal processes, and directly supporting the EU accession negotiation process.

Also, in 2024, the Competition Council took a significant step in consolidating institutional integrity by implementing, with the support of the Moldovan Institute for Standardization and the USAID's Moldova Institutional and Structural Reforms (MISRA) programme, the international anti-bribery standard ISO 37001:2016. This achievement reflects our firm commitment to preventing corruption risks and aligning the institution's activities with the best international practices in this area.

In 2024, we intensified dialogue with the business community: we resumed the practice of working meetings in various regions of the country and engaged in joint initiatives with representatives of various business associations. To ensure more open and transparent communication, a new website of the Competition Council was launched. This openness in our relationship with the business community will remain a strategic priority, essential both for a better understanding of the rules of fair competition by businesses and for more effective and balanced interventions by the authority.

At the same time, collaboration with the academic environment has been expanded through active participation in public lectures, training sessions, and the development of specialized programs in the field of competition, thus contributing to the formation of a solid and sustainable competition culture

among future lawyers and economists.

We thank our development partners, civil society, the academic community, and the business environment for the open dialogue and valuable contributions. We also thank our colleagues within the Competition Council for the professionalism, integrity, and determination with which they carry out their daily work.

We look to the future with confidence and assume the challenges of 2025 with determination, fully aware of our responsibility to ensure a fair economic environment in the Republic of Moldova.

President of the Competition Council

Alexei Gherțescu

Chisinau, 2025

The **COMPETITION COUNCIL** is an autonomous public authority, accountable to Parliament, responsible for the implementation and enforcement of the legislation in the field of competition as provided by the Competition Law; of state aid as regulated by Law No. 139/2012 on State Aid; of commercial advertising in terms of ensuring the rights and interests of undertakings as regulated by Law No. 62/2022 on Advertising; of the field of railway transport services regulation in accordance with the duties set out by the Railway Transport Code No. 19/2022; and of unfair commercial practices within the limits of the duties established by Law No. 231/2010 on Domestic Trade.

The **PURPOSE** of the Competition Council's activity is to ensure compliance with the competition legislation by preventing anti-competitive practices, eliminating competition infringements, and promoting and enhancing the culture of competition.

The **VISION** – a modern public authority, recognized at both national and European levels, that ensures the protection, maintenance, and stimulation of competition through objectivity and impartiality, cooperation, and transparency, thus contributing to the economic development of the Republic of Moldova and the well-being of consumers.

The **MISSION** – implementation of effective measures for the protection of competition in order to maintain a functional competitive environment, ensure the freedom of entrepreneurial activity, and promote the legitimate interests of consumers.

The Competition Council is composed, in accordance with the Competition Law, of the Plenum of the Competition Council and the Executive Body of the Competition Council.

The Competition Council is headed by the Plenum of the Competition Council. The Plenum is a collegial decision-making body consisting of 5 members, including a President and two Vice-President, who also serve as the President and Vice-Presidents of the Competition Council, respectively. The members of the Plenum of the Competition Council hold public dignity positions. The term of office for the members of the Plenum of the Competition Council is 5 years. Each member of the Plenum is entitled to two consecutive mandates.

In 2024, the composition of the decision-making body of the Competition Council was modified due to the expiration of the term of office of one of its members. Mr. Ionel Sîrghii was appointed as a member of the Plenum of the Competition Council for a 5-year term.

Composition of the Plenum of the Competition Council:



Alexei GHERȚESCU, President of the Competition Council, President of the Plenum of the Competition Council, appointed by Parliament Decision no. 33/2022.



Roman PUȘCA, Vice President of the Competition Council and Vice President of the Plenum of the Competition Council, appointed by Decision No. 380/2023 of the Parliament of the Republic of Moldova.



Diana LAPTEACRU, Vice President of the Competition Council and Vice President of the Plenum of the Competition Council, appointed by Decision No. 210/2024 of the Parliament of the Republic of Moldova.



Cornelia GORINCIOI, Member of the Plenum of the Competition Council, appointed by Decision No. 381/2023 of the Parliament of the Republic of Moldova.



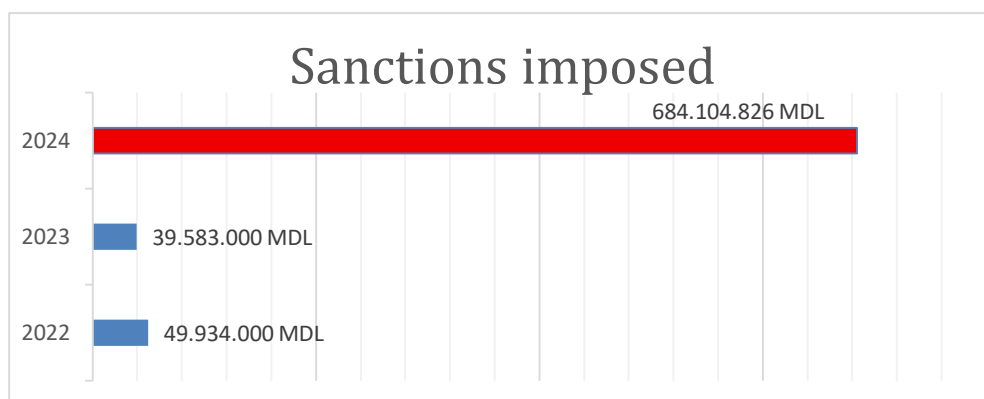
Ionel SÎRGHII, Member of the Plenum of the Competition Council, appointed by Decision No. 211/2024 of the Parliament of the Republic of Moldova.

The Plenum of the Competition Council convened for 81 meetings and 11 hearings during the reporting period.

I. COMBATING ANTI-COMPETITIVE PRACTICES AND UNFAIR COMPETITION ACTIONS

In 2024, the Competition Council continued its efforts to combat anticompetitive practices and unfair competition, aiming for the strict enforcement of competition rules across the markets of the Republic of Moldova. To this end, the institution finalized several major investigations.

Throughout the year, 11 investigations were launched into anticompetitive practices and unfair competition. In 2024, the relevant departments carried out 9 dawn raids. Of the ongoing investigations, 7 were concluded, and the Plenum of the Competition Council issued sanctioning decisions, imposing fines totalling 684,104,826 MDL.



The Competition Council optimized its activity related to conducting market inquiries (market studies) in several priority sectors, aimed at identifying barriers and risks affecting competition. The purpose of these analyses is to examine the structure and functioning of markets in key areas of the national economy.

The main sectors analyzed during the reporting period were:

The market for the sale of human-use medicines: Evaluation of the distribution chain for human-use medicines to identify potential inefficiencies and contribute to improving the distribution and commercialization process for these products.

The market for the production and sale of cereal and oilseed crops: A market inquiry intended to provide a comprehensive understanding of the dynamics and challenges of this essential sector of the national economy.

The business-to-business supply market for agricultural and food products: This inquiry aims to examine the supply chains for agricultural and food products, as well as the existing practices in the relationships between retail networks and their suppliers (i.e., producers of agricultural and food goods).

At the same time, the Competition Council continued its analysis of the advertising market to collect and report the essential data required by its annual obligations.

The effectiveness of market inquiries in 2024 was limited due to insufficient human resources allocated to this area. In the upcoming period, with team consolidation and internal reorganization, the Competition Council will intensify its efforts to complete these inquiries and perform relevant economic analyses.

It should be noted that market inquiries are not investigations based on specific signs of infringements

of competition law. Their purpose is to analyze the structure of relevant markets, identify market failures, key market participants, current practices, legislative gaps, and other relevant issues.

In this context, the Competition Council organized a series of events, including roundtable discussions and bilateral meetings with business associations, representatives of enterprises active in the respective markets, public authorities and institutions, as well as civil society. The goal of these meetings was to identify the main issues affecting those markets.

The Competition Council is resuming its previous practice of conducting market inquiries, with a focus each year on a limited number of key sectors. Upon completion of these inquiries, the main findings will be presented to the business community, public authorities, and the general public.

Anticompetitive Agreements

In 2024, a total of 26 investigations were ongoing concerning potential infringements of Article 5 of the Competition Law. During the reporting period, the Plenum of the Competition Council adopted five decisions establishing material infringements of the Competition Law and one decision establishing a procedural infringement.

During the reference period, one major and complex investigation was completed. It addressed multiple aspects and resulted in the finding of an infringement of Article 5 of the Competition Law and the imposition of a fine.

The total fine imposed on 17 undertakings, based on the six decisions, amounted to approximately 681,763,543 MDL.

The Competition Council conducted six dawn raid at the premises of key undertakings active in the market for the procurement of raw cow milk intended for processing. The inspections aimed to verify suspicions of anticompetitive practices prohibited under Article 5 of the Competition Law, particularly related to procurement practices from producers. Additionally, three dawn raid were carried out at undertakings in the medical device distribution sector, as part of an investigation into possible bid rigging in electronic public procurement procedures, in breach of the same article.

Summary of completed investigations

“The Oil Companies Case” (coordination of retail fuel prices)

By Decision No. DA-03/21-18 as of 28.06.2024, the Plenum of the Competition Council found that the undertakings “Lukoil-Moldova” LLC, “Bemol Retail” LLC, “Datario” LLC, “Petro-Moldova” LLC, “Rompetrol Moldova” JSC, and “Tirex Petrom” JSC, active in the retail sale of petroleum products, coordinated the sale prices of these products.

The investigation covered the period from March 2019 to January 2021, during which the six undertakings engaged in several rounds of price changes, applying the same values. These price adjustments occurred both consecutively (when one or more undertakings changed their prices, followed by others making similar changes) and simultaneously (when most or all undertakings made similar pricing decisions at the same time, prior to public display on signage boards).

Based on the evidence gathered and the arguments presented by the involved parties, the Plenum of the Competition Council concluded that the six undertakings had infringed Article 5 (1) and (3)(a) of the Competition Law No. 183/2012 (as in force at the time of the conduct).

For this infringement, by [Decision No. DA-03/21-18 as of 28.06.2024](#), the six undertakings were fined

a total of 481,632,296.00 MDL.

The case concerning the anticompetitive agreement between “Floarea Soarelui” JSC and “Lux Proba Grup” LLC on the bottled sunflower oil supply market

In June 2022, the Plenum of the Competition Council launched an investigation into suspected infringements of Article 5 (anticompetitive agreement between “Floarea Soarelui” JSC and “Lux Proba Grup” LLC) and Article 11 (abuse of dominant position) of the Competition Law. Upon completing the investigation, the Council concluded that an anticompetitive agreement existed between the two undertakings. However, the initial suspicions regarding excessive pricing were not confirmed.

“Lux Proba Grup” LLC is the main distributor of bottled sunflower oil produced by “Floarea Soarelui” JSC. In parallel, the producer also delivers its products directly to certain retail chains. Therefore, both undertakings operate at the same level of the sunflower oil distribution chain in relation to retailers.

During the investigation, it was found that between October 2019 and June 2022, the two undertakings coordinated their prices before communicating them to their respective clients.

This coordination restricted intra-brand competition, reducing the opportunity for retailers to purchase directly at more favorable prices and to offer lower prices to consumers. Furthermore, the coordination negatively affected the private labels of other undertakings producing oil at the “Floarea Soarelui” JSC factory, thereby limiting inter-brand competition as well.

Additionally, the investigation did not confirm the initial signs of excessive pricing in May 2022. The Competition Council’s analysis showed a correlation between costs and prices and failed to demonstrate the existence of excessive pricing.

By [Decision No. APD-08/22-38 as of 27.12.2024](#), the Plenum of the Competition Council sanctioned the sunflower oil producer “Floarea Soarelui” JSC and its distributor “Lux Proba Grup” LLC, imposing a total fine of 192,665,281.00 MDL.

The case of “APS Service Grup” LLC, “Moncomtex” LLC, “Sud-Terra” LLC and “Zagorlar” LLC (submission of rigged bids in public procurement procedures)

By Decision No. DA-31/19-39 as of 27.12.2024, the Competition Council sanctioned four undertakings for submitting rigged bids in approximately 60 public procurement procedures conducted during the period 2018–2020. The sanctioned companies are: “APS Service Grup” LLC, “Moncomtex” LLC, “Sud-Terra” LLC and “Zagorlar” LLC.

These undertakings operate in the construction sector, with core activities including the construction of residential and non-residential buildings, as well as road infrastructure works, such as road and sidewalk repairs and other types of construction-related works.

The investigation revealed that all bids were coordinated by a single individual, a manager of one of the companies, who received information on the offers of the other undertakings and prepared the participation documents on their behalf. This practice eliminated any uncertainty regarding the behaviour of the participating companies and led to the distortion of competition in the procurement procedures. Such conduct constitutes a serious form of cartel – one of the most severe infringements of competition law – directly affecting the proper functioning of the market and the integrity of public procurement.

For the established infringement, by [Decision No. DA-31/19-39 as of 27.12.2024](#), the four undertakings were sanctioned with fines amounting to a total of 4,714,534.44 MDL.

The case of “Vigurcom” LLC and “Rapid Link” LLC(submission of rigged bids in a public procurement procedure)

By Order No. 27 as of 29.10.2020, the Plenum of the Competition Council ordered, ex officio, the initiation of an investigation concerning signs of an infringement of Article 5 of the Competition Law by “Vigurcom” LLC and “Rapid Link” LLC, through the submission of rigged bids in the electronic procurement procedure No. MD-1572350870650, organized and conducted by the Information Technology and Cyber Security Service.

The investigation found that “Vigurcom” LLC and “Rapid Link” LLC, in preparing their participation bids, exchanged competition-sensitive information and coordinated their bids for the procurement procedure concerning construction works for telephone and communication lines and related auxiliary works.

Accordingly, the Plenum of the Competition Council found that “Vigurcom” LLC and “Rapid Link” LLC infringed the provisions of Article 5 para. (1), para. (3) letter d) and Article 7 para. (1) letter d) of the Competition Law No. 183/2012 (as in force at the time of the conduct), by submitting rigged bids in the public procurement procedure. By [Decision No. DA-27/20-06 as of 05.04.2024](#), fines in the amount of 1,918,063.52 MDL were imposed.

The case of “Lisnic Grup” LLC and “Tehnoclimat” LLC (submission of rigged bids in a public procurement procedure)

By Order No. 07 as of 10.03.2020, the Plenum of the Competition Council ordered, ex officio, the initiation of an investigation concerning signs of an infringement of Article 5 of the Competition Law by the undertakings: “Lisnic Grup” LLC, “Tehnoclimat” LLC, “Eurosiguranta” LLC and “Ilonet-Prim” LLC, participants in the electronic public procurement procedure No. MD-1573827468923 – procurement of security video cameras (facial recognition system).

The investigation found that “Lisnic Grup” LLC and “Tehnoclimat” LLC exchanged competition-sensitive information and coordinated their bids. At the same time, no evidence was found of the involvement of “Eurosiguranta” LLC and “Ilonet-Prim” LLC in such practices.

It is important to note that “Lisnic Grup” LLC acknowledged the anticompetitive conduct attributed to it, which was taken into account when individualizing the fine.

For the established infringement, by [Decision No. DA-07/20-35 as of 28.10.2024](#), fines totalling 256,597.94 MDL were imposed.

The case of “Horus” LLC (finding of a procedural infringement)

On 7 June 2024, the Plenum of the Competition Council adopted a decision establishing a procedural infringement by “Horus” LLC during the conduct of an dawn raid. The inspection took place at the beginning of 2023 in the context of an investigation into possible infringements of the Competition Law.

During the inspection at the premises of “Horus” LLC, the Competition Council’s team encountered multiple obstacles and delays caused by the undertaking’s representatives. The conduct of the undertaking’s employees included refusals to promptly grant access to certain workspaces, delays in accessing emails, and evasive or inaccurate responses to questions.

In accordance with the applicable legislation and considering the circumstances of the case, the Competition Council, by [Decision No. DA-11 as of 07.06.2024](#), imposed a fine of 576,769.79 MDL on

the undertaking.

Abuse of dominant position

During the reporting period, 13 investigations were ongoing regarding signs of infringements of Article 11 of the Competition Law. In the same period, 4 complaints concerning alleged anticompetitive actions were preliminarily reviewed. Of these, 3 complaints were tacitly withdrawn (related to the market for commercial space lease services, the market for issuing certificates regarding car characteristics, and the market for purchasing insurance services), while 1 complaint was dismissed by decision ([Decision No. APD-36 as of 28.10.2024](#)).

Anticompetitive actions by Public Authorities

One of the main objectives of the Competition Council is to protect, maintain, and stimulate competition by identifying, preventing, and, where applicable, counteracting the actions or inactions of central and local public authorities that may restrict, hinder, or distort competition. In 2024, 11 investigations into possible anticompetitive actions by public authorities and institutions were ongoing. Of these, 3 investigations were initiated in the reporting year – one ex officio and two following complaints.

Of the 12 complaints submitted concerning public authorities' actions:

- 3 complaints were dismissed by decisions of the Plenum of the Competition Council:
 - [Decision No. AAP-08 as of 12.04.2024](#)
 - [Decision No. AAP-25 as of 15.08.2024](#)
 - [Decision No. APD-32 as of 09.10.2024](#)
- 5 complaints were tacitly withdrawn after responses were sent indicating the lack of reasonable grounds to suspect an infringement;
- 2 complaints submitted in 2024 were to be examined in 2025;
- 2 complaints led to the initiation of investigations:
 - Order No. 09 as of 10.07.2024: investigation initiated regarding the actions of the Chisinau Municipal Council in delegating, through Decision No. 1/14 as of 07.02.2018, the management of the public lighting and traffic light service, without complying with legal provisions.
 - Order No. 10 as of 18.07.2024: concerning a possible infringement of Article 12 of the Competition Law by the Ministry of Finance, through Instruction No. 34 as of 18.12.2023, which restricted access of other suppliers to the natural gas supply market for public institutions in 2024.
 - An investigation was initiated ex officio regarding signs of infringement of Article 12 para. (1) letter b) of the Competition Law No. 183 as of 11.07.2012 by the National Agency for Public Health and the Ministry of Health, manifested through the provision of medical-sanitary services not provided by law on a competitive market during 2019–2024.

Unfair competition practices

Unfair competition practices

During the reporting period, the Competition Council focused on examining unfair competition practices, most frequently manifested through the denigration of competitors and confusion, which are prohibited acts under the competition legislation. In 2024, 13 investigations were ongoing, of which 1 was completed and 1 was suspended.

Summary of the completed investigation:

The case of "КРИСТИНА" А.О., "Невский кондитер" О.О.О. and "Azamet-Grup" LLC vs. "Bucuria" JSC

On 19.01.2022, the Competition Council received a complaint submitted on behalf of the undertakings "КРИСТИНА" А.О., "Невский кондитер" О.О.О. and "Azamet-Grup" LLC regarding alleged unfair competition practices committed by "Bucuria" JSC. According to the complaint, "Bucuria" JSC allegedly used, without authorization, the trademarks and packaging of the confectionery products "MU" and "PARKUR" previously used by the complainants, which would indicate infringements of Article 19 para. (1) letters a) and b) of the Competition Law.

Following the preliminary examination, by Order No. 03 as of 16.02.2022, the Competition Council initiated an investigation into the possible copying of the packaging and external appearance of the "MU" and "PARKUR" products manufactured by "Невский кондитер" О.О.О. and distributed in the Republic of Moldova by "Azamet-Grup" LLC, actions which could create confusion among consumers.

By [Decision No. CN-03/22-13 as of 07.06.2024](#), the Plenum of the Competition Council found that "Bucuria" JSC had infringed Article 19 para. (1) letter b) of the Competition Law, by copying the packaging of the products "Сливочная Му" and "ПАРКУР" and marketing them on the market (the investigation concerning letter a) was discontinued due to insufficient evidence).

For the established facts, "Bucuria" JSC was sanctioned with a fine amounting to 1,814,347.24 MDL.

During 2024, 11 complaints were registered concerning alleged unfair competition actions carried out by competing undertakings, of which one complaint formed the basis for initiating an investigation. Additionally, during the reporting year, two other complaints received in 2023 were examined, both of which were dismissed by decisions of the Plenum of the Competition Council ([Decision No. CN-01 as of 09.01.2024](#) and [Decision No. CN-04 as of 23.02.2024](#)).

Unfair commercial practices

In 2024, the Competition Council established the Unfair Commercial Practices Department, a specialized subdivision responsible for implementing and monitoring compliance with legislation on unfair commercial practices.

During the reporting period, the Department did not register any cases of unfair trading practices committed by buyers in relation to suppliers of agricultural or food products. The absence of cases examined regarding unfair trading practices mainly reflects the lack of complaints filed by suppliers. At the same time, this situation is also caused by the existing deficiencies in the current legal framework, which limit the effectiveness of interventions in this field.

Additionally, upon its establishment, the Unfair Commercial Practices Department took over the market inquiry initiated by Order No. 02 as of 30.01.2024 regarding the business-to-business supply market for agricultural and food products. The aim of the study is to identify bottlenecks and dysfunctions in the relationships between producers and retailers, including those related to access to retail networks. During the research, a significant reluctance from suppliers to provide relevant

information regarding possible unfair practices was noted. The study is expected to be completed in 2025.

II. MERGER CONTROL

To prevent the emergence of significant impediments to competition, one of the primary objectives of the Competition Council is the control of economic concentrations, particularly in cases where such concentrations may lead to the creation or strengthening of a dominant position. In 2024, the Council reviewed 14 complete merger notifications. Of these:

- 6 operations were authorized in Phase I (with no competition concerns identified);
- 1 operation was authorized in Phase II (following an in-depth analysis of the concentration's impact on the competitive environment and with commitments undertaken by the undertaking for a 3-year period);
- 3 transactions were classified as falling outside the scope of the Competition Law;
- 4 notifications were under evaluation at the end of 2024 and were to be finalized in 2025.

Summary of the most significant notified/authorized mergers

1. Acquisition of sole control over “Peon – Farm” LLC by “Birivofarm” LLC

The Competition Council authorized, through Decision No. DCE-21/23-03 as of 14.02.2024, the acquisition of sole control over “Peon – Farm” LLC by “Birivofarm” LLC. The assessment focused on the retail markets of pharmaceutical and para-pharmaceutical products, identifying risks of competition restriction due to overlaps and vertical integration. The transaction was conditionally authorized (see [Decision No. DCE-21/23-03 as of 14.02.2024](#)), with a set of commitments undertaken by “Birivofarm” LLC for a period of three years.

2. Acquisition of control over “Vistarcom” LLC and “Cviza-M” LLC by “Imensitate” LLC

The Competition Council authorized, by [Decision No. DCE-28 as of 16.09.2024](#), the acquisition of sole control over “Vistarcom” LLC (operating under the brand “Green Hills”) and “Cviza-M” LLC by “Imensitate” LLC, owner of the retail chains “BONUS,” “Local DISCOUNTER,” “Local,” “KVARTAL,” and “1 PRIMUL discounter.”

The assessment focused on the procurement and retail markets for food and non-food products, identifying horizontal overlaps and vertical integration in the supply chain. Market share assessments and concentration indices indicated that the transaction would not significantly affect competition and was declared compatible with the competitive environment.

3. Acquisition of sole control over “DiNova” LLC by “Slavena Lux” LLC

“Slavena Lux” LLC notified the Competition Council of its intention to acquire sole control over “DiNova” LLC through the full acquisition of its share capital. Both companies operate in the wholesale distribution of food products and import raw materials and finished goods, supplying them to retail chains in Moldova.

The competitive assessment covered various relevant markets: dairy products, cheese, canned goods (tuna, pineapple), confectionery, mayonnaise, sauces, and ketchup – at the national level. As a result of the evaluation, by [Decision No. DCE-33 as of 10.10.2024](#), the notified merger was declared compatible with the competitive environment.

4. Acquisition of control over assets previously held by “Dafnacom” LLC by “Honest Company” LLC

“Honest Company” LLC, operating stores under the brand “Merci Gastronome,” notified the

acquisition of control over assets previously used by “Dafnacom” LLC, including the business assets of the “Mirra” store located at 10 Costiujeni Street, Codru town. The transaction included equipment, movable assets, commercial goodwill, and rights related to the lease contract. The Council assessed the transaction from the perspective of the retail food market, particularly small shops under 250 m² near the sales point.

By [Decision No. DCE-12 as of 07.06.2024](#), the transaction was declared compatible with the competitive environment.

5. Acquisition of control over “Diamedix Impex” JSC (Romania) and “Diamedix Impex” LLC (Moldova) by “EMMA ZETA LIMITED” LLC

Through [Decision No. DCE-03 as of 24.01.2024](#), the Competition Council authorized the acquisition of control over “Diamedix Impex” JSC (Romania) and indirectly over “Diamedix Impex” LLC (Moldova) by EMMA ZETA LIMITED, part of the EMMA CAPITAL group.

The group is already active in Moldova’s electricity sector via Premier Energy. “Diamedix Impex” supplies medical diagnostic solutions, offering over 8,000 products to hospitals, clinics, and laboratories in Eastern Europe, including through its Moldovan subsidiary.

The assessment focused on the electricity supply and distribution market and the medical device market. The analysis showed that the transaction would not negatively affect competition or lead to the creation or strengthening of a dominant position in the relevant markets.

6. Acquisition of control over “Hansa-M” LLC by “Numina” LLC

The Competition Council authorized, through [Decision No. 22 as of 17.07.2024](#), the acquisition of control over “Hansa-M” LLC by “Numina” LLC “Hansa-M” operates in the household appliances sector, while “Numina” LLC is active in hardware, furniture services, and household appliances.

The assessment targeted wholesale and retail markets for certain appliance categories (range hoods, stoves, refrigerators, ovens, dishwashers, microwaves). The analysis revealed no risk of dominant position consolidation, and the transaction was declared compatible with the competitive environment.

7. Acquisition of control over “Proaspăt Prod” LLC by “Produse de Familie” LLC

“Produse de Familie” LLC notified the Competition Council of the acquisition of control over “Proaspăt Prod” LLC, active in meat and meat products production and wholesale, including sausages.

During the assessment, indications emerged that both undertakings belonged to the same group, being controlled by the same individuals. Initially, the notifier denied such control ties. Later, the investigation confirmed structural links through associated or affiliated persons.

The Council concluded that the transaction constituted an internal restructuring under Article 21 letter c) of the Competition Law and did not require authorization. However, it found a breach of Article 68 para. (1) letter b) of the same law, due to inaccurate, incomplete, or misleading information in the notification form.

As a result, by the [Decision No. DCE-18/23-37 as of 27.12.2024](#), “Produse de Familie” LLC was sanctioned with a fine amounting to 526,974.69 MDL.

Cases of unnotified economic concentrations

During the year 2024, the Competition Council continued actively monitoring the market to identify potential infringements of Articles 20 and 22 para. (1) of the Competition Law, initiating 4 ex officio investigations regarding presumed unnotified economic concentration operations. The investigations targeted the acquisition of assets (fuel stations and related assets) from “Tirex Petrol” JSC by several economic operators active in the retail distribution of petroleum products and liquefied gas.

III. ENSURING COMPLIANCE WITH THE LAW ON STATE AID

State aid policy plays an essential role within competition policy, having a direct impact on how the state interacts with the market and influences the economic structure. State interventions in the economy, in the form of state aid, can distort free competition by favoring certain undertakings or sectors to the detriment of others. Therefore, it is important that such support measures are properly regulated to prevent situations where the aid granted is not economically justified or creates an artificial advantage that affects competition.

Continuous monitoring of state aid is essential to ensure that it is granted correctly and transparently, without disturbing the market balance or jeopardizing healthy competition between undertakings. Such monitoring allows authorities to promptly identify any form of state aid that could lead to distortion of competition and to intervene where necessary.

The Competition Council, as the responsible authority, plays the role of ensuring the application and compliance with state aid legislation by all involved parties. It supervises both the public authorities granting state aid and the undertakings receiving it, ensuring that all actions comply with legal regulations and do not lead to anticompetitive practices. In this respect, the competition authority ensures a uniform and fair application of the regulations, thus protecting market interests and contributing to maintaining a healthy competitive environment.

Notification and authorization of State Aid

As of 2024, 13 decisions were issued regarding notified support measures, of which 11 were authorization decisions and 2 were determinations that the notified support measures did not constitute state aid. In the case of 2 notified support measures, the initiation of the examination procedure provided for in Article 10 para. (2) letter c) of the Law on State Aid was ordered. Additionally, during the reporting period, 27 state aid authorization/conditional authorization decisions were monitored.

The authorized state aid measures were granted in the form of price reductions for supplied goods and services, subsidies, grants, free transfer of fixed assets, exemptions from rent and fee payments, guarantees under preferential conditions, foregone revenues, etc.

A brief description of some of the examined support measures (authorized/considered not to constitute state aid) is provided below.

1. Notification of the support measure granted through the State Aid Scheme related to the provision of subsidies to municipal theatrical and concert institutions from the local budget of the Chisinau municipality by the Chisinau Municipal Council

The notified support measure involves granting subsidies to municipal theatrical and concert institutions by the Chisinau Municipal Council. The beneficiaries of the notified support measure are public theatrical and concert institutions in Chisinau municipality established by the CMC, in agreement with the Ministry of Culture, pursuant to Article 11 para. (2) of Law No. 1421/2002 on theatres, circuses, and concert organizations. Following the examination of the support measure, by [Decision No. ASER-15 as of 21.06.2024](#), it was determined that the support measure granted by the Chisinau Municipal Council constitutes state aid within the meaning of Article 3 of the Law on State Aid.

- Granting period: 2022–2025
- Form of granting: subsidies

- Estimated budget: 154,436.7 thousand MDL
 - Objective: sectoral state aid for culture and heritage conservation
 - Notification examination period: 40 days
2. **Notification of the Regional State Aid Scheme for enterprises in free economic zones in the Republic of Moldova by the Ministry of Economic Development and Digitalization**

The scheme was developed to align existing state aid schemes established under Law No. 440/2001 on free economic zones, in line with the commitment undertaken by the Republic of Moldova through the Association Agreement with the European Union, ratified by Law No. 112/2014.

The notified support measure consists of applying exemptions from income tax at rates of 25%, 50%, and 100%, in accordance with Article 49 of the Fiscal Code, from the rate set in Article 15 letter b) of the Fiscal Code. By [Decision No. ASER-27 as of 02.09.2024](#), it was determined that the support measure notified by the Ministry of Economic Development and Digitalization, granted in the form of income tax exemptions for residents of free economic zones through the Regional State Aid Scheme, constitutes state aid within the meaning of Article 3 para. (1) of the Law on State Aid.

- Granting period: 27.12.2024–01.07.2034
 - Form of granting: exemptions and/or reductions from taxes, duties, and other mandatory payments
 - Estimated budget: 2,000 thousand MDL
 - Objective: regional development state aid
 - Notification examination period: 10 days
3. **Simplified notification received from the Customs Service regarding the extension of the granting period for the support measure under the State Aid Scheme for VAT exemption pursuant to Article 103 para. (1) point 31 of the Fiscal Code**

The Competition Council examined the simplified notification received from the Customs Service concerning the extension of the granting period for the support measure under the State Aid Scheme for VAT exemption pursuant to Article 103 para. (1) point 31 of the Fiscal Code, previously authorized by the Decision of the Plenum of Competition Council No. ASS-21 as of 21.04.2016. By [Decision No. ASER-31 as of 04.10.2024](#), the Competition Council authorized the notified state aid.

- Granting period: 01.01.2020–01.01.2026
 - Form of granting: exemptions and/or reductions from taxes, duties, and other mandatory payments
 - Estimated budget: 4,320 thousand lei
 - Objective: SGEI (Services of General Economic Interest)
 - Notification examination period: 10 days
4. **Notification received from the National Employment Agency regarding support measures granted to enterprises in the form of subsidies, based on Articles 33, 34, 36, 38, 39, 40 of Law No. 105 as of 14.06.2018 on the promotion of employment and unemployment insurance**

By [Decision No. ASR-16 as of 28.06.2024](#), the Competition Council determined that the support

measures provided in Articles 33, 34, 36, 38, 39, and 40 of Law No. 105 as of 14.06.2018 on the promotion of employment and unemployment insurance, notified by the National Employment Agency, constitute state aid within the meaning of Article 3 of the Law on State Aid and are compatible with a normal competitive environment.

- Granting period: 2023–2026
- Form of granting: subsidies
- Estimated budget: 133,652.7 thousand lei
- Objective: employee training and creation of new jobs
- Notification examination period: 35 working days

5. Notification received from the Chisinau Municipal Council regarding the granting of support measures to the Municipal Enterprise "Regia Autosalubritate" in the form of budgetary allocations, subsidies and annual exemptions from the payment for the lease of fixed assets.

The Competition Council examined the notification received from the Chisinau Municipal Council regarding the granting of support measures in the form of budgetary allocations, subsidies and annual exemptions from the payment for the lease of fixed assets owned by the municipality and used by the Municipal Enterprise "Regia Autosalubritate". The state aid granted to "Regia Autosalubritate" is necessary for the provision of the service of transporting and storing household waste in Chişinău municipality and its suburban localities and will not unduly distort competition. By [Decision No. ASR-21 as of 17.07.2024](#), it was found that the notified support measures constitute state aid within the meaning of Article 3 of the Law on State Aid and are compatible with the normal competitive environment.

- Granting period: 2022–2026
- Form of granting: subsidies, budgetary allocations, annual exemptions from the payment for the lease of fixed assets owned by the municipality and used by the undertaking
- Estimated budget: 23,531.9 thousand lei
- Objective: services of general economic interest
- Notification examination period: 44 working days

6. Notification received from the Ministry of Energy regarding support measures granted under Article 34 of Law No. 10 as of 26.02.2016 on the promotion of energy from renewable sources to large and small eligible producers of renewable energy

By [Decision of the Plenum of the Competition Council No. EMAS-30 as of 30.09.2024](#), it was found that the support measures granted under Article 34 of Law No. 10/2016 on the promotion of the use of energy from renewable sources to large and small eligible producers of renewable energy constitute state aid within the meaning of Article 3 of the Law on State Aid, which is compatible with the normal competitive environment.

- Granting period: 2025–2040
- Form of state aid: budgetary allocations
- Estimated budget: 31,063,748.4 thousand lei

- Objective: aid for environmental protection
 - Notification examination period: 41 working days
- 7. Notification received from the Chisinau Municipal Council regarding support measures granted to the Municipal Enterprise "Parcul Urban de Autobuze" for the provision of public passenger transport services in Chisinau municipality**

By [Decision of the Plenum of the Competition Council No. EMAS-34 as of 10.10.2024](#), it was found that the support measures granted to the Municipal Enterprise "PUA" in the form of budgetary allocations for the increase of statutory capital, exemption from the payment of taxes for passenger transport, exemption from the payment of value added tax and customs duties, and exemption from the payment for the lease of fixed assets granted under economic management, for the provision of public transport services, constitute state aid within the meaning of Article 3 of the Law on State Aid, which is compatible with the normal competitive environment.

- Granting period: 2023–2025
 - Form of state aid: budgetary allocations, exemption from the payment of taxes for passenger transport, annual exemptions from the payment for the lease of fixed assets, as well as exemptions from the payment of customs duties and value added tax on the import of used buses
 - Estimated budget: 36,542.2 thousand lei
 - Objective: aid granted to beneficiaries providing services of general economic interest
 - Notification examination period: 42 working days
- 8. Notification received from the General Directorate of Finance of the Executive Committee of the ATU Gagauzia regarding budgetary allocations granted to the State Enterprise Periodical Publication – Newspaper "Вести Гагаузии" for the publication of the official bulletin "Ekspres-Kanon"**

Following the examination of the notification, by [Decision No. ASO-05 as of 22.03.2024](#), it was found that the support measure, in the form of annual budgetary allocations granted by the General Directorate of Finance of the Executive Committee of the ATU Gagauzia during the period 2020–2024 to the State Enterprise Periodical Publication – Newspaper "Вести Гагаузии" and subsequently to the Public Institution News Agency "Ekspres-Kanon", constitutes state aid within the meaning of Article 3 of the Law on State Aid, which is compatible with the normal competitive environment. Likewise, the support measure granted by the Comrat Municipal City Hall during the period 2020–2023, in the form of exemption from the payment for the lease of premises owned by the City Hall and used by the State Enterprise Periodical Publication – Newspaper "Вести Гагаузии" and subsequently by the Public Institution News Agency "Ekspres-Kanon", constitutes state aid within the meaning of Article 3 of the Law on State Aid, which is compatible with the normal competitive environment.

- Granting period: 2020–2024
- Form of state aid: price reductions for supplied goods and services, including the sale of movable and immovable property below market price
- Value of state aid: 5,266.1 thousand lei
- Objective: sectoral aid depending on the sectors of activity of the national economy

- Notification examination period: 42 working days

9. Notification received from the National Agency for Research and Development regarding the State Aid Scheme granted for innovation projects, technology transfer and innovation vouchers

The Competition Council examined the notification received from the National Agency for Research and Development regarding the state aid scheme granted for innovation projects, technology transfer and innovation vouchers. Following the examination of the notification, by [Decision No. ASO-09 as of 10.05.2024](#), it was found that the support measure notified by the National Agency for Research and Development concerning public funding of innovation projects, technology transfer and innovation vouchers for research and innovation organizations engaged in economic activity, as well as for partner undertakings, constitutes state aid within the meaning of Article 3 of the Law on State Aid and is compatible with the normal competitive environment. As a result, the state aid scheme for research, development and innovation was authorized for the period 2024–2025, providing for the financing of technology transfer projects, innovation projects, and innovation voucher projects.

- Granting period: 2024–2025
- Form of state aid: budgetary allocations
- Value of state aid: 16,774.3 thousand lei
- Objective: aid for research, development and innovation
- Notification examination period: 44 working days

10. Notification received from the Organization for Entrepreneurship Development regarding the support measure granted under the Investment Stimulation Program "373" approved by Government Decision No. 351/2023

The Competition Council examined the notification from the Public Institution Organization for Entrepreneurship Development regarding the Investment Stimulation Program "373". The Plenum of the Competition Council, by [Decision No. ASO-24 as of 15.08.2024](#), found that the notified support measure concerning the partial compensation of the interest rate on investment loans offered by banks constitutes state aid within the meaning of Article 3 of the Law on State Aid and is compatible with the normal competitive environment.

- Granting period: 2024–2031
- Form of state aid: provision of loans on preferential terms
- Value of state aid: 404,081 thousand lei
- Objective: aid granted to small and medium-sized enterprises
- Notification examination period: 30 working days

11. Notification received from the City Hall of Rezina regarding the transfer of tangible assets and subsidies under economic management

The Competition Council examined the notification received from the City Hall of Rezina regarding the transfer of tangible assets and subsidies under economic management. The state aid granted to the Municipal Enterprise "Servicii Comunal Locative Rezina" is necessary for the uninterrupted operation of the public service for potable water supply and wastewater disposal and will not unduly distort competition. By [Decision No. OTN-20 as of 03.07.2024](#), it was found that the notified support

measure constitutes state aid within the meaning of Article 3 of the Law on State Aid and is compatible with the normal competitive environment.

[Examination procedure under Article 10 of the Law on State Aid](#)

During the reporting period, the Competition Council finalized 2 in-depth assessments and initiated 2 others under the examination procedure provided for in Article 10 para. (2) letter c) of the Law on State Aid, involving the detailed analysis of notified state aid measures.

• Notification received from the Criuleni District Council regarding the granting of support measures to the Municipal Enterprise "Edilitate Criuleni"

Following the examination of the submitted information, the Plenum of the Competition Council, by Order No. 11 as of 07.08.2024, ordered the initiation of the examination procedure under Article 10 para. (2) letter c) of the Law on State Aid concerning the support measures granted to the Municipal Enterprise "Edilitate Criuleni", consisting of the free-of-charge transfer into economic management (with entry into the balance sheet) by the Criuleni District Council of the "Photovoltaic Park" facility in Criuleni city, Orhei street, as well as exemption from the payment of rent for the use of the public land on which the "Photovoltaic Park" facility is located, which raises doubts regarding compatibility with the normal competitive environment.

• Notification received from the Public Property Agency regarding support measures granted under items 1 and 2 subitem 3) of Government Decision No. 380/2021 on the allocation of financial means and conclusion of a large-scale transaction

Following the examination of the submitted information, the Plenum of the Competition Council, by Order No. 17 as of 04.10.2024, ordered the initiation of the examination procedure under Article 10 para. (2) letter c) of the Law on State Aid concerning alleged doubts regarding the compatibility of the support measures granted under items 1 and 2 subitem 3) of Government Decision No. 380/2021 on the allocation of financial means and conclusion of a large-scale transaction, to JSC "Energocom" and JSC "Termoelectrica" by the Public Property Agency, with the normal competitive environment.

• Brief description of procedures under Article 10 para. (2) letter c) of Law No. 139/2012 on State Aid

On 28.06.2024, the procedure initiated by Order No. 23 of the Plenum of the Competition Council as of 28.11.2023 was completed, regarding the notification from the Customs Service concerning support measures granted under point 7 of the general rules for the application of customs duty provided in the Law on the Approval of the Combined Nomenclature of Goods No. 172/2014. By [Decision No. ASO-23/23-17 as of 28.06.2024](#), it was found that the support measure notified by the Customs Service does not constitute state aid within the meaning of Article 3 of the Law on State Aid.

The Competition Council completed the procedure initiated by Order No. 28 of the Plenum of the Competition Council as of 29.12.2023 regarding the support measures notified by the Customs Service under Article 126 para. (31) of the Customs Code No. 1149/2000 and point 4 of Government Decision No. 146/2014 for the approval of the Regulation on the procedure for extending the payment period of value added tax and customs duty, for the duration of the production cycle, but not exceeding 180 days, for raw materials, materials, accessories, primary packaging and complementary articles imported.

By [Decision No. ASS-28/23-23 as of 07.08.2024](#), the Plenum of the Competition Council found that the notified support measures do not constitute state aid within the meaning of Article 3 of the Law on

Reporting of State Aid

In 2024, in accordance with the provisions of the Law on State Aid, the Competition Council prepared the eleventh Report on the state aid granted in the Republic of Moldova, based on the information submitted by state aid and de minimis aid grantors (central and local public authorities, etc.) through the automated information system “State Aid Register”.

The report includes an analysis of the state aid reported in 2023, as well as of de minimis aid, support measures granted for the provision of services of general economic interest, and aid intended to compensate for damage caused by natural disasters or other exceptional circumstances.

The document serves as a statistical tool to ensure transparency in the field of state aid and provides relevant information for public authorities for the development of policies in various sectors of the national economy and decision-making regarding the efficient allocation of public resources. Moreover, the report can serve as an informational basis for scientific research.

The report was approved by [Decision of the Plenum of the Competition Council No. ASER-40 as of 30.12.2024](#) and submitted to the Parliament and the Government of the Republic of Moldova.

According to Article 50(2) of Law No. 62/2022 on Advertising, the Competition Council presents, in a separate chapter of its annual activity report, the following information regarding the monitoring of compliance with the advertising legislation: a general overview of the advertising market, relevant data regarding the advertising market, including its volume, actions undertaken or to be undertaken to ensure compliance with the advertising legislation, the impact of such actions on the state of the advertising market, and other relevant information for monitoring compliance with the advertising legislation.

General overview of the advertising market 2024

The advertising market in the Republic of Moldova has been significantly affected by recent economic challenges, driven by factors such as the pandemic and regional instability. Several enterprises from various industries have resumed investments in advertising to attract customers and promote their products or services.

This trend has contributed to the revitalization of the advertising market, boosting the revenues of advertising agencies compared to previous years. In turn, advertising agencies responded to these changes by revising marketing strategies, diversifying their service portfolios, and redirecting funds.

The main advertising dissemination channels used by advertising agencies and providers continue to be both traditional media and digital platforms, as follows:

- **Television.** Television remains one of the main advertising channels in the Republic of Moldova, especially for major brands and national campaigns.
- **Radio.** Although less in demand than TV stations, radio stations remain effective for local and regional advertising, as well as for companies targeting audiences who consume media on the move (e.g., in traffic).
- **Online platforms.** Interest in digital advertising grew significantly throughout 2024. This type of advertising includes graphic banners and videos placed on websites, platforms, and software applications, social media promotion, influencer marketing, etc. As of March of the reporting year, it also includes advertising on the YouTube platform. The resumption of advertising on YouTube in March 2024 generated both enthusiasm and concern among advertising market players.
- **Outdoor advertising.** Outdoor advertising (i.e., advertising displayed on billboards, transport vehicles, buildings, or through digital boards, etc.) continues to be primarily used in Chisinau municipality and major cities, and to a lesser extent in rural areas.
- **Printed publications.** Print media was not neglected in 2024, despite its diminishing influence compared to digital advertising in recent years.

Relevant data on the advertising market. Market volume

According to information from the National Bureau of Statistics for 2023, out of 703 active entities under CAEM code 7311, only 499 reported revenues from advertising activities. Moreover, of the 499 companies, only 203 achieved revenues exceeding 1 million lei.

The information presented in this report is based on the responses received by the Competition Council following requests sent to companies that, in 2023, recorded sales revenues exceeding 1 million lei. It

is important to note that some of the targeted companies did not submit the requested information within the established deadline for report preparation. Consequently, the data included in this report is not exhaustive, and a comprehensive study was not possible under the conditions stipulated by the Law on Advertising. Therefore, the data collected by the Competition Council may differ from those included in various market studies conducted by companies or specialized institutions that used different methodologies.

The table below, strictly compiled based on the information submitted to the Competition Council by the companies, includes data on the volume of the advertising market (registered in 2024) by different market segments, categorized by advertising dissemination channels:

Table no. 1. Volume of the advertising market registered in 2024 by category of disseminators

Nr.	Year	2024
	Type of advertising	Sales revenue (MDL)
1	TV	209 432 294
2	Radio	39 496 201
3	Online	337 015 782
4	Outdoor	118 629 293
5	Print/Newspapers/Magazines	38 872 031

It is worth mentioning that the table above presents only a partial view of the advertising market volume. Given the sector's complexity, actual market estimates are significantly higher and not limited to revenues from TV, radio, online, outdoor, and print advertising.

Specific challenges in the TV advertising market and the development of online advertising

Media service providers in Moldova have reported several challenges stemming from the rapid expansion of digital platforms, especially social media such as TikTok, Instagram, and Facebook.

These platforms offer highly targeted marketing options and are increasingly attracting advertising budgets that were previously allocated to traditional television. This trend raises concerns about fair competition: digital platforms operating in Moldova's advertising market are not subject to the same legal obligations as traditional television providers, creating an uneven playing field.

The consequences are significant — declining advertising revenues threaten the economic sustainability of television broadcasters, who also face increased costs to adapt content for multi-platform delivery. As a result, TV stations are simultaneously grappling with declining viewership, reduced advertising demand, and higher production costs, all of which impair their competitiveness against digital advertising channels.

Future actions to be taken

A key strategic action is to strengthen the capacity of the Competition Council to detect and investigate potential anticompetitive practices in the advertising market. This task falls under the Council's core responsibilities and represents a crucial intervention tool for ensuring fair market operation, especially given that the Council does not hold regulatory powers in this sector.

Investigations and interventions based on competition law can more effectively address market imbalances and discourage abusive or discriminatory behavior by certain market players.

At the same time, it is necessary to eliminate the provisions of Article 50 of Law No. 62/2022 on Advertising, which require the Competition Council to produce an annual report on the advertising market. This type of complex structural analysis is outside the Council's core mandate and demands significant resources that are not efficiently justified.

Moreover, under the current legal and institutional framework, it is impossible to ensure a complete, rigorous, and relevant analysis across all market segments within the short timeframe mandated. Instead, large-scale market studies should be conducted, when needed, by specialized companies with the required methodologies, expertise, and resources.

The Competition Council could carry out such analyses periodically, every few years, to identify major structural changes and developments in the sector. The authority should focus on analyzing anticompetitive behavior based on relevant data, rather than preparing general annual market reports that may present a partial or misleading picture if not adequately substantiated. Eliminating this reporting obligation would allow for more efficient resource management and a stronger focus on the authority's core mission — tackling anticompetitive practices.

V. OUTCOMES OF COURT PROCEEDINGS AND ADVISORY ACTIVITY

Outcomes of court proceedings

In 2024, a total of 86 cases were pending before the courts, including 67 administrative litigation cases, 3 civil cases, 6 insolvency cases, 8 contravention cases, and 2 criminal cases. Accordingly, approximately 78% of all pending cases were administrative litigation cases, involving orders, decisions of the Plenum of the Competition Council, inspection orders, and inspection reports drawn up by the Competition Council, as well as other administrative acts issued by the competition authority or other public authorities.

To represent the interests of the Competition Council in court, its representatives participated in 193 court hearings in 2024.

As a result of court proceedings concerning the Competition Council's cases in 2024, 13 cases were completed. Of these, 7 administrative litigation cases where the Competition Council was the defendant, 3 administrative or civil cases where the Council was a third party or plaintiff, and 3 contravention cases were completed with the confirmation of the sanctioning agent's proposal. The average duration for finalizing these 13 cases was approximately 27 months (2 years and 3 months), with the longest lasting 54 months (4 years and 8 months), concerning the assessment of a horizontal anticompetitive agreement in the form of bid rigging in procurement procedures. The shortest duration was 2 months for a case concerning the challenge of an administrative operation.

In 2024, the courts irrevocably upheld the legality of 7 administrative acts issued by the Plenum of the Competition Council and confirmed the correctness of fines imposed by 4 administrative acts of the Plenum of the Competition Council amounting to 1,031,049.19 MDL. Accordingly, the rate of upholding the administrative acts of the Plenum of the Competition Council by the courts in 2024 was 100% of the 7 completed cases.

Below are the most relevant cases concerning the judicial practice in exercising legality control over the decisions of the Plenum of the Competition Council regarding findings of infringements of the Competition Law and other administrative acts issued by the Competition Council.

- **The case of “Lesobaza” JSC and “Sistembloc-Construct” LLC regarding the failure to notify an economic concentration**

By Decision No. DCE-10/18-10 as of 17.03.2020, the Competition Council found that the economic concentration between “Lesobaza” JSC and “Sistembloc-Construct” LLC was implemented without prior notification, violating Articles 20(1) and 22(1) of the Competition Law. The individual shareholder of “Sistembloc-Construct” LLC acquired control over “Lesobaza” JSC, including by renaming it “Materiale Forestiere de Construcții” JSC. A fine of 205,033.45 lei was imposed.

The transaction was later declared compatible with the competitive environment, as it did not raise significant concerns on the coal and cement markets in Balti. The decision of Competition Council was challenged, but the Chisinau Court, Riscani office, confirmed that the legal notification thresholds had been met and the obligation to notify rested with the shareholder of “Sistembloc-Construct” LLC. The request for annulment was rejected, and the Competition Council's decision upheld.

- **The case of "GBG-MLD" LLC v. the Competition Council concerning the conduct of an inspection at the company's premises**

By means of a statement of claim, "GBG-MLD" LLC requested the annulment of the order issued by

the Competition Council on 11.04.2024 concerning the conduct of an inspection at the claimant's premises, during a period when the investigation of the Competition Council was still ongoing and had not been concluded by adopting a decision on the investigated case.

The court of first instance declared the action of "GBG-MLD" LLC inadmissible based on Article 207, para. (2), letter e), of Administrative Code No. 116/2018, and the appellate court upheld the solution of the first instance.

In substantiating their decisions, the courts noted that the Inspection Order did not contain enforceable provisions addressed to the undertaking at which the inspection was conducted. The inclusion in the order of obligations to cooperate and the legal responsibilities/sanctions does not constitute enforceable provisions established individually for "GBG-MLD" LLC, as these are general and mandatory under the Competition Law for all entities subject to control by the Competition Council. Thus, the inspection order of the Competition Council does not meet the mandatory elements of an individual administrative act subject to administrative litigation and instead constitutes an administrative operation that can only be challenged together with the final decision of the investigation, which is why the judge declared the action inadmissible.

Furthermore, the courts concluded that the arguments based on Article 47 para. (1) of the Competition Law could not be upheld, as the inspection order cannot be challenged separately. According to Article 15 para. (1) of the Administrative Code, only enforceable administrative operations or those directed against a third party may be challenged separately.

It is worth mentioning that, for the first time in the Competition Council's practice, judicial review of the legality of an inspection order contested during the ongoing investigation took place. This concluded in favour of the Competition Council, through the decision of the Chisinau Court of Appeal dated 09.09.2024, which is final and irrevocable.

- **The case of "Liftmontaj" LLC v. the Competition Council regarding the imposition of coercive penalties for denying access to conduct inspections**

By Decision No. 10 as of 07.03.2019, the Competition Council imposed coercive penalties amounting to 501,788.10 lei on "Liftmontaj" LLC for failing to comply with Decision No. 15 as of 26.03.2018, which required the company to grant access to the authority's inspectors at its premises during the period from 28.03.2018 to 24.01.2019. The penalties were calculated at 1661.55 MDL for each day of delay in granting access, in accordance with Article 68 para. (1) letter d) and Article 76 of the Competition Law.

"Liftmontaj" LLC challenged Decision No. 10 as of 07.03.2019 in court, seeking its annulment. The courts of first instance and appeal ruled in favour of the Competition Council, dismissing the action. The court did not uphold the company's argument that the public authority had unjustifiably imposed coercive penalties for denying access to information relevant to the inspection's purpose and object, especially given that the authority had only visited the premises once in ten months. According to Article 76 of the Competition Law, refusal to submit to an inspection ordered under Article 56 constitutes grounds for imposing a penalty. In this case, the evidence demonstrated that Competition Council staff visited the premises of "Liftmontaj" LLC repeatedly, but access was not granted. The law does not require a predetermined frequency of visits, and this aspect cannot justify failure to comply with the obligation.

Consequently, the courts deemed the penalty decision lawful and well-founded. Regarding the alleged infringement of the right to defence due to the absence of a lawyer or interpreter at the time of

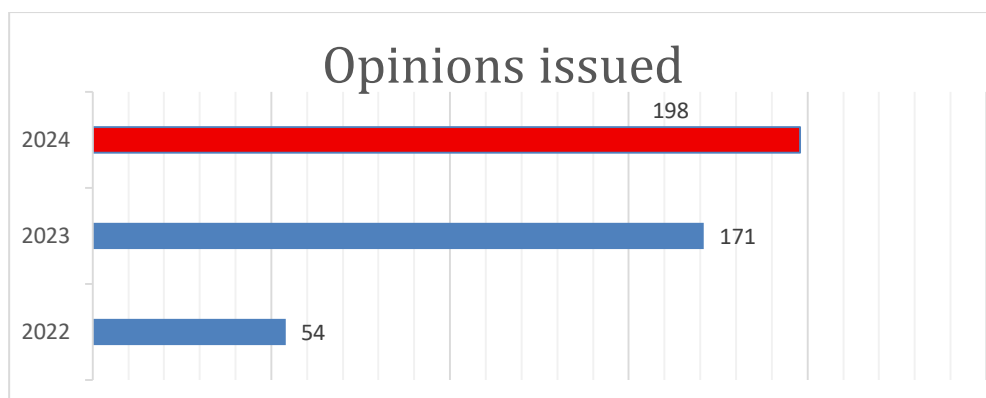
inspection, the appellate court rejected the argument as unfounded. It was established that the company refused to provide the requested information even though it understood the purpose of the inspection. Furthermore, the law does not require the presence of a lawyer at that time, as legal assistance could be provided subsequently. Therefore, no breach of the right to defence was found.

"Liftmontaj" LLC did not file an appeal against the appellate court's decision as of 21.10.2023. Accordingly, it should be noted that the courts confirmed the legality of imposing coercive penalties for obstructing the inspection, which exceeded by far the amount of the fine imposed through the Competition Council's decision establishing the obstruction of the inspection at the company's premises.

Advisory activity

The advisory activity exercised by the Competition Council on draft normative acts regulating economic activity aims to prevent the adoption of legal provisions that may have the effect of restricting, hindering, or distorting competition. In order to assess the regulatory impact on the competitive environment, the Competition Council issued 198 opinions throughout 2024 on 131 draft normative acts submitted for review. Through 133 of these opinions, the Plenum of the Competition Council submitted proposals and recommendations to ensure compliance with competition legislation, 45 of which concerned draft acts related to the field of state aid.

Subsequently, in order to ensure transparency in the advisory activity on draft normative acts, the Competition Council publishes its opinions on its [official website](#).



Competition advocacy in society

Strengthening competition culture in the Republic of Moldova remains a core mission of the Competition Council, through the promotion of compliance with the principles of a free and fair market. In 2024, the authority maintained open communication with the media, economic operators, civil society, and the general public, including by launching an improved version of the website www.competition.md, featuring new sections and reorganized content to facilitate easier navigation.

Throughout the year, approximately 110 press releases and announcements concerning the institution's activity were published, and its presence on social media platforms (Facebook and LinkedIn) was enhanced through over 160 posts — including infographics, explanatory messages, public consultations, etc. Two thematic online campaigns on competition legislation reached around 30,000 people.

Dialogue with the press included two press conferences and one informal meeting with economic journalists, during which the institution's priorities were discussed. The President of the Competition Council was a guest on relevant radio and television programmes, and more than 400 media articles were published on the authority's activities.

At the same time, direct promotion of competition culture continued through the organization of over 60 advocacy events in Chisinau and across the regions, attended by approximately 900 participants — representatives of the business environment and public authorities.

Also in 2024, the Institution's Communication Plan was developed — a key document that will guide our efforts in public information, awareness-raising, and dialogue in the coming years.

Ensuring transparency and access to information

Throughout 2024, the Competition Council responded to 18 requests for access to official information. The requests were submitted in writing by representatives of the media, individuals, and non-profit organizations.

The main topics of interest concerned areas within the institution's scope of competence, including public procurement, budget information, details on the professional background, education, remuneration, and business trips of the Competition Council staff, as well as information on the authority's decisions, orders, and internal acts. The Competition Council provided all the requested information, with an average response time of 10 days.

During the reporting period, 388 pieces of information were published on the official website of the Competition Council in order to ensure transparency of its activities.

This figure reflects the openness and transparency of the Competition Council's work towards civil society and media sources.

International Cooperation

The Competition Council of the Republic of Moldova actively cooperates within an extensive international network, participating in global and regional initiatives aimed at strengthening competition policy. In 2024, the authority intensified its bilateral relations with counterpart institutions from other countries, facilitating the exchange of experience through conferences, seminars,

roundtables, and working groups. These interactions contribute to the adoption of international best practices and their adaptation to national realities, ensuring a more transparent and predictable competitive environment. Active collaboration with leading organizations – such as the International Competition Network (ICN), OECD, WTO, UNCTAD, and the World Bank Group – has reinforced the institution’s international profile. Privileged relationships with competition authorities from other countries supported the process of harmonizing standards and institutional modernization.

Throughout 2024, the Competition Council undertook a series of actions aimed at promoting the institution’s image by developing and diversifying collaboration and cooperation both within the above-mentioned organizations and with peer authorities from other countries, as follows:

Competition Council of Romania

A central pillar of the Competition Council’s international relations is its solid and long-standing partnership with the Competition Council of Romania.

This strategic cooperation has consistently been based on the generous support and expertise of the Romanian authority, significantly contributing to the institutional capacity-building of the Competition Council of the Republic of Moldova. Over the years, the Competition Council of Romania has provided legal expertise, experience exchange, and assistance in analyzing sensitive economic sectors, as well as support in organizing study visits and workshops.

A key milestone in 2024 was the launch of the TWINNING project: “Strengthening the institutional capacities of the Competition Council for the implementation of competition and state aid policies in line with EU best practices,” where the Competition Council of Romania acts as the lead partner.

In 2024, representatives of the Romanian authority were actively involved in several bilateral and regional initiatives that benefited the Competition Council of the Republic of Moldova, including:

- **A seminar on State Aid** (12–14 November 2024), held within the regional experience-sharing platform involving competition authorities from 10 Central and Eastern European countries;
- **The annual conference “Competition in Key Sectors” (30 October 2024)**, which addressed topics such as the economic integration of the Republic of Moldova into the EU single market and Romania’s strategic role in this process;
- **The International Conference Competition Upgrade II (14–15 May 2024)**, with the theme “Practical Aspects of the Application of Competition Law in the Republic of Moldova and the EU,” which included debates on anticompetitive practices, investigations, mergers, and the definition of the relevant market.

All these events and meetings were of particular importance in the context of Moldova’s intensified European integration process, where the experience of Romanian colleagues proved extremely valuable.

Polish Office of Competition and Consumer Protection (UOKiK)

Bilateral cooperation with UOKiK had a significant impact on the activity of the Competition Council, contributing to increased visibility at the regional level and the adoption of European best practices.

With the support of the Polish authority, a bilateral cooperation project funded by Polish Aid was launched, focusing on key areas such as investigations, merger control, state aid, and legislative harmonization. The project included:

- A study visit to UOKiK in Warsaw (5–13 September 2024);
- A regional workshop in Chişinău (4–6 November 2024), with the participation of experts from Poland, Romania, and Ukraine.

UOKiK also initiated the Regional Cooperation Platform on Competition, signed in April 2023, which brings together competition authorities from 11 Central and Eastern European countries.

Under this platform, the following events took place in 2024:

- The Meeting of competition authority heads (31 October);
- A regional workshop on mergers and foreign direct investments (25–27 September).

This cooperation directly supports institutional capacity-building and brings the Republic of Moldova closer to EU standards in the field of competition.

Competition authority of Armenia

In 2024, relations with the Competition Authority of Armenia were strengthened through the Competition Council's participation in the international conference "Promoting Competition and Private Sector Development," held in Yerevan on 18 June 2024 with the support of the World Bank Group.

During the session dedicated to the activities of public authorities, the Competition Council presented tools for promoting competition and shared examples of interventions against distortive actions by public authorities.

International Competition Network (ICN)

The International Competition Network (ICN) is a global platform that brings together competition authorities from around the world to promote the exchange of best practices and foster international cooperation.

In 2024, the Competition Council participated in the ICN Annual Conference held in Sauipe, Brazil, contributing its experience to the panel on enforcing competition rules in the agricultural and food sectors. In its intervention, the authority highlighted challenges related to proactive research, market monitoring, and limitations in collecting information on anticompetitive practices in these sensitive sectors.

Organisation for Economic Co-operation and Development (OECD)

In 2024, the Competition Council strengthened its cooperation with the OECD by participating in the Global Forum on Competition (2–3 December, Paris), where the President of the Council joined discussions on the role of competition policy in combating poverty and on the functioning of agricultural and food markets.

Additionally, from 15 to 17 April, the Council hosted a regional event titled "Competition and Regulated Sectors." For the first time, the Competition Council of the Republic of Moldova was selected as host institution for an event under the auspices of the OECD-GVH Regional Centre for Competition in Budapest. The event brought together representatives of competition authorities from 17 countries, including Albania, Armenia, Azerbaijan, Belgium, Bosnia and Herzegovina, Czech Republic, Croatia, Finland, France, Georgia, Kazakhstan, Montenegro, Serbia, Spain, Ukraine, Hungary, and Uzbekistan. It served as an important platform for sharing ideas and best practices among international specialists.

Moreover, Council representatives took part in several OECD-GVH Centre training sessions on topics such as effective antitrust enforcement, detecting bid-rigging, and training of new staff members.

Among other training opportunities attended by Council staff in 2024 were:

- A seminar titled “State Aid and Competition,” organized by the European Commission in Brussels, Belgium (7–8 October 2024);
- A working internship at the Directorate-General for Competition of the European Commission (1 October – 20 December 2024).

World Bank Group

In 2024, the Competition Council strengthened its cooperation with the World Bank Group through participation in several meetings and official missions, including a mission held from 23 September to 4 October under the Technical Assistance (TA) program of the FCI and the M-GROW project, aimed at supporting private sector development and competitiveness. From 23 to 27 September, the Council’s staff benefited from targeted trainings on dawn raids, sector prioritization, merger control, the state aid register and regime, and investigative communication techniques.

In addition, with World Bank support, work began on the development of a methodology for determining reference rates in the field of state aid, updating the Regulation on merger control, and modernizing the Automated Information System “State Aid Register” (SIA RAS).

TAIEX

In 2024, at the initiative of the Competition Council and with support from TAIEX, a study visit on the topic “Implementation of New Rules on *De minimis aid*” was organized in the Czech Republic from 26 to 28 November. The Moldovan delegation, composed of representatives from the Competition Council and the Organization for the Development of Entrepreneurship, attended working sessions hosted by the Competition Authority in Brno and the Ministry of Agriculture in Prague. The visit aimed to enhance institutional capacity for effective implementation of the new rules on *de minimis aid*.

USAID Moldova Institutional and Structural Reforms Activity (MISRA)

During the reporting period, with the support of the USAID MISRA Program, the internal processes of the Competition Council were assessed and optimal solutions for their improvement were identified. Additionally, the Council’s new official website was created, and the institution’s communication strategy was developed. With continued USAID support, the Competition Council of the Republic of Moldova obtained certification for the implementation of the international anti-bribery standard ISO 37001, demonstrating the institution’s commitment to combating corruption risks and aligning with European best practices.

TWINNING Project “Strengthening the institutional capacities of the Competition Council to enforce the competition and state aid policy in line with the EU best practices”

The project was launched on 1 October 2024 and will run for a period of 27 months. The main objective of this project is to support the effective implementation of competition policy and state aid regulations, in accordance with the EU–Moldova Association Agreement and the relevant European acquis. The project also aims to strengthen the institutional capacities of the Competition Council in order to implement these policies in a manner that reflects the best practices of the European Union.

Implemented by a consortium led by the Competition Council of Romania, in cooperation with the competition authorities of Lithuania and Poland, the project aims to develop an efficient institutional framework capable of responding to challenges in the areas of competition and state aid, in the context of the Republic of Moldova’s integration into the European Union. Thus, within the framework of this project, three fundamental components will be implemented for the development of the institutional and administrative capacities of the Competition Council, with a view to aligning with the standards and regulations of the European Union.

The first component focuses on strengthening the institutional and administrative capacity of the Competition Council, through a series of measures aimed at enabling the implementation of the EU acquis and European best practices. It targets the creation of a competition authority similar to those in the European Union, thus contributing to the establishment of a solid and adaptable regulatory framework. In parallel, the second component aims at aligning the competition policy of the Republic of Moldova with the rules of the European Union, so as to ensure the uniform and effective application of the rules in this field. In the same direction, the third component focuses on adapting state aid policy to the EU acquis and best European practices, with the objective of ensuring the proper and transparent management of state aid, in order to protect fair competition and the country’s economic interests.

The main goal of this Twinning project is to enhance the institutional capacity of the Competition Council, harmonize national legislation with the European legal framework, and support the Competition Council in the effective enforcement of rules in the areas of competition and state aid. In parallel, special attention will be paid to awareness-raising and public outreach activities targeting the public and relevant stakeholders, including judges. The project will also support the implementation of an IT system for state aid, contributing to increased transparency and efficiency in their management. Thus, through an integrated approach, the TWINNING project will contribute to the institutional strengthening of the Competition Council and ensure the proper enforcement of EU-aligned competition and state aid rules, strengthening the Republic of Moldova’s European integration process.

Although the TWINNING project was officially launched on 17–18 December 2024, its activities began in October 2024, with the aim of providing support to the Competition Council in the process of European integration, taking into account the commitments undertaken by the Republic of Moldova in the European integration process and the preparations for the bilateral screening meeting for Chapter 8 / Competition Policy, for which the Competition Council is the coordinator.

Between 16 and 18 October 2024, the project’s first mission took place. The mission aimed at evaluating and identifying the priority actions to be implemented in the medium term for strengthening the capacities of the competition authority. During this mission, European experts held detailed discussions with the staff of the Competition Council of the Republic of Moldova in order to develop the initial work plan, structured around three essential components: institutional development,

competition policy, and state aid. These components aimed to modernize the operational processes of the Competition Council to ensure their alignment with the best practices of the European Union and the gradual integration of the Moldovan market into the European market. At the same time, on 17 October 2024, a meeting took place with representatives of the Ministry of Economic Development and Digitalization, with discussions focusing on the coordination of actions in the field of competition and state aid, in order to ensure a unified approach in this respect.

The official launch of the project took place on 17–18 December 2024, during a high-level event attended by representatives of the European Union, competition authorities from partner states, as well as officials from the Republic of Moldova. The event highlighted the importance of this initiative in the context of Moldova’s European integration process and emphasized the central role the project will play in strengthening the Competition Council’s capacity to ensure a free and fair market in Moldova, in accordance with the standards of the European Union.

The first meeting of the Steering Committee was held on 28 November 2024, during which the Initial Work Plan and the Communication and Visibility Plan were approved.

Between 2 and 6 December 2024, the institutional assessment took place for the development of the Institutional Development Plan (IDP), aligned with the National Development Strategy “European Moldova 2030.” The activity focused on the analysis of the institutional structure and the identification of the specific needs of the Competition Council for strengthening its capacities. This is an ongoing activity, which will be extended in the first semester of 2025, with two additional missions planned for February and March.

In parallel, the project carried out a series of activities aimed at supporting the implementation of competition policy. Between 28 October and 31 November 2024, a training on merger analysis in the retail sector was organized, with the purpose of providing the Competition Council with the necessary tools to assess the relevant market. Also, on 21–22 November 2024, a training session on vertical agreements took place, based on the best practices of the Competition Council of Romania. Between 27 and 29 November 2024, work was carried out on the establishment and implementation of a case prioritization mechanism in the field of competition law, and between 18 and 19 December 2024, a specific needs assessment was conducted for the staff, aimed at improving their competencies in the enforcement of competition legislation.

On state aid, between 28 October and 1 November 2024, a training was organized for the staff of the Competition Council on the bilateral screening of Chapter 8 in the context of EU accession negotiations, focused on key notions such as “market operator” and other relevant concepts related to state aid. On 18–19 December 2024, the need for additional staff training in state aid control and in the effective enforcement of legislation in this area was assessed. Additionally, between 9 and 13 December 2024, a legislative roadmap was developed for aligning Moldova’s competition legislation with the regulations and best practices of the European Union.

These activities carried out within the Twinning project have significantly contributed to preparing the Competition Council to meet the commitments undertaken by the Republic of Moldova in the European integration process, strengthening its institutional capacities and contributing to the alignment of legislation and practices with the standards of the European Union.

VIII. IMPLEMENTATION OF COMMITMENTS RELATED TO THE EUROPEAN PATH OF THE REPUBLIC OF MOLDOVA IN AREAS OF THE COMPETITION COUNCIL'S COMPETENCE

Competition and state aid policies remain a key pillar of European integration, being among the priorities of the EU–Republic of Moldova Association Agreement and Association Agenda. The granting of candidate country status has further reinforced these commitments, requiring the harmonization of national legislation with the EU *acquis* and the effective implementation of sectoral policies. In this context, in 2024, the Competition Council, as the competent authority and coordinator of Working Group 8 “Competition Policy,” actively participated in coordinating the accession process.

In a context marked by broad structural reforms, the Competition Council has strengthened its role as a key institution in the European Union accession process, assuming responsibility for aligning legislation in the areas of competition and state aid. Its activity required a constant balance between operational priorities and European-level commitments, delivering concrete results despite existing challenges. Efforts focused on the drafting and adjustment of regulations transposing EU legal instruments, including those on simplified procedures for acknowledging infringements, regional development state aid, and support for undertakings in difficulty. Simultaneously, the institution actively contributed to the screening process, by completing questionnaires, preparing technical presentations, and participating consistently in national working groups.

In the context of monitoring the European integration process of the Republic of Moldova, the Competition Council was assigned a key role in implementing national-level action plans aimed at coordinating the efforts of public authorities, such as:

- The Action Plan to limit the excessive influence of private interests on economic, political, and public life (de-oligarchization), approved by the National Commission for European Integration in 2023 and updated in July 2024;
- The set of short-term measures to accelerate the European integration process, responding to the recommendations of the 2023 EU Enlargement Report;
- The National Action Plan for the Accession of the Republic of Moldova to the European Union for 2024–2027;
- The Priority Action Plan for the period 2023–2024.

In 2024, the Competition Council played an active role in implementing the commitments undertaken by the Republic of Moldova in the context of EU accession and the Action Plan to limit the excessive influence of private interests (so-called “de-oligarchization”). The actions taken focused on: strengthening institutional capacity, combating anticompetitive practices and unlawful state aid, conducting market studies in high-risk sectors, promoting voluntary compliance, and creating a mechanism for case prioritization.

Chapter 8 – Competition Policy, coordinated by the Competition Council in partnership with the Ministry of Economic Development and Digitalization, was specifically reflected in the National Action Plan for Accession 2024–2027. Out of 17 actions planned for 2024, 11 were fully implemented and 6 were partially implemented, some being rescheduled for the 2025–2029 period.

A major effort was dedicated to preparing for the explanatory and bilateral screening meetings organized by the European Commission. The Council provided technical contributions to 13 negotiation chapters and prepared 17 thematic presentations for Chapter 8, covering the entire

spectrum of the EU acquis: antitrust rules, merger control, state aid, and sectoral schemes (regional development, energy, transport, etc.).

A key priority of the Competition Council's work in 2024 was the preparation for the EU assessment of Chapter 8 "Competition Policy," coordinated jointly with the Ministry of Economic Development and Digitalization. For the explanatory screening meeting, technical information and relevant documents were submitted to the European Commission, including on sensitive aspects of the national regulatory framework and its harmonization status. For the bilateral screening, scheduled for 20–22 January 2025, the Council's team conducted an in-depth analysis of the EU acquis and developed 17 thematic presentations based on an agenda that included 161 EU acts: treaties, regulations, directives, decisions, and non-binding documents. The topics covered the institutional framework, antitrust rules, merger control, as well as state aid for various sectors (energy, transport, regional development, etc.).

The presentations reflected the current state of legislative alignment and the authority's priorities. This effort contributed to enhancing institutional capacity for analysis, reporting, and technical dialogue with European structures, while also strengthening interinstitutional cooperation.

As coordinator of the Working Group for Chapter 8, the Competition Council is responsible for implementing the commitments undertaken by the Republic of Moldova in the field of competition, turning these commitments into strategic objectives for legislative and institutional alignment.

In the 2024 Country Report, the European Commission assessed that the Republic of Moldova has a "certain level of preparation" in the field of competition policy, issuing the following key recommendations:

- Alignment of legislation with the EU acquis in the fields of antitrust, mergers, and state aid; increased transparency regarding granted aid;
- Continued strengthening of the administrative capacity of the Competition Council.

In this context, the competition authority holds a crucial role in achieving the EU accession objectives, within a competitive environment marked by internal challenges and external pressures.

Pursuant to Government Decision No. 1171/2018 approving the *Regulation on the harmonization of the legislation of the Republic of Moldova with the legislation of the European Union*, the Competition Council submitted the following normative acts to be included in the database of harmonized national legislation:

1. *Decision of the Plenum of the Competition Council No. 5 as of 02.09.2024 amending Decision No. 02/2020 on the approval of the Regulation on the assessment of regional development state aid*

By revising Annex No. 4, the criteria for identifying eligible regions for regional state aid were updated and a new map of maximum intensities applicable for the period 2024–2027 was approved.

2. *Decision of the Plenum of the Competition Council No. 6/2024 on the approval of the Regulation on de minimis aid*

The new Regulation on de minimis aid establishes the legal framework for granting small-value state aid in the Republic of Moldova, in line with new thresholds and standards closely aligned with those of the European Union.

3. *Decision of the Plenum of the Competition Council No. 7/2024 on the approval of the Methodology for establishing reference and discount rates in the field of state aid*

The methodology provides a clear set of rules on how to calculate and update rates, which will serve as

a basis for quantifying the grant equivalent of state aid granted in tranches and of aid resulting from subsidized interest schemes.

At the same time, the methodology sets out the method for calculating and determining, by decision of the Plenum of the Competition Council, the discount rate applicable to state aid granted in multiple tranches, as well as the method for establishing interest rates applicable to aid subject to recovery. This framework will allow for the proper and consistent application of subsidized interest regimes, thus ensuring compliance with competition rules. This approach guarantees transparency and equal treatment for all enterprises benefiting from state aid, regardless of their size.

4. *Decision of the Plenum of the Competition Council No. 9/2024 on the approval of the Regulation on the application of the simplified procedure in cases where undertakings or associations of undertakings admit to committing an anticompetitive practice*

The Regulation on the simplified procedure applicable to undertakings that admit to committing an anticompetitive practice allows for a fine reduction of between 10% and 30%. This innovative procedure contributes to the efficiency of investigations, savings in administrative resources, and shortening of proceedings, while allowing for cumulation with the leniency policy for additional reductions of up to 50%.

5. *Decision of the Plenum of the Competition Council No. 11/2024 amending Decision No. 16/2013 on the approval of the Regulation on the determination of dominance and the assessment of abuse of dominant position*

The purpose of this normative act is to update the secondary legislation in the field of competition by aligning it with the most recent amendments to EU legislation, in particular with the new guidelines of the European Commission on the application of Article 102 TFEU (formerly Article 82 EC Treaty) to exclusionary practices, and to ensure the implementation of Law No. 199/2023 amending the Competition Law No. 183/2012.

In 2024, the Plenum of the Competition Council approved two decisions on the establishment of reference and discount rates in the field of state aid:

- *Decision No. 8/2024 on the establishment of reference and discount rates in the field of state aid*
- *Decision No. 10/2024 on the establishment of reference and discount rates applicable in the field of state aid*

Also, during the reporting period, the Competition Council initiated the transposition process of two normative acts planned for adoption at the beginning of 2025:

- *Decision No. 1/2025 on the approval of the Regulation on the form of notification, the procedure for examination, and the adoption of decisions on state aid*
- *Decision No. 2/2025 on the approval of the Regulation on economic concentrations*

The Competition Council plays a fundamental role in fulfilling the European commitments of the Republic of Moldova by aligning the regulatory framework and institutional practices with European Union standards. The concerted efforts in these areas will contribute to the effective integration of the country into the EU internal market and to the achievement of the strategic objective of EU accession. Competition and state aid policy constitutes one of the fundamental chapters of the EU acquis that must be integrated into the legislation and practices of the Republic of Moldova as part of its European path. The Regulation on economic concentrations was approved in 2025 by decision of the Plenum of the Competition Council.

Organization and Human Resources

On 18 July 2024, by Decision No. 194, the Parliament of the Republic of Moldova approved the new organizational structure and the staff ceiling of the Competition Council, reducing the number of positions from 130 to 120.

In the exercise of its duties, the Competition Council is composed of the management, and the executive staff (comprising 10 specialized subdivisions and 8 operational subdivisions).

Table No. 2. Staffing coverage by area, as of the end of 2024

Structural subdivision	Number of positions		Coverage rate
	approved	filled	
Management			
Plenum of the Competition Council	5	5	100%
Head of Executive Body	1	0	0%
Specialized Departments, total:	78	35	44,9%
<i>Competition Department</i>	52	21	40%
<i>State Aid Department</i>	16	9	56,3%
<i>Legal Department</i>	10	5	50%
Operational Departments	36	17	47,2
Total:	120	57	47,5%

At the end of 2024, the total number of employees of the Competition Council was 57 persons, of whom 5 held the status of public dignitaries, 51 were civil servants (including 35 with investigative responsibilities and 16 with administrative responsibilities), and 1 was a member of the technical staff.

In terms of the proportion of employees with control functions in the total staff of the institution, in 2024 this share reached the level of %, similar to the previous year.

Table No. 3. Staffing coverage by function level for the year 2024

	Public dignitary	High-level managerial civil service position	Managerial civil service position	Professional civil service position	Technical support staff	Total staff
Approved staff ceiling as of 31.12.2024 (positions)	5	1	28	82	4	120
Filled positions as of 31.12.2024 (persons)	5	0	16	35	1	57

	Public dignitary	High-level managerial civil service position	Managerial civil service position	Professional civil service position	Technical support staff	Total staff
Occupancy rate of civil service positions/posts, %	100%	0%	57.14%	42.7%	25%	47,5%

As in 2023, the year 2024 was marked by a relatively low filling rate of civil service positions within the Competition Council, especially for general civil service roles.

Table No. 4. Staffing coverage over time

Year	Approved positions according to the staffing plan	Filled positions	Share, %
2020	130	83	63,8%
2021	130	72	55,3%
2022	130	66	50,8%
2023	130	64	49,2%
2024	120	57	47,5%

Throughout 2024, a total of 14 positions were filled (1 public dignitary position, 1 managerial civil service position, 11 general civil service positions, and 1 technical support position). On 31 July 2024, by Parliament Decision No. 211, the composition of the decision-making body of the Competition Council was completed with a new member. Thus, Mr. Ionel Sîrghii was appointed as a member of the Plenum of the Competition Council for a five-year term.

Among the procedures for filling civil service positions within the Competition Council during the reporting period, the prevailing procedure was the competitive selection process. A total of 28 civil service positions were announced for competition, of which 2 were managerial civil service positions and 26 were general civil service positions. As a result of the job announcements, 12 civil service positions were filled, including 1 managerial and 11 general civil service positions.

Although recruitment announcements were held continuously, in 2024 a very low occupancy rate of civil service positions was observed. The limited capacity of the authority to meet its staffing needs is due to several factors: **the complexity of activities** across all sectors of the national economy, and the **level of remuneration that does not reflect the complexity of the duties** and competencies required for the positions. It is important to underline that the field of competition is highly complex and is among the most specialized areas of public administration.

According to the data presented in Table 4, most of the employees holding general civil service positions with investigative responsibilities (State Controllers) are employed as Main State Controllers (16 employees), which represents the highest level within the general civil service position category.

Table No. 5. Structure of general civil service positions

General civil service position with investigative duties	Number of positions filled	Share
Main State Controller	16	64%
Senior State Controller	3	12%
State Controller	6	24%
Total	25	100%

It is also worth noting that in 2024, there were 4 entry-level civil servants (junior civil servants), of whom 3 were confirmed in their civil service positions, while one is expected to complete the probationary period in 2025.

At present, the Competition Council is facing a shortage of qualified personnel.

The share of vacant civil service positions/posts within the Competition Council out of the total existing positions is 52.5%.

In the course of 2024, a total of 21 employment relationships were terminated, of which: 8 by resignation, 10 by dismissal due to organizational restructuring, 2 due to circumstances beyond the control of the parties, and 1 due to the expiration of mandate.

Table no. 6. Staff turnover

Years	2020	2021	2022	2023	2024
Turnover	13,6%	17,7 %	28,2%	18,75%	33,87%

The staff turnover rate for 2024 was 33.87%. The main factors that contributed to this turnover were the closure of regional offices and the restructuring of state aid departments.

The average age of employees of the Competition Council in the reporting year was 33.4 years.

Training and institutional development

As part of its institutional capacity-building efforts, the Competition Council seeks to ensure the organization and implementation of training activities necessary to achieve an appropriate level of employee training and professional development. Various types and forms of training activities are organized with the aim of deepening and updating knowledge, developing skills, and shaping the abilities/behaviors required for the effective performance of duties.

Thus, during 2024, 65 employees of the Competition Council participated in 41 training sessions, of which:

- 30 external training courses (16 held in the country and 14 abroad), organized by national public institutions and international partners, attended by 47 employees;
- 11 internal training courses, facilitated by both the Council's internal trainers and international experts, attended by 53 employees.

Institutional integrity

In 2024, the Competition Council took an important step in the fight against corruption by joining the initiative to implement the international anti-bribery standard ISO 37001:2016, with the support of the Moldovan Institute for Standardization and the USAID Moldova Institutional and Structural Reforms Activity (MISRA) program. The purpose of this standard is to help organizations implement, maintain, and improve a management system designed to prevent, detect, and respond to bribery and corruption

risks.

ISO 37001 is an international standard developed by the International Organization for Standardization (ISO) and published in 2016. It provides a framework for preventing and detecting cases of bribery and corruption. The standard supports institutions in adopting an anti-bribery policy, appointing a compliance officer, training personnel, assessing risks, and establishing clear procedures for reporting and investigating incidents.

The alignment of the Competition Council with ISO 37001:2016 was carried out over a period of nine months. The process included the training of approximately 60 employees, the review and drafting of internal policies, and the creation of procedures to identify and mitigate corruption risks. The compliance audit was conducted by SRAC CERT LLC, a company from Romania, internationally accredited.

In December 2024, the Competition Council of the Republic of Moldova obtained the certification for the implementation of the ISO 37001:2016 international anti-bribery standard, confirming the institution's commitment to combating corruption risks and aligning with best European practices.

The implementation of ISO 37001:2016 strengthens the reputation and credibility of the Competition Council, contributing to risk reduction and associating the institution with initiatives that promote integrity and ethics. Furthermore, fighting corruption and reducing bribery risks are essential conditions in the process of the Republic of Moldova's integration into the European Union and align with public commitments to implement the ISO 37001:2016 anti-bribery standard with the goal of enhancing efforts to detect and combat potential corruption cases within state bodies performing supervisory functions.

The year 2025 represents a crucial stage in strengthening the role of the Competition Council as a cornerstone of a functional economy and a key institution in the process of European integration. Through a proactive and strategic approach, the Council aims to become a model of efficiency, fairness, and transparency in the service of the public interest. Building on the developments and results achieved in 2024, as well as the recommendations of the European Commission, the Competition Council has set the following strategic priorities for 2025:

1. Strengthening the fight against anticompetitive practices

- Intensifying efforts to detect anticompetitive practices, especially in sectors with significant impact on the Moldovan economy.
- Expanding the use of advanced economic analysis tools and digital technologies for market monitoring and investigations.
- Promoting leniency programs for self-reporting of anticompetitive practices, simplified procedures for favorable treatment of undertakings or associations of undertakings that admit to anticompetitive conduct, and commitment mechanisms in the context of competition investigations.

2. Market inquiries in key sectors

- Continuing market inquiries in key sectors of the national economy to assess the competitive environment and provide recommendations to improve the functioning of these markets.
- Analyzing the legal framework governing market activities with the aim of identifying potential barriers to competition and proposing amendments or improvements to existing regulations in those sectors.

3. Enhancing the effectiveness of merger control

- Promoting simplified procedures for the notification of economic concentrations.
- Conducting more in-depth analysis of complex merger transactions.

4. Harmonization of the regulatory framework and preparation for EU accession

- Reviewing primary and secondary legislation in the fields of competition and state aid in accordance with the EU acquis.
- Adopting and applying best practices from the work of EU competition authorities, as supported by the implementation of the EU Twinning Project.

5. Strengthening institutional capacity

- Enhancing the level of training and professionalism through advanced thematic training programs for staff, in collaboration with European experts.
- Implementing modern systems for the efficient conduct of investigations and market analyses.

6. Promoting a competition culture

- Organizing information sessions and practical workshops on competition and state aid, focusing on the benefits of compliance and the risks associated with violations.
- Developing and disseminating user-friendly guidelines and explanatory materials on competition rules, tailored to different target groups.
- Strengthening partnerships with professional organizations, chambers of commerce, and educational institutions to promote the principles of fair competition and voluntary compliance with competition

law.

7. Regional and international cooperation

- Proactively engaging in the work of European and international competition organizations and networks.
- Strengthening cooperation with EU and regional competition authorities to exchange best practices.

**NARRATIVE REPORT
ON THE EXECUTION OF THE COMPETITION COUNCIL'S BUDGET AS OF
DECEMBER 31, 2024**

F1F3: 0411 General economic and commercial services

P1P3: 5005 Competition protection

P3: 00117 Competition protection

I. General overview of budget execution

The budgetary process was managed by the President of the Competition Council, the subdivision responsible for financial and administrative matters within the authority, as well as the public procurement working group (in charge of procurement procedures). The information included in this narrative report is presented based on data provided by the Financial and Administrative Department of the Competition Council.

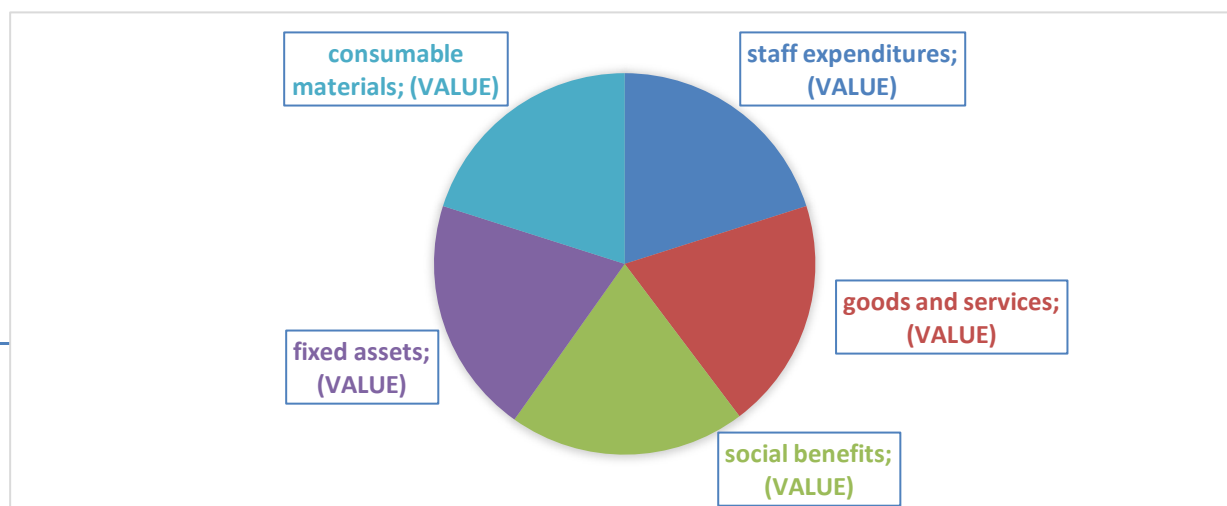
The approved budget ceilings for 2024 for the Competition Council, according to the State Budget Law for 2024 No. 418 as of 22 December 2023, amounted to 30,784.3 thousand MDL. Following the rectification of the State Budget Law for 2024, the ceilings were increased by 1,193.9 thousand MDL, reaching a total of 31,978.2 thousand MDL, allocated as follows:

Table No. 1. Budget of the Competition Council for 2024

(thousand MDL)

		Approved	Specified	Executed 31.12.2024	Execution rate
149 800	Funding from the budget	30 484,7	31 078,2	31 021,6	99,82
142 310	Proceeds from the provision of paid services	300,0	900,0	904,4	100,49
	TOTAL income	30 784,3	31 978,2	31 926,0	99,84
Class 2	Expenditures	30 084,3	31 573,3	31 521,2	99,83
<i>Subclass 21</i>	Staff costs	26 656,1	27 650,0	27 649,9	100,0
<i>Subclass 22</i>	Goods and services	2 525,4	2 243,4	2 191,4	97,68
<i>Subclass 27</i>	Social benefits	902,8	1 679,9	1 679,8	99,99
<i>Subclass 28</i>	Other expenditures	0,00	0,05	0,05	100,0
Class 3	Non-financial assets	700,0	404,9	404,8	99,99
<i>Subclass 31</i>	Fixed assets	200,0	4,9	4,9	100,0
<i>Subclass 33</i>	Stocks of current assets	500,0	400,0	399,9	99,99
	TOTAL expenditures	30 784,3	31 978,2	31 926,0	99,84

The budget execution for the reporting period amounted to 99.84% for revenues and 99.84% for expenditures.



In the reference year, the Ministry of Finance initiated the procedure for amending the State Budget Law for 2024. In this context, proposals were submitted for adjusting the revenues by +600.0 thousand MDL and the personnel expenditures by +993.9 thousand MDL, as well as social benefits by +200.0 thousand MDL, as follows:

Table No. 2. Proposals of the Competition Council for the adjustment of the 2024 budget
(thousand MDL)

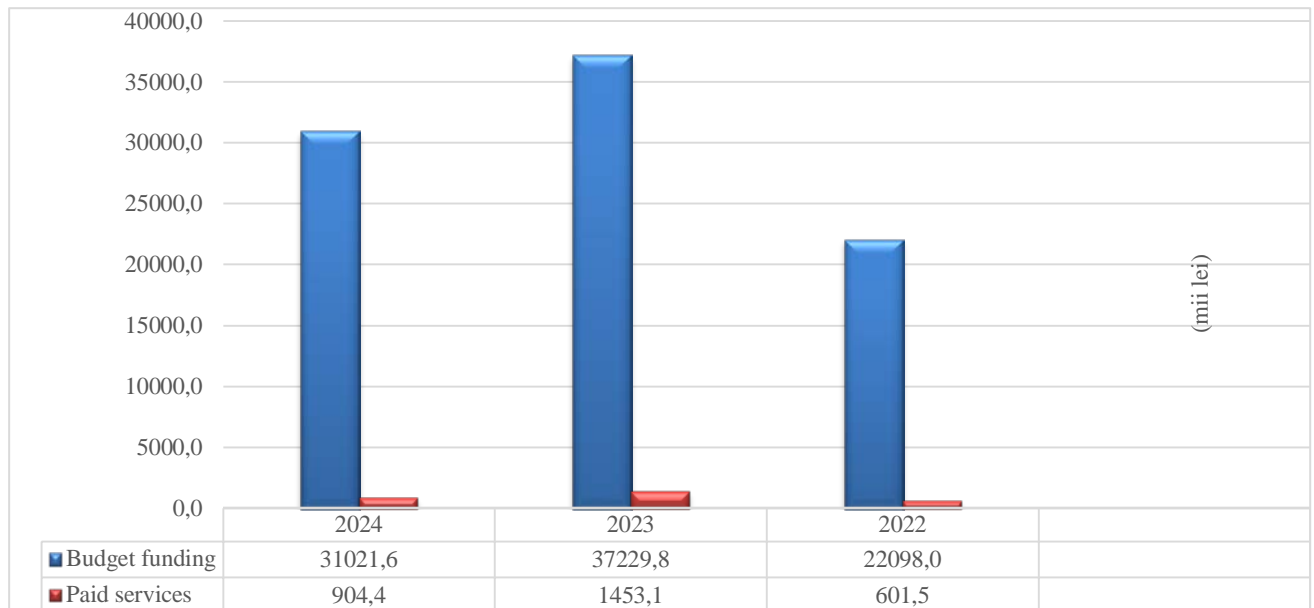
K6		Approved 2024	Proposals for adjustment	Specified 2024
142.310	Proceeds from the provision of paid services	300,0	+ 600,0	900,0
21	Staff expenditures		+993,9	
27	Social benefits		+200,0	

Table No. 3. Executed revenues for the year 2024 compared to the years 2022–2023
(thousand MDL)

		Executed		
		2024	2023	2022
	Revenue, total	31 926,0	38 682,9	22 699,5
142 310	Proceeds from the provision of paid services	904,4	1 453,1	601,5
149 800	Funding from the budget	31 021,6	37 229,8	22 098,0

The proceeds from the provision of paid services consist of receipts from fees for the notification of economic concentrations. The utilization of the executed budgetary allocations for the year 2024 amounted to 100.49%, compared to 161.46% in 2023 and 114.3% in 2022.

Share of executed revenues 2022-2024



The largest share of executed revenues comes from **budget funding**, which amounted to 31,021.6 thousand MDL.

Table No. 4. Actual revenues for the year 2024 compared to the same period in 2022–2023
(thousand MDL)

		Actual		
		2024	2023	2022
	Actual revenues, total	32 151,8	37 995,9	22 584,9
142 310	Proceeds from the provision of paid services	1 129,4	703,1	486,4
149 200	Income from free title assests			
149 300	Income from asset revaluation		63,0	
149 500	Income from recovery of material damage			0,568
144 114	Voluntary donations for current expenditures from internal sources for budgetary institutions	0,8		
149 800	Budget funding	31 021,6	37 229,8	22 098,0

The actual revenues for the reporting period amounted to 32,151.8 thousand MDL and consisted of the following: 142.310 – Proceeds from paid services: 1,129.4 thousand MDL; 144.114 – Voluntary donations for current expenditures from internal sources for budgetary institutions: 0.8 thousand MDL (fuel recorded in accounting from an individual); 149.800 – Budget funding: 31,021.6 thousand MDL. A significant increase is noted under economic classification code 142.310 "Proceeds from paid services", the reason being a higher number of notifications of economic concentrations in 2024 compared to 2023. These revenues consist of fees collected for the notification of economic concentrations, as provided by the Competition Law No. 183 of 11 July 2012.

Compared to the same period, revenues from notification fees for economic concentrations in

2024 increased by 426.3 thousand MDL compared to 2023, and by 643.3 thousand MDL compared to 2022.

Table no. 5. Actual expenses for 2024 compared to the same periods 2022 – 2023
(thousand MDL)

		2024	2023	2022
	Actual expenses	33 150,0	26 994,7	22 746,8
211	Staff costs	21 810,1	17 757,2	14 619,6
212	Compulsory state social security contributions	6 324,9	5 149,6	4 239,7
221	Goods – Expenses related to the use of inventories	442,4	388,0	441,8
222	Goods and services	2 172,6	2 345,8	2 230,8
231	Expenses related to the wear and tear of fixed assets	770,1	526,7	563,4
232	Expenses related to the amortization of intangible assets	151,7	240,1	253,2
273	Social benefits	1 465,3	579,3	397,8
289	Other expenses	13,0	8,1	0,56

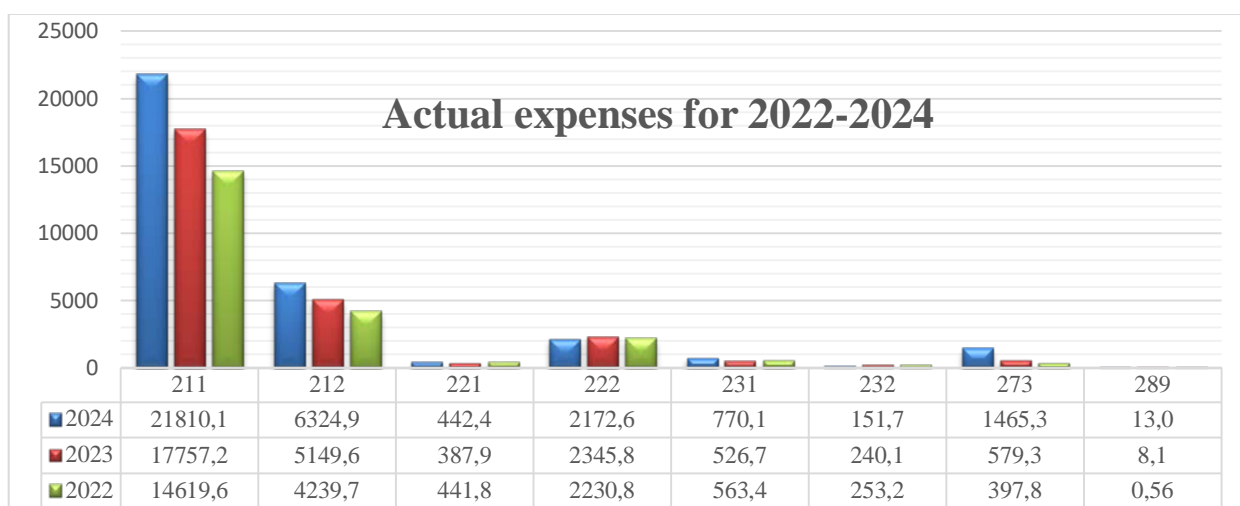
The actual expenditures for the reporting period amounted to 33,150.0 thousand MDL and consisted of the following: 211 – Staff costs: 21,810.1 thousand MDL, 212 – Compulsory state social security contributions: 6,324.9 thousand MDL, 221 – Goods – Expenses related to the use of inventories: 442.4 thousand MDL, 222 – Goods and services: 2,172.6 thousand MDL, 231 – Expenses related to the wear and tear of fixed assets: 770.1 thousand MDL, 232 – Expenses related to the amortization of intangible assets: 151.1 thousand MDL, 273 – Social benefits: 1,465.3 thousand MDL, 289 – Other expenses of budgetary authorities/institutions: 13.0 thousand MDL

According to the table data, the largest share of total expenditures is represented by staff costs, which together with compulsory state social security contributions account for 84.8% of total actual expenditures in 2024, 84.9% in 2023, and 82.9% in 2022.

The majority of expenditures are financed from budget funding, covering employee remuneration, procurement of materials and goods, various services, and depreciation during the reporting year—necessary for the proper functioning of the institution.

Table no. 6. Deviations of actual expenses compared to the similar period 2022-2023
(thousand MDL)

		2024 compared to 2023	2023 compared to 2022
	Actual expenses	+6155,3	+4 247,9
211	Staff costs	+4052,9	+3 137,7
212	Compulsory state social security contributions	+1175,3	+909,9
221	Goods – Expenses related to the use of inventories	+54,4	-54,0
222	Goods and services	-173,2	+115,0
231	Expenses related to the wear and tear of fixed assets	+243,4	-36,7
232	Expenses related to the amortization of intangible assets	-88,4	-13,1
273	Social benefits	+886,0	+181,6
289	Other expenses	+4,9	+7,5



II. Description of the information from the Balance Sheet

At the beginning of the year, the value of the assets and liabilities in the balance sheet amounted to **15,280.4 thousand MDL**, and as of 31.12.2024 – **14,368.8 thousand MDL**.

The balance of fixed assets at the beginning of the reporting period amounted to **23,712.2 thousand MDL**.

During the year, the Competition Council recorded:

Balance of fixed assets as of **31.12.2024 – 23,262.3 thousand MDL**.

Acquisitions in the amount of **117.1 thousand MDL**, including: Account group 311 “Buildings” – 0.0 thousand MDL, Account group 314 “Machinery and equipment” – **0.0 thousand MDL**, Account group 316 “Tools and instruments, production and household inventory” – **117.1 thousand MDL**, Account group 317 “Intangible assets” – 0.0 thousand MDL

A component of non-financial assets is represented by fixed assets, which fall under account group 31. The total value of fixed assets in 2024 was **23,262.3 thousand MDL**.

Account 391 “Wear of fixed assets” – **7,930.1 thousand MDL**

Account 392 “Amortization of intangible assets” – **1,895.5 thousand MDL**

The balance sheet value of fixed assets – **13,436.7 thousand MDL**

The balance of account 391 “Wear of fixed assets” amounts to **9,825.6 thousand MDL**, including:

- 391 400 “Wear of machinery and equipment” – **3,533.1 thousand MDL**
- 391 500 “Wear of means of transport” – **2,879.2 thousand MDL**
- 391 600 “Wear of tools, instruments, and household inventory” – **1,512.6 thousand MDL**
- 391 900 “Wear of other fixed assets” – **5.2 thousand MDL**

The balance of account 392 “Amortization of intangible assets” amounts to **1,895.5 thousand MDL**.

Table no. 7. Degree of wear and tear of assets

	31.12.2024
Machinery and equipment	79,20 %

Means of transport	99,81 %
Tools, instruments, and household inventory	85,34 %
Intangible assets	93,20 %
Other fixed assets	100 %
Total for the entity	91,51%

The balance of the stocks of current assets at the beginning of the reporting period amounted to **547.2 thousand MDL**.

- Balance of subclass 33 “**stocks of current assets**” as of 31.12.2024 – **547.2 thousand MDL**
- **Purchase** in the amount of **388.1 thousand MDL**, including: fuel – **168.7 thousand MDL**, spare parts – **6.9 thousand MDL**, household materials and office supplies – **179.5 thousand MDL**, and other materials – **33.0 thousand MDL**
- **Write-off** of material stocks used in the course of activities – **442.4 thousand MDL**

Internal receivables as of 31 December 2024 amounted to **384.9 thousand MDL**. **Internal liabilities** as of 31 December 2024 amounted to **3,311.9 thousand MDL**.

III. Description of receivables and liabilities

Account 419 “Other receivables of budgetary authorities/institutions” – 384.9 thousand MDL

Table no. 8. Breakdown of receivables according to the economic classification

		(thousand MDL)	
		Situation as of 31.12.2024	Situation as of 31.12.2023
222.220	Telecommunication services	12,3	0,82
222.300	Rental services	198,0	189,2
222.500	Current repair services	3,1	0,48
222.720	Foreign travel expenses	53,6	
222.980	Postal services	4,2	2,21
222.999	Services not classified under other line items	32,6	66,7
273.200	Severance payments upon termination of the employment contract	15,5	
316.110	Tools and instruments, production and household inventory		112,3
331.110	Purchase of fuel	24,0	12,7
336.110	Purchase of household materials and office supplies	35,4	39,0
339.110	Purchase of other materials	6,3	2,1
	Total	384,9	425,5

519 account group «Other liabilities of budgetary authorities/institutions” at the end of the management period constitute

Table no. 9. Deciphering liabilities according to economic classification

		(thousand MDL)		
		Situation as of 31.12.2024	Situation as of 31.12.2023	Deviations (+/-)

142.310	Proceeds from the provision of services	750,0	975,0	-225,0
211.180	Remuneration of employees according to the states	1 951,6	1 578,3	+373,3
212.100	Compulsory state social security contributions	569,6	457,7	+111,9
222.220	Telecommunications services		0,05	-0,05
222.300	Location services		0,0001	-0,0001
222.720	Transport services	25,7	0,013	+25,7
222.999	Services not assigned to other lines			
273.200	Indemnities upon termination of the employment contract		211,3	-211,3
273.500	Allowances for temporary incapacity of work	15,0	2,7	+12,3
	Total	3 311,9	3 225,1	+86,8

The liabilities as of 31 December 2024 have increased by 86.8 thousand MDL compared to the situation as of 31 December 2023. The balance of item 142.310 “Proceeds from the provision of services” decreased at the end of the year, with six notifications of economic concentration under examination, compared to seven notifications as of 31.12.2023.

The increase in personnel expenses is due to the salary raise for employees implemented on 01.08.2024, compared to the previous year.

It should be noted that as of 31.12.2024, there were no arrears, with all outstanding liabilities being incurred in December of the current year.

Description of performance by programs/subprograms

Changes were made to the organizational structure and the staffing limit of the Competition Council. In accordance with the provisions of Parliament Decision No. 194 as of 24 July 2024 “On the approval of the organizational structure and the staffing limit of the Competition Council,” the approved staffing limit comprises 120 positions, of which:

- Public dignity positions – 5 units
- Senior civil servants – 29 units
- Executive civil servants – 82 units
- Support staff – 4 units

The salary fund for the reporting period, including mandatory social insurance contributions, amounts to a total of 28,135 thousand MDL, as presented in the table below.

Table no. 10. Salary fund of the Competition Council for the year 2024

(thousand MDL)

		year 2024,	year 2023,	Deviation (+ / -)
211.110	Basic salary	13301,0	10 495,4	2805,6

211.120	Increments and supplements to the basic salary	6924,2	5 565,7	1358,5
211.140	Rewards	1584,9	1695,9	-111,0
211	<i>Remuneration of work</i>	<i>21810,1</i>	<i>17757,2</i>	<i>4052,9</i>
212.100	Compulsory state social security contributions	6324,9	5149,6	1175,3
212	<i>Compulsory state social security contributions</i>	<i>6324,9</i>	<i>5149,6</i>	<i>1175,3</i>
	Total	28135,0	22 906,8	5228,2

Information on salary expenditures and other relevant indicators:

The salary level at the Competition Council, in relation to the complexity of its activity, leads to a rather low interest from specialists for the job vacancies announced through public announcements.

Employee remuneration is carried out in accordance with the provisions of Law No. 270 as of 23.11.2018 on the unified salary system in the public sector, implemented as of 01.12.2018, Government Decision No. 426 as of 26.04.2004 on the method of calculating the average salary, and within the limits of the annual salary fund, according to the approved staffing structure.

An analysis of the allocations provided to the Competition Council for the reporting period shows that these were mainly earmarked for staff remuneration and the payment of mandatory social insurance contributions, which accounted for 87.5% of total cash expenditures (Form FD-043) and 86.6% of total actual expenditures (Form FD-042). The report on the staffing table and actual personnel (Form FD-048) presents information on the approved and existing staff structure as of the reporting date.

In 2024 as well, the Competition Council directed its efforts toward the implementation of sub-program objectives. As such, a number of performance indicators were fully achieved, recording increases and positive deviations, as shown in Annex FD-053 – Performance Report as of 31.12.2024.

Additional information

The Competition Council maintains its accounting records in accordance with the Order of the Ministry of Finance No. 216 as of 28.12.2015 “On the approval of the chart of accounts in the budgetary system” and the “Methodological norms on accounting and financial reporting in the budgetary system.”

The annual inventory was conducted in accordance with the provisions of Order No. 60 as of 29.05.2012 of the Ministry of Finance “On the approval and enforcement of the Inventory Regulation,” as subsequently amended. The inventory procedure within the Competition Council was carried out based on the Order of the President No. 57 as of 20 November 2024. The inventory of fixed assets, circulating material stocks, receivables, and liabilities was performed at the end of the reporting year; no surpluses or shortages were detected. No audits were conducted by the Court of Accounts. Accounting records are maintained using the "1C" software system, managed by the public institution Financial Technology Center and the Financial Management Information System.

No amounts were recorded under account 723000 "Correction of prior years' results of the public institution."

Within the public procurement activity, the following actions were undertaken:

- The Annual Public Procurement Plan for 2024 was drafted, approved, and updated;
- 40 contracts and 8 additional agreements were concluded;
- 34 contracts were registered with the Ministry of Finance and the State Treasury;

- The report on the implementation of low-value public procurements for 2024 was submitted via the e-tender platform;
- The report on public procurement contract monitoring for 2024 and the quarterly report for the current year were developed, approved, and published.

In the course of 2024, a total of 555 payment orders were issued and submitted via the e-docplat platform to the Treasury system.

Execution rate of payment orders – 100%.

The financial result for the reporting period amounted to 998.4 thousand MDL, and the cumulative financial result from previous years was 11,056.9 thousand MDL (actual revenues – 32,151.8 thousand MDL; Actual expenditures – 33,150.2 thousand MDL).

In 2024, the Competition Council did not receive any assets free of charge or any material assistance.

Quantitative indicators of Competition Council's activity for 2024

Nr.	Indicators	2024
<i>Competition Law No. 183 as of 11.07.2012</i>		
1	Cases of Competition Law infringements	
	- Investigations initiated	11
	a) based on complaints	4
	b) ex-officio	7
	- Investigations completed regarding infringements of the substantive provisions of the Competition Law	7*
	- Sanctioning decisions for breaches of procedural rules	2*
	* One decision issued with two findings: 1) regarding the closure of an investigation concerning the failure to notify an economic concentration 2) imposing a sanction on the undertaking for a procedural infringement	
	- under investigation	72
	1.1 anti-competitive agreements	
	- initiated	2
	- completed	5
	- under investigation	24
	1.2 abuse of a dominant position	
	- initiated	0
	- completed	0
	- under investigation	9
	1.3 unfair competition	
	- initiated	1
	- completed	1
	- under investigation	13
	1.4 limitation of competition by public authorities	
	- initiated	3
	- completed	0
	- under investigation	11
	1.5 un-notified economic concentrations	
	- initiated	4
	- completed	1
	- under investigation	10
	1.6 multiple object cases (indicate art.)	
	- initiated	1
	- completed	2

	- under investigation	5
2	Control of notified economic concentrations	
	- Number of forms examined	14
	- Examinations completed with information letters on the fact that the operation does not fall under the Competition Law	3
	- Authorized economic concentrations	7
3	Fines/sanctions, thousand MDL	
	- <i>applied</i>	684 104 862,16 lei
	- <i>collected</i>	2 032 663,44 lei.
4	Illegal advertising, cases examined	
<i>Law 139 as of 15.06.2012 on state aid</i>		
5	Authorized measures	11
6	Existing state aid schemes examined	5
7	Share of state aid grantors using SIA RAS out of all those who have notified State aid	100%
8	Share of state aid grantors using SIA RAS out of all those who reported state aid	100%
9	Cases of infringement of legislation on State Aid	
	- initiated	2
	- completed	2
	- under investigation	4
<i>Legal activity</i>		
10	Opinions issued on draft legislative acts	198
11	Cases pending in courts	86
12	Cases completed:	4
	- <i>in favor of the Competition Council</i>	100% (4 of 4)
	- <i>to the detriment of the Competition Council</i>	0%
13	Contravention cases:	3
	- <i>finding agent's proposal upheld</i>	3
	- <i>contravention report cancelled</i>	0