

Antitrust Law and Legal Advocacy: Perspective on Promoting Fair Competition in Indonesia, Uzbekistan, and Russia

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Abstract

Antitrust law plays a critical role in ensuring fair competition, yet its effectiveness varies across different legal and institutional contexts. This paper examines the comparative regulation and implementation of antitrust law in Indonesia, Uzbekistan, and Russia, with particular attention to the role of legal advocacy and legal services in enhancing compliance and enforcement. The objective is to analyze how these three countries, with distinct political and economic systems, construct and operationalize their competition law frameworks to promote healthy market competition. Employing a normative legal research method with a comparative approach, the study relies on statutory texts,

institutional documents, case law, and scholarly literature. Data were collected through library research and analyzed qualitatively using descriptive-comparative analysis. The findings reveal that Indonesia has developed a comprehensive legal framework through Law No. 5/1999, yet its enforcement remains inconsistent due to institutional limitations and judicial resistance. Uzbekistan has adopted modern competition principles in its 2012 Competition Law, but enforcement is hindered by state dominance in the economy and limited legal capacity. Russia, in contrast, possesses a mature regulatory framework and a powerful Federal Antimonopoly Service (FAS), though enforcement often reflects political considerations. Across all three contexts, legal advocacy and professional legal services significantly influence compliance by educating businesses, guiding merger notifications, and shaping litigation strategies. This study contributes to comparative competition law scholarship by highlighting the interplay between regulation, enforcement, and advocacy in shaping effective competition regimes. The conclusion underscores that building effective antitrust law requires not only robust statutes but also active advocacy and accessible legal services. Recommendations include strengthening compliance mechanisms in Indonesia through KPPU's DPKPU guidelines, enhancing legal education in Uzbekistan to foster a bottom-up competition culture, and encouraging FAS Russia to sustain transparency in digital markets.

Keywords *Antitrust Law, Competition Law, Advocacy, Legal Services*

A. Introduction

Business competition is the main pillar for creating healthy and equitable economic dynamics.¹ Business competition encourages efficiency, innovation and a more optimal distribution of resources

¹ Ulita Bella Anggraeni, "Menggali Peran Hukum Persaingan Usaha Dalam Mendorong Inovasi Dan Efisiensi Ekonomi," *Rechtsvacuum: Journal of Legal Studies* 1, no. 1 (May 22, 2024): 24–29, <https://doi.org/10.15294/LESREV.V3I2.35395>.

among economic actors.² Unsupervised market mechanisms result in the risk of anti-competitive behavior leading to monopolies and oligopolies.³ This market condition not only causes losses for consumers, but also hinders long-term economic growth.⁴ To maintain order in economic activities and achieve market fairness, countries around the world establish competition law regulations, better known as antitrust law. Antitrust law has evolved as a legal instrument that is not only technical but also strategic in supporting political stability and national development.

Competition law is becoming increasingly complex and relevant. Cross-border interconnectedness, the expansion of multinational corporations, and technological advancements present new challenges for competition authorities.⁵ International cartel practices, abuse of dominant positions by global companies, and cross-jurisdictional mergers are becoming important issues in effective regulatory arrangements at both the domestic and international levels.⁶ Each

² Desi Sommaliagustina and Veoni Sinta Nosi, "Hukum Persaingan Usaha di Indonesia Agar Menjamin Pasar Yang Adil dan Efisien," *JUDAKUM: Jurnal Dedikasi Hukum* 4, no. 2 (August 31, 2025): 112–23, <http://103.241.192.17/~jurnalunidha/index.php/JDH/article/view/2247>.

³ Ratna Dewi et al., "Peran Komisi Pengawas Persaingan Usaha Sebagai Wasit Sekaligus Hakim dalam Ekonomi," *Collegium Studiosum Journal* 7, no. 2 (December 30, 2024): 481–96, <https://doi.org/10.56301/CSJ.V7I2.1417>.

⁴ Dhea Aulia Putri et al., "Monopoli Perdagangan dan Dampaknya Terhadap Persaingan Usaha Yang Sehat," *Al-Zayn: Jurnal Ilmu Sosial & Hukum* 3, no. 3 (June 27, 2025): 1845–52, <https://doi.org/10.61104/ALZ.V3I3.1446>. See also Ridwan Arifin, Auliya Rochman, and Muhammad Ikram Nur Fuady. "The Political Economy of Corruption Law Enforcement in Indonesia". *The Indonesian Journal of Critical Legal Studies* 1, no. 1 (2026): 31-60. <https://inleads.id/publications/index.php/IJCLS/article/view/20>.

⁵ Nurul Nurul, Martulus Tambunan, and Indah Noviyanti, "Strategi Ekspansi Global Perusahaan: Tantangan dan Solusi Manajemen Strategi," *ECONOMIST: Jurnal Ekonomi dan Bisnis* 1, no. 3 (July 5, 2024): 1–11, <https://doi.org/10.63545/ECONOMIST.V1I3.25>. See also Pratama Agus Widodo, "The Role of Indonesian Fatwa Institutions in Responding to Artificial Intelligence Technology". 2026. *The Indonesian Journal of Islamic Legal Modernism* 1, no. 1 (2026): 121-50.

⁶ Karmila Sari Sukarno and Reky Nurviana, "Kajian Hukum Akuisisi Dan Merger Lintas Negara (Cross Border) Sektor Perbankan Di Indonesia," *Indonesian Journal*

country has different ways of formulating, interpreting, and enforcing competition law, even though there are universal principles governing the prohibition of monopolies. This is influenced by factors such as legal history, political conditions, economic culture, and national development needs. Comparative studies between countries are important to understand the variations in the application of antitrust law and to seek best practices that can be adapted to each country's context.

There are a number of business competition law models that serve as references. The United States has an antitrust legal framework called the *Sherman Act* of 1890, which forms the basis for regulating monopolistic practices.⁷ The European Union developed a supranational competition law system by applying the principle of single market integration.⁸ In Asia, various countries are developing competition regulation models that adapt to the regional challenges of each country and economic globalization. This shows that competition law is not static, but continues to evolve with economic and technological developments.⁹

of Islamic Jurisprudence, Economic and Legal Theory 3, no. 1 (January 25, 2025): 723–33, <https://doi.org/10.62976/IJJEL.V3I1.995>.

- ⁷ Andrea Piletta Massaro, "Competition as an Institution for Regulating Societal Transformations in the Digital Era: The Role of Social Values in Competition Law," *Digital Society* 4, no. 1 (April 24, 2025): 33, <https://doi.org/10.1007/s44206-025-00184-9>. See also Fadhel Arjuna Adinda, "Assessing the Economic Impact of Competition Law Enforcement on Market Efficiency in Indonesia". *The Indonesian Journal of Economic Analysis of Law* 1, no. 1 (2026): 31-60. <https://inleads.id/publications/index.php/IJEAL/article/view/9>.
- ⁸ Salih I. Bora and Lucas Schramm, "Intergovernmentalism in a Supranational Field: France, Germany, and EU Competition Policy Reform," *West European Politics* 48, no. 6 (2025): 1270–98, <https://doi.org/10.1080/01402382.2024.2355812>.
- ⁹ Nakzim Khalid Siddiq and Arief Rahman, "Perlindungan Hukum Terhadap Persaingan Usaha Yang Adil Dalam Perkembangan E-Commerce Di Indonesia," *Commerce Law* 5, no. 1 (June 20, 2025): 32–42, <https://doi.org/10.29303/commercelaw.v5i1.7199>. See also Firdaus Arifin, and Andika Prawira Buana. "Unfair Business Competition in the E-Commerce Ecosystem: Comparison of Indonesian and South Korean Regulations." *Contemporary Issues on Indonesian Social Justice and Legal Reform* 1, no. 1 (2025): 40-57. <https://journals.arteslibres.org/index.php/law/article/view/3;>

Indonesia as the country with the largest economy in Southeast Asia,¹⁰ facing challenges in maintaining a balance between national interests and the protection of healthy business competition.¹¹ Indonesia, through Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition, strives to enforce rules that can control anti-competitive behavior in the market.¹² In practice, various obstacles such as limited institutional capacity, a developing legal culture, and political intervention weaken the effectiveness of competition law. This situation puts Indonesia in a strategic position to review the practices and experiences of other countries with different legal and economic characteristics in order to strengthen domestic antitrust legal instruments.

Uzbekistan is a relatively new country in developing a competition law framework. As part of the post-Soviet states, Uzbekistan carries the legacy of a centralized economic system, placing the state as the dominant actor in economic activity.¹³ The transition to a market economy system requires Uzbekistan to build more modern antitrust regulations in line with the demands of foreign investment and

Fayhan Rafiq Alamsyah, and David Wilson. "The Role of Digital Economy in Promoting Economic Justice: A Case Study of Indonesia's Tech Sector". *Indonesian Economic Justice Review* 1, no. (2024). <https://doi.org/10.65815/z23ttf59>.

- ¹⁰ Muhammad Taqwa, Syadam Maulana, and Maulana Azani, "Kontribusi Indonesia Terhadap Stabilitas Ekonomi Dunia Dalam Kerangka G-20: Studi Atas Kebijakan Dan Komitmen Selama Krisis Global," *Multidisciplinary Research Journal* 1, no. 1 (June 25, 2025): 11–16, <https://doi.org/10.70716/murej.v1i1.13>.
- ¹¹ Zahra Ainun Maldina and Ubaid Aisyul Hana, "Hukum Persaingan Usaha Dan Perlindungan Konsumen Mewujudkan Pasar Yang Adil Dan Transparan," *Jurnal BANSI - Jurnal Bisnis Manajemen Akutansi* 5, no. 1 (August 12, 2025): 22–30, <https://doi.org/10.58794/BNS.V5I1.1444>.
- ¹² Dinda Delfiana, "Sosialisasi Dan Pelatihan Tentang Hukum Persaingan Usaha Yang Sehat," *Journal Of Human And Education (JAHE)* 5, no. 2 (April 18, 2025): 432–41, <https://doi.org/10.31004/JH.V5I2.2439>.
- ¹³ Zauresh Saktaganova et al., "The Transition from the Formation of a Mixed Party Elite Based on Local Ethnic Groups and Client-Patronage Clan Relations in the Soviet Republics of Central Asia to National Bureaucratic Ethnocracy in the Post-Soviet Period," *Public Integrity* 27, no. 3 (2025): 256–73, <https://doi.org/10.1080/10999922.2023.2289877>.

integration into global trade.¹⁴ In recent years, the Government of Uzbekistan has implemented legal and institutional reform efforts to promote a more competitive business climate.¹⁵ Uzbekistan's antitrust law serves not only as a market control mechanism, but also as an instrument of economic transformation.¹⁶

Russia shares similarities with Uzbekistan in terms of its legal system. Russia is a country with a legacy of the Soviet legal and economic systems.¹⁷ Russia is facing the complexity of balancing state political influence with market mechanisms. Melalui *Federal Law No. 344-FZ on Protection of Competition*, Russia has developed quite advanced competition regulations, including provisions regarding mergers, cartels and abuse of dominant position.¹⁸ Furthermore, Russia also plays an active role in establishing competition regulations in the Eurasian region, making it an important actor in the regional context.¹⁹ Competition law in Russia demonstrates that competition law not only encompasses legal-economic aspects, but is also closely linked to politics and state policy.

¹⁴ Sitora Ashurova, "THE IMPORTANCE OF COMMERCIAL LAW IN REGULATING MODERN BUSINESS TRANSACTIONS: THE CASE OF UZBEKISTAN," *Oriental Renaissance: Innovative, Educational, Natural and Social Sciences* 5, no. 4 (2025): 2181–1784, <https://cyberleninka.ru/article/n/the-importance-of-commercial-law-in-regulating-modern-business-transactions-the-case-of-uzbekistan>.

¹⁵ Erkaboyeva Jasmina Safarali Qizi, "ENHANCING THE EFFICIENCY AND ENSURING THE COMPETITIVENESS OF UZBEKISTAN'S ECONOMY," *Eurasian Journal Of Entrepreneurship and Pedagogy* 3, no. 1 (2024): 11–15.

¹⁶ Mahsuda Tadjibayeva, "Uzbekistan's Competition Law and Legal Transplants," *Osteuropa Recht* 70, no. 1 (2024): 4–13, <https://doi.org/10.5771/0030-6444-2024-1-4>.

¹⁷ Vladimir Gel'man, *The Politics of Bad Governance in Contemporary Russia* (Ann Arbor, MI: University of Michigan Press, 2022), <https://doi.org/10.3998/mpub.11621795>.

¹⁸ Andrey Tsyganov, Lesya Davydova, and Anastasia Dokukina, "Merger Control in Russia: Review and Perspectives," in *Research Handbook on Global Merger Control* (Edward Elgar Publishing, 2023), 537–62, <https://doi.org/10.4337/9781800378193.00035>.

¹⁹ Andrej Krickovic and Igor Pellicciari, "From 'Greater Europe' to 'Greater Eurasia': Status Concerns and the Evolution of Russia's Approach to Alignment and Regional Integration," *Journal of Eurasian Studies* 12, no. 1 (January 1, 2021): 86–99, <https://doi.org/10.1177/1879366521998808>.

A comparison between Indonesia, Uzbekistan, and Russia becomes relevant because all three are in different positions on the spectrum of competition law development. Indonesia represents a developing country with a relatively open democratic system,²⁰ Uzbekistan illustrates a transitional country that is building competition law instruments,²¹ while Russia brings the experience of a large country with significant political influence in economic practices.²² These three cases allow for a comparative analysis that not only highlights variations in formal regulations, but also the role of legal advocacy, the involvement of law enforcement agencies, and the challenges in creating economic justice. By looking at these three countries, it can be understood how antitrust law functions in diverse socio-political environments, while also affirming that the effectiveness of competition law is inseparable from the national context of each country.

Along with increasing economic globalization and cross-border economic relations where international trade is becoming more open, anti-competitive practices are no longer limited to the domestic scope, making this research important to conduct. Developing countries such as Indonesia and Uzbekistan need robust legal instruments to be able to face the potential dominance of multinational corporations' economic practices. Meanwhile, Russia shows that antitrust law can be a political and economic tool in dealing with international pressure. Thus, comparing these three countries will provide a more complete picture of how competition law can function as a means of maintaining a balance between domestic and global interests.

Advocacy and legal services are a crucial part that also influences the effectiveness of the antitrust legal framework.²³ Indonesia has

²⁰ Ghiyats Amri Wibowo et al., "Pembatasan Oligarki Dalam Mewujudkan Sistem Demokrasi Di Indonesia," *Media of Law and Sharia* 5, no. 3 (June 20, 2024), <https://doi.org/10.18196/MLS.V5I3.102>.

²¹ Tadjibayeva, "Uzbekistan's Competition Law and Legal Transplants."

²² Adam Rose, Zhenhua Chen, and Dan Wei, "The Economic Impacts of Russia-Ukraine War Export Disruptions of Grain Commodities," *Applied Economic Perspectives and Policy* 45, no. 2 (June 1, 2023): 645–65, <https://doi.org/10.1002/AEPP.13351>.

²³ Hasudungan Sinaga, "Bantuan Hukum Sebagai Sarana Memperjuangkan Keadilan," *J-CEKI: Jurnal Cendekia Ilmiah* 4, no. 1 (December 24, 2024): 2929–41, <https://doi.org/10.56799/JCEKI.V4I1.7032>.

KPPU, Uzbekistan has Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan and Russia has FAS (*Federal Antimonopoly Service*) as the implementing bodies of the antitrust instruments possessed by each country. The success of competition law does not only depend on formal regulations, but also on the extent to which society and business actors accept and understand the principles of competition as part of economic practice. Advocacy and legal services become an important aspect as a benchmark for the differences in the implementation of competition law in these three countries.

Competition law is not merely a technical rule concerning economics, but also a part of development strategy, political stability, and international diplomacy. Indonesia illustrates the efforts of developing countries to strengthen legal institutions,²⁴ Uzbekistan demonstrates the process of transition towards a market economy,²⁵ while Russia demonstrates the close relationship between antitrust law and politics and geopolitics.²⁶ This comparison confirms the urgency of research to understand the variations in the application of competition law and its implications in facing global and domestic challenges.

The research by Herry Polontoh and Fitri Arianti Saputri in *JHK: Jurnal Hukum dan Keadilan* highlights the problems of competition law enforcement in Indonesia. This study emphasizes the gap between existing legal norms and the effectiveness of their application by supervisory authorities, especially regarding the limitations of sanctions and the weakness of decision execution mechanisms.²⁷ Meanwhile,

²⁴ Endah Rantau Itasari and Erwin Erwin, "Reformasi Hukum Dalam Mewujudkan Keadilan Sosial: Tantangan Dan Prospek Pengembangan Sistem Peradilan Di Indonesia," *Jurnal Cahaya Mandalika* ISSN 2721-4796 (Online), April 17, 2024, 1657–64, <https://ojs.cahayamandalika.com/index.php/jcm/article/view/2934>.

²⁵ Lorena Lombardoizzi, "An Historical Analysis of State Capitalism through Structural Transformation: The Case of Uzbekistan," *Globalizations*, June 20, 2023, <https://doi.org/10.1080/14747731.2023.2221094>.

²⁶ Marco Siddi, "The Role of Power in EU–Russia Energy Relations: The Interplay between Markets and Geopolitics," in *The European Union, Russia and the Post-Soviet Space* (Abingdon: Routledge, 2022), 10–29, <https://doi.org/10.4324/9781003081722-2>.

²⁷ Herry Polontoh and Fitri Arianti Saputri, "Regulation and Sanctions Against Unfair Business Competition: Challenges in Law Enforcement," *JHK: Jurnal*

Mahsuda Tadjibayeva in *Osteuropa Recht* highlights how Uzbekistan adopted the legal framework of competition from other countries through a process of legal transplants. The study explains the dynamics of legal transition in Uzbekistan, but focuses more on the normative aspects and the adoption process, rather than on practical implementation or accompanying legal advocacy.²⁸

Andrey Makarov in *Post-Communist Economies* focuses on court practices in Russia in handling anti-competitive agreements. This article elaborates in detail how courts interpret and apply antitrust regulations, but is limited to a specific time period and does not mention the connection with legal advocacy or the role of non-judicial institutions.²⁹ Thus, these three studies provide important contributions, but none have comprehensively compared antitrust regulations, implementation, advocacy, and legal services in a cross-country context.

The novelty of this research lies in its comparative approach involving three countries with different legal, political, and economic backgrounds, namely Indonesia, Uzbekistan, and Russia. Not only does it discuss formal regulatory aspects, but this study also examines how legal advocacy and legal services play a role in supporting the effectiveness of antitrust law. Thus, this research offers a multidimensional perspective that goes beyond previous studies that tend to be normative, focused on one country, or limited to the judicial dimension alone. The aim of this research is to analyze in depth the comparison of antitrust regulations, advocacy, and legal services in Indonesia, Uzbekistan, and Russia in an effort to promote healthy business competition. This research is expected to provide a comprehensive overview of the factors that influence the effectiveness of competition law in these three countries, while also offering practical insights that can be used to strengthen competition law policies in developing and transitional countries.

Hukum Dan Keadilan 2, no. 3 (April 27, 2025): 28–43, <https://doi.org/10.61942/JHK.V2I3.322>.

²⁸ Tadjibayeva, “Uzbekistan’s Competition Law and Legal Transplants.”

²⁹ Andrey Makarov, “Anti-Competitive Agreements in Russian Courts (2008–2012): Antitrust Law Implementation and Interpretation,” *Post-Communist Economies* 31, no. 3 (May 4, 2019): 383–95, <https://doi.org/10.1080/14631377.2018.1537738>.

This research is a normative legal research with a comparative approach. The focus of the research is on the analysis of antitrust regulations, advocacy and legal services in Indonesia, Uzbekistan and Russia. This is done to assess the extent to which these three countries can synergize between their antitrust regulations and the advocacy and legal services applied in each country. The comparative approach was chosen because it allows researchers to examine the development of competition law regulations in three countries with different characteristics and backgrounds. Through a comparative approach, it is hoped that a comprehensive picture of the effectiveness of antitrust law in promoting healthy business competition can be obtained.

Data collection techniques were carried out through library research by examining various primary and secondary sources. Primary sources include laws and regulations, official documents from competition supervisory institutions, and court decisions related to antitrust practices in the three countries. Secondary sources include books, scientific journals, international reports, and relevant previous research articles. Data was obtained using the documentation method, namely collecting, classifying, and organizing information that is directly related to the focus of the research.

The data analysis technique used is qualitative analysis with a descriptive-comparative model. The collected data will be analyzed systematically to identify legal principles, institutions, and legal advocacy practices for competition in each country. Furthermore, a comparison between countries is carried out to find similarities, differences, and factors that influence the effectiveness of antitrust law. The results of the analysis are described descriptively, resulting in a more complete and in-depth understanding of how competition regulations and legal advocacy work in different contexts.

B. Comparison of Antitrust Law Regulation and Implementation in Indonesia, Uzbekistan, and Russia

Antitrust law is a fundamental pillar for maintaining the integrity and efficiency of the market economy.³⁰ Antitrust law is designed to

³⁰ Sommaliagustina and Nosi, "Hukum Persaingan Usaha Di Indonesia Agar Menjamin Pasar Yang Adil Dan Efisien."

prevent excessive concentration of economic power, which can manifest itself in the form of monopolistic practices, cartels, or abuse of dominant position.³¹ Without a strong legal framework, markets tend to lead to structural failures and harm the well-being of the people.. Therefore, antitrust law is a vital legal instrument to ensure healthy, effective, and efficient competition.

Legal advocacy and legal services in the context of implementing competition law do indeed need to be separated and analyzed specifically because their roles and focus are different. In legal advocacy related to effective competition law, the primary step to take is to raise awareness and understanding among stakeholders, including the government, businesses, and the public, about the importance of healthy competition to achieve market efficiency and public welfare. Advocacy should also drive policy and regulatory updates that are adaptable to market dynamics, and provide recommendations and input to policymakers to create a conducive business climate. Additionally, advocacy plays a role in educating business owners to understand prohibited practices and fostering a culture of compliance with competition law. The Indonesian Competition Supervisory Commission (KPPU), for example, is not only a law enforcement agency but also actively advocates thru socialization and policy consultations to strengthen the overall implementation of this law.

Meanwhile, in providing legal services related to the effective implementation of competition law, the necessary strategies include creating an internal compliance program within the company to identify and prevent competition law violations at an early stage. Steps such as due diligence to detect potential violations, review of business documents and agreements, and legal risk mitigation should be proactively implemented. Competition lawyers play a role in helping businesses understand their legal obligations, providing legal assistance in handling cases, and guiding businesses to adjust their business practices to comply with competition law provisions. This preventive approach is crucial for business owners to avoid sanctions and disputes

³¹ Putri et al., “Monopoli Perdagangan Dan Dampaknya Terhadap Persaingan Usaha Yang Sehat.”

that could damage their reputation and business.³² Legal advocacy aims to strengthen the policy framework, raise awareness, and improve the business competition ecosystem, while legal services focus on practical application at the company level to ensure legal compliance and mitigate the risk of violations. Both are essential complementary components for the effective and sustainable implementation of competition law.

Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition constitutes the antitrust legal framework possessed by Indonesia.³³ The Anti-Monopoly and Unfair Business Competition Law is a legislative response to the 1998 economic crisis that hit Indonesia. The Anti-Monopoly and Unfair Business Competition Law was formed based on the spirit of economic democracy which desires equal opportunities for every citizen to participate in the production and marketing process.³⁴ Hal This indicates that the objective of competition law in Indonesia is not only to achieve economic efficiency, but also to realize public welfare and prevent the concentration of economic power in certain business actors.³⁵

The Anti-Monopoly and Unfair Business Competition Law categorizes in detail what types of business practices are prohibited. Article 4 paragraph (1) of the Anti-Monopoly and Unfair Business Competition Law explicitly prohibits oligopoly agreement practices, which reads "Business actors are prohibited from making agreements

³² See also Ardhitama Suchayanto, "Digital Society and the Transformation of Community-Based Dispute Resolution in Indonesia". *The Indonesian Journal of Sociolegal Development* 1, no. 1 (2026): 31-60. <https://inleads.id/publications/index.php/IJSLD/article/view/14>.

³³ Putri et al.

³⁴ Noranisa, Farhurahman, and Nur Paikah, "Efektivitas Fungsi Pengawasan Komisi Pengawas Persaingan Usaha (KPPU) Kanwil VI Makassar Dalam Mencegah Praktek Monopoli Perdagangan Perspektif Hukum Islam | Journal of Islamic Economic Studies," *Jurnal of Islamic Economic Studies* 1, no. 1 (March 2025), <https://journal.hamfara.com/hamfara/article/view/10>.

³⁵ Seselia Ongso, Sugeng Santoso, and A. Hasnanda Sakina Maheswari, "Analisis Kasus Praktek Monopoli Terhadap Pelayanan Jasa Bongkar Muat Petikemas Disebabkan Kebijakan Stack 100% (Studi Putusan Nomor 1344 K/Pdt.Sus-KPPU/2020)," *Jurnal Sosial Dan Sains* 5, no. 6 (June 26, 2025): 1820-36, <https://doi.org/10.59188/JURNALSOSAINS.V5I6.32222>.

with other business actors to jointly control the production and/or marketing of goods and/or services that may result in monopolistic practices and/or unfair business competition."³⁶ This norm demonstrates the state's seriousness in preventing market concentration. The effectiveness of this article is still limited because the interpretation of the article is often inconsistent between the KPPU (Indonesia Competition Commission), the Commercial Court, and the Supreme Court. This difference in interpretation creates legal uncertainty for business actors.

Article 11 of the Anti-Monopoly and Unfair Business Competition Law prohibits cartel practices, which reads "business actors are prohibited from making agreements with their competitors, which intend to influence prices by regulating the production and/or marketing of a good and/or service, which may result in monopolistic practices and/or unfair business competition."³⁷ This provision is designed to prevent price agreements that harm consumers. However, difficulties arise in directly proving this due to covert cartel practices and their execution through informal mechanisms.³⁸ This obstacle means that many cartel cases rely solely on indirect evidence such as price patterns.³⁹ This condition weakens law enforcement against cartels, which are fundamentally the most dangerous form of violation in competition law.

³⁶ Olivya Olivya and Zulfikar Judge, "Analisa Hukum Penetapan Harga Dalam Monopoli Dan Persaingan Usaha Tidak Sehat," *JHI: Jurnal Hukum Indonesia* 2, no. 2 (April 30, 2023), <https://jhi.rivierapublishing.id/index.php/rp/article/view/45>.

³⁷ Lunita Jawani, "Prinsip Rule of Reason Terhadap Praktik Dugaan Kartel Menurut Pasal 11 Undang-Undang Nomor. 5 Tahun 1999 Tentang Larangan Praktik Monopoli Dan Persaingan Usaha Tidak Sehat," *Jurnal Hukum, Humaniora, Masyarakat Dan Budaya* 1, no. 2 (2021): 99–106.

³⁸ Dedi Mardianto, Hamzah Haeriyah, and Muslimin Kara, "PRAKTIK MONOPOLI DAN KARTEL DI PASAR GLOBAL DALAM METAFORA KEADILAN," *JEBIMAN: Jurnal Ekonomi, Bisnis, Manajemen Dan Akuntansi* 3, no. 4 (July 1, 2025): 210–18, <https://sociohum.net/index.php/JEBIMAN/article/view/133>.

³⁹ Siti Aminah, "KEDUDUKAN BUKTI TIDAK LANGSUNG (INDIRECT EVIDENCE) DALAM PENYELESAIAN PRAKTIK KARTEL DI INDONESIA," *"Dharmasisya" Jurnal Program Magister Hukum FHUI* 2, no. 3 (January 4, 2023), <https://scholarhub.ui.ac.id/dharmasisya/vol2/iss3/34>.

Article 17 paragraph (1) of the Anti-Monopoly and Unfair Business Competition Law prohibits monopolistic practices, which reads "business actors are prohibited from controlling the production and/or marketing of goods and/or services that may result in monopolistic practices and/or unfair business competition."⁴⁰ This article is the main basis for supervising companies that have a dominant market share. However, this article does not regulate the limits of market dominance in detail, so supervision depends on the interpretation of the KPPU. The KPPU often uses an economic approach to determine dominant market share, but the results are often debated in the litigation process.⁴¹ This has resulted in many KPPU decisions being overturned by the courts on the grounds that the "dominant" evidence was not strong enough.⁴² This condition shows a disparity between substantive legal norms and the evidentiary mechanism in court.

Rules regarding mergers and acquisitions are found in Article 28 paragraphs (1) and (2) of the Anti-Monopoly and Unfair Business Competition Law, which reads: "(1) Business actors are prohibited from carrying out mergers or consolidations of business entities that may result in monopolistic practices and/or unfair business competition; (2) Business actors are prohibited from taking over shares of other companies if such actions may result in monopolistic practices and/or

⁴⁰ Nurdiani Yusnita Sari, "Implementasi Penjatuhan Denda Dalam Putusan Perkara Pelanggaran Pasal 17 Undang-Undang Nomor 5 Tahun 1999 Tentang Larangan Praktik Monopoli Dan Persaingan Usaha Tidak Sehat," *UNES Law Review* 6, no. 1 (September 10, 2023): 832–46, <https://doi.org/10.31933/UNESREV.V6I1.890>.

⁴¹ Gilang Wahyu Saputra, "ANALISA YURIDIS PERSAINGAN USAHA TIDAK SEHAT DALAM PELAKSANAAN KEMITRAAN ANTARA PT ABURAHMI DAN KOPERASI PENUKAL LESTARI (Studi Putusan KPPU Nomor 02/KPPU-K/2023)" (Universitas Islam Sultan Agung, 2025).

⁴² Luki Alvino, Firdaus Firdaus, and Setia Putra, "Penggunaan Bukti Petunjuk Dalam Proses Pembuktian Perkara Persaingan Usaha Dan Monopoli Dalam Pengadilan Indonesia," *Jurnal Ilmiah Wahana Pendidikan* 11, no. 4.D (April 30, 2025): 67–80, <http://www.jurnal.peneliti.net/index.php/JIWP/article/view/11852>.

unfair business competition."⁴³ In practice, in the context of mergers, KPPU faces problems in conducting economic analysis, especially regarding *horizontal merger* and *vertical integration*.⁴⁴ The merger evaluation process is often based on administration rather than long-term competitive impact analysis.⁴⁵ In addition, not all business actors comply with merger reporting due to weak sanction mechanisms for late reporting.⁴⁶ This indicates that the KPPU has weak control over the economic analysis of merger practices to identify competition law issues.

The Anti-Monopoly and Unfair Business Competition Law adopts two approaches, namely the *per se* illegal approach for practices that are inherently anti-competitive and the rule of reason approach for other practices whose detrimental impact must be proven.⁴⁷ Nevertheless, law enforcement related to practices such as cartels often faces difficulties. This is due to the limitations of the implementing agency's authority to conduct searches or wiretaps in collecting direct evidence. The Business Competition Supervisory Commission (KPPU) was formed as an independent institution to implement the Anti-

⁴³ Yordanius Trio Ate et al., "Aspek Hukum Dan Regulasi Dalam Penggabungan Usaha (Merger Dan Akuisisi)," *Journal of Comprehensive Science (JCS)* 4, no. 1 (January 25, 2025): 385–92, <https://doi.org/10.59188/jcs.v4i1.2985>.

⁴⁴ Windha Windha and Syarifah Lisa Andriati, "Studi Terhadap Dampak Perjanjian Integrasi Vertikal Pada Industri Farmasi Ditinjau Dari Perspektif Hukum Persaingan Usaha," *Jurnal Sains Farmasi & Klinis* 10, no. 2 (August 21, 2023): 226–37, <https://doi.org/10.25077/JSEK.10.2.226-237.2023>.

⁴⁵ Ilham Daylami and Nurul Huda, "Implikasi Merger Dan Akuisisi Terhadap Upaya Peningkatan Kinerja Finansial Perusahaan," *Cakrawala Repositori IMWI* 8, no. 1 (January 21, 2025): 1452–60, <https://doi.org/10.52851/CAKRAWALA.V8I1.763>.

⁴⁶ Ahmad Sabirin and Raafid Haidar Herfian, "Keterlambatan Pelaporan Pengambilalihan Saham Perusahaan Dalam Sistem Post Merger Notification Menurut Undang-Undang Persaingan Usaha Di Indonesia," *JURNAL PERSAINGAN USAHA* 2 (2021): 55–63.

⁴⁷ Nur Abdul Rahman Roy, Elisatris Gultom, and Deviana Yuanitasari, "Eksaminasi Penerapan Rule of Reason Terhadap Persekongkolan Untuk Memperoleh Rahasia Perusahaan Kompetitor Dan Probabilitas Dominasi Perusahaan Dalam Tindakan Anti Kompetitif: Studi Kasus Putusan Perkara Nomor: 08/Kppu-L/2024," *Jurnal Pendidikan Indonesia* 6, no. 4 (April 27, 2025): 1985–95, <https://doi.org/10.59141/japendi.v6i4.7652>.

Monopoly and Unfair Business Competition Law.⁴⁸ The KPPU has the authority to receive reports, conduct investigations, and impose administrative sanctions.⁴⁹ In addition to its law enforcement function, the KPPU also has a vital advocacy role in providing advice and considerations to the government to create a healthy and more conducive business climate.⁵⁰

KPPU is an independent institution that is responsible to the president.⁵¹ This structural relationship creates potential tensions in sensitive cases involving state-owned enterprises (BUMN) or conglomerates with strong political influence. The implementation of the Anti-Monopoly and Unfair Business Competition Law faces significant challenges not only at the KPPU (Indonesia's anti-monopoly agency) but also within the Indonesian legal system. One of the main problems is the difference in interpretation and understanding of the legal provisions between the KPPU, the Commercial Court, and the Supreme Court. KPPU decisions are administrative in nature and can be appealed to the Commercial Court up to the Supreme Court level.⁵²

⁴⁸ Farsya Dalila Alamsyah et al., "PENGUATAN KPPU MELALUI MODEL SUPERVISI UNTUK MENCEGAH TUMPANG TINDIH KEWENANGAN DALAM PENEGAKAN HUKUM PERSAINGAN USAHA," *Jurnal Hukum Statuta* 4, no. 2 (April 15, 2025): 95–107, <https://doi.org/10.35586/jhs.v4i2.10823>.

⁴⁹ Zaini Munawir Lubis, Budi Sastra Panjaitan, and Arifuddin Harahap, "Aspek Hukum Pidana Dalam Persaingan Usaha Pasca UU Cipta Kerja No. 6 Tahun 2023 Dan Peraturan Pemerintah Nomor 44 Tahun 2021 Serta Perpres Nomor 100 Tahun 2024 Tentang KPPU," *Jurnal Ilmiah Penegakan Hukum* 12, no. 1 (July 2, 2025): 91–100, <https://doi.org/10.31289/JIPH.V12I1.15194>.

⁵⁰ Muhammad Iqbal Pratama, "PENDEKATAN PEMBUKTIAN DALAM PENEGAKAN HUKUM PERSAINGAN USAHA BERDASARKAN UNDANG-UNDANG NO. 5 TAHUN 1999," *Jurnal Magister Ilmu Hukum: Hukum Dan Kesejahteraan* 9, no. 2 (July 30, 2025): 24–36, <https://doi.org/10.36722/JMIH.V9I2.4582>.

⁵¹ Alamsyah et al., "PENGUATAN KPPU MELALUI MODEL SUPERVISI UNTUK MENCEGAH TUMPANG TINDIH KEWENANGAN DALAM PENEGAKAN HUKUM PERSAINGAN USAHA."

⁵² Viranti Nur Ikhwan, Yulianto Syahyu, and Diana Fitriana, "Penegakan Hukum Terhadap Praktik Kartel Dalam Kasus Penjualan Minyak Goreng Kemasan," *Journal of Law and Security Studies* 2, no. 1 (June 30, 2025): 42–57, <https://doi.org/10.31599/ZNP59K42>.

Many KPPU decisions were submitted to the court and declared null and void.⁵³ This tiered process often leads to differences in interpretation and overlapping authorities, potentially weakening the effectiveness of law enforcement and creating uncertainty.

Uzbekistan has taken a major step in reforming its competition regime with the enactment of a new Law “On Competition” No. ZRU-850, which came into effect on October 4, 2023.⁵⁴ This law is a massive reform aimed at refreshing the enforcement of antitrust laws, which have been relatively passive.⁵⁵ This policy explicitly replaces the old law and introduces innovative modern legal concepts. The adoption of this modern law demonstrates a strong political commitment to transition from a centralized economic legacy towards a more market-oriented system and to attract foreign investment into a healthier business climate.

Law “On Competition” No. ZRU-850 introduces modern legal concepts to address increasingly complex market challenges. One significant concept is “superior bargaining power,” where an entity unilaterally has the ability to influence the terms, scope, and price of transactions even without having a dominant position.⁵⁶ This legal concept recognizes that market power can stem from a strategic position in the supply chain, not just from a large market share. Law “On Competition” No. ZRU-850 also prohibits certain actions by business entities with a dominant position or “superior bargaining power.” These prohibited actions include Establishment of monopolistically high and monopolistically low prices for goods; Allowing infringement of the rights of consumers to receive goods of the required quantity and

⁵³ Alvino, Firdaus, and Putra, “Penggunaan Bukti Petunjuk Dalam Proses Pembuktian Perkara Persaingan Usaha Dan Monopoli Dalam Pengadilan Indonesia.”

⁵⁴ Evgeny Khokhlov, “New Competition Law in Uzbekistan,” *AUSTRALIAN JOURNAL OF COMPETITION AND CONSUMER LAW* 31, no. 4 (2023): 345–52.

⁵⁵ Maksim Dogonkin, “Statism and the State Sector in the Former Soviet Union: The Competition Law Perspective” (University of East Anglia. School of Law, 2022).

⁵⁶ Kamila Sharipova, “A NEW COMPETITION LAW WAS ADOPTED,” Vakhidov & Partners, 2024, <https://vakhidovlaw.com/en/resources/news/a-new-competition-law-was-adopted>.

quality; Charging fees in excess of the established price for goods subject to state price regulation or violation of the order of state price regulation, as well as charging fees for services that are not provided or services that should be provided free of charge; Reducing the volume of circulation of goods with the intention of creating or maintaining a deficit in the commodity or financial markets, leading to higher prices and/or harming the rights and legitimate interests of the consumer; Prohibition or restriction of the purchase or sale of goods produced by other business entities; Providing consent to the conclusion of the contract only on the condition that the counterparty receives or sells other goods, or refrains from receiving goods from other business entities or selling them to other business entities; Preventing other business entities from entering the commodity or financial market.⁵⁷

Law “On Competition” No. ZRU-850 also specifically defines and regulates “digital platform” operators. Law “On Competition” No. ZRU-850 prohibits digital platform operators with a dominant position from restricting competition by imposing requirements for the use of specific digital technologies or products.⁵⁸ This demonstrates that Uzbekistan is seeking to address issues that are being debated in many other, even more advanced, jurisdictions. Law “On Competition” No. ZRU-850 significantly changes the criteria for determining a dominant position, including a new market share threshold of more than 40% for monopolies and a minimum revenue threshold.⁵⁹

Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan merupakan lembaga pelaksana Law “On Competition” No. ZRU-850.⁶⁰ Law “On Competition” No. ZRU-850 removes the rule regarding a special list of dominant companies that

⁵⁷ Sharipova.

⁵⁸ Kosta Legal, “New Law on Competition,” Kosta Legal, July 30, 2023, <https://kostalegal.com/legal-alerts/new-law-on-competition>.

⁵⁹ Sharipova, “A NEW COMPETITION LAW WAS ADOPTED.”

⁶⁰ Sarvinov Sunnatillaeva, “ENFORCEMENT OF RULES ON ABUSE OF DOMINANT POSITION IN THE EU AND UZBEKISTAN,” *INTERNATIONAL CONFERENCE OF NATURAL AND SOCIAL-HUMANITARIAN SCIENCES* 1, no. 7 (August 21, 2024): 3–10, <https://doi.org/10.5281/ZENODO.8217753>.

must be monitored.⁶¹ This step allows the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan to directly conduct investigations into alleged abuses without having to go through bureaucratic procedures to register the entity first.⁶² The elimination of this registry reflects a shift from a formalistic and prescriptive approach to a more flexible and effects-based analysis.

A key challenge in the implementation of competition law in Uzbekistan is the dominant role of state-owned enterprises (SOEs).⁶³ Law “On Competition” No. ZRU-850 explicitly gives special attention to entities with state participation and their impact on competition. The new rules prohibit the establishment of companies with state participation in markets that are already competitive if there are already five private business actors in them.⁶⁴ However, the regulation contains an exception that allows the formation of state-owned entities if there is a decision from the President or Cabinet.⁶⁵ The existence of this exception demonstrates that, despite the push for liberalization, political power can still override competition principles and create a fundamental tension between economic goals and state control.

Through Law “On Competition” No. ZRU-850, Uzbekistan requires certain entities to implement an antimonopoly compliance system (*antimonopoly compliance*).⁶⁶ Such entities include state bodies, entities with dominant positions, and companies with significant state ownership.⁶⁷ This obligation is a strategic step to instill a culture of compliance from within and reduce reliance on external enforcement. In addition, Law “On Competition” No. ZRU-850 also introduces a

⁶¹ Ummatov Bekzod Kh, “ANTIMONOPOLY REGULATION AT THE PRESENT STAGE: CHALLENGES AND OPPORTUNITIES,” *Scientific Journal of Actuarial Finance and Accounting* 4, no. 09 (October 8, 2024): 43–47, https://doi.org/10.55439/AFA/VOL4_ISS09/534.

⁶² Sharipova, “A NEW COMPETITION LAW WAS ADOPTED.”

⁶³ Fazilat Abdullaeva, “Enhancing Financial Stability Analysis of Economic Entities in Uzbekistan,” *Central Asian Journal of Innovations on Tourism Management and Finance* 6, no. 3 (June 21, 2025): 1001–9, <https://doi.org/10.51699/CAJITMF.V6I3.952>.

⁶⁴ Khokhlov, “New Competition Law in Uzbekistan.”

⁶⁵ Sharipova, “A NEW COMPETITION LAW WAS ADOPTED.”

⁶⁶ Sharipova.

⁶⁷ Khokhlov, “New Competition Law in Uzbekistan.”

leniency program, which exempts cartel participants from sanctions if they are the first to voluntarily report anti-competitive agreements to the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan.⁶⁸ This method represents the state's effort to dismantle cartels that are difficult to prove.

The competition law framework in Russia is based on Federal Law No. 135-FZ “On the Protection of Competition,” which was enacted in 2006.⁶⁹ Federal Law No. 344-FZ “On the Protection of Competition” was amended in 2024 by Federal Law No. 344-FZ which came into force in March 2025.⁷⁰ The institution that has authority over the enforcement of Russian competition law is the Federal Antimonopoly Service (FAS).⁷¹ FAS has a central role in the competition law regime through its authority to oversee commodity and financial services markets. FAS also has jurisdiction over transactions outside Russia if such transactions have an anti-competitive effect on the domestic market.⁷² This approach reflects that FAS operates based on the effects of an action and disregards jurisdiction.

Federal Law No. 344-FZ has a fairly prescriptive approach in defining and prohibiting anti-competitive practices. Article 10 of Federal Law No. 344-FZ contains a prohibition on abuse of a dominant position, which reads: “Abuse of dominant position by a business entity, including monopolistically high or low prices, withdrawal of goods from

⁶⁸ Legal, “New Law on Competition.”

⁶⁹ Khulkar Rajabova, “CONSUMER REVIEWS AND RECOMMENDATIONS AS FACTORS IN E-COMMERCE: LEGAL REGULATION CHALLENGES,” *Web of Humanities: Journal of Social Science and Humanitarian Research* 3, no. 3 (March 18, 2025): 122–29, <https://webofjournals.com/index.php/9/article/view/3615>.

⁷⁰ World Intellectual Property Organization, “Federal Law No. 135-FZ of July 26, 2006, on the Protection of Competition, Russian Federation,” WIPO: World Intellectual Property Organization, 2024, <https://www.wipo.int/wipolex/en/legislation/details/22926>.

⁷¹ Yuliya Rodionova et al., “Public Procurement Efficiency and Enforcement: Evidence from Kazakhstan and Russia,” *International Journal of Public Administration*, February 8, 2025, <https://doi.org/10.1080/01900692.2025.2452918>.

⁷² Jurgita Malinauskaite and Fatih Bugra Erdem, “Digital Antitrust: The Google (Android) Decisions in Russia, Turkey and India,” *Business Law Review* 42, no. Issue 4 (August 1, 2021): 182–94, <https://doi.org/10.54648/BULA2021026>.

circulation, or creating discriminatory conditions, shall be prohibited.”⁷³ The definition of dominance in Russia relies heavily on clear market share thresholds. A company is legally considered dominant if it has a market share of more than 50%, and dominance can be established by FAS if the market share exceeds 35%.⁷⁴ While the application of strict thresholds provides certainty and simplifies investigations, it is potentially less effective in addressing abuses of market power that are not directly related to high market share. This reflects the tendency of the Russian legal system to be more formalistic.

The prohibition of anti-competitive agreements is also regulated in Federal Law No. 344-FZ, as stated in Article 11, which reads: “Agreements between competing business entities aimed at fixing prices, dividing markets, or restricting production shall be prohibited.” This provision includes prohibitions on both horizontal and vertical agreement practices.⁷⁵ These rules are in line with international standards, although their application is based on Russia's political influence. The supervision of mergers and acquisitions is regulated in Articles 27–33. Notification of mergers and acquisitions is mandatory to the Federal Antimonopoly Service (FAS) if the transaction value exceeds a certain threshold.⁷⁶ These regulations are designed to prevent excessive market concentration. However, FAS also uses these rules to restrict the entry of foreign investment in strategic sectors. This demonstrates that competition law in Russia is not solely market-oriented but also contains a geopolitical dimension.

⁷³ Inna Kovalenko et al., “Mechanism of Protection of Business Entities from Unfair Competition,” *Revista Amazonia Investiga* 11, no. 53 (July 4, 2022): 227–33, <https://doi.org/10.34069/AI/2022.53.05.23>.

⁷⁴ N. I. Markov, “Analysis of Competition and Domination in the Market of Biologically Active Supplements in Russia,” *Studies on Russian Economic Development* 34, no. 5 (October 26, 2023): 640–50, <https://doi.org/10.1134/S107570072305009X>.

⁷⁵ Daniela Nováčková and Jana Vnuková, “Competition Issues Including in the International Agreements of the European Union,” *Tribuna Juridică* 11, no. 2 (2021): 234–50.

⁷⁶ K. Afuwape, “Regulatory Barriers in Digital Mergers and Acquisitions: Antitrust Regulation of Technology Sector,” *Journal of Digital Technologies and Law* 3, no. 2 (July 6, 2025): 304–37, <https://doi.org/10.21202/JDTL.2025.13>.

FAS has demonstrated assertive and extensive enforcement capabilities. However, despite FAS demonstrating independence in handling anti-competitive cases, a fundamental challenge in Russian competition law is the dominant role of state-owned enterprises. These companies are often used as strategic instruments to achieve geopolitical goals, especially in the energy sector.⁷⁷ This situation creates a fundamental dilemma for FAS: balancing its mandate to promote competition with the political reality where dominant entities are under state control. Government intervention can contradict sound market principles, and the most significant cases for the economy are often the most politically sensitive, thus testing the limits of FAS's independence.

Aware of the dilemma faced by FAS, Russia is taking steps to modernize its competition law regime through the enactment of the "6th antimonopoly package" in 2024. One of the strategic efforts in this step is FAS's push for an antitrust compliance program, as implemented in Uzbekistan. This program is in effect and mandatory for state-owned companies with more than 50% state ownership.⁷⁸ This program is an effort to address structural legal issues and demonstrates recognition that state entities can be a source of competition law violations. This method is a pragmatic way to bridge the gap between pro-market policies and an economic legacy dominated by the state.

A comparison of the regulation and implementation of antitrust law in the three countries shows a common goal but with different approaches and challenges. In terms of the legal framework, Indonesia has reasonably good instruments, born from the context of political and economic reform. Uzbekistan is undergoing a significant transformation, with its latest laws introducing modern and innovative legal concepts. Meanwhile, Russia has a more prescriptive approach through the establishment of clear thresholds for "dominance," reflecting a legal system that tends to be formalistic. In the institutional aspect, Indonesia's KPPU faces enforcement challenges due to varying

⁷⁷ Sophiana Widiastutie, "Hubungan Cina-Rusia Dalam Dinamika Geopolitik Kawasan Asia Tengah," *Journal of Political Issues* 5, no. 2 (January 31, 2024): 187–95, <https://doi.org/10.33019/jpi.v5i2.147>.

⁷⁸ Valentina Kvanina, "Antitrust Compliance and Its Legal Nature," *Bulletin of the South Ural State University Series "Law"* 19, no. 1 (2019): 46–52, <https://doi.org/10.14529/LAW190108>.

interpretations of the legal framework by commercial courts and the Supreme Court. The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan is in a transitional phase and needs to prove its strength. Russia's FAS is a strong institution with broad authority, but in the process, it operates under the shadow of strong state intervention dominance.

Based on the above explanation, the following table and brief explanation summarize the antitrust legal perspectives and legal advocacy for promoting healthy business competition in Indonesia, Uzbekistan, and Russia, as shown on Table 1.

TABLE 1. Antitrust Law Perspectives and Legal Advocacy to Promote Healthy Business Competition in Indonesia, Uzbekistan, and Russia

Aspect	Indonesia	Uzbekistan	Rusia
Legal Basis	Law No. 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition	Law “On Competition” No. ZRU-850 (2023)	Federal Law No. 135-FZ “On the Protection of Competition” (2006) and amendments No. 344-FZ (2024)
Goals & Principles	Preventing the concentration of economic power, achieving efficiency, and public welfare in the spirit of economic democracy	The transition from a centralized economy to a market economy, attracting foreign investment, and the innovation of the concept of superior bargaining power.	Protecting market competition with prescriptive definitions and formal limitations on market dominance.
Prohibition of Practice	Oligopoly, cartel, monopolistic practices, mergers harmful to competition, stock acquisitions with monopolistic effects	Prohibition of monopoly practices, cartels, and unilateral bargaining power; special regulation of digital platform operators	Abuse of dominant position, price collusion and market sharing, merger and acquisition control
Supervisory Institution	KPPU (Business Competition	Competition Promotion and	Federal Antimonopoly

Aspect	Indonesia	Uzbekistan	Rusia
	Supervisory Commission), independent but accountable to the President.	Consumer Protection Committee, transition to a more flexible and effective system	Service (FAS), a broad authority including extraterritorial jurisdiction
Enforcement Challenges	Differences in legal interpretation between KPPU, Commercial Court, and Supreme Court; limitations in investigation authority; weak sanctions for merger reporting.	State-owned enterprise dominance and political interference; more flexible oversight without a list of dominant companies; internal compliance culture is still developing.	Dominance of state-owned enterprises as a geopolitical tool; strong political influence over enforcement; conflict between market principles and state control.
Legal Approach	The per se illegal approach and the rule of reason; proving a cartel often relies on circumstantial evidence.	Market analysis-based effect approach; new dominance threshold of 40% market share; compliance system and leniency program for cartels	The dominance threshold is clearly above 35-50%; a formalistic approach; a mandatory compliance program for SOEs with ownership >50%.
Advocacy and Other Roles	KPPU's proactive advocacy role provides input on government policies to create a conducive business climate.	Promoting anti-monopoly compliance culture reform and internal program development	FAS is promoting the modernization of competition law and compliance, aiming to balance political and market roles.

Source: Various sources, edited and analyzed by Authors

Indonesia has a fairly mature antitrust legal framework with Law No. 5 of 1999, which was enacted after the 1998 economic crisis and is based on the principles of economic democracy. Nevertheless, law enforcement faces significant obstacles, particularly differing interpretations among judicial institutions and the limited capacity of

the KPPU in investigating and overseeing mergers. KPPU's legal advocacy for healthier policy development is considered important. The strength of competition law enforcement in Indonesia lies in the proactive and structured role of KPPU Advocacy. KPPU not only acts as a law enforcer but also actively promotes compliance and influences government policy, which is an important pillar for creating a healthy competition culture, even amid challenges of judicial interpretation.

Uzbekistan is undergoing major reforms with Law "On Competition" No. ZRU-850, which refreshes the old system and introduces new concepts such as superior bargaining power and digital regulation. The institution is growing with an effects-based approach and the removal of the mandatory supervision list. However, the dominance of state-owned enterprises and political intervention remain major challenges. The strength of competition law enforcement in Uzbekistan lies in its innovative legislative reforms and institutionalized high-level political support for market demonopolization. This has enabled the adoption of legal concepts and structural measures, such as mandatory compliance by state-owned enterprises, to address competition issues within a state-dominated system.

Russia has a more formalistic system with clear regulations and market share limits for determining market dominance. The Federal Antimonopoly Service (FAS) has strong authority and broad enforcement capabilities, including extraterritorial jurisdiction, but it must operate within the context of state-owned enterprises being used as political tools and geopolitical strategies, thus facing a dilemma in upholding the principles of fair competition. Russia also adopted a mandatory antitrust compliance program for state-owned enterprises to address internal violations. These three countries demonstrate that the success of competition law enforcement does not only depend on the quality of the legislation, but also on the maturity of institutions, political will, and the prevailing economic culture in each society. The strength of competition law enforcement in Russia lies in the broad authority and interventionist capabilities of the FAS, particularly its ability to control and issue mandatory orders (prescriptions) against public entities that violate competition law. This positions the FAS as an institution capable of taking direct corrective action, and the adoption of mandatory compliance by state-owned enterprises is a pragmatic way to balance market interests with the realities of a state-dominated economy.

The effectiveness of competition law enforcement in the three countries is not only determined by the quality of the substance of the legislation but is also influenced by institutional maturity, political will, and the prevailing economic culture. Indonesia faces systemic implementation challenges, including judicial bureaucracy and adaptation to the digital economy. Uzbekistan demonstrates ambitious commitment and innovation, but its reforms depend on the ability to truly dampen the influence of state-owned enterprises. Russia has a strong legal framework and assertive enforcement authority, but it must continue to navigate the fundamental conflict between market principles and the use of state-owned enterprises as geopolitical instruments. The struggle to create healthy business competition is a reflection of the power structure and values prevailing in a country.

C. The Role of Legal Advocacy and Legal Services in the Effective Implementation of Competition Law

Advocacy and legal services are essential elements in the implementation of competition law. The existence of comprehensive regulations will not be effective without adequate understanding, compliance, and legal assistance for business actors.⁷⁹ Advocacy in competition law is a series of activities carried out in the form of socializing the principles of healthy competition. Legal services are technical assistance and guidance provided by the antimonopoly agency, in the form of consultations, reviews of compliance programs, or the issuance of official guidelines to facilitate understanding and compliance with competition law.⁸⁰

In the context of legal advocacy, competition authorities must carry out activities such as raising public awareness, socializing basic principles of fair competition, conveying the risks of anticompetitive behavior, and promoting pro-competitive policy design. These

⁷⁹ Farhan Setyo Oetomo and Trubus Rahardiansah, "KESENJANGAN REGULASI DAN PRAKTIK DALAM IMPLEMENTASI HUKUM BISNIS DI INDONESIA PERSPEKTIF ILMU SOSIAL," *AT-TAKLIM: Jurnal Pendidikan Multidisiplin* 2, no. 6 (June 19, 2025): 702–15, <https://doi.org/10.71282/AT-TAKLIM.V2I6.465>.

⁸⁰ Lathifaturahmah et al., *HUKUM BISNIS*, ed. Cory Vidiati and Asti Sri Mulyanti, Cetakan Pe (Makassar: CV Tohar Media, 2024).

advocacy efforts are essential to building a long-term competition culture, reducing resistance to enforcement, and preventing policy distortions. Meanwhile, legal services require concrete steps and strategies such as providing consultations for government agencies or business actors, reviewing and validating internal compliance programs, issuing written guidelines or opinions, conducting pre-merger consultations, and offering technical explanations related to the implementation of specific provisions of competition law. These services ensure that parties subject to the law can correctly interpret and apply competition rules in practice. Active law enforcement is strengthened by advocacy, while advocacy becomes less effective without the power of law enforcement. Therefore, these two functions go hand in hand to create a strong competition culture.

The KPPU is the institution responsible for overseeing the behavior of business actors to prevent monopolistic practices and/or unfair business competition.⁸¹ The KPPU is mandated by the Anti-Monopoly and Unfair Business Competition Law with the duties of supervision, investigation, and competition advocacy. The KPPU has an advocacy role in the form of providing advice and considerations to the government, which is explicitly stated in Article 35 letter e of the Anti-Monopoly and Unfair Business Competition Law.⁸²

The organizational structure of the KPPU reflects the institution's commitment to legitimizing its non-enforcement roles. This is evident in the establishment of the Bureau of Prevention, separate from the Bureau of Law Enforcement, as stated in Article 5 of the Regulation of the Supervisory Commission for Business Competition Number 5 of 2024 concerning the Organization and Working Procedures of the Secretariat General of the Supervisory Commission for Business Competition. This step demonstrates that advocacy and prevention are not additional activities but rather core functions that are structured and equal to the task of law enforcement. The Bureau of Prevention is

⁸¹ Putri Noviyanti et al., "Fungsi Dan Peran Lembaga KPPU Dalam Praktek Persaingan Usaha," *Karimah Taubid* 2, no. 3 (June 5, 2023): 697–707, <https://doi.org/10.30997/KARIMAHTAUHID.V2I3.8789>.

⁸² Pratama, "PENDEKATAN PEMBUKTIAN DALAM PENEGAKAN HUKUM PERSAINGAN USAHA BERDASARKAN UNDANG- UNDANG NO. 5 TAHUN 1999."

specifically tasked with conducting reviews and analyses of government policies and providing advice and considerations related to monopolistic practices and/or unfair business competition, as stated in Article 21 of the Regulation of the Supervisory Commission for Business Competition Number 5 of 2024 concerning the Organization and Working Procedures of the Secretariat General of the Supervisory Commission for Business Competition. This ensures that there is a dedicated work unit with the resources to carry out this proactive role within the KPPU.

The KPPU carries out advocacy as a persuasive tool to influence the role and policies of the government in healthy business competition practices.⁸³ The advice and considerations provided by the KPPU can be based on requests from government agencies, public institutions, or on the KPPU's own initiative (commission initiative). This approach aims to create pro-healthy competition policies. To legitimize this process, the KPPU ratified KPPU Regulation Number 4 of 2023. This regulation introduces the Business Competition Policy Checklist (DPKPU). The DPKPU consists of 13 questions designed to help government agencies conduct self-assessments of the policies they will issue. By using the DPKPU, government agencies can proactively identify and modify policy provisions that could potentially lead to monopolistic practices. This mechanism is a strategic approach by providing a framework for government agencies to internalize and implement the principles of healthy business competition independently. This pre-emptive strategy aims to prevent the enactment of anti-competitive policies, thereby reducing the need for law enforcement later on.

The KPPU also actively conducts socialization and direct advocacy to the public and business actors, for example, collaboration with the Indonesian Employers' Association (Apindo) to raise awareness about the importance of healthy business competition and the sanctions for violations of the Anti-Monopoly and Unfair Business Competition

⁸³ Yanuar Syam Putra et al., "Peran Komisi Pengawasan Persaingan Usaha Dalam Menjaga Persaingan Usaha Sehat Di Indonesia," *Syntax Literate; Jurnal Ilmiah Indonesia* 9, no. 10 (October 16, 2024): 5295–5302, <https://doi.org/10.36418/syntax-literate.v9i10.15415>.

Law.⁸⁴ In addition, the KPPU provides advocacy to universities and units under the Ministry of Education, Culture, Research, and Technology regarding healthy procurement of goods/services and the prevention of tender collusion.⁸⁵ Besides advocacy, the KPPU provides legal services that focus on socializing compliance among business actors, which is regulated in KPPU Regulation Number 1 of 2022 concerning the Business Competition Compliance Program. This program is voluntary and designed to help business actors develop internal procedures to ensure compliance with competition law.⁸⁶ The benefits of this program include reputation maintenance, good corporate governance and violation prevention.⁸⁷

The voluntary nature of this program is highly significant. It is a strategic decision by the KPPU to incentivize business actors so that they can become the first line of defense against anti-competitive behavior. By offering legitimacy to compliance programs, the KPPU provides clear benefits to companies that are proactive in self-regulation. The KPPU also organizes socialization, outreach, and training to facilitate the implementation of this program.

The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan was established in 2019 through a presidential decree. This institution was formed as an effort to liberalize the economy and strengthen the protection of citizens' rights.⁸⁸ The political support enjoyed by the Competition Promotion

⁸⁴ Muhammad Harianto, "KPPU Dan Apindo Tingkatkan Kepatuhan Persaingan Usaha," ANTARA News Mataram, June 15, 2024, <https://mataram.antaranews.com/berita/352653/kppu-dan-apindo-tingkatkan-kepatuhan-persaingan-usaha>.

⁸⁵ Ermina Jaen, "KPPU Beri Advokasi Perguruan Tinggi Dan UPT Kemendikbudristek," Radio Republik Indonesia, June 12, 2024, <https://rri.co.id/bisnis/820538/kppu-beri-advokasi-perguruan-tinggi-dan-upt-kemendikbudristek>.

⁸⁶ Delfiana, "Sosialisasi Dan Pelatihan Tentang Hukum Persaingan Usaha Yang Sehat."

⁸⁷ Novalia Pertiwi and Annisa Azzahrah Burhan, "Efektifitas Penerapan Program Kepatuhan Persaingan Usaha Dalam Pencegahan Persaingan Usaha Tidak Sehat," *Jurnal Studia Legalia: Jurnal Ilmu Hukum* 4, no. 1 (May 2023): 72–87.

⁸⁸ Competition Promotion and Consumer Protection Committee, "O'zbekiston Respublikasi Raqobatni Rivojlantirish va Iste'molchilar Huquqlarini Himoya

and Consumer Protection Committee of the Republic of Uzbekistan serves as a strong catalyst for the agency's advocacy. The Government of Uzbekistan, through its mandate to the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan, emphasizes the importance of competition to reduce prices and improve product quality.⁸⁹ This commitment allows the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan to pursue systemic changes that might not be possible for institutions lacking political support from the government.

The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan proactively influences government policies. The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan has analyzed more than 1,100 draft regulations and found that 65% of them contained anti-competitive norms.⁹⁰ The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan has also played a role in proposing and drafting the new Law "On Competition" and integrating it with previous laws on competition and natural monopolies.

The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan is tasked with uncovering and eliminating the exclusive rights of state-affiliated entities.⁹¹ In addition, the Competition Promotion and Consumer Protection Committee of

Qilish Qo'mitasi," Competition Promotion and Consumer Protection Committee, 2025, <https://raqobat.gov.uz/en/about-the-committee/>.

⁸⁹ The Permanent Mission of the Republic of Uzbekistan to the United Nations, "Competition in the Process of Transition to a Market Economy Is a Fundamental Issue | Uzbekistan," The Permanent Mission of the Republic of Uzbekistan to the United Nations, May 28, 2020, <https://www.un.int/uzbekistan/news/competition-process-transition-market-economy-fundamental-issue>.

⁹⁰ Competition Promotion and Consumer Protection Committee, "Expected Changes and Innovations in the Law 'On Competition,'" Competition Promotion and Consumer Protection Committee, November 30, 2022, <https://raqobat.gov.uz/en/expected-changes-and-innovations-in-the-law-on-competition/>.

⁹¹ Dogonkin, "Statism and the State Sector in the Former Soviet Union: The Competition Law Perspective."

the Republic of Uzbekistan proposed that antitrust compliance be mandatory for state-owned enterprises.⁹² State-Owned Enterprises (SOEs) that implement an antitrust compliance system will not be subject to administrative sanctions in the event of a competition law violation.⁹³ This demonstrates that strong political support from the government for the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan's advocacy creates measurable actions to reduce state dominance in key sectors of the economy.

The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan also provides legal services to support market development. The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan publishes "clarifications and guidelines" and "competition impact assessments."⁹⁴ This method is carried out as a form of legal service to ensure healthy business competition. The institution also focuses on introducing new legal concepts presented in the new Law "On Competition" and providing education to experts and judges.⁹⁵ This demonstrates that the government and the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan recognize that the legal framework will not be effective without a competent ecosystem to support it. Uzbekistan is building a foundation for the long-term effectiveness of the new Law "On Competition" with the aim of creating a healthy competition culture for the market economy.

The Federal Antimonopoly Service (FAS) of Russia is described as a "multifunctional" authority with far broader competencies than other

⁹² KUN. UZ, "Antimonopoly Committee Proposes to Introduce Antitrust Compliance in GM Uzbekistan and 9 More Companies," KUN.UZ, April 25, 2019, <https://kun.uz/en/news/2019/04/25/antimonopoly-committee-proposes-to-introduce-antitrust-compliance-in-gm-uzbekistan-and-9-more-companies>.

⁹³ Dildora Karimova and Uygun Nigmatjanov, "Perspectives on Introducing Corporate Criminal Liability for the Crime of Bribery in Uzbekistan," in *The Political Economy of Central Asian Law, International Political Economy Series*, ed. Rustamjon Urinboyev (Cham: Palgrave Macmillan, 2024), 53–77, https://doi.org/10.1007/978-3-031-55341-7_3.

⁹⁴ Tadjibayeva, "Uzbekistan's Competition Law and Legal Transplants."

⁹⁵ Sunnatillaeva, "ENFORCEMENT OF RULES ON ABUSE OF DOMINANT POSITION IN THE EU AND UZBEKISTAN."

competition agencies.⁹⁶ The FAS has the legal authority to control the actions of public bodies and can issue "prescriptions" to public bodies if they violate Russian competition law.⁹⁷ The FAS's ability to control and sanction anti-competitive actions by public authorities is something that the KPPU, with its persuasive approach, cannot do. The difference in legal authority over institutions positions the FAS as an interventionist agency capable of taking direct action against state bodies, not just as a policy advisor. The FAS has prepared regulations to prevent fraudulent digital communication practices and collaborates with digital marketplaces to develop "fair practices" to prevent the sale of counterfeit goods.⁹⁸ FAS also provides legal services in the form of guidance for business actors on internal antitrust compliance systems.⁹⁹ The pre-merger consultation services conducted by the FAS are also structured with clear procedures and specified response deadlines.¹⁰⁰

International sanctions imposed on Russia have severely impacted FAS's legal and advocacy services.¹⁰¹ The FAS's mandate, which includes control over foreign investment, becomes crucial in this context. The FAS must balance its pro-competition role with issues of

⁹⁶ Ruoyao Li, "Antitrust Regulation of Self-Preferential Behavior of Digital Platform Operators in China," ed. N. Mohamad Nasri, S. Amat, and Y. Chen, *SHS Web of Conferences* 190 (April 18, 2024): 03031, <https://doi.org/10.1051/shsconf/202419003031>.

⁹⁷ Oleg Alexandrov, "Regulatory Guillotines: International Experience in Removing Barriers to Business and Investment," *Trade Policy* 1, no. 17 (2019): 107–19, <https://doi.org/10.17323/2499-9415-2019-1-17-107-119>.

⁹⁸ United Nation, "Maximizing Synergies between Competition and Consumer Protection Policies Contribution The FAS Russia," in *9th United Nations Conference on Competition and Consumer Protection Room XIX, Palais Des Nations* (Geneva: United Nation, 2025).

⁹⁹ Alexey Koshel et al., "In Search of the Regulatory Optimum for Digital Platforms: A Comparative Analysis," *Legal Issues in the Digital Age* 6, no. 2 (July 2, 2025): 4–49, <https://doi.org/10.17323/2713-2749.2025.2.4.49>.

¹⁰⁰ E. A. Fedorova et al., "The Impact of Corporate Governance on the Capital Structure of Domestic Companies," *Finance: Theory and Practice* 26, no. 2 (April 29, 2022): 25–37, <https://doi.org/10.26794/2587-5671-2022-26-2-25-37>.

¹⁰¹ Simon J. Evenett and Niccolò Pisani, "Geopolitics, Conflict, and Decoupling: Evidence of Western Divestment from Russia during 2022," *Journal of International Business Policy* 6, no. 4 (December 6, 2023): 511–40, <https://doi.org/10.1057/s42214-023-00167-y>.

national security and economic stability under significant external pressure. This unique geopolitical context differentiates the FAS from the KPPU and the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan, whose scope of authority is largely driven by domestic dynamics.

The three antitrust agencies mentioned above demonstrate three distinct strategic models in advocacy and legal services. The KPPU's model in Indonesia is persuasive and educational, focusing on prevention and collaboration. The KPPU uses tools like DPKPU to encourage government agencies to be proactive in assessing their own policies. Fundamentally, this aims to internalize competition principles and reduce the need for enforcement intervention. The model of the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan is state-supported and systemic. The effectiveness of its advocacy and legal services highly depends on high-level political commitment explicitly targeting demonopolization and market liberalization. The agency's role extends to drafting legislation and institutional reform, with the goal of building a structurally sound market economy foundation.

The Russian FAS model is multifunctional and interventionist. With a broad mandate and the power to control government bodies, the FAS's advocacy is not only persuasive but also possesses enforcement power. This allows the FAS to actively intervene in various markets, including digital markets. The advocacy and legal services roles of antitrust agencies vary based on each agency's legal basis, institutional mandate, and socio-political environment. The KPPU excels in its persuasive and educational approach, the FAS in its interventionist authority backed by enforcement, and the Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan in its systemic, state-supported role.

D. Conclusion

The enforcement of competition law in Indonesia, Uzbekistan, and Russia is highly influenced by the quality of regulations, institutional capacity, and the support of advocacy and legal services. Indonesia has a comprehensive legal framework, but its implementation

remains weak due to disharmony in interpretation among institutions. Uzbekistan has adopted modern and sophisticated competition law concepts but still faces constraints due to the dominance of state-owned enterprises. Russia has a more mature system and institutions, but institutional independence is influenced by political factors, creating practical dilemmas. This illustrates that building an effective legal system is not only about the substance of the legal framework but also about legal awareness, advocacy, and stakeholder participation. Thus, each country needs to adapt its competition law strengthening strategy according to its political, economic, and social context. With a combination of clear regulations, strong institutions, and the active role of advocacy and legal services, healthy business competition will be realized.

There are several practical recommendations that can be applied. The KPPU of Indonesia needs to continue to develop and promote DPKPU as an instrument for internalizing competition principles in government agencies and to strengthen the monitoring mechanism for recommendations in accordance with Article 17 of KPPU Regulation No. 4 of 2023. The Competition Promotion and Consumer Protection Committee of the Republic of Uzbekistan needs to continue training and education programs for legal professionals, including judges, to build a strong competition culture structurally. The FAS of Russia needs to leverage its authority to address modern economic challenges, especially in the digital sector, and maintain formal practices in advocacy and legal services for transparency. Active interaction with advocacy and legal service mechanisms, whether through voluntary compliance in Indonesia, systemic reform in Uzbekistan, or FAS intervention in Russia, will strengthen the effectiveness of competition law. In this way, each actor can contribute to a healthier and more competitive business environment.

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