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**CARTELS AND COMPETITION LAW: AN ANALYSIS**- Arya Sreeram<sup>1</sup>**ABSTRACT:**

The aim of this paper is to examine and delve into the importance of regulating anti-competitive behaviour; cartels and its effect on the economy. This paper's primary focus is to provide research on the correlation between competition law and its proven benefit towards an economy. Cartels are degrading competition which therein, as will be seen in the paper- plunge the economy and its well-being. This will, by relation cause them to spend less on the goods in the markets and save more. This paper will analyse few legal precedents and the decision of the courts to understand this topic in a deeper manner.

The discourse of the research are three-fold wherein Part I will be dealing with the nature of Competition Law and its benefits which help in fostering and ameliorating our economy by producing better goods and services at a cheaper rate and understanding the history of the legislations enacted on Competition by India. Subsequently, the crux of this paper will be attended to under Part II ; Cartels. Here, the focus will be on the meaning and arguments on how it is detrimental to the economy. An in depth analysis of cases relating to cartels will be dealt, highlighting the importance to Section 3 of the Competition Act. Lastly, Part III would essentially include various policies used by different countries and strengthening the current leniency programmes that would help regulate cartels better.

Keywords: Cartels, Competition Law, Markets, Section 3, Leniency.

**I. Introduction:**

Competition remains as one of the most eminent facets of economics. An economy is capable of flourishing only when markets are constantly striving to compete against each

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other and developing themselves in order to be more worthy to the consumers. Having competition serves to have better quality products and services, at a lower cost for the consumers. Competitive markets in an economy not only helps in providing a baseline for comparison, but also bring consumers' interest under the aegis of them.<sup>2</sup>

However, consistently producing superior quality goods and services at a lower cost is not an easy task, which often demotivates markets from being competitive and accordingly indulge in unethical anti-competitive practices. Thus, it becomes imperative to have regulations as a check on these malpractices. These regulations govern how markets interact with each other as well as with the consumers and are often an amalgamation of competition laws which describe what necessarily entails as anti-competitive or anti-trust behaviour, and how these would be governed.<sup>3</sup>

## **II. Cartels:**

The formation of Cartels is one such anti-competitive behaviour that subdues the market's competitive spirit. Collusion is a form of agreement in which competing markets agree on fixing or manipulating on a certain price, and control how much production will take place, allocate customers, engage in bidding and divide or combine profits. This is done to ensure that all the players in the market are equitably profitable and do not incur any loss. There are other infringing practices that these firms engage in as well. In an oligopolistic economy, cartels usually takes place. This kind of economy supports a situation where multiple firms have significant control over the market. Cartels follow the rule "*Our competitors are our friends and our consumers are our enemies.*"<sup>4</sup>

It can be observed that by such formation of cartels in an economy, it reduces the scope for competition. Usually, cartels are private in nature where the government is not involved in enforcing, which is illegal in nature. Public Cartels are supported by the Government and are created for the welfare for the consumers and they are also highly advantageous in nature. An example of a Public Cartel can be of **Oil and Petroleum**

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<sup>2</sup> Barry J Nalebuff and Joseph E. Stiglitz, *Information, Competition, and Markets*, Vol. 73, No. 2, American Economic Association, 278, 278-283 (1983)

<sup>3</sup>Hyung Ju Hong, *Effects of Competition Policy on Macroeconomic Outcomes*, Vol. 37, No. 2, Journal of Economic Integration, 337, 337-376 (2022)

<sup>4</sup>Lovely Dasgupta, *Review: Cartels and Competition Law in India*, Vol. 51, No. 9, Economics and Political Weekly, 59, 59-61 (2016)

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**Exporting Countries (OPEC)** that controls the prize and production of oil production and exportation. It must be noted that for the purposes of this research paper, only private cartels will be dealt with. Cartels, by nature are said to be the most anti-competitive behaviour because of its impact on consumers, the economy and the very principle of competition. Mario Monti who is the former competition commissioner of the European Union has described cartels to be “*cancers on the open market economy.*” Countries like the US have also openly conceded the spill-over effects of cartelisation.<sup>5</sup>

### **III. Indian Law enacted to regulate Cartels and Anti-Competitive behaviour:**

India has recognised the importance of regulating markets and their behaviour which helps in a better standing for the economy. The primary goal of any country is to build on their economic status and bring forth developments that help in strengthening their country. India started to forge its path through the *Monopolies and Restrictive Trade Practices Act, 1969 (MRTP)*. The intent of passing this act was to curb the unequal distribution of wealth or economic power that only few people had, to also reduce the unfair trade practices and promote fair trade. Maldistribution leads to monopolisation which was highly detrimental to the economy. The act, consequently could be described to be ‘*anti-monopolistic*’ in nature. It was argued that the crux of such a legislation was ultimately to protect the interests of the consumers.

While the enactment of MRTP act was a positive beginning, there was a need for an improved legislation that would further address issues like mergers, anti-competitive agreements, abuse of dominance, and etc.<sup>6</sup> The main issues that were seen in the MRTP Act was the narrow interpretation of Anti-Competitive Practices. Interestingly, the mention of cartels which are known to be the anti-competitive practice that is considered to be the most harmful to the economy, was nowhere to be found. Even the elements under cartels like collusion and price fixing were nowhere mentioned in the act. Further, the definitions and meanings were also found to be ambiguous, which had allowed a lot of room for mistakes and misinterpretations.

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<sup>5</sup>Chennupati, Divakara Babu; Potluri, RajasekharaMouly, *A Viewpoint on Cartels: An Indian Perspective*, Vol. 53, No. 4, Internal Journal of Law and Management, 252, 252-262 (2011)

<sup>6</sup>Bhatia, G. R.; Hussain, Abdullah, *Competition Law in India Law in Focus*, Vol no.1, THE INDIAN JOURNAL OF INTERNATIONAL ECONOMIC LAW, 181, 181-203 (2008)

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Many judgements like **ITC Ltd. v MRTP Commission (1996) 46 Comp Cas 619** **6 Bholanath Shankar Das v Lachmi Narain AIR (1930)** are heavily criticised because of this restrictive act. In these cases, the offenders were not penalised by the law, as should have been expected to be mandated.

Because of the underpinnings of the Act, a new legislation had to be passed, which is our current Competition Act that was enacted in 2002.<sup>7</sup>

The Competition Act has gone through several changes in phases, and in 2009, the act finally came into place. **Section 3 of the Act** explicitly dealt with agreements involving collusion or cartelisation. **Section 4 of the Act** deals with abuse of dominance. This legislation was established with the help of the EU competition law under Article 101 of the Treaty on the Functioning of the European Union (TFEU).<sup>8</sup> The act also gave powers to the Competition Commission of India (CCI) that would be regulating the Act and would also be able to bring about cases against such entities that violate the provisions of the Act. Further, a committee was set up in 2018 by the Ministry of Finance and Corporate Affairs known as the “Competition Law Review Committee” that aims to analyse the provisions and provide reports entailing recommendations and suggestions. This involves the contributions by the stakeholders and the suggestions deal in both substantive and procedural aspects of the law.<sup>9</sup>

It is observed that the main goal of the Competition Act was to promote competition and bring under it, a wider set of issues that would tamper with this and the regulation of the same.<sup>10</sup>

#### **IV. Understanding the spill-over effects caused by Cartels through legal judgements:**

<sup>7</sup>SarsizGupt, *Research paper on efficacy of competition law in controlling the cartels*, SarsizGupt, *Research paper on efficacy of competition law in controlling the cartels*, Vol 8, No. 7, International Journal of Creative Research Thoughts, 3321, 3321-3325 (2020)

<sup>8</sup> Vishaka Singh Deshwal, *Combating Cartels In India*, ssm, <https://deliverypdf.ssrn.com/delivery.php?ID=800100124064065090084087014074098081036046034042033020101002099072120070106095105095110003010016007048098010023084029020123001118055068037012103082122116088098115077091053022067068082079107122067082067067094068089124088107028123085014074065127077027005&EXT=pdf&INDEX=TRUE>

<sup>9</sup>Ies.gov.in, <https://www.ies.gov.in/pdfs/Report-Competition-CLRC.pdf>, (last visited June 4<sup>th</sup>, 2024)

<sup>10</sup> Amit Kashyap, Thajudeen K, *Competition law and consumer welfare in India*, science web publishing, <http://www.sciencewebpublishing.net/jeibm/archive/2018/1/pdf/Kashyap%20and%20Thajudheen.pdf>

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Cartels are highly detrimental and is an obstacle to the development of the Indian economy. There have been various court orders that have dealt with the effects of cartelisation and highlight the sectors that are affected by the same.

The '*Cement Cartel Case*' or in *Re: Builders Association of India V. CMA and Ors* is one of the most landmark cases that has come about with regards to cartels in India. The Cement Industry, has been widely known for its cartelisation activities. Many cases have been put forth before the Competition Commission of India and the Courts wherein it was alleged multiple times that Cement Manufacturer's Association (CMA) indulges in such activities. These claims have been brought forth by the Builders Association. It was contended by the petitioners that there have been a sudden increase in the prices of cement, which was abnormal in nature and went against the regulations of The Competition Act, 2002.<sup>11</sup>

The brief facts of this case is that the Builders Association of India brought forth a case against the Cement Manufacturing Association (CMA) and 11 other cement companies which included cement industry giants like Ambuja Cement Ltd, UltraTech Cement Ltd, The India Cements Ltd, and etc. It was alleged that all these leading cement companies were under the control of the CMA and with their assistance, engaged in monopolistic activities which restrict trade. In order to raise profits, they controlled the price, the production and manufacturing of cement which was highly collusive in nature. It was also alleged that in order for each manufacturer to monopolise the country, they divided the territory of India into 5 zones. By doing so, they contravened the provisions of Section 3 of the Competition Act. The illegal acts that were enacted by these companies were protected by CMA, which goes against Section 4 of the act as well. Cement Manufacturer's Association have already been given warnings and a 'cease and desist' order by the Supreme Court of India in the past, but they still continue to engage in cartelisation.

Further, it was challenged by the petitioners that few companies like Holcim Group and Lafarge Group were already penalised in the past for their anti-competitive activities.

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<sup>11</sup> K.R. Srivats, *Cement cartel case: Delhi HC allows Builders Association of India to approach CCI*, The Hindu BusinessLine,(Sept 26, 2022, 6:53 PM) <https://www.thehindubusinessline.com/news/real-estate/cement-cartel-case-delhi-hc-allows-builders-association-of-india-to-approach-cci/article65937590.ece>

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Such activities like price-fixing, restricting the supply of cement and eliminating competition from the market has caused enormous loss to the real-estate sector and consumers in general.<sup>12</sup>

The housing and construction sectors have been affected the most by this. The data as per National Account of Statistics, 2009 show that the growth of the construction sector went down from 10.10% in 2007-08 to 6.5% by 2009-10. Also, in the real-estate sector, the growth came down to 7.77% in 2008-09 from 8.52% in 2007-08. Since this decline would normally affect the growth of cement industry, what was surprising to note is that even then the Operating Profit Margin generated was 26% in 2008 which was quite high. The data shows that even though their production had reduced, they were still abnormally gaining profits.

The CCI in this case observed that Price Parallelism which is described as “*where there are changes in prices by rivals that are identical, or nearly so, and simultaneous, or nearly so. It includes other forms of parallel conduct, such as capacity reductions, adoption of standardized terms of sale, and suspicious bidding patterns, e.g., a predictable rotation of winning bidders*”.<sup>13</sup>

It is to also be noted that Section 19(3)<sup>14</sup> of the act includes factors that can make an agreement have adverse effects on Competition under Section 3 and hold these such agreements to be void because of their nature. They are anti-competitive and is harmful for the economy.

Moreover, it was observed that because of the price fixing that had taken place, it had also contravened the provisions of Section 3(1)<sup>15</sup> along with Section 3 (3)(a) which concludes that there was a high price that was paid by the consumers and at the same time, a higher profit margin for the manufacturing industries. Since the act done by the opposing parties breach Section 3(1) of the act, under Section 3(2)<sup>16</sup> of the act, these agreements are void.

Section 3 (1) and (2) read as :

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<sup>12</sup> Re: Builders Association of India, 2016 SCC CCI 46

<sup>13</sup>Para 2.1 of OECD Policy Roundtables on “Prosecuting Cartels Without Direct Evidence” (2006)

<sup>14</sup> The Competition Act, 2002 § 19(3), Acts of Parliament, 2002 (India)

<sup>15</sup>The Competition Act, 2002 § 3 (1), Acts of Parliament, 2002 (India)

<sup>16</sup>The Competition Act, 2002 § 3 (2), Acts of Parliament, 2002 (India)

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*“(1) No enterprise or association of enterprises or person or association of persons shall enter into any agreement in respect of production, supply, distribution, storage, acquisition or control of goods or provision of services, which causes or is likely to cause an appreciable adverse effect on competition within India.*

*(2) Any agreement entered into in contravention of the provisions contained in sub-section (1) shall be void.”<sup>17</sup>*

Furthermore, it was proved by the commission that the opposing parties in this case were unable to show any economical gains, technological or scientific development. But instead, what was observed was that the capacity utilisation had notably decreased which indicates that the efficiency in the market had drastically reduced too. This price rigging done by the cement industry showcased to be quite detrimental to the consumers. Hence, a penalty under Section 27(b) of the Act<sup>18</sup> was imposed where as per the proviso it states that the penalty may be determined on the basis of net profit or turnover, whichever is higher and in this case, the Commission takes into account the net profit for computing the penalty.<sup>19</sup>

The ramifications of cartelisation was mainly on the real estate and construction sectors. As is seen by the data above, the decline in these industries could mostly be blamed to the price rigging done by these manufacturers. This would lead to lesser demand and supply, thereby hampering the entire market.

*Rajasthan Cylinders and Containers Ltd V Union of India and Ors* was presented before the Supreme Court of India wherein another landmark judgement emerged. This case relates to the cartelisation done by manufacturers of LPG Gas Cylinders around the country. The inquiry was initiated against 47 such companies that sold oil exclusively to Indian Oil Corporation Limited, Bharat Petroleum Corporation Limited and Hindustan Petroleum Limited. Out of the 47 named companies, the CCI acquitted 2 of them, rest of them being found guilty for entering into anti-competitive agreements.

CCI upon its findings, observed that these 45 companies, although unrelated to each other, were charging similar bids, even though their cost of production, transport,

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<sup>17</sup>The Competition Act, 2002 § 3, Acts of Parliament, 2002 (India)

<sup>18</sup> The Competition Act, 2002 § 27(b), Acts of Parliament, 2002 (India)

<sup>19</sup> Re: Builders Association of India V. CMI and ors, Suo Moto Case No. 29/2010

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location, etc differed greatly. They have also met in a common place on multiple occasions, to discuss the prices, thus making sure that competition from outside this association called Indian LPG Cylinders Manufacturers Association, was eliminated. There was also no upgradation of technology and the products manufactured by all of the parties were identical. This evidenced to the fact there was obvious collusion. It was noticed that every bidder had received a share and no bidder had left without acquiring a share. Further, they had divided the territories of India in such a way that the bidders who quoted in one part of India would not quote elsewhere.

When it came to analysing the aspect of price parallelism, the apex court while relying on judgements like *Excel Crop Cartel case*<sup>20</sup>, *CCI Vs. Coordination Committee of Artists & Technicians of West Bengal Film & Television*<sup>21</sup> and other international regulations, agreed that while there may not be blunt evidence, there was an actual association between the companies which therein constitute the risk of competition, that tantamount to anti-competitive practices.<sup>22</sup> Their main agenda as observed was to disincentivise other companies from entering into the market so as to keep the profits generated with themselves.

Thus, upon analysing the facts, the court held that “*we come to the conclusion that the inferences drawn by the CCI on the basis of evidence collected by it are duly rebutted by the appellants and the appellants have been able to discharge the onus that shifted upon them on the basis of factors pointed out by the CCI. However, at that stage, the CCI failed to carry the matter further by having required and necessary inquiry that was needed in the instant case.*”<sup>23</sup> They have contravened the provisions of section 3(3)(d) of the Competition Act, 2002 thereby resulting in the onus of severe penalties by CCI as fines under section 27 of the Act.

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<sup>20</sup>Excel Crop Care Limited V CCI and Another, Suo Moto Case No. 02/ 2020

<sup>21</sup>CCI Vs. Coordination Committee of Artists & Technicians of West Bengal Film & Television, Suo Moto Case No. 6691/2014

<sup>22</sup> M M Sharma, *Supreme Court of India delivers 2nd landmark judgment on cartels in India –dismisses legalistic findings of CCI and COMPAT of bid rigging in tender floated by IOCL for LPG Cylinders- based on market conditions*, competitionlawyer, (Oct 14<sup>th</sup>, 2018) <https://www.competitionlawyer.in/supreme-court-of-india-2nd-landmark-judgment-on-cartels-in-india-dismisses-legalistic-findings-of-cci-and-compat-of-bid-rigging-in-tender-floated-by-iocl-for-lpg-cylinders-based-on-market-condition/>

<sup>23</sup>Rajasthan Cylinders and Containers Ltd. V Union of India and Ors, 2018 SCC SC 1718

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To emphasise further on Price Parallelism, the court has relied on the standard established in an US case “*Monsanto Co v. Spray-Rite Service Corp.*, 465 U.S. 752 (1984<sup>24</sup>)”. It was determined there must be either a direct or circumstantial link that can prove that the companies in question had made an effort into putting their common goal which is unlawful and violates the act, into action.<sup>25</sup> It becomes pertinent in order for our economy to boom, to not allow for any negative effects by such illegal and anti-competitive behaviour on the affected sectors.

Additionally, a table is made to study other recent cases on Cartelisation in India:



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<sup>24</sup>*Monsanto Co v. Spray-Rite Service Corp.*, 465 U.S. 752 (1984)

<sup>25</sup>*Price Parallelism in Bid Rigging Arrangements*, Indian Corp Law, ( Nov 19<sup>th</sup>, 2018)  
<https://indiacorplaw.in/2018/11/price-parallelism-bid-rigging-arrangements.html>

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Case No.	Year	Sector Affected	Main Issue	No. Of Players Involved	Decision
20/2020	2023	Pharmaceutical	Anti-competitive practices like collectively boycotting pharma products, collectively decide and impose margins, purchase and supply was limited by the Opposing Parties All under the protection of OP1(Chemist Association)	28	Commission holds them to be guilty under Section 3(3)(a) and 3(3)(b) of the Act <sup>26</sup>

<sup>26</sup> Re: Solar Life Sciences Medical Private Limited, Suo Moto Case No. 20/2020

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Suo Moto Case No. 04/201 8	202 2	Agro industry	<p>1. Case based on an article wherein it was alleged that the OPs' mentioned engaged in raising prices of pulses arbitrarily due to cartelisation .</p> <p>2. Collusive activities were held with the help of few financial and trading companies to induce abnormal profits.</p> <p>3. They also induced artificial</p>	12	No sufficient evidence was produced to hold the OPs' guilty of cartelisation, and there must be a test of reasonability applied which falls flat in this case. <sup>27</sup>
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<sup>27</sup> Re: Alleged Cartelisation for Increasing Pulses Prices In India, Suo Moto Case No. 04/2018

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			<p>scarcity thereby rigging the prices of the stock.</p>		
05/2017	2020	Industrial and Automotive Bearings	<p>Steel which is the main raw material observed a sharp increase in its price suddenly. To get better profits, they illegally coercively brought about a change as increase in</p>	5	<p>Using Section 27(a), hold the OP's guilty under and passed an order to cease their cartelisation practises and desist from doing so in the future.<sup>28</sup></p>

<sup>28</sup> Re: Cartelisation in Industrial and Automotive Bearings, Suo Moto Case No. 05/2017

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### **V. Cartels and their Regulation in other Countries:**

In the US, cartels enforcement made its way through the Sherman Act of 1890 which imposed a punishment of incarceration of upto 1 year. It was incorporated in Section 1 of the act which discusses the collusive conduct of parties engaging in such activities and prohibits the same. The Government, then raised the criminal offence to a felony and increased the time period to maximum of 3 years of imprisonment. Finally, in 2004 an act was passed by the Antitrust Criminal Penalty Enhancement and Reform Act increased the maximum fine from US\$350,000 to US\$1 million and the maximum term of incarceration from three to ten years.

In Canada, it was observed that there were even stricter regulations in force. The maximum sentence was upto 14 years in prison and/or a fine of upto CA\$25Million.

Additionally, in the UK cartelisation became an offence in 2003 and thereby stated that *“by entering into or implementing a prohibited cartel agreement (direct or indirect price-fixing, limiting or preventing production or supply, sharing customers or markets or bid rigging), a prison sentence of up to five years could be imposed.”*<sup>29</sup>

In India, it can be said that the said provisions in place that came into effect by the Competition Act 2002 is well-suited for the country and the regulations set in place provide for a strong foundation to rely on while deciding such cases. But, cartelisation is always not easily traceable and many small organisations indulge in such practices, which have not come out in courts or by the CCI yet. Thus, it becomes imperative to further build on the current legislation. Leniency regulations have been adopted throughout the world in many countries, and India was no exception. In 2009, it announced a legislation called the Lesser Penalty Regulations of 2009, modelling it based on the EU guidelines.

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<sup>29</sup>*The criminal cartel offence around the world*, Norton Rose Fulbright, (June 2016), <https://www.nortonrosefulbright.com/en/knowledge/publications/1c8cd600/the-criminal-cartel-offence-around-the-world>

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Leniency programmes or the Whistle-blower programmes help tracking down cartels better because it provides for an opportunity for individuals/ companies to come forth and alert the CCI about the collusive activities taking place around them. The Competition Commissioner Of India possess complete discretionary power to grant total immunity. This helps in detecting cartels on a much higher scale than before.<sup>30</sup>

## **VI. Conclusion:**

Competition Law in India has evolved from the MRTP Act to the current legislature that is the Competition Act, 2002. The Competition Act, 2002 has addressed several long-overdue changes also ensured to rectify the lacunae that the old legislation had. Further, after the incorporation of this act, it became all the more crucial to comprehend what cartels are and how they impact our economy. The judgements of the Cement Cartel case and the LPG Cylinder case is relevant to understand the impact it has had on the sectors that were affected by such collusive acts. The industries that depend on these producers have suffered greatly as a result of the price increase. Cartelization, as was understood, needed to be regulated. While the current legislation provides a detailed policy and regulation mechanisms, efforts must be made to strengthen the current whistleblower programme by setting additional guidelines that clearly define requirements for leniency and the circumstances under which recipients would be qualified to receive it. Upon analysing the regulations established by other countries, it is pertinent that the legislators and economists should collaborate to analyse and improve our current legislation so that it is more effective in identifying cartels and enforcing penalties against them, as needed which brings forth a much more developed act that regulates competition in the Indian economy.

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<sup>30</sup> Karn Gupta, *CARTEL REGULATION: A CRITICAL STUDY WITH SPECIAL REFERENCE TO INDIA*, iclr, <http://iclr.in/wp-content/uploads/2019/08/Vol.1CARTEL-REGULATION-A-CRITICAL-STUDY-WITH-SPECIAL-REFERENCE-TO-INDIA-.pdf>

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