

Comparative Analysis Of Anti- Cartel Enforcement In China And
Pakistan

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Cartels are some of the worst violations of competition rules by dividing markets, limiting production, or fixing prices, distorting markets, and harming consumers. This study compares and contrasts China's and Pakistan's anti-cartel enforcement systems, pointing out the advantages and disadvantages of each country's institutional strength and legal system. Based on a review of important laws like Pakistan's Competition Act 2010 and China's Anti-Monopoly Law, this paper investigates the influence of leniency programs, sanctions, and investigative processes in reducing cartel activity. The study also explores how various institutional and economic conditions have influenced enforcement tactics and results. The study also mentions improving the efficiency of anti-cartel enforcement in Pakistan in light of these revelations.

Keywords: Anti-cartel enforcement, Comparative analysis, Leniency programs, Competition law in China and Pakistan, Cartel penalties and sanctions.

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Introduction

Cartel measures present a serious risk to consumer welfare and economic efficiency because they entail agreements between rival businesses to split markets, restrict production, or fix prices. The fundamental tenets of free-market competition are undermined when cartels artificially alter market conditions to raise prices, stifle innovation, and restrict customer choice.¹ The economic effects of cartels are especially noticeable in developing nations like China and Pakistan because these organizations frequently take advantage of regulatory gaps and structural flaws to thrive.²

Maintaining market integrity and promoting economic growth depends heavily on effective anti-cartel enforcement. It protects customers against unfair pricing, avoids monopolistic tactics, and guarantees a level playing field for companies.³ Furthermore, by guaranteeing fair competition, strong enforcement encourages confidence in economic institutions and draws in international investment. According to their separate competition laws—Pakistan's Competition Act 2010 and China's Anti-Monopoly Law (AML)—both countries acknowledge the significance of fighting cartels.⁴ Nonetheless, variations in institutional capabilities, enforcement strategies, and policy agendas produce a varied picture for analysis.

The purpose of this study is to compare the anti-cartel enforcement systems in China and Pakistan, with an emphasis on the efficacy of regulatory bodies, enforcement strategies, and legal frameworks. This study's scope includes a review of significant parallels and divergences, offering perspectives on how both nations might improve their anti-cartel policies and promote global collaboration in the enforcement of competition laws. This research aims to add to the larger conversation on enhancing anti-cartel tactics, especially in developing nations, by bringing attention to these factors.

1. Overview of Anti-Cartel laws

¹ Soomro, N. E. (2021). Competition law in Pakistan and China: A comparative study. *J. Pol. & L.*, 14, 1.

² Mushtaq, S. A., & Khan, F. A. (2020). The Curve Of Cross Border Cartel Enforcement (Challenges and Remedies in Global Business Environment). *Journal of Accounting and Finance in Emerging Economies*, 6(1), 73-86.

³ Connor, J. M. (2003). Private international cartels: effectiveness, welfare, and anticartel enforcement.

⁴ Yuhui, W. (2023). Appraisal of existing evidences of competition law and policy: Bilateral legislative developments of Sino-Pak. *Heliyon*, 9(8).

2.1 China

The People's Republic of China's Anti-Monopoly Law (AML), passed in 2008, serves as the main framework for anti-cartel enforcement in China.⁵ The AML provides a thorough framework for regulating monopolistic activities, such as bid-rigging, market allocation, output limits, and price-fixing—all essential elements of cartel action.⁶

- Chapter II of AML focuses on "monopoly agreements," which are contracts that limit or completely eradicate competition.
- The law makes a distinction between vertical agreements, which are made between suppliers and distributors, and horizontal agreements, which are made between competitors. If either form severely limits competition, it is illegal.
- Cartels are specifically addressed in Articles 13 and 14, which forbid collusion over pricing, output levels, market division, and other practices detrimental to free competition.

Clarity in cartel investigations is ensured by complementary legislation like the Interim Provisions on Prohibiting Monopoly Agreements (2020), which offer comprehensive enforcement guidance.⁷ These rules permit rule-of-reason evaluations in some cases while emphasizing a per se approach for other cartel activity.

2.1.1 Key Regulatory Organizations and Their Functions

The main body in charge of anti-cartel enforcement in China is the State Administration for Market Regulation (SAMR). SAMR, which was created in 2018 as a result of the amalgamation of multiple organizations, combines policy-making, enforcement, and regulatory authority to improve competition oversight.⁸

1. Investigation and Enforcement: SAMR has the authority to look into cartel activity, issue penalties, and mandate corrections. To find and deal with cartels, it uses instruments including dawn raids, leniency initiatives, and whistleblower procedures.

⁵ Eichner, A. W. (2011). Battling cartels in the new era of Chinese antitrust enforcement. *Tex. Int'l LJ*, 47, 587.

⁶ State Administration for Market Regulation. (2008). *Anti-Monopoly Law of the People's Republic of China*.

⁷ Williams, M. (2020). Cartel prohibition and the search for deterrent penalties: the United States, the European Union, Australia and China compared. In *Research Handbook on Methods and Models of Competition Law* (pp. 116-137). Edward Elgar Publishing.

⁸ State Administration for Market Regulation. (2008). *Anti-Monopoly Law of the People's Republic of China*.

2. Leniency Programs: SAMR grants leniency to businesses that self-report and submit crucial evidence during investigations to promote collaboration. Depending on the level of cooperation and the date of the revelation, fines may be lowered or eliminated.⁹
3. Local AMR Offices: At the province and local levels, SAMR is supported by Regional Market Regulation Administrations in implementing competition legislation. To combat localized cartel activity, these offices are essential.¹⁰
4. Judicial Support: Chinese courts are involved in anti-cartel enforcement as well, especially when it comes to civil lawsuits filed by harmed parties.¹¹ The courts have the power to enforce SAMR's administrative sanctions and grant damages. Together with strong court support, the incorporation of SAMR's investigation capabilities has greatly improved China's ability to discourage and punish cartel activity, fostering fair competition in its quickly expanding market.

1.2 Pakistan

The 2010 Competition Act serves as the main basis for anti-cartel action in Pakistan. This law was passed to safeguard consumer welfare, encourage fair competition, and stop anti-competitive behavior.¹² It brought Pakistan's competition laws into compliance with international norms by superseding the Monopolies and Restrictive Trade Practices (Control and Prevention) Ordinance, of 1970.¹³

Important Cartel-Related Provisions in the 2010 Competition Act:

- Section 4: Agreements between undertakings that specifically aim to hinder, restrict, or lessen market competition are expressly forbidden by this clause. This covers the fundamental elements of cartel conduct, such as bid-rigging, production restrictions, market-sharing, and price-fixing.¹⁴

⁹ Wilczynski, M. The SEC's New Enforcement Mandate.

¹⁰ State Administration for Market Regulation. (2008). *Anti-Monopoly Law of the People's Republic of China*.

¹¹ Campbell, N. (2019). Cartel Regulation 2020.

¹² Government of Pakistan. (2010). *Competition Act, 2010*. Islamabad: Ministry of Law, Justice and Parliamentary Affairs.

¹³ Fatima, S. (2023). Cartels under Competition Act 2010 of Pakistan: An Appraisal. *Journal of Law & Social Studies (JLSS)*, 5(3), 491-506.

¹⁴ Government of Pakistan. (2010). *Competition Act 2010: Section 4*. Retrieved from https://cc.gov.pk/home/func_comp_act

- **Leniency Program:** To promote whistleblowing and undermine cartel stability, the Act gives the Competition Commission of Pakistan (CCP) the authority to grant leniency to cartel members who voluntarily reveal information regarding cartel activity.¹⁵
- **Penalties:** Serious financial penalties, up to 10% of the yearly turnover or PKR 75 million, whichever is higher, may be imposed for breaking anti-cartel regulations. The CCP has the authority to refer cases for criminal prosecution in extreme circumstances.¹⁶
- **Dawn Raids and Investigations:** In order to effectively discover cartel activity, the Act gives the CCP the authority to carry out surprise inspections and confiscate pertinent documents while conducting investigations.

2.2.1 Important Regulatory Organizations and Their Functions (such as the Competition Commission of Pakistan)

The primary body in charge of upholding competition laws, including anti-cartel rules, is the Competition Commission of Pakistan (CCP).¹⁷ The Competition Act of 2010 established the CCP, which functions as a separate and independent regulatory agency.

The CCP's roles and responsibilities include:

1. **Investigation and Enforcement:** Through official inquiries, market research, and proactive surveillance, the CCP looks into alleged anti-competitive agreements and cartel activity. It has the power to require corrective actions and levy fines.¹⁸
2. **Administration of the Leniency Program:** To encourage cartel members to self-report, the CCP oversees the leniency program.¹⁹ The discovery and dismantling of cartels has been made possible in large part by this effort.
3. **Advocacy and knowledge:** To increase public knowledge of anti-competitive behavior and adherence to competition laws, the CCP regularly interacts with companies, stakeholders, and the general public.

¹⁵ Competition Commission of Pakistan. (2010). *Guidelines on Leniency Program under the Competition Act 2010*.

¹⁶ Competition Commission of Pakistan. (2010). *Competition Act 2010*.

¹⁷ Kemal, A. R. (2002). Regulatory framework in Pakistan. *The Pakistan Development Review*, 41(4), 319-332.

¹⁸ Hassan, R. K. (2008). Competition Law and Policy in Pakistan. *Int'l. In-House Counsel J.*, 2, 1193.

¹⁹ Sokol, D. D. (2013). Policing the firm. *Notre Dame L. Rev.*, 89, 785.

4. Policy Recommendations: The Commission offers suggestions to eliminate market distortions and counsels the government on matters affecting market competition.²⁰
5. International Cooperation: To match its enforcement tactics with international best practices, the CCP works with international competition agencies and organizations (such as UNCTAD and the OECD).

2.2.2 Important CCP Anti-Cartel Measures:

By enacting market reforms and levying steep fines, the CCP has taken decisive action against cartels in industries including cement, sugar, and autos. The CCP showed its dedication to combating cartelization in vital industries in 2020 by fining cement producers for conspiring to raise prices. In general, the CCP-led legislative and institutional framework for anti-cartel enforcement in Pakistan is changing toward stricter and more proactive measures to stop anti-competitive behavior and protect market integrity.²¹

2. Mechanism of Enforcement

To ensure market competition, prevent cartel activity, and safeguard consumers, effective enforcement measures are essential. China and Pakistan have both created systems for looking into, punishing, and dissolving cartels.²² The investigation procedures, fines and punishments, and the function of leniency programs in anti-cartel enforcement in both nations are examined in this section.

3.1 Investigative process

3.1.1 China

The State Administration for Market Regulation (SAMR) is the main enforcement body for China's anti-cartel laws, which are mainly regulated by the Anti-Monopoly Law (AML) of 2008.²³ In China, the investigation process is thorough and according to set protocols:

²⁰ Wilson, J. (1996). Consumer welfare and government regulation of telecommunications: lessons for Pakistan.

²¹ Fatima, S. (2012). Competition law in Pakistan: Brief history, aspirations and characteristics. *Commonwealth Law Bulletin*, 38(1), 43-62.

²² Soomro, N. E. (2021). Competition law in Pakistan and China: A comparative study. *J. Pol. & L.*, 14, 1.

²³ State Administration for Market Regulation. (2008). *Anti-Monopoly Law of the People's Republic of China*. Beijing, China: SAMR.

1. SAMR has the authority to start investigations ex officio, or on its own initiative, or in response to grievances made by customers, market players, or other governmental entities.²⁴
2. Evidence Gathering: Investigators have the authority to visit the location, take papers, speak with staff, and go through financial information. They are also able to examine business letters and electronic data.
3. Dawn Raids: To stop evidence from being destroyed, surprise inspections, often known as dawn raids, are regularly employed.
4. Use of Forensic Tools: The SAMR utilizes digital forensic tools to recover deleted files and encrypted communications, enhancing the robustness of its investigations.²⁵
5. Confidentiality Obligations: The AML mandates that investigators must maintain confidentiality regarding the information obtained during investigations to protect business secrets.

3.1.2 Pakistan

Under the Competition Act of 2010, Pakistan implements anti-cartel regulations, and the Competition Commission of Pakistan (CCP) serves as the regulating agency.²⁶ The following are part of the investigation process:

1. Investigations may be started by CCP on its own initiative, in response to stakeholder complaints, or in response to referrals from other governmental organizations.
2. Inspections and Information Requests: CCP is able to hold hearings, request documents, and issue information summonses.²⁷
3. Market Surveys and Studies: To find possible anti-competitive practices, particularly in collusion-prone industries, the CCP regularly carries out sectoral studies and market surveys.

²⁴ Huang, C., & Sun, Y. (2023). China's merger control. In *Research Handbook on Global Merger Control* (pp. 437-461). Edward Elgar Publishing.

²⁵ Ho, A. T., & Li, S. (Eds.). (2015). *Handbook of digital forensics of multimedia data and devices*. John Wiley & Sons.

²⁶ Government of Pakistan. (2010). *Competition Act 2010*. Islamabad: Competition Commission of Pakistan.

²⁷ Khan, K., & FRAZ, A. Market Regulations, Competition Policy and the Role of Competition Commission of Pakistan (CCP). *Evaluations of Regulatory Authorities, Government Packages, And Policies*, 1.

4. Due Process: Before enforcing sanctions, the Commission notifies the accused and gives them a chance to defend themselves, ensuring procedural justice.²⁸

Comparison

China's investigation system is more active and capable, with more power to conduct surprise inspections and gather evidence. The CCP in Pakistan has relatively little enforcement authority and is frequently bound by legal requirements and procedural safeguards.²⁹

3.2 Penalties and Sanctions for Cartel Activities

2.2.1 China

To discourage anti-competitive activity, the AML enforces severe fines on companies involved in cartel activities:³⁰

1. Monetary Penalties: Businesses convicted of cartel activity may be fined between 1% and 10% of their previous year's revenues.
2. Illegal Gains Confiscation: Any money made through cartel activity may be seized.
3. Non-monetary penalties: In extreme circumstances, culpable parties may be subject to administrative fines and business licenses may be canceled.
4. Public Disclosure: The company's reputation is harmed when penalties and case information are frequently made public.

2.2.2 Pakistan

The following sanctions for cartelization are stipulated in the Competition Act of 2010:

1. Monetary Fines: CCP has the authority to levy fines of up to 10% of the yearly turnover or PKR 75 million, or around USD 260,000, whichever is greater.³¹
2. Orders to Cease and Desist: The CCP has the authority to issue directives to promptly halt anti-competitive behavior.
3. Behavioral and Structural Remedies: To reestablish competition, the CCP may order enterprises to make structural or behavioral adjustments.

²⁸ Fatima, S. (2023). Cartel Penalties in Pakistan's Competition Regime: Is Criminalization Possible?. *International Journal of Academic Research for Humanities*, 3(3), 1-8.

²⁹ Brusick, P. (2018). Competition Concerns in Cross-border E-commerce: Implications for Developing Countries. *Study, CUTS International*.

³⁰ Eichner, A. W. (2011). Battling cartels in the new era of Chinese antitrust enforcement. *Tex. Int'l LJ*, 47, 587.

³¹ Darr, A. (2020). Cartels & the Politics of Competition Law Enforcement in Pakistan. Available at SSRN 3726614.

4. Limited Criminal Liability: The Act mainly focuses on administrative fines rather than criminal punishments against people.

Comparison

China's enforcement is harsher, with the potential for license revocation and wider reputational harm, even though both nations impose large financial penalties. Although Pakistan imposes severe fines, there are no criminal penalties for people, which lessens personal responsibility.³²

3.3 Role of Leniency Programs in Enforcement

3.3.1 China

China implemented a Leniency Program to encourage cartel-affiliated businesses to self-report and assist with investigations:³³

1. Eligibility: Complete immunity from fines may be granted to the first applicant to disclose cartel activity and offer essential proof. Depending on the quality of the material submitted, subsequent applicants may be eligible for lower penalties.
2. Requirements: Applicants must stop being involved in the cartel and cooperate honestly and consistently throughout the investigation.
3. Impact: Particularly in sectors like pharmaceuticals and auto parts, the leniency program has been crucial in revealing covert cartel arrangements.

3.3.2 Pakistan

Pakistan also operates a Leniency Program under Section 39 of the Competition Act:

1. Full or Partial Immunity: Businesses may be exempt from sanctions if they willingly reveal their involvement in cartel activity and present strong proof.
2. Confidentiality Assurance: To shield leniency applicants from business reprisals, the CCP guarantees complete confidentiality.³⁴
3. Challenges: Although Pakistan's leniency program is in place, participation has been low, mostly because people are unaware of and do not trust the CCP's secrecy pledges.

³² Soomro, N. E. (2021). Competition law in Pakistan and China: A comparative study. *J. Pol. & L.*, 14, 1.

³³ Eichner, A. W. (2011). Battling cartels in the new era of Chinese antitrust enforcement. *Tex. Int'l LJ*, 47, 587.

³⁴ Fatima, S. (2023). Cartels under Competition Act 2010 of Pakistan: An Appraisal. *Journal of Law & Social Studies (JLSS)*, 5(3), 491-506.

Comparison:

By promoting self-reporting, China and Pakistan's leniency policies aim to undermine cartels. China's program, on the other hand, has been more successful, most likely as a result of improved regulatory system trust and more robust enforcement measures. Underutilization hinders Pakistan's program's ability to effectively dismantle cartels.³⁵

4. Comparative Analysis

Market efficiency and consumer welfare are seriously threatened by cartel conduct, which is defined as rivals banding together to split markets, restrict output, or control prices. China and Pakistan have both passed legislation to stop anti-competitive behavior after seeing the negative effects of cartels.³⁶ Nonetheless, their approaches to anti-cartel enforcement show both parallels and divergences in terms of institutional capabilities, enforcement tactics, and legal frameworks.

4.1 Similarities in Approach and Enforcement Challenges

4.1.1 Frameworks for Laws Prohibiting Cartels

China and Pakistan both have specific competition laws that forbid cartel activity. Price-fixing, market division, and bid-rigging are among the anti-competitive agreements that are illegal under China's 2008 Anti-Monopoly Law (AML). Similar to this, undertakings are forbidden by Pakistan's Competition Act, 2010 from entering into agreements that limit competition, with a special emphasis on horizontal agreements between rivals.³⁷

4.1.2 Challenges in Evidence Collection and Detection

Because cartels operate in secrecy, it is intrinsically challenging to detect them in both countries. The secret nature of collusive agreements makes it difficult to detect them in China, even with the State Administration for Market Regulation (SAMR) playing an active role. Similarly, the Competition Commission of Pakistan (CCP) in Pakistan faces challenges related to inadequate systems for monitoring the market and gathering

³⁵ Mushtaq, S. A., Baig, K., Hassan, S., & Ahmad, W. (2024). The Importance of China's Competition Law in the Management of Data in the Country's Rapidly Developing Digital Economy: Policy Recommendations for Pakistan. *Current Trends in Law and Society*, 4(1), 27-51.

³⁶ Soomro, N. E. (2021). Comparative study of competition law between China and Pakistan with special reference to the use of evidences submitted by companies to other legal proceedings. *J. Pol. & L.*, 14, 96.

³⁷ Mushtaq, S. A., & Khan, F. A. (2020). The Curve Of Cross Border Cartel Enforcement (Challenges and Remedies in Global Business Environment). *Journal of Accounting and Finance in Emerging Economies*, 6(1), 73-86.

evidence. Both jurisdictions frequently rely on indirect indications like price trends or market activity since they have trouble obtaining firsthand data.³⁸

4.1.3 Dependence on Leniency Programs

China and Pakistan have also implemented leniency policies to incentivize cartel members to come forward with information. If cartel members willingly disclose their involvement and present strong evidence, China's AML leniency policy permits lighter punishments.³⁹ Similar to this, companies that self-report cartel activity and assist with investigations are granted leniency by Pakistan's CCP. However, because of a lack of business awareness and a fear of reprisals, both nations struggle to implement these programs successfully.

4.1.4 Procedural and Judicial Delays

In both nations, effective enforcement is hampered by legal and procedural delays. Investigations may be slowed down in China by convoluted administrative processes and overlapping regulatory organizations.⁴⁰ Similar delays in enforcement measures and deterrent occur in Pakistan as a result of drawn-out court cases and a lack of judicial experience in competition problems.

4.2 Key Differences in Legal Frameworks, Enforcement Strategies, and Institutional Capacities

4.2.1 Legal Framework and Penalty Severity

Compared to Pakistan's Competition Act, China's AML has more authority and harsher sanctions for cartel offenses.⁴¹ The SAMR has a larger deterrent effect in China, where it can levy fines of between 1% and 10% of a company's yearly sales income. Furthermore, for serious infractions, Chinese authorities have started looking into criminal sanctions. Pakistan's CCP, on the other hand, has no provisions for criminal culpability and instead depends mostly on administrative fines, usually up to PKR 75 million or a percentage of revenue, which limits its power to deter.⁴²

³⁸ Soomro, N. E. (2021). Competition law in Pakistan and China: A comparative study. *J. Pol. & L.*, 14, 1.

³⁹ Soomro, N. E. (2021). Comparative study of competition law between China and Pakistan with special reference to the use of evidences submitted by companies to other legal proceedings. *J. Pol. & L.*, 14, 96.

⁴⁰ Javed, S. U. (2012). Globalization of Competition Law-Challenges for Pakistan's Competition Regime. Available at SSRN 2035813.

⁴¹ Yuhui, W. (2023). Appraisal of existing evidences of competition law and policy: Bilateral legislative developments of Sino-Pak. *Heliyon*, 9(8).

⁴² Chen, Z. (2023). Research on the Improvement of the Fine System in the Context of the Revision of China's Anti-Monopoly Law. *Law and Economy*, 2(5), 46-52.

4.2.2 Institutional Resources and Capacity

Significant governmental support, improved budget, and a more extensive provincial police network are all advantages for China's SAMR. Because of its strong institutions, China is better equipped to carry out in-depth investigations and implement anti-cartel policies. On the other hand, Pakistan's CCP has a small workforce and few resources, which limits its capacity to carry out in-depth research and outreach initiatives.⁴³

4.2.3 Enforcement Techniques and Market Concentration

China takes a proactive approach to enforcement, focusing especially on areas like technology, pharmaceuticals, and the automobile that have a significant influence on consumers. To identify questionable market activity, the SAMR regularly launches sector-specific investigations and uses economic research. Instead of employing proactive market monitoring,⁴⁴ Pakistan's enforcement approach is more reactive, frequently sparked by complaints. Furthermore, the CCP has little involvement in developing businesses like technology and instead concentrates on more established sectors like sugar and cement.

4.2.4 Judicial Independence and Oversight

With little court involvement, competition law is primarily enforced administratively in China. There is little court review of the SAMR's decisions, and it has significant discretion over investigations and sanctions. In Pakistan, there is a system of checks and balances in place whereby the Competition Appellate Tribunal and the judiciary examine enforcement judgments made by the CCP.⁴⁵ However, the authority of the CCP is occasionally undermined by this judicial scrutiny, which results in conflicting rulings and delays in execution.

4.2.5 Advocates and Public Awareness

Through public campaigns and seminars, China has raised business understanding of anti-cartel regulations and made significant investments in public lobbying and education. More compliance and involvement in leniency programs have resulted from

⁴³ Soomro, N. E. (2021). Competition law in Pakistan and China: A comparative study. *J. Pol. & L.*, 14, 1.

⁴⁴ Soomro, N. E. (2021). Comparative study of competition law between China and Pakistan with special reference to the use of evidences submitted by companies to other legal proceedings. *J. Pol. & L.*, 14, 96.

⁴⁵ Yuhui, W. (2023). Appraisal of existing evidences of competition law and policy: Bilateral legislative developments of Sino-Pak. *Heliyon*, 9(8).

this.⁴⁶ Due to budget limitations, Pakistan falls behind in advocacy activities, which lowers public and corporate sector awareness of anti-cartel laws and reporting procedures.⁴⁷

5. Conclusion

China and Pakistan have different legal systems, enforcement tactics, and institutional capabilities, even though they both face similar obstacles in identifying and prosecuting cartels, such as trouble gathering evidence and unused leniency programs. In contrast to Pakistan's comparatively reactive strategy and laxer enforcement measures, China's tougher sanctions, more solid institutional capability, and proactive enforcement offer a more comprehensive anti-cartel regime. By learning from China's more forceful and organized approach, Pakistan might improve public awareness campaigns, increase punishments for infractions, and build its institutional capacity to improve anti-cartel enforcement. To bridge the enforcement gap, Pakistan should prioritize capacity building within the Competition Commission, implement stricter penalties to enhance deterrence, and streamline judicial processes to ensure timely resolution of cases. By adopting similar strategies while addressing local market dynamics, Pakistan can develop a more effective and resilient anti-cartel enforcement system that safeguards market competition and protects consumer welfare. Moreover, Pakistan could benefit from enhancing its leniency program by building trust within the business community and ensuring confidentiality for whistleblowers, thereby encouraging more firms to come forward with information on cartel activities. Introducing advanced investigative tools and data analysis techniques, similar to those used in China, can also improve detection capabilities. A balanced approach that combines deterrence, proactive monitoring, and stakeholder engagement will be essential for Pakistan to foster competitive, fair, and dynamic markets that drive economic growth and protect consumer interests.

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⁴⁶ Emch, A., & Stallibrass, D. (2013). *China's anti-monopoly law: the first five years*. Kluwer Law International BV.

⁴⁷ Fatima, S. (2023). Cartels under Competition Act 2010 of Pakistan: An Appraisal. *Journal of Law & Social Studies (JLSS)*, 5(3), 491-506.

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