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ANNUAL REPORT



2025

CROATIAN COMPETITION AGENCY


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Foreword



SANDRA ŠIMUNOVIĆ/PIXSELL.

2025 was a year of significant achievements and further development for the Croatian Competition Agency (CCA). In the year in which we marked 30 years since the adoption of the first Competition Act in the Republic of Croatia, we recalled the development of the anti-trust regime in Croatia while responding to new challenges posed by the modern economy, such as digitalisation, new business models, rapid technological development and increasingly complex market relationships.

The fundamental objective of the CCA's work within its powers remained unchanged: to ensure effective competition, ensure a level playing field for undertakings and contribute to consumer welfare. Effective competition is not merely a legal concept; it is one of the key prerequisites for economic development because it encourages innovation, increases productivity, broadens consumer choice and contributes to better products and services at competitive prices.

During 2025 the CCA continued to exercise its statutory powers, directing its activities towards areas with the greatest impact on market functioning and consumer welfare. We resolved a total of 714 competition and unfair trading practices cases, continuing to act against the most serious infringements while also developing our preventive and advocacy role through opinions, market studies and cooperation with market participants and institutions.

In the area of anti-trust particular emphasis was placed on detecting and combating prohibited agreements between undertakings – including both cartels and vertical agreements and bid-rigging in public procurement, as well as abuse of a dominant position in the market. Such infringements harm not only competitors but ultimately consumers and the economy, through higher prices, a smaller choice of products and services and weaker incentives to innovate. Effective detection and sanctioning of the most serious infringements will therefore remain one of the CCA's key priorities.

An equally important part of the CCA's activities focused on unfair trading practices in the business-to-business agricultural and food supply chain. The CCA continued to enforce the Act on the prohibition of unfair trading practices in the business-to-business food supply chain, aiming to ensure balance between buyers and suppliers and protect parties with weaker bargaining position. In this way, the CCA contributes to stable and fair operation of one of the most important sectors for citizens and the economy.

2025 also saw continued development of the CCA's capacity to respond to the challenges of the digital economy. By developing digital forensics, data analysis and specialised knowledge for monitoring digital markets, we further improved our ability to understand new business models, algorithms and data-based market power. The CCA actively participated in implementation of the European Digital

Markets Act and in projects aimed at developing a new regulatory approach to artificial intelligence and digital technologies.

We continued strengthening the CCA's institutional capacities, because only a professionally strong, independent and technically well-equipped authority with sufficient resources can effectively meet the increasingly complex demands of modern markets. During 2025 we increased the number of expert employees, invested in their continuous professional development and developed the necessary analytical and technological capacities.

International cooperation continued to be an important part of the CCA's work. Through active participation in the European Competition Network, cooperation with the European Commission, the OECD and other national competition authorities, the CCA contributed to the exchange of knowledge, development of best practices and alignment with European competition standards.

Transparency and openness towards the public remain fundamental principles of the CCA's work. By publishing decisions, expert opinions, press releases and educational materials, and communicating with different stakeholders, we seek to make our work understandable and accessible to the public. We attach particular importance to competition advocacy across institutions, businesses and the wider public, since awareness rising and competition culture is built not only through enforcement of rules but also by understanding their importance.

The results achieved in 2025 confirm the CCA's continuing development as a modern, professional and independent regulator.

Our responsibility is to ensure a business environment in which undertakings can compete on equal terms, innovation and investment are encouraged, and consumers benefit from effective competition. In the period ahead, we will continue acting responsibly and decisively by combining effective law enforcement, prevention, development of expert capacities and strong cooperation with domestic and international institutions.

Effective competition remains one of the key foundations of a competitive, resilient and sustainable Croatian economy.

30 years of anti-trust regime in the Republic of Croatia

For the Croatian Competition Agency, 2025 was not only a year of intensive enforcement activities and further institutional development, but also a year of an important anniversary. It marked 30 years since the adoption of the first Competition Act in the Republic of Croatia, which began the building of a modern anti-trust regime and the development of a competitive economy.

Over the past three decades Croatia's anti-trust regime has evolved continuously, keeping pace with economic changes, Croatia's accession to the European Union and alignment of national legislation with the EU acquis. At the same time, the role of the Croatian Competition Agency evolved from a national regulator to an active participant in the European competition system and enforcement of European competition rules.

Today the CCA operates as a modern, independent national expert regulator in the area of anti-trust, merger control and unfair trading practices in the business-to-business agricultural and food supply chain actively participating in European regulatory networks. By developing its digital and analytical capacities, using new technologies and continuously strengthening expertise within available resources, the CCA seeks to respond successfully to challenges posed by a digital and globally interconnected economy. This significant anniversary offers an opportunity to reflect on the development of the anti-trust regime in Croatia and affirms an enduring commitment to the values of an open and fair market. Effective competition encourages innovation, strengthens economic competitiveness, ensures a level playing field and gives consumers a wider choice of better-quality products and services at competitive prices.

Thirty years of development demonstrate that strong and independent institutions, effective enforcement and alignment with the European standards are essential prerequisites for building a resilient, competitive and sustainable Croatian economy.

Activities that marked 2025

22 January
CCA conditionally approved the concentration arising from Eagle Hills' acquisition of direct control over Sunčani Hvar and Sunčani Hvar nekretnine.

10 July
The Croatian Competition Agency and the Croatian National Bank signed a cooperation agreement.

14 July
The first annual gathering of regulators took place.

22 July
CCA fined TOMMY d.o.o., Split, EUR 212,500 for unfair trading practices.

28 August
The OECD newsletter featured CCA in an interview with president of the Competition Council Mirta Kapural, PhD.

26 September
The Croatian Parliament adopted CCA's 2024 Annual Report.

16 October
Economy Committee Chair Ivica Mesić and Deputy Chair Boris Piližota paid a working visit to CCA.

6 November
A regional meeting on "Implementation of the Unfair Trading Practices Directive and legislation" took place in Zagreb.

7 November
Competition Day was held under the title "New trends in merger assessment and compliance with competition rules in the digital environment".

21 November
Students of the Faculty of Economics and Business in Zagreb visited CCA.

17 December
The DICE project began, strengthening national competition authorities' digital capacities.

THE YEAR IN FIGURES

714
cases resolved

50
administrative

664
non-administrative cases

383
European Commission notifications

62
employees

98
relevant markets analysed

3
sector inquiries

1
market overview

€ 322,500
Fines imposed

PROHIBITED AGREEMENTS

32
cases resolved

ANALYSED

22
relevant markets

ABUSE OF DOMINANT POSITION

42
cases resolved

22
administrative

20
non-administrative cases

MERGER CONTROL

25
cases resolved

ANALYSED

59
relevant markets

PROCESSED

383
notifications of concentrations with a European dimension

COMPETITION ADVOCACY

112
cases

UNFAIR TRADING PRACTICES IN THE FOOD SUPPLY CHAIN

31
cases

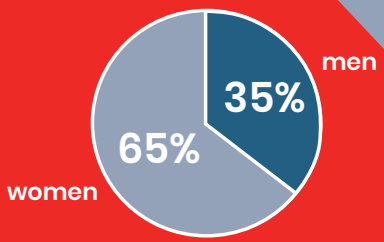
4
administrative proceedings

ANALYSED

98
relevant markets

ON 31 DECEMBER 2025 CCA HAD

62
employees



THREE SECTOR INQUIRIES

food retail market

vertical relations in the retail sector

press market

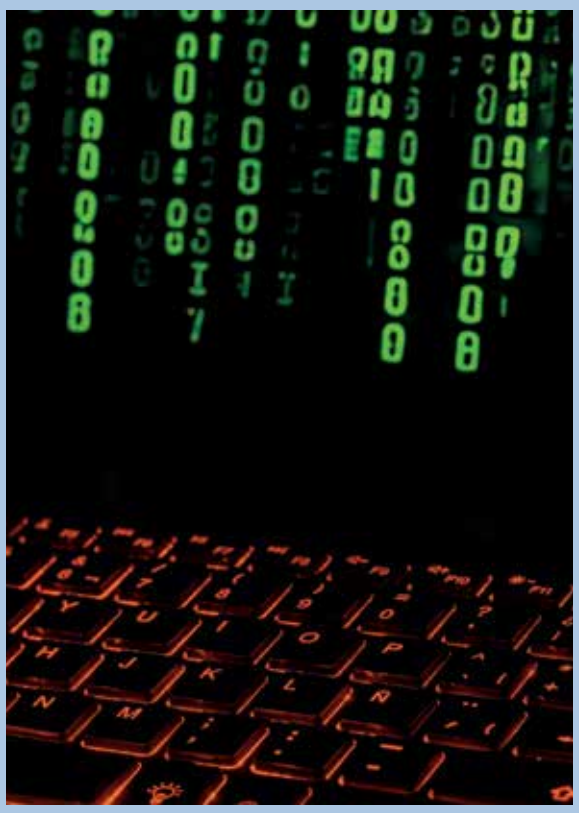
CCA's key priorities in 2025

ANTI-TRUST

During 2025 the CCA focused its enforcement activities further on detecting and sanctioning the most serious infringements of competition rules. Emphasis was placed on prohibited agreements between competing undertakings, abuse of a dominant position and strategically important markets for the Croatian economy, including food retail, energy and electronic communications. The CCA also stepped up to detect bid-rigging in public procurement.

Cartels and other serious infringements of competition rules remained the CCA's main enforcement priorities during 2025.





CCA DIGITAL TRANSFORMATION

Developing digital capacities was a hallmark of 2025. The CCA continued strengthening its Digital Affairs Department and improved the use of digital forensics, data analysis and electronic evidence in the enforcement of competition rules. Special attention was paid to digital markets and implementation of the Digital Markets Act (DMA), together with active participation in European projects on the application of artificial intelligence in the area of anti-trust.

The development of digital forensics and the use of digital tools further strengthened the CCA's ability to monitor and analyse developments in modern markets.

ENSURING FAIR TRADING PRACTICES IN THE AGRICULTURAL AND FOOD SUPPLY CHAIN

The CCA continued to monitor and analyse relationships between buyers and suppliers in the agricultural and food supply chain. Detailed investigations were conducted in four administrative proceedings whereas in three cases the CCA found infringements of the Act on the prohibition of unfair trading practices in the business-to-business food supply chain and imposed fines totalling EUR 322,500. This further confirmed the importance of ensuring balanced relationships in the food supply chain.

Fair trading practices in the food supply chain contribute to greater market stability and a more level playing field for all market participants.







INTERNATIONAL COOPERATION

During the year the CCA remained actively involved in the European Competition Network (ECN), the OECD and EU working bodies. Participation in international projects and the exchange of knowledge and experience with European regulators further strengthened the CCA's expertise, particularly in public procurement, digital markets and the application of new technologies.

Cooperation with European and international partners enables the application of regulatory best practices in Croatia.

STRENGTHENING INSTITUTIONAL CAPACITY

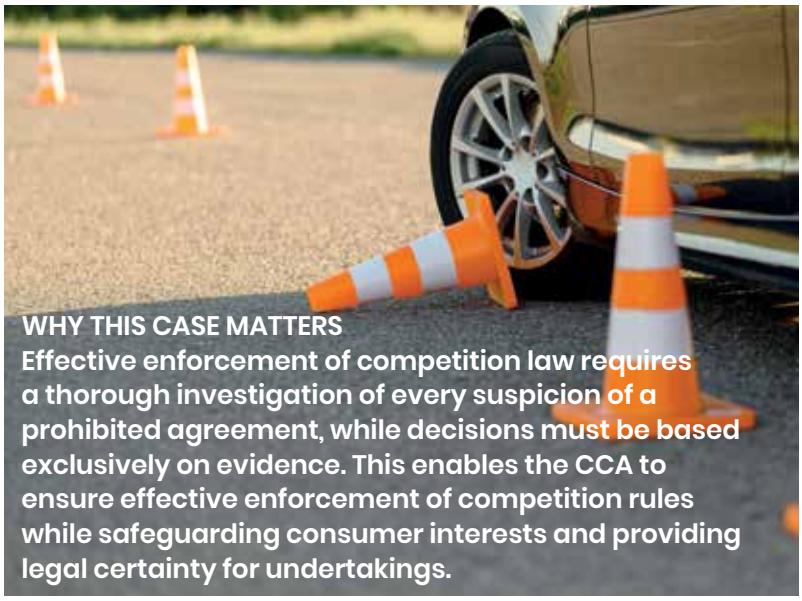
To meet increasingly complex challenges in modern markets, the CCA continued investing in expertise, recruitment and modernisation of analytical tools. At year-end it had 62 employees, representing increased expert capacity compared with the previous year and further strengthening effective enforcement of Croatian and European competition law.

Investment in skilled people, knowledge and technology is the foundation of effective and independent enforcement of competition rules in a new business environment.

Enforcement of the Competition Act
Prohibited agreements

CCA v four driving schools in the Split area following a complaint by driving schools Classic-R Trade and AMK d.o.o. from Split

Detecting and sanctioning cartels remained one of the CCA's key priorities. During the year, 32 prohibited-agreement cases were resolved, with preliminary investigations conducted on 22 relevant markets. Attention was paid to detecting prohibited agreements that restrict competition and cause the greatest harm to consumers and the economy. The CCA terminated the administrative proceedings launched ex officio on 11 January 2022 against the undertakings Kružni tok d.o.o., Auto škola Hajduk d.o.o., Obrt Auto škola Dalmacija and Obrt Croatia Start, investigating whether these undertakings had entered into a prohibited horizontal price-fixing agreement for category A and B driver training, contrary to Article 8 of the Competition Act.



WHY THIS CASE MATTERS
Effective enforcement of competition law requires a thorough investigation of every suspicion of a prohibited agreement, while decisions must be based exclusively on evidence. This enables the CCA to ensure effective enforcement of competition rules while safeguarding consumer interests and providing legal certainty for undertakings.

The CCA initiated the proceedings after the complaint received in July 2021 pointed to indications of possible price coordination among several driving schools in the Split area and alleged pressure on driving schools unwilling to take part. During the preliminary market investigation, it gathered data from the Croatian Automobile Club and analysed the driving schools' official price lists, statements by the complainants and other available information.

In the administrative proceedings initiated, the CCA comprehensively established the facts in the public interest and to protect consumer rights. Its investigation included unannounced inspections of two undertakings' business premises, statements from the parties, analysis of text messages and communications submitted alongside the complaint and a detailed analysis of pricing trends of the driving schools concerned between 2020 and 2023. Assessing each item of evidence individually and all evidence together, the CCA concluded that the available evidence did not indicate the existence of concerted practices or a prohibited price-fixing agreement between the parties concerned.

The price analysis showed that different driving schools changed their prices independently of one another; some price levels had already been set before the alleged meeting at which the agreement was said to have been reached; and the same driving schools did not always charge identical prices in all their branches. The evidence collected, including inspection findings and submissions, did not confirm coordinated price-setting with an anti-competitive objective. Because no prohibited agreement under Article 8 of the Competition Act, or other circumstances justifying further proceedings, was established, the CCA terminated the proceedings in this case.

Coordination of market conduct between undertakings, particularly regarding prices, terms of sale or other key commercial conditions, constitutes one of the most serious infringements of competition law. Undertakings must therefore ensure that their contacts, meetings and activities within associations do not lead to exchange of commercially sensitive information capable of producing coordinated market conduct. The independent determination of prices and commercial policies by undertakings is fundamental to effective competition and the protection of consumer interests. The CCA will continue to monitor market developments and assess undertakings' compliance with competition rules, with a view to preventing anti-competitive conduct and ensuring a level playing field for all market participants.



Abuse of a dominant position

Preliminary market investigation following a complaint by Telepass S.p.A., Italy, alleging abuse of a dominant position by Hrvatske autoceste d.o.o., Zagreb

In 2025 the CCA resolved 42 cases concerning abuse of dominance by undertakings in the market (22 administrative and 20 non-administrative cases).

To establish whether sufficient indications existed to open ex officio proceedings in the area of abuse of dominance the CCA examined 17 relevant markets during the year:

- building management and maintenance services;
- motorway operation;
- European Electronic Toll Service (EETS) provision and toll collection;
- espresso coffee distribution;
- mobile home sales;
- distribution of orthopaedic and other aids;
- training on the safe use of pesticides;
- real-estate intermediation;
- online product advertising;
- IBAN-based payment services;
- insurance;
- digital services;
- milk purchasing;
- retail chains;
- trading via an app-based online platform;
- internet platforms; and
- sale of personal hygiene supplies.

On 27 February 2025 the CCA received a complaint lodged by Telepass S.p.A. alleging that Hrvatske autoceste d.o.o. (HAC) had abused its dominant position within the meaning of Article 13 of the Competition Act or, alternatively, had entered into a prohibited agreement contrary to Article 8 of the Act. Telepass alleged that HAC's agreements with companies operating fuel-card payment systems (FCC partners), which enabled customers to pay motorway tolls and purchase electronic toll collection (ENC) devices, restricted access to the market for the distribution of ENC devices and distorted competition. Telepass further claimed that HAC paid providers of the European Electronic Toll Service (EETS) a fee equivalent to the maximum permitted under the applicable regulatory framework, namely 0.9% of toll revenues collected, excluding VAT, while offering more favourable commercial terms to its FCC partners. In its preliminary market investigation, the CCA analysed the regulatory framework and HAC's contractual relationships with EETS providers and FCC partners. The analysis showed that HAC paid Telepass and another EETS provider the same fee, at the maximum amount prescribed under the Ordinance on the methodology for calculating the remuneration for EETS providers. The CCA also established that the agreements concluded with FCC partners concerned the acceptance of their cards for toll payments and the purchase of ENC devices, thereby providing an additional distribution channel. Since FCC partners provide payment services, they do not operate on the same market as EETS providers. Furthermore, they are not restricted from entering into agreements with other issuers or distributors of electronic toll collection devices.

The preliminary investigation therefore revealed no indications that HAC restricted access to the relevant market or applied dissimilar conditions to equivalent transactions with EETS providers, thereby placing them at a competitive disadvantage. Furthermore, the analysis of the agreements between HAC and its FCC partners revealed no indications of a prohibited agreement or concerted practices restricting competition. Accordingly, the CCA found no indications of abuse of a dominant position or an infringement of the rules prohibiting anti-competitive agreements in this case. It should be emphasised that competition law does not prohibit an undertaking from holding a dominant position as such, but rather prohibits certain forms of conduct that, under specific circumstances, may constitute abuse of that position.

The Competition Act establishes market share as an initial indicator of dominance, providing for a rebuttable legal presumption that an undertaking holding a market share exceeding 40% on the relevant market can be in a dominant position.

Although a high market share is an important starting point for assessing whether an undertaking holds a dominant position, it is not necessarily the sole determining factor. A range of other factors must also be taken into account, including the duration for which the undertaking has maintained a high market share and its market position, its financial strength, advantages in accessing sources of supply or markets, links with other undertakings, legal or factual barriers to market entry faced by competitors, its ability to influence market conditions through its position as a supplier or purchaser, and its ability to foreclose competitors from the market by directing customers or suppliers towards other undertakings.

Merger control

Eagle Hills Zagreb Real Estate d.o.o. / Sunčani Hvar d.d. and Sunčani Hvar nekretnine d.o.o. – Conditional clearance of the concentration subject to remedies



During 2025 the CCA resolved 25 merger control cases and analysed 59 relevant markets. None of the notified concentrations was declared incompatible with competition rules. The CCA also received 383 notifications of concentrations with an EU dimension, under the referral procedures provided under the EU Merger Regulation.

On 22 January 2025 the CCA adopted a decision declaring the concentration involving Eagle Hills Zagreb Real Estate d.o.o., Sunčani Hvar d.d. and Sunčani Hvar nekretnine d.o.o. conditionally compatible, subject to remedies proposed by the notifying party to address potential adverse effects on competition. In assessing the concentration, the CCA examined the structure of the relevant market, the market shares of the parties to the concentration and their competitors, the findings of the market investigation, and the likely effects of the concentration on competition and consumers. The assessment also involved a detailed legal and economic analysis.

On the basis of the evidence gathered, the CCA concluded that the concentration could be cleared only subject to appropriate remedies designed to address potential competition concerns in the market for hotel accommodation and catering services on the island of Hvar. The accepted remedies are intended to maintain effective competition and include substantial investment commitments relating to the renovation and development of hotel facilities, particularly the Sirena and Amfora hotels, with the possibility of extending investments to other accommodation facilities. The planned investments are expected to improve the quality of tourism services, enhance the competitiveness of accommodation facilities and contribute to the development of sustainable tourism infrastructure. In addition to these investment commitments, Eagle Hills is committed to maintain its existing business relationships with domestic suppliers of goods and services on terms no less favourable than those currently in place and to increase the value of contracts concluded with suppliers established on the island of Hvar. These commitments are intended to maintain the stability of the local supply chain, strengthen the position of local businesses and address potential adverse effects of the concentration on competition.

To ensure effective implementation of the commitments, the CCA appointed an independent monitoring trustee responsible for overseeing compliance with the remedies and reporting regularly to the CCA on their implementation. The CCA concluded that the proposed remedies were appropriate and sufficient to address the potential anti-competitive effects of the concentration concerned.

Accordingly, the concentration was declared conditionally compatible with competition rules, subject to the implementation of the accepted remedies.

WHY THIS CASE MATTERS

The decision allowed the concentration to proceed subject to remedies designed to address potential competition concerns, encourage investment in tourism infrastructure and safeguard the interests of local suppliers and consumers.

Competition advocacy

CCA finds Šibenik "Silver Benefits Card" Pilot Programme compatible with competition rules

In addition to its enforcement activities, the CCA is, under the Competition Act, continuously engaged in competition advocacy. During 2025 the CCA closed 112 competition advocacy cases, including the opinions on both existing and proposed legislation regarding their compliance with competition rules, statements and co-operation with public authorities.

The CCA issued an opinion following an enquiry from the Municipality of Šibenik concerning the compatibility of its "Silver Benefits Card" Pilot Programme and the related Invitation to express interest in participating in the Programme with competition rules.

The Pilot Programme was designed to improve the quality of life of people aged 65 and over by facilitating access to goods and services through various benefits and discounts. The Programme was based on decisions adopted by the Municipality of Šibenik in the field of social welfare, within the powers conferred on local self-government authorities to determine social welfare entitlements for their residents. On the basis of the documentation submitted and its examination of the Invitation to express interest, the CCA found that participation in the Programme was voluntary and that the Municipality of Šibenik neither derived any financial benefit from its implementation nor provided financial support to participating undertakings. Programme partners were free to withdraw at any time, while the terms and conditions of their participation were governed by partnership agreements.

The CCA further established that the Invitation to express interest was publicly available and open to all undertakings on equal terms, without favouring or discriminating against any undertaking or group of undertakings. All interested legal entities and sole traders were eligible to participate and could independently determine the benefits they wished to offer to Silver Benefits Card holders.

The CCA also noted that the Invitation contained no exclusivity provisions favouring individual undertakings. Consequently, the implementation of the Programme should not result in restrictions on market access, preferential treatment or the exclusion of other undertakings from participating on equal terms.

In this context, the CCA emphasised that local and regional self-government authorities, when adopting measures within their respective areas of competence, must ensure compliance with competition rules, particularly the principles of transparency, non-discrimination and equal access to the market for all interested undertakings.

Following its assessment, the CCA concluded that the Municipality of Šibenik's "Silver Benefits Card" Pilot Programme and the accompanying Invitation to express interest in participation were not contrary to competition rules. This conclusion was based on the voluntary nature of participation, the availability of the Programme to all undertakings on equal terms and the absence of restrictive, discriminatory or exclusivity provisions capable of distorting competition.

Through this opinion, the CCA highlighted the importance of ensuring a level playing field and transparent market access for all undertakings when designing and implementing local public policies, including the social welfare programmes. The CCA's opinion was issued solely in the sense of competition rules.

WHY THIS CASE MATTERS

The case demonstrates the CCA's preventive competition-advocacy role through expert opinions that help ensure public policies follow the principles of transparency, equal treatment and open access to the market.



Cooperation with other institutions

Recognising the importance of cooperation with other stakeholders in enforcing and promoting competition law, the CCA worked closely with various institutions during 2025. It signed a cooperation agreement with the Croatian National Bank, cooperated with the Croatian Parliament's Economy Committee and continued its excellent cooperation with the Faculty of Economics and Business in Zagreb, whose students visited CCA to learn about its work and powers. It should also be noted that the CCA initiated the first Annual meeting of regulators, held in July 2025.



COOPERATION AGREEMENT WITH THE CROATIAN NATIONAL BANK

On 10 July 2025 Boris Vujčić, governor of the Croatian National Bank (HNB), and Mirta Kapural, PhD, president of the CCA's Competition Council, signed a cooperation agreement enabling stronger joint work in market supervision and regulation. The agreement provides for exchange of expert opinions and data, cooperation in proceedings against prohibited agreements and abuse of a dominant position, and technical and expert assistance. Cooperation also covers joint training, professional gatherings and conferences, continuing the long-standing good practice between HNB and CCA in promoting effective competition. The agreement further strengthens a transparent and competitive business environment in Croatia.



COOPERATION WITH THE CROATIAN PARLIAMENT'S COMMITTEE ON THE ECONOMY

On 16 October 2025, Ivica Mesić, chair of the Croatian Parliament's Committee on the Economy, and Boris Piližota, deputy chair of the committee, paid a working visit to the CCA to gain a better understanding of the CCA's work, activities and challenges in carrying out its statutory responsibilities. Mirta Kapural, PhD, president of the Competition Council, presented the CCA's remit, organisational structure and the work of its departments. Discussions focused on sector inquiries and their importance in understanding market structures and identifying possible competition concerns, as well as the CCA's efforts to promote competition law and policy.



VISIT BY STUDENTS FROM THE FACULTY OF ECONOMICS AND BUSINESS, UNIVERSITY OF ZAGREB

On 21 November 2025, third- and fourth-year business economics students from the Faculty of Economics and Business, University of Zagreb, visited the CCA to gain a better understanding of the role and responsibilities of the national competition authority. During the visit, the students were introduced to the CCA's main responsibilities and the challenges it faces in enforcing competition law, with particular emphasis on the importance of linking theoretical knowledge with practical experience. Discussions also covered the CCA's international cooperation, including its activities within the EU, OECD, ICN and UNCTAD, as well as its role in the enforcement of the DMA. The visit further strengthened cooperation between the CCA and the Faculty of Economics and Business under their 2023 Cooperation Agreement, helping to bridge the gap between academic knowledge and the practical application of competition law.

Enforcement of the Act on the prohibition of unfair trading practices in the business-to-business food supply chain

TOMMY d.o.o. fined EUR 212,500 for selling food products below their purchase price

During 2025 the CCA resolved 31 cases concerning unfair trading practices in the agricultural and food supply chain, including four administrative proceedings. The CCA continued to monitor trading relationships between buyers and suppliers and imposed fines totalling EUR 322,500 for infringements of the Act on the prohibition of unfair trading practices in the business-to-business food supply chain (UTPs Act).

In the administrative proceedings the CCA found that the retail chain TOMMY d.o.o. had sold 12 food products to consumers at prices below their purchase price, including VAT, thereby committing a serious infringement of the UTPs Act. The CCA imposed a fine of EUR 212,500.

The proceedings were initiated following a written submission alleging that certain food products were being sold below their purchase price. The CCA established that the combination of promotional retail prices and an additional 10% discount offered to a particular group of consumers had resulted in certain products being sold at prices below the purchase price paid by TOMMY to its suppliers, including VAT.

The CCA emphasised that offering discounts, running promotional campaigns and providing other benefits to consumers are not prohibited in themselves. However, an infringement occurs where such price reductions, whether individually or in combination, result in food products being sold below their purchase price. This practice is expressly prohibited by the UTPs Act, subject to certain statutory exceptions, including clearance sales following the closure of a retail outlet, the withdrawal of products from the retailer's range and the sale of products approaching their expiry date. None of these exceptions applied in this case.

The prohibition on selling food products below their purchase price is intended to ensure fair trading relationships throughout the food supply chain. Such practices may distort competition, put pressure on suppliers to lower their prices, adversely affect smaller producers and retailers and, in the longer term, reduce consumer choice and lead to higher prices. The purpose of the statutory prohibition is therefore not to limit discounts or other benefits offered to consumers, but to ensure fair trading conditions for all participants in the food supply chain. In setting the fine, the CCA took into account the gravity, scope and consequences of the infringement, as well as the mitigating circumstances identified during the proceedings. The fine is intended to underline the importance of compliance with the rules prohibiting unfair trading practices and to deter similar infringements, thereby contributing to fair trading relationships and the long-term sustainability of the food supply chain.



WHY THIS CASE MATTERS

The prohibition on selling food products below their purchase price is intended to safeguard suppliers, ensure fair trading practices and maintain the long-term sustainability of the food supply chain.

Sector inquiries and market analyses



In addition to administrative proceedings, CCA continuously monitors market conditions through sector inquiries and analyses. These studies help build a better understanding of market developments, relationships among market participants, potential barriers to competition, the regulatory environment and provide an important basis for effective enforcement of the rules within the CCA's remit.

During 2025 CCA analysed 98 relevant markets in individual cases and conducted three sector inquiries and one market review. These market studies covered: i) the grocery retail market, ii) the press market, iii) the vertical relations between retailers and suppliers in the food supply chain (food, beverages, toiletries and household supplies) and, (iv) a market review of the construction sector.





Market research

Grocery Retail Market Survey for 2024

The CCA conducted its traditional annual survey of the grocery retail market in Croatia (primarily food, beverages, toiletries and household supplies). The survey included 41 undertakings which, based on their turnover, represented the most significant market participants.

In 2024, total turnover increased by 8.8% in nominal terms, from EUR 7.73 billion in 2023 to EUR 8.41 billion. However, turnover growth slowed compared with the previous year, when it stood at 16.1%. The total number of retail outlets rose to 5,266, an increase of 2.5% compared with 2023, while total net retail floor space grew by 2.2% to 1.63 million m².

Konzum plus remained Croatia's largest grocery retailer in 2024, with a market share of [20–30] %, representing a slight decrease compared with 2023. Lidl and Kaufland, both members of the Schwarz Group, maintained a combined market share of [20–30] %. Studenac continued to operate the largest number of retail outlets (1,411), predominantly small-format stores. Of the 41 retailers surveyed, 35 recorded turnover growth, with the largest increases in nominal terms achieved by Konzum plus, Studenac, Lidl, Plodine, Spar and Kaufland. The CR10 concentration ratio, which measures the combined market share of the ten largest grocery retailers, stood at 87.8%

in 2024, a slight increase compared with 2023, primarily driven by gains in the market shares of Studenac and NTL.

The CR5 concentration ratio, representing the combined market share of the five largest grocery retailers, stood at 66.3% in 2024, a marginal decrease compared with the previous year. The Herfindahl-Hirschman Index (HHI) stood at 1,409 points, indicating that the grocery retail market was not highly concentrated within the surveyed sample.

Geographically, the highest turnover was recorded in the City of Zagreb (EUR 1.4 billion), followed by Split-Dalmatia, Primorje-Gorski Kotar and Istria counties. Together, the six leading counties and the City of Zagreb accounted for 65.2% of total grocery retail turnover in Croatia. Changes in retailers' rankings across counties and cities reflected the growing market presence of regional retailers, particularly Plodine, Studenac and Tommy.

Supermarkets remained the dominant retail format, generating EUR 4.4 billion in turnover, or 52.3% of the total. They were followed by hypermarkets (EUR 1.66 billion), self-service stores (EUR 1.62 billion) and small shops (EUR 731 million). In terms of the number of outlets, self-service stores accounted for the largest share (41.3%), followed by small shops (39.9%). Supermarkets also accounted for the largest share of total net retail floor space (49.6%), followed by hypermarkets (21.3%).

Online grocery sales continued to account for only a small proportion of total turnover. Just seven retailers reported sales through online platforms, with Konzum plus accounting for the largest share of online sales. Loyalty programmes were operated by 14 retailers, with Konzum plus recording the highest number of programme members.

In 2024, average gross margins were highest for bakery products (37.9%) and confectionery (32.2%). Compared with 2023, average gross margins increased slightly in six product categories and decreased marginally in two. When interpreting these figures, account must be taken of the Croatian Government's relevant decisions introducing direct price control measures that applied during the period under review.

The survey also examined territorial supply constraints (TSC). Most of the undertakings surveyed (39 out of 41) reported that they had not encountered such practices. Two undertakings highlighted certain issues relating to territorial supply constraints within the EU internal market, including the European Commission's enforcement action concerning such restrictions. These findings pointed to the need for continued monitoring of territorial supply constraints.



International cooperation

International cooperation remained one of the key elements of the CCA's work during 2025. By actively participating in European and international organisations, the CCA continued strengthening its expertise, sharing experience with other competition authorities and contributing to the development of a common European practice.

The CCA representatives participated in the OECD Competition Committee and Global Forum on Competition, and in seminars organised by the Regional Centre for Competition (RCC) in Budapest. The three-year OECD–Siemens project "Fair Market Conditions for Competitiveness", in which the CCA actively participated to improve competitiveness and market integrity in Adriatic-region countries, was successfully completed in June 2025.

At the European Union level the CCA continued taking an active part in the European Competition Network (ECN) and working bodies of the Council of the European Union. During the year it cooperated intensively with other national competition authorities through information exchange, professional dialogue and coordination in matters of mutual interest.

Emphasis was placed on participation in European technical-assistance projects. Implementation of a TSI project aimed at preventing prohibited agreements in public procurement continued, while a new DICE project was launched to develop the digital capacities of national competition authorities. The project focuses on advanced analytical methods, data science and artificial intelligence in competition enforcement and further strengthens the CCA's capacity to meet the challenges of the digital economy.

On 6 November 2025 the CCA hosted the third regional meeting on enforcement of unfair trading practices legislation in Zagreb, bringing together the representatives of Austria, Romania, Slovenia, Spain and Croatia. The meeting provided an opportunity to exchange experience and enforcement practices and to discuss the legal and operational challenges national authorities face in protecting suppliers in the food supply chain. Participants considered how to further align national legislation with the European regulatory framework and improve implementation. Regional cooperation and direct exchange of experience contribute to more effective enforcement and shared solutions to challenges involving unfair trading practices.

Through international cooperation the CCA continuously develops expertise, adopts European best practices and strengthens its role as a modern regulator effectively ensuring competition and fair trading practices in the agricultural and food supply chain in an increasingly complex economic environment.

45
meetings of EU working groups and committees







32
CCA representatives participating in the work of European bodies

58
requests for information from other national competition authorities within the ECN received and responded to

2
EU TSI projects involving CCA

15
member states, including Croatia, involved in DICE



International cooperation allows the CCA to exchange experience, apply European and international best practices and continuously strengthen the expertise needed for effective enforcement of competition rules. Through active participation in OECD bodies, especially the Competition Committee, Global Forum on Competition and Regional Centre for Competition, the CCA follows the development of policies and enforcement practices in different jurisdictions and contributes to international professional discussions. OECD participation and international projects provide practical experience and insight into new competition-law approaches, while training and specialist activities further develop staff knowledge and skills. This strengthens the CCA's capacity to tackle new challenges, including digitalisation, data analysis and artificial intelligence in competition-law enforcement.

Communication, education and transparency



Open communication with the public, promotion of competition culture and greater legal certainty continued to be crucial for the CCA in 2025. The CCA actively informed both the specialist community and the wider public about its work and contributed to better understanding of competition rules and the prohibition of unfair trading practices through educational activities.

The CCA experts delivered approximately twenty lectures, workshops and training sessions and published several professional articles. Training focused on practical implementation of competition rules, including prohibited agreements, abuse of a dominant position, merger control and unfair trading practices in the food supply chain.

Open communication, educational activities and cooperation with national and international stakeholders are essential to promoting a better understanding of competition law and strengthening public confidence in the CCA.

Emphasis was placed on exchanging experience with undertakings, lawyers, judges, academia and other institutions. A notable development was the first annual regulators' meeting, initiated by the CCA and held at the Croatian National Bank on 14 July 2025, bringing together representatives of seven key institutions.

The gathering aimed to strengthen inter-institutional cooperation, share experience and good practices and improve understanding of regulatory bodies' role in the economic and institutional framework. Focus was placed on regulators' independence, responsibilities and resources and on communication with consumers and the public.

By initiating this annual gathering the CCA helped establish regular dialogue among regulatory and supervisory bodies, encouraging closer links, exchange of knowledge and alignment of practices.

In November the CCA organised the traditional international "Competition Day" conference, devoted to new challenges in merger control and competition rules in the digital environment. The conference brought together representatives of the European Commission, the OECD, the EU member states' competition authorities, domestic regulators, academia and business, confirming the importance of international exchange and applica-











20 +
expert papers and workshops

1
international conference

1
first annual meeting of Croatian regulatory authorities

1
regional meeting on unfair trading practices in the food supply chain

68
decisions published

88
press releases

44
responses to media enquiries

10
issues of "AZTN Info" newsletter

tion of European regulatory standards. During the year the president of the CCA Competition Council Mirta Kapural, PhD gave more than twenty papers, took part in conferences, panels and workshops and communicated with the public through the media to raise awareness of the CCA's role in enforcing competition law, addressing developments in digital markets and promoting a competitive economy.

Transparency was further strengthened by regular publication of decisions, opinions, expert articles and press releases on the CCA's website and communication through the LinkedIn business network. During the year 68 decisions and 88 press releases were published, 44 journalists' enquiries and 12 enquiries from parties were answered, and ten editions of the electronic newsletter "AZTN info" were issued. All key decisions and press releases are regularly published in English as well, improving information access for international specialists.

Through these activities the CCA confirms its role not only as a regulator but also as an institution promoting competition culture, encouraging stakeholder dialogue and contributing to a transparent and predictable regulatory environment.

Digital Transformation and Development of Analytical Capabilities

Digital transformation marked one of the CCA's key development achievements in 2025. By investing in new digital tools, analytical capabilities and the application of artificial intelligence, the CCA continued modernising competition enforcement and strengthening its ability to detect the most complex forms of anti-competitive behaviour.

Emphasis was placed on developing digital solutions for identifying bid-rigging in public procurement proceedings. As part of implementing the national Anti-Corruption Strategy, activities commenced to develop a system for automatically detecting possible irregularities and indicators of collusive bidding, thereby improving preventive and supervisory mechanisms in public procurement.

Another important step was approval of the DICE project, "Supporting Digital Transformation in Competition Law Enforcement", financed by the European Union's Technical Support Instrument (TSI). The CCA has a leading role in this project, which brings together competition authorities from 15 EU member states.

The project aims to develop specialist knowledge and digital competences in artificial intelligence, data analysis and digital technologies to improve detection and sanctioning of competition-law infringements. During 2025 the system for anonymous reporting of cartels and other prohibited agreements was also upgraded. A modernised interface and stronger security and organisational arrangements facilitate safe and confidential communication with informants and contribute to earlier detection of the most serious competition infringements. Digital capacity development is accompanied by continuous investment in employee expertise.

Digital tools, data analysis and AI, together with cybersecurity, are becoming key elements of modern competition enforcement; digitalisation is one of the greatest changes in the work of European competition authorities.

The CCA experts participated in specialised programmes on artificial intelligence, data analysis and information security, including international standards for information security management and responsible AI use. This further strengthens the CCA's readiness to enforce competition law in the digital economy and aligns its work with European regulatory trends.

15
member states in the TSI project

1
new system for detecting possible bid-rigging in public procurement in the pipeline

1
upgraded system for anonymous cartel reporting

10
staff members taking specialised AI training

2
international ISO standards concerning information security and AI management

ENHANCING ENFORCEMENT

- development of a system to detect bid-rigging in public procurement
- modernisation of the anonymous cartel-reporting system
- improvement of analytical tools for market studies

DEVELOPING DIGITAL CAPABILITIES

- launch of the EU DICE project
- staff training in AI and data analysis
- application of advanced digital solutions in competition-law enforcement

DIGITAL SECURITY AND RESPONSIBLE USE OF TECHNOLOGY

- strengthening the CCA's cybersecurity
- training on international ISO standards
- data protection and responsible use of artificial intelligence





Looking ahead

The CCA will remain firmly committed to the effective enforcement of Croatian and EU competition law, with particular emphasis on detecting and sanctioning the most serious infringements, including prohibited agreements between undertakings and abuse of a dominant position. Merger control and the enforcement of rules prohibiting unfair trading practices in the agricultural and food supply chain will also remain key priorities.

Attention will be paid to the challenges posed by the digital economy. The CCA will continue to develop and deploy advanced analytical tools, digital forensic techniques and artificial intelligence to improve its ability to detect anti-competitive conduct. At the same time, the CCA will invest in strengthening its expertise and digital capabilities and deepen its cooperation with European and international partners, drawing on regulatory best practices.

Alongside its enforcement activities, the CCA will continue to strengthen its preventive, advisory and educational role through engagement with undertakings, public institutions and citizens. These efforts will focus on raising awareness of competition law, promoting a culture of competition and contributing to a transparent and predictable regulatory environment.

Achieving these objectives will require continued investment in the CCA's institutional capabilities, including adequate staffing, specialist expertise and the technical resources needed to fulfil its statutory responsibilities effectively. At a time of rapid economic and technological change, effective competition remains essential to sustainable economic growth, innovation and consumer welfare. The CCA will continue to carry out its responsibilities independently and effectively, working to ensure a level playing field for undertakings and contribute to a more competitive Croatian economy.

Thirty years of competition law in Croatia mark the development of a modern and increasingly robust enforcement framework. This progress reflects a sustained commitment to effective competition, innovation and consumer welfare, providing a strong foundation for the continued development of a competitive and resilient Croatian economy.

NOTES

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