

CCA Enforcement and Policy Priorities for 2026

The Croatian Competition Agency (hereinafter: CCA), as an independent and autonomous competition authority across all markets, seeks to ensure and contribute to the proper functioning of markets for consumers, undertakings, and the economy as a whole. It does so by maintaining open markets, effective competition and innovation, and by removing barriers that have arisen or may arise from restrictions of competition.

In exercising its powers, the CCA conducts proceedings pursuant to the Competition Act, in parallel with the application of the EU law, in particular Articles 101 and 102 of the Treaty on the Functioning of the European Union.

In 2026, one of the key priorities is the amendment of the Competition Act to fully align the legislative framework with the EU acquis and the OECD recommendations. The objective is also to improve existing provisions whose practical application has shown the need for clarification, supplementation, or redesign. These amendments aim to enhance enforceability, refine existing legal instruments, and introduce new ones capable of strengthening deterrence. The legislative framework will also be updated through revised secondary legislation on the criteria for setting fines and the criteria for immunity from, or reduction of, fines (leniency).

Focus on Core Enforcement Priorities

In 2026 the CCA will continue to prioritise the detection, investigation, and sanctioning of the most serious infringements, including anticompetitive agreements (cartels), abuse of a dominant position, and the exploitation of superior bargaining power of the buyer through the imposition of unfair trading practices (UTPs) on the supplier in the business-to-business food supply chain, pursuant to the Act on the prohibition of unfair trading practices in the business-to-business food supply chain (UTPs Act).

Sectoral Priorities for 2026

The CCA will focus its activities on sectors with the greatest impact on consumer welfare, competition dynamics, and innovation, as well as sectors where risks to effective competition have been identified, but also those enhancing innovation, productivity and resilience and contestability of markets.

Therefore, the priority sectors include:

a) Retail trade in food and fast-moving consumer goods

This market remains a key enforcement priority, particularly through long-standing sector inquiries conducted under both the Competition Act and the UTPs Act.

While the CCA does not have price regulation powers, it will act in the public interest within its mandate by:

- investigating potential cartels or concerted practices,
- closely monitoring contractual relationships and business practices between buyers and suppliers of food and agri products, and
- assessing evidence of possible anticompetitive conduct or UTPs in the agri-food supply chain.

b) Electronic communications

Since the electronic communications sector remains essential for both businesses and consumers, the CCA will continue the ongoing investigations into:

- suspected cartels, and
- abuse of dominance.

c) Energy

Given the strategic importance of the energy sector and the ongoing geopolitical pressures, in the sense of consumer welfare, in 2026 the CCA will:

- monitor market developments and relationships between market participants, and
- investigate suspected anticompetitive conduct where relevant indications arise.

d) Construction

The construction sector, particularly in public procurement and post-earthquake reconstruction, is highly significant and historically prone to competition infringements.

Hence the CCA will:

- conduct market studies, and
- investigate potential bid-rigging and other cartel behaviour, especially in public procurement.

e) Digital markets – ride-hailing platforms

The CCA will continue monitoring digital markets, with a particular focus on:

- platforms facilitating passenger transport services via apps,
- market structure and access conditions,
- intermediation models, and
- competitive dynamics between platforms and market participants.

In proceedings across all the identified priority sectors, the CCA will continue to cooperate with specific sector regulators and, building on its initiative from the previous year, will jointly organise the second annual conference of regulators.

Cartel Enforcement and Public Procurement

The conclusion of prohibited horizontal agreements (cartels) between competing undertakings—whereby they fix prices or other parameters of competition, share markets, allocate customers or sales territories, agree on rebates, determine output levels or the scope of their activities, and coordinate their conduct and bidding conditions in public procurement—constitutes the most serious infringement of competition law, causing the greatest harm to the economy and consumers.

Hence, the CCA will maintain a strong focus on cartel detection, particularly horizontal agreements involving

- bid rigging in public procurement.

Such prohibited agreements can increase public procurement prices by up to 20%.

To strengthen enforcement, the CCA will in 2026:

- enhance its capabilities in digital evidence and AI-based tools,
- continue cooperation with the Ministry of Economy and the State Commission for the Supervision of Public Procurement Procedures,
- complete a joint project - the implementation of the Technical Support Instrument (TSI) with the European Commission, OECD, and Member States (Austria, Bulgaria, Cyprus, Greece and Romania), resulting in best-practice guidelines and further training. In this project, the Republic of Croatia has taken on a leading role, and it has included a series of training activities on combating bid rigging in public procurement for various stakeholders in the procurement system (contracting authorities, judicial bodies and business associations). Further joint workshops of the Croatian Competition Agency and other institutions on this topic are planned.

Leniency policy will remain a key enforcement tool, and CCA will continue promoting whistleblowing mechanisms, including anonymous reporting tools. The use of the digital online anonymous reporting tool will continue to be encouraged, enabling any individual to report prohibited agreements or other infringements of the Competition Act via the Croatian Competition Agency website with full protection of anonymity.

Abuse of Dominance and Merger Control

The CCA will continue to:

- investigate and sanction abuse of a dominant position by undertakings, particularly where these hard-core infringements hinder market entry or innovation, impede competition, adversely affect the market structure and harm the consumers,
- assess the compatibility of concentrations (mergers and acquisitions) to prevent a significant impediment to effective competition, in particular as a result of the creation or strengthening of a dominant position.

Digital Regulation and DMA

In its role as national coordinator for the implementation of the Digital Markets Act that lays down harmonised rules ensuring contestable and fair markets in the digital sector across the EU where gatekeepers are present, the CCA will in cooperation with the European Commission continue to:

- monitor large digital platforms (“gatekeepers”),
- strengthen its capacities related to regulation and monitoring of gatekeepers,
- strengthen expertise in digital and AI-related competition issues in general.

In that context, the implementation of the Technical Support Instrument (TSI) project with the European Commission and EU Member States will also continue, in which the Republic of Croatia, through the Croatian Competition Agency, participates alongside France as one of the leading Member States.

Advocacy and Market Studies

In 2026 the CCA will:

- prioritise sector inquiries in markets with the greatest consumer impact (such as groceries retail market) and start new ones depending on the functioning of a particular market,
- issue expert opinions on draft legislation and existing rules and advocate alignment with competition rules, especially regarding the compliance with the Competition Act and UTPs Act, such as the introduction of provisions under the Draft Public Procurement Act regulating the exclusion from participation in future public procurement procedures of cartel participants for a certain period, in order to ensure a stronger deterrent effect against such infringements.

As a standing priority, the CCA will also continue in 2026 to carry out activities aimed at promoting knowledge of competition rules and the prohibition of UTPs in the agri-food supply chain, as well as raising awareness of the importance of compliance. This will be pursued

through trainings delivered by the CCA experts for various stakeholder groups and through the organisation of events, as already initiated by the roundtable on green transition and competition held in cooperation with Poslovni dnevnik in the first quarter of 2026.

International Cooperation

Key priorities include:

- active participation in the European Competition Network (ECN),
- hosting an ECN working group meeting in Zagreb, and
- continued engagement in OECD Competition Committee activities, including accession-related commitments.

Unfair Trading Practices (UTPs)

With regard to unfair trading practices in the business-to-business food supply chain the CCA will continue enforcing the UTPs Act by:

- concluding the ongoing administrative proceedings partly following the investigation into the compliance of the business contracts and operations,
- investigating buyers across the supply chain (including distributors), and
- acting on complaints, including anonymous submissions.

At EU level, the CCA will actively participate in the UTP Enforcement Network and contribute to discussions particularly in light of the adoption of Regulation (EU) 2026/697 of the European Parliament and of the Council of 11 March 2026 on cooperation between enforcement authorities responsible for the application of Directive (EU) 2019/633 on unfair trading practices in business-to-business relationships in the agricultural and food supply chain (applicable from 10 September 2027), as well as activities related to participation in working groups in the context of the adoption of EU legislation on the prohibition of unfair trading practices in the agri-food supply chain, and active participation in various international conferences and meetings on unfair trading practices. Within the framework of regional cooperation, assistance and active cooperation by the CCA with neighbouring countries that are in the process of introducing legislation on the prohibition of unfair trading practices will be pursued and further strengthened in 2026.

Institutional Priorities

The CCA will focus on:

- strengthening human resources and expertise, whereas recruitment will depend on the ability to attract and retain qualified experts in a competitive labour market, especially in light of comparatively lower remuneration,

- training staff (including placements at the European Commission), and
- maintaining transparent communication with the public and media in both antitrust and unfair trading practices area.

Conclusion

These priorities are designed to ensure efficient enforcement and optimal allocation of resources towards areas with the greatest impact on competition, consumers, and the economy.

At the same time, the CCA will retain the necessary flexibility to respond to unforeseen market developments and ensure the continued protection of effective competition in the Croatian market.