



Roadmap

2025/2026



THE *AUTORITÉ DE LA CONCURRENCE* PUBLISHES ITS ROADMAP FOR 2025-2026

The reports by Enrico Letta and Mario Draghi made an unambiguous assessment of the lack of competitiveness in the European economy, and highlighted the role of competition policy alongside a renewed industrial policy.

The primary causes of Europe's lack of competitiveness are the fragmentation of the single market, an excess of regulations, and the absence of a unified capital market to mobilise Europeans' abundant savings. Nevertheless, competition authorities must play their part in the effort to restore competitiveness, both at European level and within the Member States, and they already have the necessary tools to support the objectives of competitiveness, sustainability and resilience, in compliance with their mandates. It is their responsibility to implement those tools.

Against this backdrop, the *Autorité de la concurrence* is today publishing the broad guidelines that will steer its work in 2025-2026. The challenges posed by the growth of digital markets and artificial intelligence, the imperative of sustainability, and the defence of purchasing power in mainland France and the French overseas territories will continue to be major concerns. In a context of budgetary constraints, reflected in a reduction in its resources, the *Autorité* must, now more than ever, ensure its efficiency, prioritise its actions, and preserve its attractiveness and the motivation of its teams.



ENSURING DIGITAL MARKETS REMAIN OPEN AND FAIR

The *Autorité* has striven, for many years now, to take the specific features of digital markets into account across its three roles: enforcement, advocacy and merger control. In 2024, it fined Google for non-compliance with some of its commitments on press-related rights, unconditionally cleared Outbrain's takeover of Teads in the non-search-related online advertising sector, and published its opinion on the competitive functioning of the generative artificial intelligence sector.

This action will remain a priority.

Understanding the competition challenges of artificial intelligence

In February 2025, the Artificial Intelligence Action Summit was held in Paris, affirming France's key role in the global AI ecosystem. At the same time, a Chinese firm, DeepSeek, launched an open-source reasoning model on a market

hitherto dominated by US and European companies.

In June 2024, after only five months of investigation, the *Autorité* published its opinion on the competitive functioning of generative AI. It analysed the strategies implemented by major digital companies to consolidate their market power upstream in the generative AI value chain and leverage that power to expand. In particular, it examined practices in respect of cloud infrastructure, computing power, and access to data and a skilled workforce.

Drawing on its generative AI opinion and its 2023 opinion on the cloud, the *Autorité* is

ready to act. The aforementioned AI opinion will be taken further with an analysis of the competition issues surrounding access to energy for players in the sector.

2025 will see the *Autorité* adopt its first roadmap on the use of generative AI. The aim is to identify use cases that will generate efficiency gains, develop the necessary tools for those use cases, and create a culture of AI use that reconciles data control and sovereignty and promotes the sharing of best practices with our partners.

Continuing the fight against anticompetitive practices and scanning the digital market horizon

The proceedings against Apple concerning the App Tracking Transparency (ATT) framework on iOS devices concluded in March 2025 with a fine of €150 million, while the proceedings on the merits against Meta – following the interim measures ordered in 2023 at Adloox’s request – are due to conclude in 2025. Aware of the need for swift action, the *Autorité* is currently examining a request for interim measures in the search engine sector. Moreover, the *Autorité* is ready to exercise the investigative powers conferred by French law 2024-449 of 21 May 2024 to Secure and Regulate the Digital Space (“SREN Law”), toward the enforcement of the European Digital Markets Act (DMA).

On the advisory front, in 2024 the *Autorité* started inquiries *ex officio* into the competitive functioning of the online video content creation sector. The responses to its public consultation will feed into the analysis and recommendations presented in the opinion to be published in 2025.

Lastly, in accordance with Article 26 of the SREN Law, the *Autorité* has launched a public consultation with a view to preparing a report presenting its work on self-preferencing and discussing desirable procedural and legislative improvements. The report will be submitted to the French government and parliament in November 2025.



FURTHER INTEGRATING THE SUSTAINABILITY IMPERATIVE INTO COMPETITION POLICY

The *Autorité* is continuing to integrate the sustainability imperative into its decision-making practice, from both an incentive and repressive angle.

The General Rapporteur can now issue informal guidance on the compliance with competition law of projects with a sustainability objective. Two letters have already been issued, one in July 2024 on measuring the carbon footprint of animal nutrition, and the other in February 2025 on collective financing of the additional costs and risks associated with the agro-ecological transition.

This approach is part of a Europe-wide effort to better integrate sustainability into competition law. The European Commission published an *Agri Sustainability Compass* in May 2024, followed by its *Vision for Agriculture and Food* in February 2025.

The *Autorité* is determined to sanction practices that deprive consumers of their ability to make an informed choice as regards the sustainability-related characteristics of products and services.



It will draw, in particular, on its January 2025 opinion on environmental rating systems for consumer products and services. It can also refer to Chapter 9 of the European Commission's new Horizontal Guidelines to assess cooperation agreements between companies, when these pursue sustainability objectives. It will also give further consideration to how to take sustainability into account when examining unilateral practices, as well as in merger control.

The *Autorité* is also mindful of the social dimension of sustainability. Its

June 2025 decision fining four companies for general no-poach agreements confirms that human resources are an important competition parameter, and highlights the harm that can be caused by practices affecting employees' prospects for mobility and improved working conditions.

The *Autorité* will continue to promote sustainability within the European Competition Network (ECN) and the International Competition Network (ICN).

Lastly, the *Autorité* will further improve its own practices and energy consumption, as demonstrated by its switch, on 1 January 2025, to exclusively green electricity from a network of local, independent producers. It will strive to obtain new certifications in this area, in particular the "Supplier Relations and Sustainable Procurement" label, advance its awareness raising and training initiatives, and update its roadmap, which includes 30 actions.



SUPPORTING PURCHASING POWER



After the inflationary shock of 2022-2023, household purchasing power has begun to recover thanks to the fall in inflation in 2024. However, the impact on households remains: from December 2021 to December 2024, consumer prices rose by 11% for all products and by 20% for food. Vigilance is therefore still required to protect purchasing power.

Anticompetitive practices not only harm households but often businesses, particularly small- and medium-sized ones, which purchase intermediate goods and services or supply the inputs required for their production. Tackling anticompetitive practices is therefore an integral part of competitiveness policy.

Goods and services affecting the budgets of households and small businesses

The *Autorité* will ensure the restructuring underway in the food retail sector does not harm prices, quality and diversity of supply.

On the advisory front, at the request of the Economic Affairs Committee of the French Senate, the *Autorité* will prepare a report on trends in farm machinery costs. On the enforcement front, the investigations already underway into the production and marketing of consumer goods will continue.

Transport and energy require particular attention, given their impact on the budgets of households and businesses and the needs of the ecological transition. Decisions on cross-Channel maritime freight and passenger transport and fuel supply, storage and distribution in Corsica will be issued in 2025.

More broadly, at a time when the competitiveness of the French and European economies must be restored, the *Autorité* will continue to focus on business services. 2025 will see the conclusion of proceedings against players in the sector for the mass distribution of legal and economic information on companies.

The detection policy is crucial to the effectiveness of its enforcement work. In 2024, the leniency programme attracted a record 11 full applications and four summary applications. The General Rapporteur also made public four dawn raids, in energy cable distribution in the French overseas territories, medical biology, explosives for civil uses and blasting and drilling, and agricultural inputs – in addition to another raid in 2025, in glass packaging.

Defending purchasing power in the French overseas territories

The *Autorité* will continue to defend purchasing power in the French overseas territories, and stands ready to do more if given the means to do so.

On the advisory front, following the signing in October 2024 of the agreement to tackle the high cost of living in Martinique, the *Autorité* is preparing an opinion, at the request of the French government, on the mark-ups of wholesale importers and distributors of basic food items in Martinique.

The proceedings opened in respect of possible anticompetitive practices in the market for the management and operation of infrastructure and facilities at the port of Longoni in Mayotte will conclude during the year, as will the proceedings against a public works company in Wallis and Futuna. The investigation into the markets for the treatment, collection and transport of infectious medical waste in a French overseas territory will also continue.

In merger control, the verification of the proper implementation of the remedies attached to the clearance of a merger in the food retail sector in Martinique is underway, with a decision to be issued in 2025.

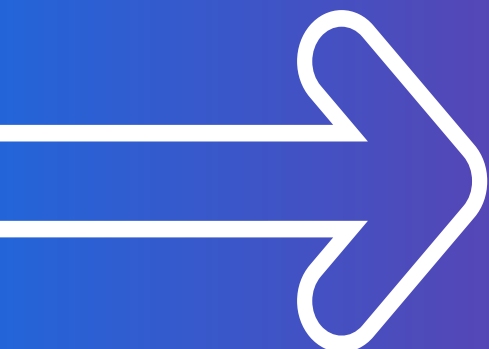
Lastly, the *Autorité* will further monitor compliance with the provisions of the French law of 20 November 2012 on Economic Regulation in the French Overseas Territories (known as the “Lurel Law”) banning exclusive import agreements.

Supporting the opening up of the regulated legal professions and changes in their fees

On the 10th anniversary of the 2015 Law for Growth, Activity and Equal Economic Opportunities, the *Autorité* started inquiries *ex officio* to assess the reforms of the conditions of establishment and fees for the regulated legal professions.

The conclusions of the inquiry, which will be completed in summer 2025, will draw in particular on the work of economic researchers, presented at a workshop in February.

In addition, in accordance with the biennial regulatory cycle provided for by the 2015 Law, the *Autorité* issued an opinion in April 2025 on the freedom of establishment of lawyers to the Supreme Courts, and will issue an opinion on commissioners of justice later in the year.



The *Autorité* will maintain its engagement in ongoing dialogue with the competition community in France, within the European Competition Network (ECN) and, internationally, within the OECD Competition Committee (chaired by the President of the *Autorité* since January 2025), the UN Trade and Development (UNCTAD) and the International Competition Network (ICN).

In parallel with the plan to raise the mandatory notification thresholds, the *Autorité* is considering the introduction of a review mechanism for mergers that are likely to harm competition but do not reach the thresholds. It will draw on European examples and the responses to the public consultation conducted in January and February 2025 to propose, before the end of 2025, a balanced framework that reconciles effective control with legal certainty for companies.

In the fulfilment of its functions, the *Autorité* wants to set an example in terms of social and societal responsibility, and will pursue its internal projects for the benefit of its employees, well-being in the workplace, attractiveness and managerial innovation. A review of its diversity and inclusion roadmap is made public annually, and work will continue to obtain the double “Equality and Diversity” label, with the support of all internal stakeholders.