

Overview of Turkish Competition Authority's 2025 Activity Report

The Turkish Competition Authority ("**TCA**") has published its annual activity report for 2025. The report shows that, as in previous years, the TCA remained active throughout 2025 in its efforts to ensure the proper, fair, and effective functioning of the free market economy, to safeguard competitive market structures, and—through the protection of competition—to contribute to consumer welfare.

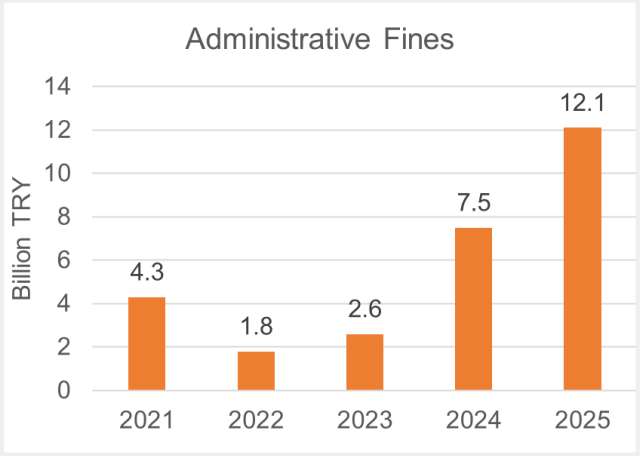
The Turkish Competition Board ("**Board**") concluded a total of 530 cases in 2025, representing a 9% increase compared to the previous year. Of the 530 final decisions, 416 related to merger and acquisition cases, while 104 were related to competition infringement cases. Approximately 78% of the cases concluded were related to merger control, while 20% were related to competition violation cases. The number of cases decided, broken down by year and case type, is presented in the table below:

YEAR	COMPETITION VIOLATION	EXEMPTION & NEGATIVE CLEARANCE	MERGER CONTROL	TOTAL
2021	74	22	309	405
2022	78	19	245	342
2023	145	8	217	370
2024	166	10	311	487
2025	104	10	416	530



01 TCA's Enforcement Activities

In 2025, the TCA conducted investigations in a wide range of sectors—including agriculture and agricultural products, machinery industry, labour market, food, and construction—and imposed administrative fines totalling approx. TRY 12.1 billion (approx. EUR 236.8 million)[1] for violations of Law No. 4054 on the Protection of Competition ("**Law No. 4054**"). The total amount of administrative fines imposed in 2025 increased by approximately one and a half times compared to the previous year. The ten sectors that received the highest administrative fines—accounting for 73% of the total administrative fines imposed—were, in order: (i) food industry; (ii) chemistry and mining; (iii) infrastructure services; (iv) labour market; (v) automotive and transportation; (vi) textiles and ready-to-wear apparel; (vii) construction; (viii) agriculture and agricultural products; (ix) machinery industry; and (x) culture, arts, entertainment, recreation, sports, betting, and education.



[1] The exchange rate used for currency conversion is EUR 1 = TRY 51.10.

Among the administrative fines imposed, the highest amount—amounting to approx. TRY 4.7 billion (approx. EUR 92.5 million)—was levied on the food industry. The labour market also stood out, with investigations resulting in total administrative fines of TRY 557 million (approx. EUR 10.9 million).

Another noteworthy development in 2025 relates to the TCA's enforcement practice regarding the imposition of administrative fines on undertakings' managers. For the first time in many years, the TCA imposed fines on managers for competition law infringements, signalling a renewed use of a sanctioning tool that had long remained largely dormant in practice, albeit with relatively modest fine amounts.

In 2025, the Board issued a total of 530 decisions, 104 of which related to suspected violations of Law No. 4054. Of these, 89 were issued following the investigation process, while 15 were concluded at the preliminary investigation level. Among the 89 investigation files relating to competition violation allegations, administrative fines were imposed on 23 undertakings as a result of the regular investigation process, 47 were concluded through settlement, and 11 through commitments. In seven cases, the investigations concluded with no finding of a violation. In this context, the ratio of cases concluded through settlement decreased to approximately 52% in 2025 from approximately 65% in 2024. The table below shows the number of settlement and commitment mechanisms applied by year.



While there was a decrease in the number of concluded investigations and preliminary investigations in 2025, there was a significant increase in the number of onsite inspection assignments compared to the previous year. The number of completed investigations, preliminary investigations, and onsite inspection assignments by year are shown in the table below.

YEAR	CONCLUDED INVESTIGATIONS	PRELIMINARY INVESTIGATIONS	ON-SITE INSPECTION ASSIGNMENTS
2021	40	29	653
2022	29	24	831
2023	61	28	1642
2024	49	27	1039
2025	44	15	1509

In 2025, the Board's decisions on whether Law No. 4054 had been violated, similar to previous years, mainly concerned violations of Article 4. The distribution of decisions taken regarding competition violations between anti-competitive agreements (Article 4) and abuse of dominant position (Article 6) is shown in the table below:

YEAR	ARTICLE	ARTICLE 6	HYBRID (4 AND 6)	TOTAL
2021	40	23	11	74
2022	58	14	6	78
2023	121	18	6	145
2024	148	13	5	166
2025	82	14	8	104

02 TCA's Merger Control Reviews

The Board decided on 311 merger and acquisition cases in 2023, while this number increased by 34% to 416 in 2025. You can read our summary of the TCA's merger and acquisition activities in 2025 **here**.

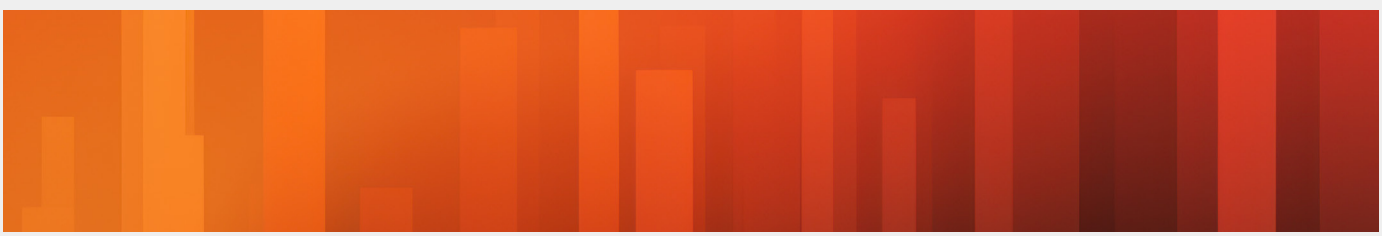
The table below provides figures on merger and acquisition decisions by year:

YEAR	MERGER	ACQUISITION	JOINT VENTURE	PRIVATISATION	TOTAL
2021	5	214	83	7	309
2022	2	160	76	7	245
2023	2	139	73	3	217
2024	2	198	105	6	311
2025	4	286	107	19	416

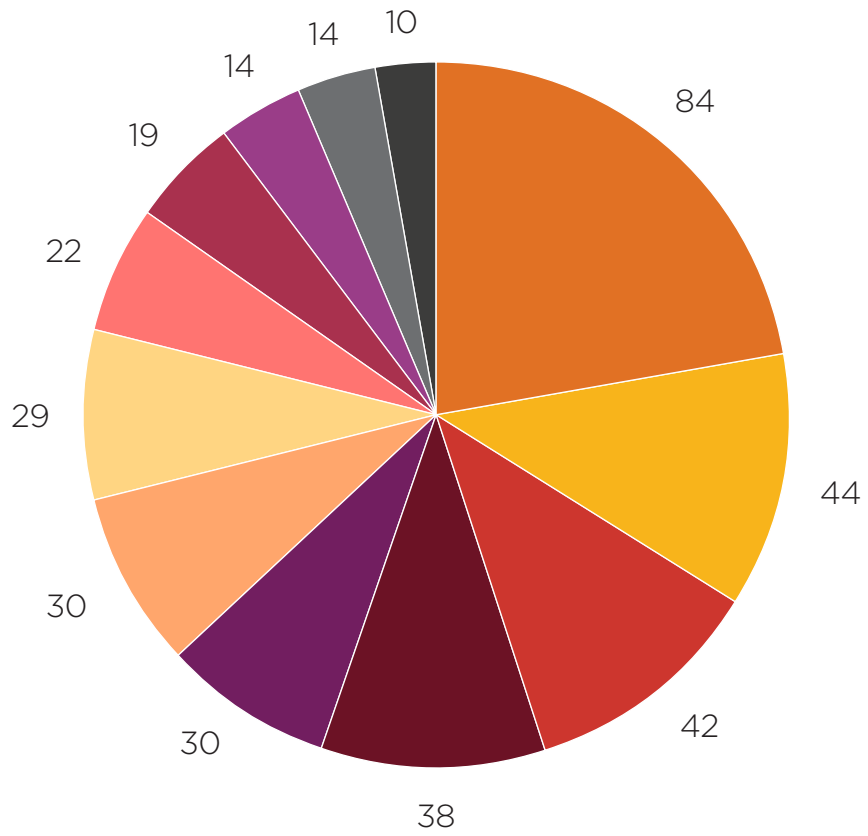
In 2025, the TCA granted unconditional approval for 381 of the 416 transactions notified, granted conditional approval for 10 transactions, and determined that 25 transactions were out of scope. Overall, approximately 99% of the transactions subject to the TCA's approval in the last five years were granted unconditional approval.

When looking at the sectoral distribution of reported merger control cases, the information technology and platform services sector ranks first with 84 files, followed by the automotive and transportation sector with 44 cases. Next are the chemicals and mining sector with 42 cases, the healthcare services sector with 38 cases, and the infrastructure services sector with 30 cases.

Notably, in 2025, the Board for the first time classified the "labour market" as a separate sector within the sectoral distribution of merger and acquisition transactions. Fourteeen transactions concerning the labour sector were reviewed in 2025. The sectoral distribution of merger and acquisition transactions is presented in the graph below.



Breakdown of Merger Control Decisions by Sector



03 Conclusion

The Board continued to increase its activities in 2025:

• 530 decisions were issued in total.

• Administrative fines amounting to TRY 12.1 billion (approx. EUR 236.8 million) were imposed, approximately one and a half times the amount imposed in 2024.

• A total of 416 merger and acquisition cases were decided, reaching the highest number in the last five years.

• The TCA continued to increasingly scrutinise labour markets both in the context of investigations and merger control reviews.

• The TCA reinstated, after many years, its authority to impose administrative fines on managers.

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Contact Us:



Sinan Diniz

sinan.diniz@ksthukuk.com



Simru Tayfun

simru.tayfun@ksthukuk.com



Beyza Arlı

beyzanur.arli@ksthukuk.com