

Regulating Competition Across Borders: Antitrust Law in the United States, European Union, and India

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Abstract: Antitrust laws are the laws that are enforced as an instrumental of regulation of anti-competitive practices and to ensure fair competition in the competitive market. In this paper we are going to discuss antitrust in jurisdiction of US, INDIA, and European Union's markets. There are different phases of evolution of antitrust in these countries. The differences and similarities in approach to matters of monopolistic practices, cartelization and market power abuse have been examined by comparing the legal framework in place, landmark cases, and enforcement mechanisms in these regions. From this comparison, the study understands the challenges of globalization, and changing economy towards the formation of a new aspect of antitrust regulation. And, we the related laws to antitrust in US that is Sherman act, and competition law in India and European union competition law and how they were established or brought into force and their historical context from 1890 to till date. This research paper mainly focuses on the economic aspects of antitrust with addition of dealing with landmark cases of those countries.

Key Words: Antitrust Law, Competition Law, Monopolies, Cartelization, Sherman Act, European Union Competition Law, Competition Commission of India (CCI), Digital Markets, Predatory Pricing, Globalization, Market Dominance, Rule of Reason, Cross-Border Regulation

INTRODUCTION

Today's modern economy still lacks proper competitiveness in the global markets still there is activities to monopolize the market and idea of cartelization and this paper suggest solution for such problems and investigate past historical debated of the same, this research problem is immediate cause to be discussed. An essential instrument for establishing and maintaining markets that are both competitive and effective in safeguarding

consumers from monopolistic behaviour is antitrust law, sometimes referred to as competition law. Most nations and economic areas have developed their own regulatory structure throughout time to address concerns about monopolies, unfair trade practices, and market domination. In this regard, this essay aims to investigate the creation, use, and enforcement of antitrust laws in the US, EU, and India—three significant legal systems. Each region has challenges created by its own distinctive political, economic, and social history, even though their main attempt is to promote free and fair competition. The United States was among the first nations to enact comprehensive antitrust laws in the late 19th and early 20th centuries, and the US legal system has informed and often affected the competition laws that many other nations have enacted¹. The European Union is a single market with unique competition laws that regulate global company conduct in the region. Although India has made great efforts in recent decades to improve its competition legislation and is becoming a more major emerging economy with rapidly rising consumer demand, it still confronts several challenges. In this paper the three nations antitrust regulation and legal tools and significant case laws are dealt.

LITERATURE REVIEW

Antitrust laws, or competition laws, are a core form of regulatory framework to be able to prevent anti-competitive practices, monopolies, and the abuse of market power. A comparison of the jurisdictions between the United States, the European Union, and India shows significant differences in development, application, and enforcement of such laws. This literature review examines historical roots, changing

¹ Romanoff, Tom. "Comparison of Competition Law and Policy in the US, EU, UK, China, and Canada | Bipartisan Policy Center." *Bipartisanpolicy.org*, 16 Dec. 2021, [bipartisanpolicy.org/blog/comparison-](https://bipartisanpolicy.org/blog/comparison-of-competition-law-and-policy-in-the-us-eu-uk-china-and-canada/)

[of-competition-law-and-policy-in-the-us-eu-uk-china-and-canada/](https://bipartisanpolicy.org/blog/comparison-of-competition-law-and-policy-in-the-us-eu-uk-china-and-canada/).

frameworks, enforcement mechanisms, and case studies of landmark cases in each of the three regions, which collectively mirror the variety of approaches to competitive markets and consumer protection.

Evolution of Antitrust Laws:

It is important to start with the historical context of antitrust law for each of the three region's relevant regulatory motivations and policy priorities. The U.S. is generally viewed as the nation where modern antitrust laws began with the 1890 Sherman Act. According to Hovenkamp, The Sherman Act was a measure in response to public outcry over monopolistic control, especially that of Standard Oil.² Through the industrial boom of the late 19th century, these trusts were formed-monopolizing industries and disrupting market competition. This generation of high-profile monopolies, like Standard Oil and Northern Securities, incited regulatory action that laid the foundation for modern U.S. antitrust enforcement.

European Union competition law also followed natural economic integration goals following World War II, with the establishment of the EU founded through the Treaty of Rome in 1957. Gerber (1998) notes that not only is there an aim at making competition, but the integration of the market across states within the EU is also guaranteed by its laws of antitrust. EU competition law was framed on the laws of Germany and France, where anti-cartel laws had been adopted in the economic crises of the 1930s³. According to Jones and Sufrin (2016), EU competition law adapts regularly to globalization and has an acute interest in the prohibition of monopolies and regulation of cross-border corporate practice within the single market.

India entered competition law much later, with the MRTP Act of 1969, which was enacted to regulate monopolistic and restrictive trade practices in a protected economy. According to Chakraborty

(2007)⁴, this regulation was an outcome of India's socialist policy-a way to enforce economic equity and resource distribution. In fact, it was in the 1990s when India liberalized its economy. This paved the way for the Development of the Competition Act in 2002 which then replaced the MRTP Act with greater focus on fair competition and efficiency of the economy (Gupta, 2012).

Comparative Approaches and Enforcement Mechanisms:

Each region's competition laws reflect a variety of approaches and policy emphases in respect of the mechanisms of enforcement. In the United States, DOJ and FTC play as dual enforcers, specializing in equal application of civil and criminal actions for anti-competitive practices. The core features of U.S. law, according to Carlton and Perloff (2015), is shaped by consumer welfare⁵ and economic efficiency principles that focus on the prevention of collusive and monopolizing practices but support innovations.

This puts the European Commission at the centre as the single enforcing authority with a wide mandate for preventing anti-competitive behaviour that affects the single market. As Whish and Bailey (2015) note, EU policy leans significantly towards providing safe access to markets in all member states, cross-border mergers, and control over dominant positions by massive multinational companies. Judgments of the Commission in Google Search (Shopping) and Microsoft v. Commission cases reflect the intention to achieve its aim of having competition actively (Ezrachi, 2018). Gerber (1998) observes that the strict enforcement of the EU has set the international benchmark for accountability because transnational business corporations within its jurisdiction have to be compliant.

The CCI in India, too, upholds antitrust laws that relate to fair competition and consumer protection.

² Hovenkamp, Herbert. "Monopolizing Digital Commerce." *William & Mary Law School Scholarship Repository*, 2022, scholarship.law.wm.edu/wmlr/vol64/iss6/3/.

³ European Parliament. "Competition Policy | Fact Sheets on the European Union | European Parliament." *Europa.eu*, Apr. 2019, www.europarl.europa.eu/factsheets/en/sheet/82/competition-policy.

⁴ Pingali, Viswanath, et al. "Competition Law in India: Perspectives." *Vikalpa: The Journal for Decision Makers*, vol. 41, no. 2, June 2016, pp. 168–193, <https://doi.org/10.1177/0256090916647222>.

⁵ Federal Trade Commission. "The Enforcers." *Federal Trade Commission*, 11 June 2013, www.ftc.gov/advice-guidance/competition-guidance/guide-antitrust-laws/enforcers.

Bhattacharjee (2010) states that although not so old, the CCI has been actively dealing with issues of cartelization, abuse of dominance, and predatory pricing, with often borrowing ideas from the EU and US models. Indian antitrust enforcement, while sensitive to the country's socio-economic conditions⁶, created its jurisprudence, with the focus on protecting emerging sectors and increasing market inclusivity, as indicated by Basu (2015).

Landmark Cases and Legal Precedents:

The landmark cases in each jurisdiction reflect the challenges and the approaches towards regulation in their respective competition laws. The U.S. has cases, such as Northern Securities Co. v. United States, 1904 and Standard Oil Co. of New Jersey v. United States, 1911, which laid the foundation for enforcing antitrust law⁷. According to Crane (2020), Standard Oil is remarkable in having established the doctrine of the "rule of reason, which gauged whether the conduct of a monopoly was reasonable based on its impact on competition, a benchmark that still resonates in American antitrust law to this day. Cases such as those illustrated by the EU as in the cases of Microsoft v. Commission that dates back to 2004 and Google Search (Shopping) case that dates back to 2017, focus on the region's effort to control the powerful tech companies with a tight hold on the market. ⁸According to Jones and Sufrin (2016), such cases are excellent representations of the EU's toughness not to let companies distort a free market, thus, being proactivity in the sphere of tech and digital markets that has influenced the rules of antitrust in other regions of the world.

India's case law is increasingly changing, with landmark cases like CCI v. DLF Limited (2011), Jio predatory pricing case depicting how the CCI was relentless in curtailing abusive practices. As Sengupta submits that these significant cases are milestones in India's competition law by demonstrating that CCI intends to curb dominance

abuse cases in emerging sectors that created a nascent but significant precedent in Indian markets⁹. Indeed, it is a case law, constantly evolving within India, and is also the synthesizing framework of the global antitrust principles adapted to fit the Indian context, which is about economic inclusivity and consumer protection.

RESEARCH GAP

This writer, while generally well-informed about "best practices" in the U.S., EU, and India through study of antitrust laws within each jurisdiction, perceives those areas where gaps still exist concerning how globalisation, digital markets, and developing economies are modifying new regulatory needs within regions. Old work typically tends to revolve around the question of how these respective regions or jurisdictions have evolved differently in their antitrust laws, with virtually no comparative work to analyse convergence or divergence of regulatory approaches as markets integrate further. Landmark cases provide precedents, but there is little analysis of how emerging issues—the growth of digital monopolies, cross-border mergers, and influence of the world's megatech companies—challenge traditional antitrust frameworks. Here, a major gap is filled: the study provides a comprehensive comparison of the economic, legal, and policy implications of antitrust regulation across the regions in light of recent globalization trends.

RESEARCH QUESTIONS

What historical, economic, or political contexts for the U.S., EU, and India lead to some peculiar approaches to antitrust law and similarities or differences emerge upon comparative analysis?

What are mechanisms in place in each jurisdiction to enforce through legal tools the challenge of monopolistic practices, cartelization, and abuse of

⁶ "Antitrust and Competition Laws in India." *Global Compliance News*, www.globalcompliancencnews.com/antitrust-and-competition/antitrust-and-competition-in-india/.

⁷ "Standard Oil Co. Of New Jersey v. United States." *Quimbee*, 23 June 2021, www.quimbee.com/cases/standard-oil-co-of-new-jersey-v-united-states. Accessed 15 Nov. 2024.

⁸ Persch, Johannes. "Google Shopping: The General Court Takes Its Position." *Kluwer Competition Law*

Blog, 15 Nov. 2021, competitionlawblog.kluwercompetitionlaw.com/2021/11/15/google-shopping-the-general-court-takes-its-position/.

⁹ KR Srivats. "DLF Case: Supreme Court Stays NCLAT Order." *BusinessLine*, 17 Mar. 2023, www.thehindubusinessline.com/companies/dlf-case-supreme-court-stays-nclat-order/article66632742.ece. Accessed 15 Nov. 2024.

market power, especially in cross-border trade and digital markets?

What are the emerging global economic trends in digital platforms and how are these trends shaping the trajectory of antitrust regulation in the United States, the European Union, and India? How might these trends feed the next generation of antitrust regulation?

What should and can be the role of antitrust in encouraging competitive fairness in highly globalized markets, and how should a nation like the U.S., or the EU, or India balance national economic interests with the compulsions of a world economy?

HISTORICAL CONTEXT

The US and EU have the most established and significant antitrust laws. First in US oldest theme was to concern about the monopolies in the market. After the civil world war there is changes in transportation, communication, production technology. US shifted from agrarian economy to industrial one. These rapid changes brought fear in farmers, workers, and small business men. After 1880 there is a boogie men known as trusts, in 1882 there established a trust called standard oil trust. That used to gather number of companies into single cohesive unit. Later in 1884 there comes cotton oil trust and later there are entry of more trusts into the market. John D Rockefeller's standard oil trust remains best known monopoly of the era. During that time every household has a five-gallon red can standard oil kerosene and he is known as greedy octopus since he is wrapping his arms around American industries¹⁰. On 2nd July 1890 President Benjamin Harison signed Sherman antitrust law. John Sherman famously referred to monopoly as a kingly prerogative inconsistent with the form of government. The Sherman act is an act that is brief and language is broad. This act contains two sections first section talks about a contract, combination in forming of trust in restraint of trade is declared

¹⁰ Jagtap, Akshay, et al. "The Antitrust Legacy of Standard Oil in Today's World." *The Way Ahead*, Society of Petroleum Engineers, 1 Nov. 2021, jpt.spe.org/twa/the-antitrust-legacy-of-standard-oil-in-todays-world.

¹¹ Terrell, Ellen. "Research Guides: This Month in Business History: Sherman Anti-Trust Act Signed into Law." *Guides.loc.gov*, guides.loc.gov/this-month-in-business-history/july/sherman-antitrust-act-enacted.

illegal. And section 2 talks about a person who shall monopolize or attempt to monopolize or attempt any part of trade or commerce among several states or with foreign states shall be deemed guilty. The punishment would be a fine of no more than \$500, a maximum sentence of one year in jail, or occasionally both.¹¹ President Theodore Roosevelt took office in 1901 and Sherman act was perfectly activated. Then Roosevelt successor William Howard Taft who was a republican brought Clayton act 1914 which strengthened Sherman act criminalizing anti-competitive. Same year in 1914 congress brought federal trade commission act a consumer protection agency. Then comes Antitrust of EU, the other side of Atlantic almost 70 years after the US Sherman act EU competition law was enacted as part of treaty of Rome in 1957. But competition law tradition can be traced in countries like Germany and France to remove tradition of cartels during which these countries Germany and France were famously known as land of cartels. Then economic crisis of 1930 cartelization laws brought in France and Netherlands and public utilities and telecom providers were nationalised in France and UK. By the end of 1930 Germany's entire economy was organised on basis of monopolies and cartels.¹² In 1951 coal and steel community is established in the meeting of treaty of Paris. In July 1957 Germany Bundestag adopted act that bans cartels. EU competition law originally targets cartels later focus shifted to monopiles and merger control. Which resulted a huge success of EU competition law when compared to American competition law.

LAND MARK JUDGMENTS

1. NORTHERN SECURITIES COMPANY VS UNITED STATES (1904):

Among the most landmark U.S. Northern Securities Co. v. is one Supreme Court case. United States, which occurred in 1904 and was a pivotal moment in the American antitrust law through the federal

¹² Lemonnier, Valentine. "French BPA Case Highlights Antitrust Law Boundaries for Association Recommendations and Initiatives." *Kluwer Competition Law Blog*, 2 Feb. 2024, competitionlawblog.kluwercompetitionlaw.com/2024/02/02/french-bpa-case-highlights-antitrust-law-boundaries-for-association-recommendations-and-initiatives/.

government's adherence to regulating monopolies and other giant corporate trusts. Here is an in-depth examination of the case, background, arguments in court, decision, and influence¹³:

Background of the Case

The enormous trust formation of mighty trusts in America dominated U.S. economy during the late 1800s and early 1900s. Among the most powerful, criticized, and abused trusts was the Northern Securities Company-the railroad holding company established in 1901 by key financial magnates of the time, among whom were J.P. Morgan and James J. Hill, E.H. Harriman. This was the Great Northern Railway, combined with the Northern Pacific Railway, as two of the largest railroad companies that existed in the U.S. Northwest. The aim here was to control rail transport in this region. This great consolidation of these two big railroad companies in the U.S. Northwest stirred up much public concern and outcry regarding the formation of railroad monopolies. Farmers, merchants, and smaller railroad firms feared this would lead to unfair and, possibly, extortionate pricing, a lack of choice, and a restriction in both firms' business and lifestyles.

Legal Action and Arguments

In 1902, President Theodore Roosevelt ordered the United States Department of Justice to bring a suit against Northern Securities Company under the Sherman Antitrust Act of 1890. The administration desired to bring an end to the monopolistic practices that were restricting trade and injuring the public interest. The case would be the epitome of the "trust-busting" stance that Roosevelt adopted toward the control of huge corporations he believed abused their market power. The Sherman Antitrust Act was enacted in 1890, with the objective of preventing anti-competitive practices embodied by prohibition on contracts, combinations, and conspiracies which restrained trade or commerce. There are two sections involved under this act:

Section 1 prohibits any restraint of trade and Section 2 details the case of monopolies or attempts to monopolize.

In this case, the government argued that the formation of a monopoly by Northern Securities, contrary to Section 1 of the Sherman Act, restricted

the railroads from competing, reduced the market choices, and created unfair controls for prices.

Supreme Court Decision

The lawsuit made it as far as the United States in 1904 Supreme Court, where those justices decided whether Northern Securities' consolidation of the railroads violated the Sherman Antitrust Act. The Court handed down a decision of 5-4 in favour of the United States; this was a narrow victory that let the business world understand that the Northern Securities Company indeed formed a monopoly that hindered interstate commerce.

Judgment and decision by the Court:

The Supreme Court held that Northern Securities was a combination that restrained trade, under Section 1 of the Sherman Antitrust Act. It explicitly stated that the federal government had the right to prevent the formation of monopolies, especially if such form of monopolies had to do with interstate commerce. The decision emphasized that "great corporations" could not use their powers to restrict trade, although their revenues have no concern with fixing prices or altering market conditions. In the majority opinion, Justice John Marshall Harlan argued that such combinations resulting in monopolies harmed public interest and economic fairness.

Effects of the Case

The Northern Securities decision established an important precedent when it recited the federal government's power to regulate monopolistic practices and break up corporate combinations which restricted competition. The case had at least these several long-range effects:

Improved the Sherman Act: The ruling demonstrated that the Sherman Act could indeed be used to dissolve monopolies and curtail anti-competitive behaviours, therefore allowing the act renewed credibility as a regulatory instrument.

Trust-busting Legacy: President Theodore Roosevelt's challenge to Northern Securities was successful. The precedent was established for further antitrust action against other powerful trusts in such industries as oil, steel, and tobacco.

¹³ "Northern Securities Co. V. United States (1904) – U.S. Conlawpedia." *Sites.gsu.edu*, [sites.gsu.edu/us-](https://sites.gsu.edu/us-constipedia/northern-securities-co-v-united-states-1904/)

constipedia/northern-securities-co-v-united-states-1904/.

The case placed a lot of emphasis on competition in the marketplace and provided a precedent for future U.S. antitrust laws, such as the Clayton Act of 1914 and the Federal Trade Commission Act of 1914, which increased the scope of antitrust regulation.

2. STANDARD OIL COMPANY OF NEW JERSEY VS UNITED STATES

Case Background

The Standard Oil case was one of the earliest foundational antitrust cases in the United States and an antitrust landmark. John D. Rockefeller's Standard Oil was arguably one of the most powerful monopolies of the late 19th and early 20th century, exercising a commanding market power of about 90% of the U.S. oil refining industry. The company was established in 1870 by merging smaller oil companies, and soon it engaged in many anti-competitive practices, including predatory pricing, secret rebates, and preferential treatment from railroads. These practices enabled Standard Oil to eliminate its competitors, gain unmatched control over the oil industry, and be able to dictate the price of oil.¹⁴

Legal Action and Argument

The United States government sued Standard Oil in 1909 under the Sherman Antitrust Act of 1890 for violating such provisions. The Government complained that Standard Oil was continuing to engage in illegal practices of monopoly with the aim of maintaining its control over the oil market, and consequently over commerce, by engaging in illegal practices, including the raising of prices, and lessening of competition. The broad wording of the Sherman Act made it feasible for the government to attack the monopolistic behaviour while the law did not forbid all the manoeuvres employed by Standard Oil. The legal question of the case was whether Standard Oil's activities constituted "restraint of trade" and "monopolization," which were terms defined under Sections 1 and 2 of the Sherman Act.

Supreme Court Decision

In 1911, the U.S. Supreme Court ruled in favour of the government, concluding that Standard Oil, indeed, had violated the Sherman Antitrust Act by

practically monopolizing the oil industry through anti-competitive practices. The Court ordered the dissolution of Standard Oil into 34 independent companies to restore competition to the oil industry.

Important Facts from the Ruling:

Rule of Reason: The Court developed the "rule of reason" doctrine, which held that all business combinations or restraints of trade were not by their nature illegal. Only those action that obviously restrained competition and affected the welfare of the people should be prohibited through the Sherman Act.

Divestiture: Standard Oil was divided, and its assets among newly formed companies so that fair oil industry competition should be re-established.

Impact of the Case

This case established a precedent for the rule of reason in antitrust law, allowing courts to determine the reasonableness of business practices case by case.

It sent a salutary message that practices amounting to monopoly could be subjected to absolute restraint and even dissolution by the government.

Standard Oil's breakup spawned additional antitrust activity and promoted public and governmental examination of large corporations and monopolies in several sectors.

The case remains one of the classic examples of governmental intervention to ensure fair competition and deter market abuse by large corporations that are dominant in certain markets.

3. JIO CASE: AND PREDATORY METHOD

Background of the Case

The Jio predatory pricing case has emerged as the latest in the long list of modern-day antitrust issues that have plagued India's telecom sector. Reliance Jio is one of the new-generation telecom providers that launched their service last year, in 2016. It entered the Indian market aggressively and at a price, offering free voice calls and data services and attracting millions of customers, rapidly disrupting Indian telecom operators. This led to old-line

¹⁴ Wex Definitions Team. "Standard Oil Co. Of New Jersey v. United States (1911)." *LII / Legal Information Institute*, Apr. 2021,

[www.law.cornell.edu/wex/standard_oil_co._of_new_jersey_v._united_states_\(1911\)](http://www.law.cornell.edu/wex/standard_oil_co._of_new_jersey_v._united_states_(1911)).

telecom operators such as Bharti Airtel, Vodafone India, and Idea Cellular facing the scorching heat of customer loss and revenue erosion due to Jio's pricing plan.¹⁵

Price Predation Charges

Critics argued that Jio was indulging in predatory pricing- a dominant player offering unsustainable, below-cost services to wipe out competition. On killers, once it killed competition by forcing rivals out of the market, it would raise prices, hurting consumer welfare. The Indian Competition Act of 2002 prohibits the practice of predatory pricing by an undertaking if done by a dominant undertaking to eliminate or reduce competition. One of this case's most significant legal hurdles was determining whether Jio was a dominant undertaking when entering the market, as predatory pricing laws are mainly applied to companies with market power.

Proceedings and Findings

The Competition Commission of India (CCI) took this case up for review in 2017 because of complaints by competitors, including Bharti Airtel. It looked at Jio's market share and pricing strategy to deduce its intent and considered whether it falls within the definition of dominance or predatory pricing.¹⁶

Key Takeaways from the CCI Order

No Dominance at Entry: The CCI also held that Jio was not a dominant player when it entered, and since the prices were low, no predatory pricing was displayed as per the Indian competition law.

Pro-Competitive Effects: In addition to this, it is also seen that the entry of Jio brought in more competition in the telecom space, and consumers also benefited from reduced prices and new services.

The CCI dismissed the complaints, holding that Jio's pricing strategy was legitimate market competition and not an abuse of dominance.

Impact of the Case

¹⁵ Shanmugam, C, and Manish Gandhi.

¹⁶ *The Predatory Pricing Case against Reliance Jio: Did CCI Miss an Opportunity to Rejuvenate Indian Telecom Sector?* – CCLE. www.icle.in/resource/the-predatory-pricing-case-against-reliance-jio-did-cci-miss-an-opportunity-to-rejuvenate-indian-telecom-sector/.

The judgment stated a challenge in defining market dominance in rapidly changing markets, especially when new entrants shake up the regular players.

The order also obscures the capacity of conventional antitrust concepts applied to those new digital markets, as most companies use disruptive and consumer-friendly prices.

The case brought to the fore a cautious approach of CCI in interpreting "dominance" and "predatory pricing". It emerged as an area for further demonstrating a pro-competitive, consumer welfare-oriented view in emerging sectors.

CHALLENGES AND EMERGING TRENDS IN ANTITRUST LAW

It is highly impossible for modern-day antitrust regulators in the globalized world because there are several corporate groups whose operations stretch in multiple jurisdictions, and it becomes a challenge to ensure regulation across the various regions. What happens in one region, the fines or corporate breakups might be influential enough to have a ripple effect in the global markets, bring about disparities which businesses take advantage of. Such interlinked systems require cooperative regulation, yet the legal frameworks differ, making the idea of integrated international enforcement quite untenable¹⁷.

The advent of digital platforms brings associated and complex issues much beyond those of the traditional antitrust. Technology giants have too much data, which they can then use to almost amplify power and monopolistic tendencies. Big data, AI, and e-commerce make it possible for firms to manipulate markets and raise hundreds of questions about data privacy and fair competition. Most old-style antitrust laws face the challenge of grappling with new digital monopolies since technological innovations are happening much faster than the updates of regulations.

Another significant factor determining antitrust policy is national interest: countries are particularly

¹⁷ Bradford, Anu. *Columbia Law School Columbia Law School Scholarship Archive Scholarship Archive Faculty Scholarship Faculty Publications 2012 Antitrust Law in Global Markets Antitrust Law in Global Markets 11 Antitrust Law in Global Markets.*

anxious to protect consumers in this respect but, in other respects, want to spur growth of domestic industries. The purposes can be disparate, as has recently been seen with the different treatment accorded to technology companies in the US, EU, and China¹⁸.

Reform proposals may include significantly strengthened oversight of digital monopolies, increased protection of consumers in such a data-driven economy, cooperation, and reinforcement of collaborative international frameworks. These approaches may help regulatory authorities better act to deal with specific problems involving global competition and further fair markets in an increasingly complex, digitalized world.

CONCLUSION

Antitrust maintains stability and fair insurance of competitive markets in the society. But the theme of this competitive laws varies from country to country in accordance to their economic problems like for instance both the US and the EU aim for market efficiency through their own legal systems, these strategies represent various circumstances related to

the politics, economy, and history of each region. This indicates that the United States has a long-standing custom, but the European Union has simply modified its legal system to address the demands of a single, united market. India made remarkable progress in bolstering the enforcement of competition legislation, despite being a recent addition to the antitrust landscape. Antitrust law will undoubtedly confront new challenges because of growing globalization and technical innovation, particularly with the emergence of these digital platforms and the cross-border operations of multinational firms. More international collaboration is required because of the increase in cross-border economic activity, which eventually results in more united antitrust laws. Although there has been a lot of progress, much more has to be done to address concerns coming from an increasing list, such as more worldwide antitrust enforcement and better control of tech monopolies. The way that antitrust laws in the US, EU, and India handle the difficulties of maintaining competition as a portion of their legal systems will affect how they develop in the future.

¹⁸ Abbott, Alden. "Antitrust Policy and National Security Interests." *Truth on the Market*, 8 Mar. 2022,

truthonthemarket.com/2022/03/08/antitrust-policy-and-national-security-interests/.