



Competition Law & Regulation

TCA's 2025 Annual Report: A Record Year for Fines, Dawn Raids & Merger Review

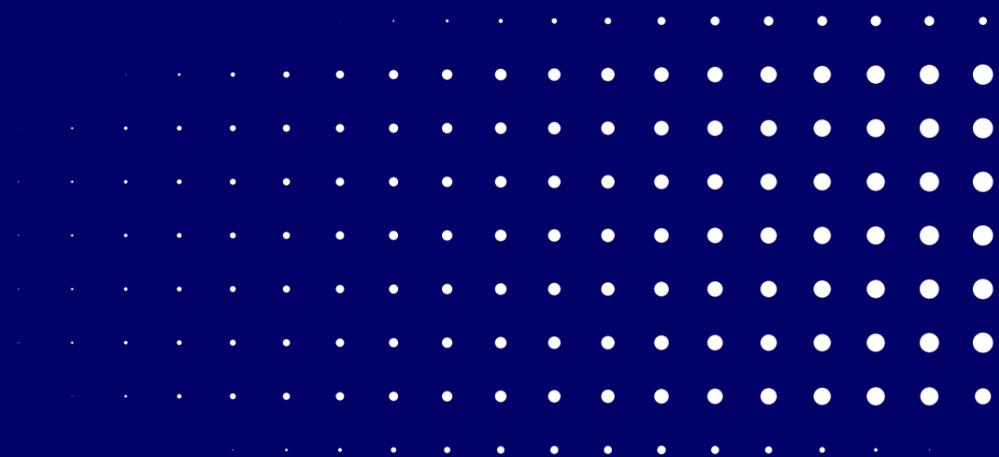


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Introduction

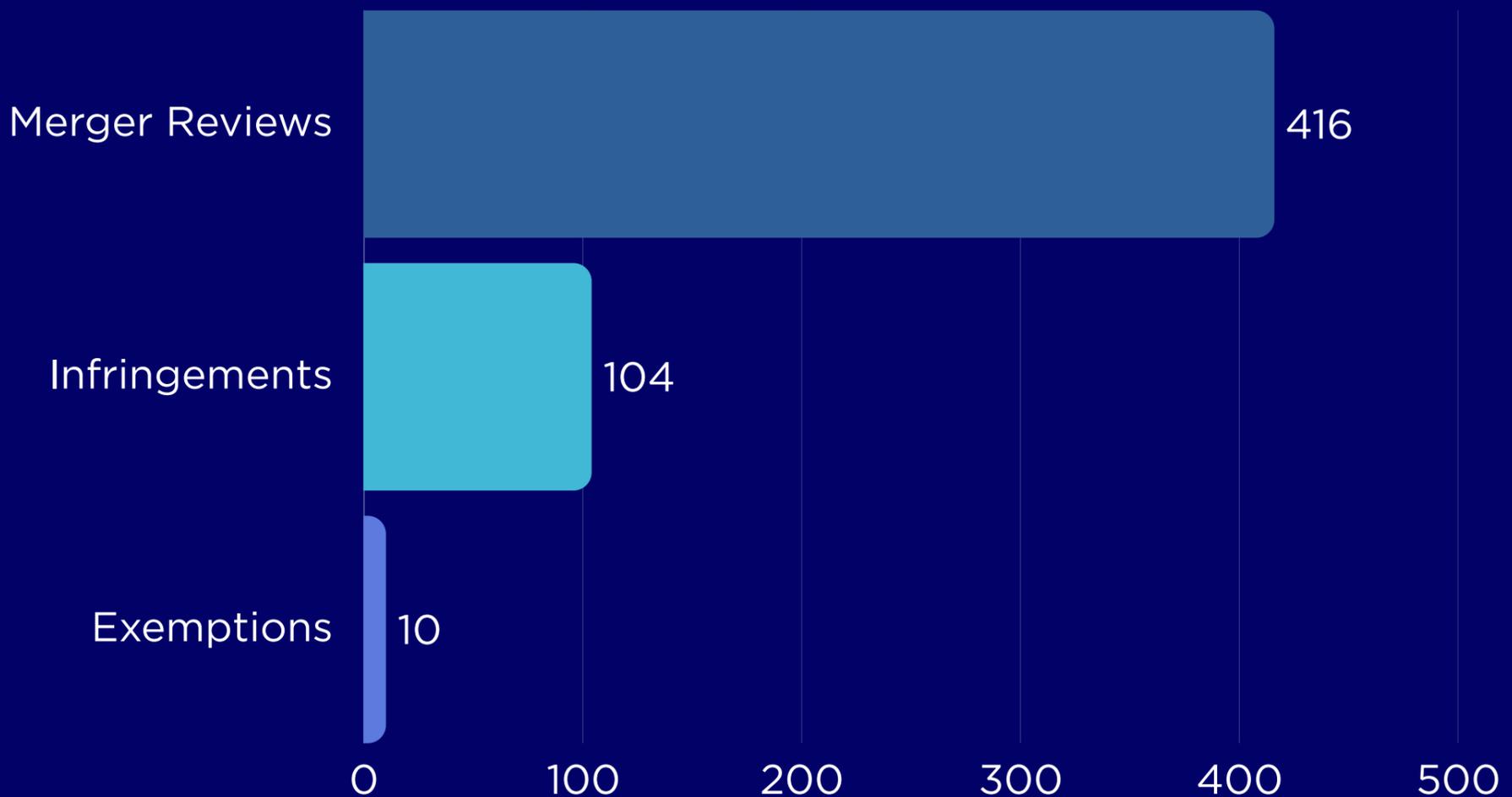
- On 4 March 2026, the Turkish Competition Authority (“**TCA**”) published its **2025 Annual Report** (the “**Report**”). The Report provides insight into the TCA’s activities throughout the past year, including enforcement decisions, merger control, and regulatory developments. For the official document in Turkish, please visit the [link](#).
- 2025 was a landmark year for competition enforcement in Türkiye: administrative fines reached an all-time high of approximately **TRY 12.1 billion**, dawn raid activity hit a five-year record, and the TCA closed a record number of cases. The year also saw heightened scrutiny of M&A activity in digital and platform markets, as well as a continued enforcement focus on the food industry and labor market practices.
- This client alert presents a data-driven snapshot of the TCA’s key figures and trends throughout 2025.





Concluded Cases

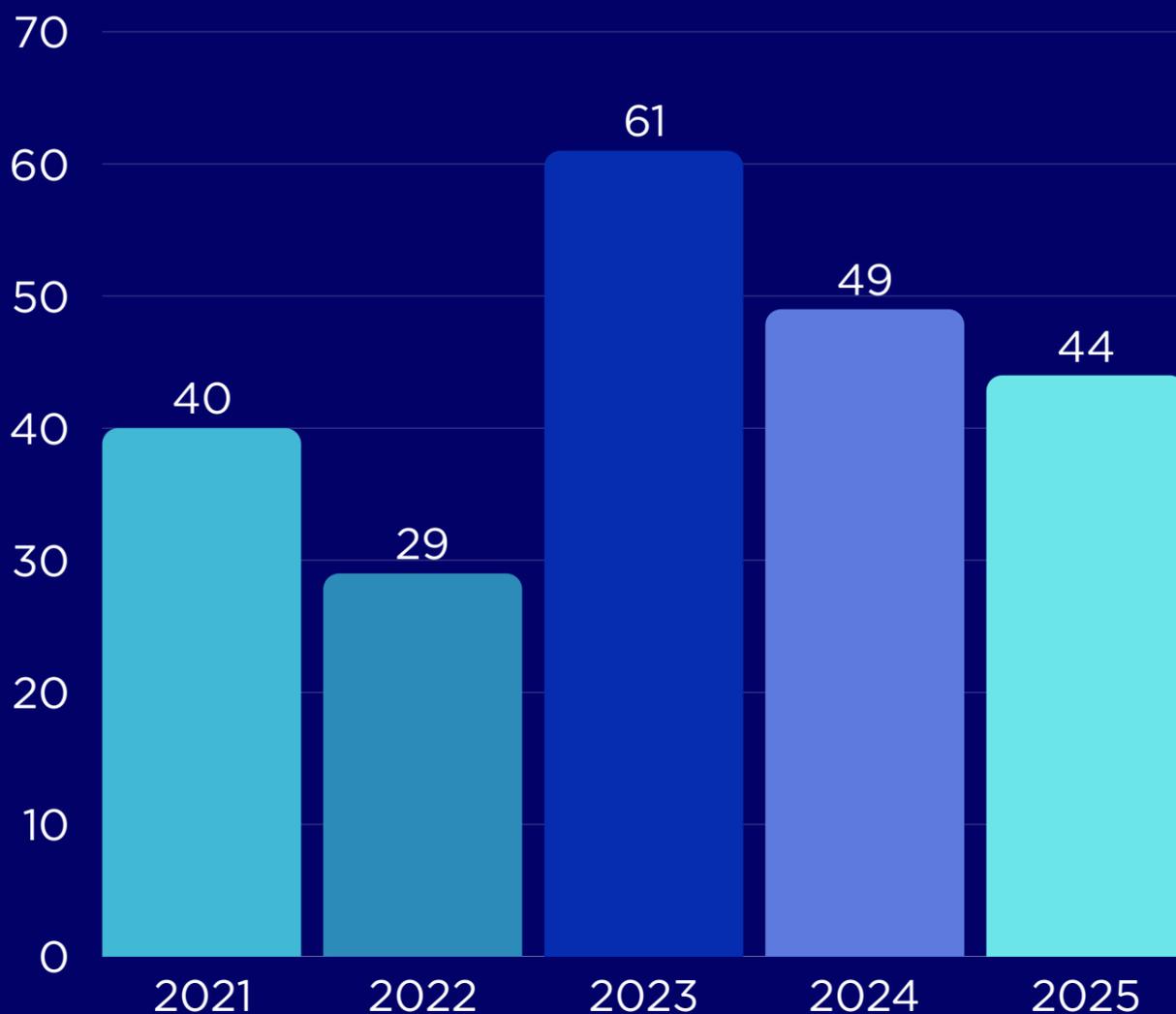
- 2025 marked **the highest number of concluded cases in the last five years**, with **530** decisions issued in total. Merger reviews drove the bulk of the caseload, accounting for approximately **78.5%** of all concluded files (**416 cases**), followed by competition infringement decisions at approximately **19.6%** (**104 cases**). Exemption and negative clearance decisions remained marginal, representing approximately 1.9% of the total (10 cases).





Completed Investigations (2021 – 2025)

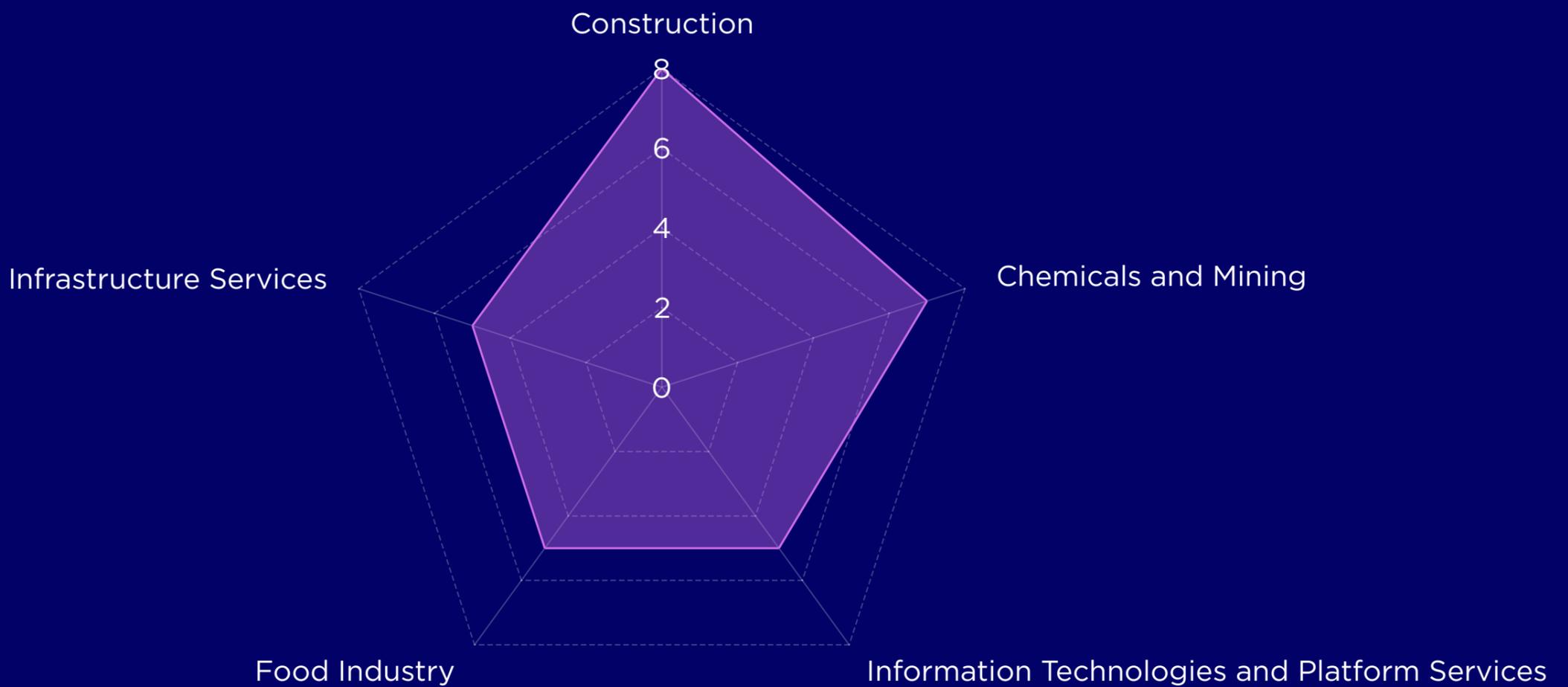
- The general trend from 2021 to 2025 reflects a fluctuating pattern. The number of completed investigations **in 2025 stood at 44**, broadly in line with 2024 (49) and above the low of 29 recorded in 2022, though still short of the five-year peak of 61 reached in 2023.





Sectoral Breakdown of Concluded Investigations (Top 5 Sectors)

- In 2025, **the construction sector** recorded **the highest number of concluded investigations with 8 cases** — a sector with a long history of enforcement activity in Türkiye. **Chemicals & Mining** followed with **7 investigations**, while Information Technologies & Platform Services, the Food Industry, and Infrastructure Services each accounted for **5 concluded investigations**.





Investigations and Dawn Raids (2021 – 2025)

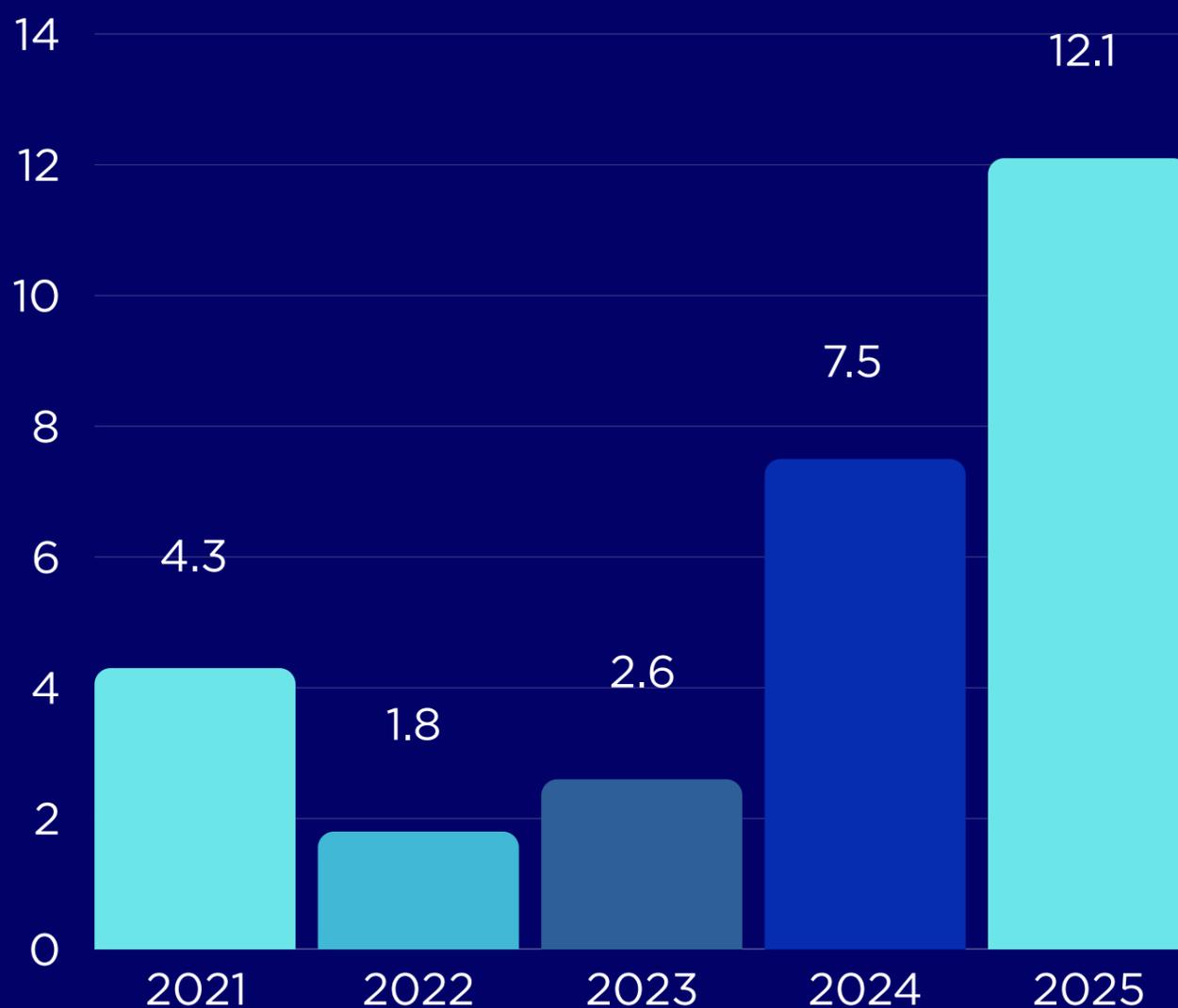
- While the number of concluded investigations in 2025 followed a similar course to 2024, **dawn raid activity reached a new record high with 1509 assignments carried out.**

Year	Concluded Investigations	Preliminary Investigations	Dawn Raid Assignments
2021	44	29	653
2022	54	24	831
2023	61	28	1642
2024	49	27	1039
2025	44	15	1509



Administrative Fines Imposed (2021 – 2025, in billion TRY)

- In 2025, the total amount of administrative fines imposed by the TCA **reached a record high of TRY 12.1 billion**, an all-time record representing an increase of approximately 61% compared to 2024 (TRY 7.5 billion). To put the trajectory in perspective: fines have grown nearly sevenfold since 2022 (TRY 1.8 billion), reflecting a sustained and deliberate escalation in enforcement intensity.





Sectoral Breakdown of Fines (Top 5 Sectors, 2025)

- The sectoral breakdown of imposed administrative fines was dominated by the food industry at **TRY 4.7 billion**, followed by chemistry, infrastructure, the labor market, and automotive as the primary focal points.

Sector	Amount of the Administrative Fines Imposed (TRY)
Food Industry	4.7 billion
Chemicals and Mining	669.5 million TRY
Infrastructure Services	658.9 million TRY
Labor Market	557 million TRY
Automotive and Vehicles	526.4 million TRY



Cases Concluded under Articles 4 and 6 of Law No. 4054 (2021 – 2025)

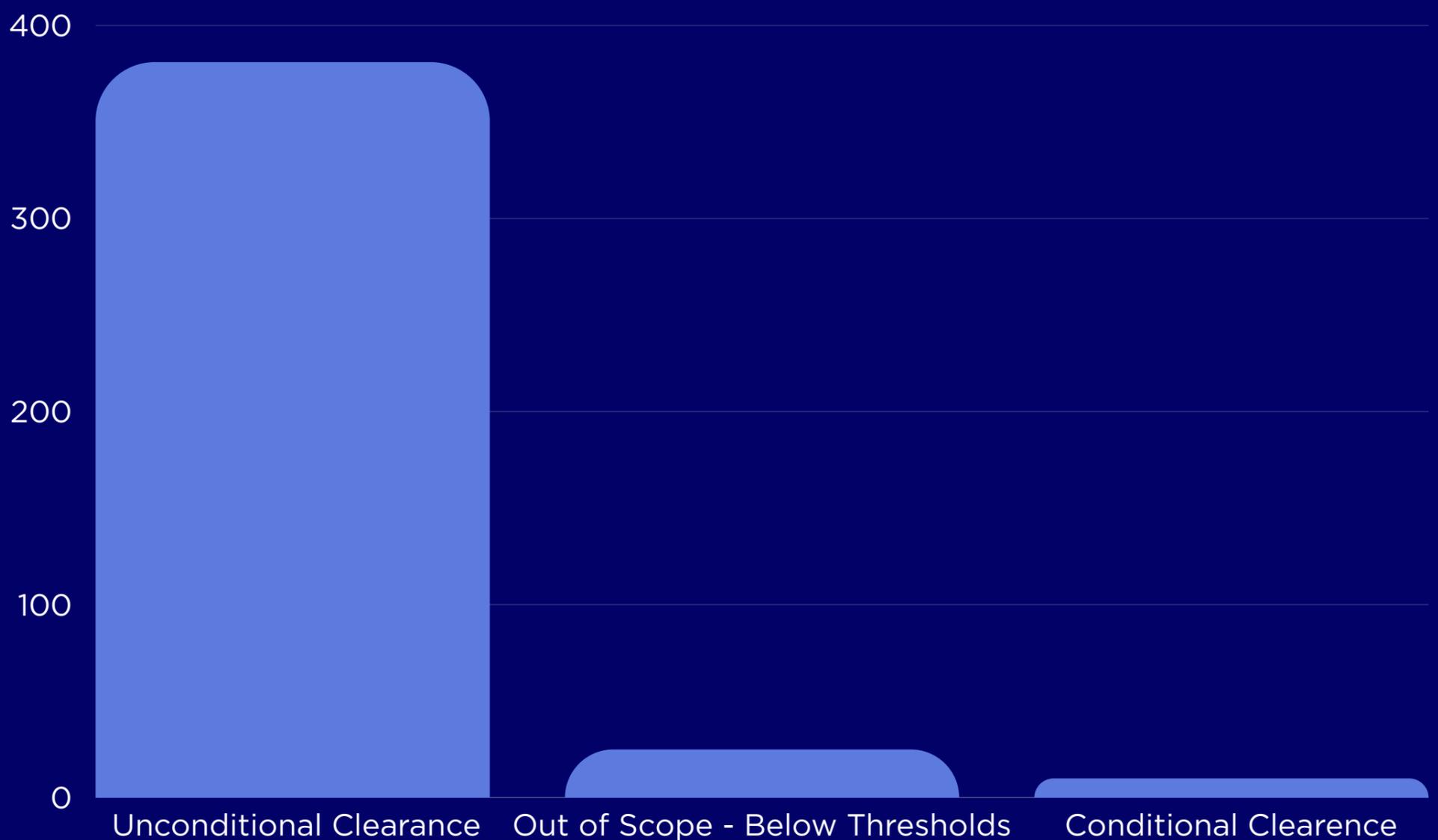
- In 2025, **82 out of 104 concluded infringement cases concerned Article 4** (anti-competitive agreements), **while Article 6** (abuse of dominance) **and hybrid assessments involving both articles accounted for 14 and 8 decisions, respectively.** Although the number of Article 4 decisions decreased compared to the peak in 2024 (148), it remained well above the levels recorded in 2021 and 2022.

Year	Article 4	Article 6	Hybrid (4 & 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



Merger Control in 2025

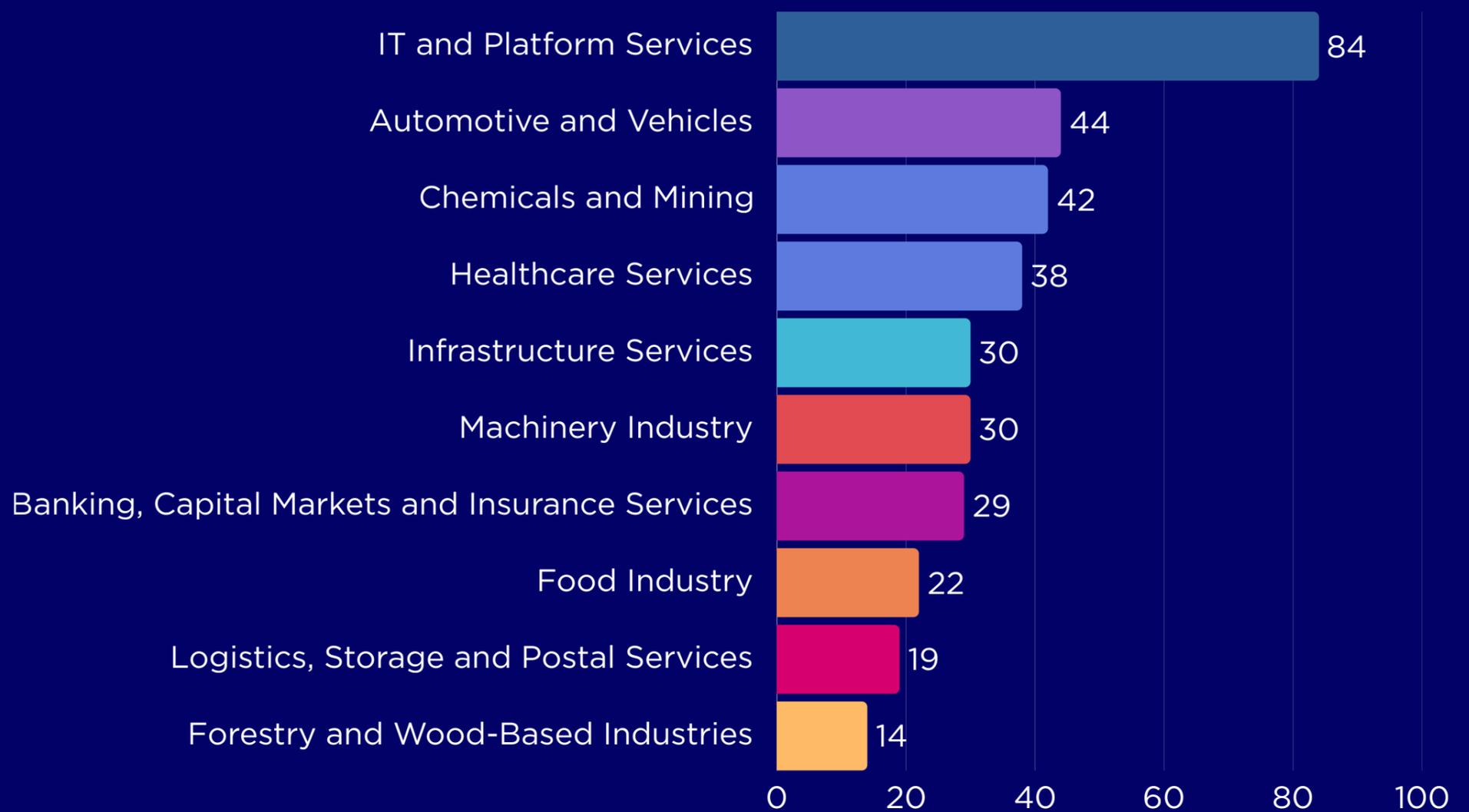
- Of the **416 transactions** notified to the TCA in 2025, 381 received unconditional clearance, while **10 were approved subject to remedies or commitments**. A further 25 transactions were ultimately found to fall outside the TCA's jurisdictional thresholds and were consequently deemed out of scope.





Sectoral Breakdown of Merger Filings (Top 10 Sectors)

- In 2025, **IT and platform services accounted for the highest number of merger decisions with 84 cases**, followed by automotive and vehicles (44), chemistry and mining (42), healthcare services (38), and infrastructure services (30).





Conclusion

The TCA's 2025 statistics reflect a landmark year of record-breaking operational activity and strengthened regulatory oversight:

- **1.509 dawn raids in 2025**, marking the highest level in the last five years.
- A total of **TRY 12.1 billion in administrative fines**, representing a record increase of approximately 61% compared to the previous year.
- **416 merger and acquisition reviews**, with IT and platform services, automotive, chemistry, healthcare, and infrastructure services emerging as the most active sectors.
- **A five-year record of 530 concluded cases in total**, including 104 competition law infringements.



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