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KPPU's Institutional Challenges in Enforcing Anti-Monopoly Law against Foreign Dominated Corporations

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ABSTRACT

Indonesia's economic expansion during the last two decades has relied heavily on foreign investment, which has created new challenges for domestic competition law. The Komisi Pengawas Persaingan Usaha (KPPU), established under Law No. 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition, serves as the guardian of fair market conduct. Despite the law's progressive intent, its enforcement capacity has been hampered by institutional weaknesses, overlapping regulatory mandates, limited investigatory power, and insufficient judicial cooperation. These challenges are exacerbated by the rapid expansion of multinational corporations operating across Indonesia's key sectors such as mining, telecommunications, and digital trade whose cross-border structures often outpace the jurisdictional reach of domestic regulators. Through doctrinal and qualitative analysis, this study examines the gap between the normative aspirations of Indonesia's competition law and its practical enforcement by KPPU. The research highlights several critical issues: (1) the inadequacy of procedural mechanisms for handling transnational antitrust cases; (2) the persistent political and bureaucratic interference undermining KPPU's institutional independence; and (3) the lack of coordination between KPPU and other economic authorities, which weakens the overall deterrent effect of competition law. The findings suggest that Indonesia's competition regime must evolve to reflect the dynamics of globalised markets. Legal reforms should focus on enhancing KPPU's investigative autonomy, ensuring judicial consistency in antitrust decisions, and aligning domestic enforcement with ASEAN and OECD competition standards. Strengthening KPPU's institutional capacity and jurisdictional reach is essential not only to preserve fair competition but also to safeguard Indonesia's economic sovereignty in the face of deepening global integration.

Keywords: KPPU; Competition law; foreign investment; extraterritorial enforcement; transnational antitrust; Indonesia

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INTRODUCTION

Foreign investment has become an indispensable driver of Indonesia's industrial growth. Under President Prabowo Subianto's administration, Indonesia has placed a strong emphasis on attracting foreign direct investment (FDI) as a central pillar of its economic strategy. The government aims to achieve ambitious investment targets projected to reach IDR 3,414 trillion by 2029 through investor friendly reforms, streamlined licensing, and the expansion of Special Economic Zones (SEZs). These measures have succeeded in drawing major international investors into strategic sectors such as downstream mineral processing, renewable energy, infrastructure, and digital technology. As a result, the Indonesian market has witnessed a growing presence of foreign dominated corporations that now play a decisive role in shaping industrial growth, exports, and employment.

While these investments stimulate employment and technological transfer, they also generate significant market concentration that challenges the principle of fair competition enshrined in Law No. 5 of 1999. The influx of multinational corporations (MNCs) with substantial financial resources, advanced technologies, and global supply chains has increased the risk of monopolistic and oligopolistic structures emerging in several industries. Many of these firms have leveraged their market dominance to influence pricing, supply chains, and even regulatory outcomes blurring the line between legitimate competitive advantage and market manipulation. In certain cases, alliances between foreign and domestic firms have evolved into cartel-like arrangements that restrict competition and consumer welfare.

KPPU was created as an independent agency to enforce anti-monopoly and unfair-competition rules. However, the increasing complexity of global corporate structures and cross border transactions exposes the agency's institutional fragility. Many anti-competitive decisions affecting Indonesian markets are made abroad by parent companies beyond KPPU's legal reach. Consequently, KPPU's ability to deter abuse of dominance by foreign actors is limited to domestic subsidiaries or agents. The problem is no longer merely substantive whether certain conduct is monopolistic but institutional: can KPPU effectively enforce its mandate against global firms that operate across multiple jurisdictions? This question lies at the intersection of administrative law, international cooperation, and economic sovereignty.

Although Indonesian scholarship has produced abundant commentary on the substantive scope of competition law such as market definition and merger control few studies have explored the procedural and structural obstacles of enforcement against foreign corporations. This research therefore addresses the institutional gap by analysing KPPU's jurisdictional boundaries, enforcement tools, and cooperative mechanisms in comparison with other jurisdictions. The study employs a doctrinal-qualitative approach, interpreting statutory provisions, policy reports, and case decisions to assess enforcement practice. It also draws comparative insights from the European Union (EU) and Japan, whose competition agencies possess broader extraterritorial powers and mutual assistance frameworks. By identifying the weaknesses of Indonesia's enforcement design, this paper contributes policy recommendations to strengthen KPPU's institutional capacity in the globalised economy.

METHOD

This study adopts a normative juridical approach supported by a case study method. According to Soerjono Soekanto and Sri Mamudji, the normative juridical approach focuses on analyzing secondary data or library materials, such as laws, legal doctrines, and scholarly writings. It differs from empirical or sociological legal research, which relies on primary data obtained through fieldwork or interviews. This approach is applied to examine the legal framework of Indonesia's competition law, particularly the implementation of Law No. 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Competition. The research analyzes relevant statutory provisions, consistency of regulations, and legal interpretations that shape the role of the Indonesian Competition Commission (KPPU) in handling cases involving foreign-dominated corporations. It also evaluates the adequacy of existing laws in responding to the growing influence of multinational corporations (MNCs) that possess greater financial and technological advantages compared to domestic firms.

To complement the normative analysis, the case study method is used to assess how competition law is enforced in practice. The study reviews selected KPPU decisions related to predatory pricing and market dominance by foreign corporations, particularly those concerning imported Chinese products. This approach links legal theory with its

real world application, revealing practical obstacles and institutional constraints faced by KPPU in enforcing anti monopoly regulations.

By combining these two methods, the research provides a comprehensive and balanced perspective on both the normative and institutional aspects of competition law enforcement in Indonesia. The normative juridical analysis offers the theoretical foundation, while the case studies illustrate practical challenges in implementation. Through this integrated methodological framework, the study aims to give readers a concise yet thorough understanding of KPPU's enforcement limitations and to highlight potential areas for strengthening Indonesia's legal and institutional capacity in addressing foreign corporate dominance.

DISCUSSION

Literature Review

Previous Studies on Indonesian Competition Enforcement

Most Indonesian scholarship on the Business Competition Supervisory Commission (KPPU) treats the agency as a doctrinal subject, analysing the definitions of monopoly, cartel and market dominance embedded in Law No. 5/1999. By contrast, only a few studies examine the KPPU's institutional capacity to enforce decisions beyond Indonesia's borders.

The extraterritorial principle literature repeatedly notes that the current statute "does not explicitly regulate extraterritorial norms" and that KPPU lacks authority to investigate foreign actors, creating a clear enforcement gap. Comparative analyses of China, Japan and South Korea show those jurisdictions routinely apply extraterritorial tools, a practice Indonesia has yet to adopt. Research on the "qualified effects doctrine" similarly argues that Indonesia must amend its competition law and cooperate internationally to give KPPU effective cross border reach.

Normative juridical examinations of KPPU's procedural powers also stress the agency's limited investigative toolkit no power of search or seizure and the need for statutory reform to strengthen enforcement. A recent rule of reason case study underscores how the absence of extraterritorial mechanisms hampers the Commission's ability to address hidden foreign dominance. Together, these works illustrate that while substantive law

receives of KPPU are well-covered, scholarly attention to its extraterritorial enforcement capacity remains sparse.

Global Scholarship and Comparative Insights

International scholarship emphasises that competition enforcement in a globalised economy requires strong extraterritorial mechanisms and inter-agency cooperation. Gerber's analysis of the European Commission shows how EU competition law achieves cross-border effectiveness through the doctrine of implementation effects, enabling jurisdiction whenever anti-competitive conduct affects the EU market. The United States applies a similar "effects doctrine" under the Sherman Act, while Japan's Fair Trade Commission (JFTC) relies on extensive bilateral agreements with trading partners.

These comparative models demonstrate that institutional design more than substantive rules determines effective enforcement. When agencies lack investigative power, international coordination, or judicial recognition of foreign evidence, enforcement becomes largely symbolic.

Identified Gap

From the foregoing literature, three major gaps emerge. First, Indonesia's competition lanalysingexplicit extraterritorial provisions enabling KPPU to pursue foreign entities whose actions affect domestic markets. Second, KPPU's investigative authority is administratively limited; it cannot compel production of evidence from entities outside its jurisdiction. Third, cooperation mechanisms with other competition agencies are informal and non-binding, rendering cross-border enforcement ineffective.

Consequently, despite Indonesia's increasing economic openness, KPPU remains institutionally isolated in a world of interconnected markets. This paper therefore focuses on analysing these three dimensions jurisdictional reach, institutional capacity, and international cooperation as the central determinants of KPPU's enforcement effectiveness.

Legal and Institutional Framework

Statutory Basis

KPPU derives its authority primarily from Law No. 5 of 1999 and Presidential Regulation No. 44 of 2008 concerning its organisation and functions. The law prohibits monopolistic practices, cartels, price fixing, and other unfair business conduct, stipulating administrative sanctions such as fines and orders to terminate anti-competitive behaviour. However, the statute does not expressly provide for extraterritorial enforcement; its language confines applicability to business actors operating "in Indonesia."

Government Regulation No. 57 of 2010 further governs merger and acquisition notifications. It requires prior or post-transaction reporting when combined market share exceeds specified thresholds. Yet again, the rule presumes that at least one merging entity is domiciled or active within Indonesia. The absence of a cross-border clause allows multinational enterprises to structure transactions through offshore vehicles, thereby avoiding KPPU scrutiny.

Institutional Structure

KPPU is an independent commission accountable to the President and the House of Representatives but not part of the judiciary. It exercises administrative quasi-judicial authority: conducting investigations, hearings, and imposing fines. Decisions become enforceable only after registration with the District Court, which may also review them upon appeal.

This dual mechanism administrative decision followed by judicial confirmation creates procedural delays and occasionally weakens KPPU's authority. Foreign corporations often exploit these procedural layers to contest jurisdiction or delay compliance.

Jurisdictional and Investigative Constraints

KPPU's jurisdiction extends only to conduct within Indonesia or committed by business actors "operating in Indonesia." It lacks subpoena powers over foreign entities without local representation. Even in cases where global headquarters direct anti-competitive strategies, KPPU can investigate only the domestic subsidiary. Moreover, data-collection powers are limited; digital-platform cases involving cross-border data flows exceed its technical capacity.

These limitations contrast sharply with agencies such as the EU's Directorate-General for Competition (DG COMP), which may conduct dawn raids and compel disclosure across member states.

Case Analysis

The Grab–Uber Merger Case (2018)

One of KPPU's most publicised encounters with a foreign-dominated business structure was the Grab–Uber merger in 2018. The acquisition effectively consolidated Indonesia's ride-hailing market under two main players: Grab (Singapore-based) and Gojek (Indonesian-based). KPPU initiated an investigation after receiving complaints of discriminatory treatment against independent drivers and partner companies. It found that Grab Indonesia and its local affiliate, TPI, had provided preferential treatment to partners using Grab's own rental subsidiary, PT Teknologi Pengangkutan Indonesia, thus restricting competition among car-rental providers.

KPPU imposed administrative fines, yet the case exposed serious enforcement constraints. Grab's corporate headquarters and major decision-making functions were based in Singapore, outside KPPU's jurisdiction. Although KPPU's decision was directed at Grab Indonesia, the strategic control of pricing, platform algorithms, and partnership models rested with the parent company. Without international cooperation, KPPU's decision had no deterrent impact on Grab's regional operations. The case revealed that domestic enforcement cannot adequately address global corporate conduct when decision-making occurs beyond national borders.

The Nickel Downstreaming Industry

A more recent example arises from Indonesia's nickel downstreaming programme, where foreign-dominated joint ventures particularly Chinese-backed smelters control the majority of refining capacity. KPPU has received complaints of coordinated pricing and supply restrictions among nickel smelters and exporters, potentially violating Article 11 of Law No. 5 of 1999 on cartel arrangements.

However, many of these smelters operate through complex shareholding structures, with controlling entities incorporated in China or Singapore. Strategic decisions on output

limitation or pricing coordination are often made at the parent-company level, making it nearly impossible for KPPU to obtain documentary evidence or testimony. The agency must rely on voluntary cooperation or information from Indonesian subsidiaries, limiting its investigative reach.

This reflects a broader asymmetry of enforcement: while foreign investors benefit from access to Indonesian resources and markets, Indonesian regulators lack reciprocal access to enforce fair-competition rules against them.

Comparative Overview

A comparative perspective highlights KPPU's institutional gap relative to its peers:

Jurisdiction	Enforcement Body	Extraterritorial Reach	Cooperation Framework	Notable Features
European Union	DG COMP	Yes (implementation effects)	EU-wide binding mechanism	Power to raid, seize evidence, impose heavy fines
Japan	JFTC	Limited but effective	Bilateral cooperation under OECD & APEC	Mutual legal assistance and data sharing
Indonesia	KPPU	No	Non-binding ASEAN cooperation	Administrative decisions subject to domestic court approval

The table demonstrates that KPPU operates in a weaker institutional environment where cross-border enforcement depends largely on goodwill rather than legal obligation.

DISCUSSION

Jurisdictional Fragmentation and Enforcement Asymmetry

KPPU's authority is territorially bound, which creates a gap between economic reality and legal reach. The modern economy functions through transnational value chains, yet

Indonesia's competition enforcement remains confined to domestic legal persons. This fragmentation of jurisdiction allows multinational corporations to separate economic control from legal accountability.

The "effects doctrine," recognised in jurisdictions such as the EU and the United States, could serve as a reference point. It allows competition authorities to assert jurisdiction when conduct outside their territory has substantial effects on domestic markets. In Indonesia, however, this doctrine has never been formally codified or adopted in KPPU practice. Judicial interpretation remains conservative, focusing on territorial nexus rather than market impact.

As a result, when a foreign parent company instructs its subsidiary in Indonesia to implement anti-competitive pricing or exclusivity policies, KPPU can act only against the subsidiary, not the parent. This undermines deterrence and weakens Indonesia's bargaining position in global competition governance.

Procedural Dependence and Institutional Weakness

KPPU's administrative decisions require registration with the District Court, which may review them upon appeal. This dual process, although intended to ensure due process, often dilutes enforcement. Many corporate defendants exploit procedural appeals to delay or overturn penalties. In cross-border cases, where assets and management lie abroad, such delays effectively neutralise enforcement.

Additionally, KPPU lacks coercive investigative tools. It cannot compel foreign entities to provide documents or testimony, nor can it request cross-border data through mutual legal assistance, as competition offences are administrative, not criminal. The absence of direct subpoena power contrasts sharply with agencies like DG COMP, which can execute unannounced inspections and impose interim measures.

Institutional weakness is further reflected in limited human and technological resources, hampering investigations of digital platforms and trans-national cartels that require advanced data-forensics and financial-analysis expertise.

Finally, a persistent political-economic tension pits competition enforcement against investment promotion. Government incentives and exclusive rights for foreign investors

often conflict with competition principles, and KPPU's actions are perceived as potentially deterring investment, leading to political friction and a de-prioritisation of enforcement.

Political–Economic Tension: Investment Versus Competition

Competition policy in Indonesia often collides with national investment objectives. The government's economic diplomacy encourages foreign participation in strategic industries, sometimes granting incentives or exclusive rights that contradict competition principles. When KPPU investigates such arrangements, its actions are perceived as potentially deterring investment, creating political friction.

This tension reflects a dual mandate conflict: promoting investment to accelerate growth while preserving fair competition to ensure equality of opportunity. In practice, the investment agenda frequently prevails, constraining KPPU's assertiveness. Without clear policy alignment, enforcement against foreign-dominated corporations risks being subordinated to political expediency.

Policy and Legal Reform Recommendations

Legislative Reform: Extraterritorial Applicability

Reform of Law No. 5 of 1999 should explicitly include extraterritorial provisions, enabling KPPU to address anti-competitive conduct originating abroad that affects the Indonesian market. Such a clause could mirror Article 101 of the Treaty on the Functioning of the European Union, which applies to any conduct "affecting trade between Member States."

Adopting an "effects-based jurisdiction" would align Indonesia with international standards and empower KPPU to pursue cross-border cartels and abuses of dominance. Judicial recognition of this principle must follow, ensuring that Indonesian courts uphold KPPU's authority in transnational cases.

Institutional Strengthening

KPPU requires expanded investigative and sanctioning powers. The law should authorise the commission to:

- Issue binding subpoenas for documents and data, including from foreign entities with operations in Indonesia.
- Impose interim measures to prevent ongoing harm during investigations.
- Collaborate with law enforcement agencies to trace and freeze assets related to anti-competitive conduct.

Budgetary support should also be increased to enhance technological capability particularly in data analysis, digital-platform monitoring, and cross-border evidence tracing.

International Cooperation Mechanisms

While ASEAN has launched the ASEAN Competition Action Plan 2026–2030, cooperation remains largely voluntary. Indonesia should pursue binding bilateral or multilateral agreements with key economic partners (China, Singapore, Japan) to facilitate information exchange, joint investigations, and recognition of enforcement decisions.

Participation in international networks such as the International Competition Network (ICN) and OECD Working Party on Competition should be intensified, not merely as observers but as active contributors to developing procedural harmonisation.

Policy Harmonisation and Inter-Agency Coordination

Competition policy should be embedded within Indonesia's broader economic governance. Coordination between BKPM (Investment Ministry), Ministry of Trade, and KPPU must be institutionalised through joint regulations to ensure consistency between investment incentives and competition principles.

Furthermore, competition assessments should become mandatory components of investment-licensing procedures, preventing the approval of projects that could result in excessive market concentration.

CONCLUSION

KPPU stands at the frontier of Indonesia's struggle to maintain economic sovereignty in the face of global corporate dominance. While Law No. 5 of 1999 provides a substantive

foundation for fair competition, its institutional implementation remains hampered by jurisdictional, procedural, and political constraints.

Foreign-dominated corporations exploit these structural gaps through transnational business models and complex ownership structures, rendering KPPU's enforcement largely symbolic in cross-border contexts. Without reform, Indonesia risks becoming a market host rather than a market shaper, reliant on foreign capital yet unable to discipline its excesses.

To remedy this, Indonesia must undertake comprehensive reform: codifying extraterritorial enforcement, strengthening KPPU's investigative powers, institutionalising international cooperation, and aligning investment policies with competition principles. Only then can Indonesia's competition regime safeguard both market fairness and national economic autonomy in an increasingly interconnected world

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