



# CONSUMERS ASSOCIATION OF SINGAPORE

## 新加坡消费者协会

செயலாளர் சங்கம்

PERSATUAN PENGGUNA-PENGGUNA SINGAPURA

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Your Ref. : pls advise

Our Ref. : misc/rachel

10 November 2006

Competition Commission of Singapore

5 Maxwell Road #13-01

Lower Block MND Complex

Singapore 069110

*by fax and post*

Attn. : Mr Ong Beng Lee

Chief Executive

Dear Sir

### PUBLIC CONSULTATION ON MERGER REGIME UNDER COMPETITION ACT

We refer to your letter to the undersigned dated 6 October 2006.

We note that the Commission is of the view that most mergers in Singapore do not pose competition problems ("this conclusion"). Hence, the Commission is proposing that declarations be made on a voluntary basis.

We would like to seek clarifications on how the Commission arrived at this conclusion.

In addition, we are of the view that to make declarations voluntary could be risky. If a particular merger poses competition problems but was not declared, substantial damage could have been done by the time the Commission detects and challenges the merger.

Yours faithfully,

Seah Seng Choon

Executive Director

Consumers Association of Singapore (CASE)