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▶ Selected Cases

- ▶ Professional Electrical Engineers' Association Set Technical Service Fee Standards in Violation of the Fair Trade Act
- ▶ Smart Elephant Violated the Fair Trade Act by Exploiting the Credibility of Charitable Organizations to Market Products
- ▶ Business Merger to Run Offshore Wind Power Sales Platform Not Prohibited
- ▶ Concerted Action of Taipei and New Taipei City Recycling Businesses in Violation of the Fair Trade Act
- ▶ Two Businesses Violated the Multi-level Marketing Supervision Act by Starting to Engage in Multi-level Marketing to Sell Anti-Odor Socks without Filing with the FTC
- ▶ Ming Xuan Development and Xin Li Tian Advertising Posted False Housing Project Ads in Violation of the Fair Trade Act

▶ FTC Statistics

Statistics on Complaint Cases

▶ FTC Activities

FTC Activities in November and December 2025

▶ FTC International Exchanges

FTC Activities in November and December 2025


Professional Electrical Engineers' Association Set Technical Service Fee Standards in Violation of the Fair Trade Act

The FTC decided at the 1767th Commissioners' Meeting on Sep. 3, 2025 that a professional electrical engineers' association violated the regulation against concerted actions set forth in the Fair Trade Act by stipulating new technical service fee standards in the association charter. The practice was able to affect the supply-demand function in the relevant market. In addition to ordering the association to cease the unlawful act, the FTC also imposed upon it an administrative fine of NT\$1 million.

The FTC launched an investigation after receiving complaints. The findings showed that the professional electrical engineers' association held general meetings and council meetings in 2012 and made the decision to establish a technical service fee reference list and a list of electrical engineering cost estimates and included them in the charter. Technical service fees were charges to be collected from clients for electrical equipment engineering design and supervision services that were based on the product of the percentage in the technical service fee reference list and the price in the list of electrical engineering cost estimates. The association also set the maximum and minimum charges, and subsequently raised the technical service fees in the list of electrical engineering cost estimates by as much as 30% during the general meetings and council meetings held in 2024.

As the members included all the service providers in the relevant market, the association had considerable market power. Therefore, the new service fee standards would definitely influence the pricing of each member, restrict competition in the market and affect the supply-demand function in the market for electrical equipment engineering design as well as the supervision service market. The actions

were in violation of the regulation against concerted actions in the Fair Trade Act.

The FTC would like to remind trade associations to allow members to have the freedom to set their own service fee standards. Setting fee standards, even if they are just suggestions or for reference, can entail the risk of violating the regulation against concerted actions. Such behavior should be avoided. 


Smart Elephant Violated the Fair Trade Act by Exploiting the Credibility of Charitable Organizations to Market Products

The FTC decided at the 1770th Commissioners' Meeting on Sep. 24, 2025 that Smart Elephant Education and Culture Co., Ltd. had violated Article 25 of the Fair Trade Act by marketing Smart Elephant Learning machines for children at charitable activities held by the Association of Literacy Education, Taiwan to create the impression that the company was associated with the charitable organization and attract people to make purchases. The practice was deceptive conduct able to affect trading order. The FTC imposed an administrative fine of NT\$2 million on the company.

To market Smart Elephant Learning Machines for Children, Smart Elephant sponsored Dinosaur Show parent-child activities held by the Association of Literacy Education, Taiwan on a long-term basis. The company distributed activity flyers and brochures at kindergartens to attract parents to attend so that the company could sell products. The FTC's investigation showed that many people had not expected to see teaching materials being marketed since the activities were organized by a charitable organization. The chief purpose of the Dinosaur Show parent-child activities was to promote the concept of literacy education. However, as the only sponsor, Smart Elephant provided exhibits, financial support and manpower and set up stands to sell products at every parent-child activity without indicating any brand or company name. Meanwhile, as the association's personnel would help children operate the computers in which the company's digital education games were

installed, people attending the charitable activity were unable to distinguish between the workers of the association and the personnel of Smart Elephant. Moreover, pictures exhibiting Montessori concepts were displayed both in the association's free manuals for parents and on the webpages of Smart Elephant Learning Machines, whereas the personnel of Smart Elephant kept emphasizing that the products were all derived from the Montessori Teaching System when explaining the products and the flyers and brochures. All these factors misled people into thinking that the products had been recommended or endorsed by the charitable organization.

Smart Elephant did not clearly draw a line between commercial conduct and charitable practices when marketing at activities held by the Association of Literacy Education, Taiwan. The intention was to take advantage of the image of the organization to win the trust of consumers and increase transactions. The difference between charitable activities and profit-seeking practices was deliberately made blurry and indistinguishable. It was deceptive conduct.

The FTC is aware that businesses often sponsor charitable activities to market products and has no objection. However, before and during an activity, they should fully disclose their intention to sell products to avoid creating any misconception about their relations with charitable organizations so that consumers will not make purchases as a result. Otherwise, they would be engaging in deceptive or obviously unfair conduct in violation of the Fair Trade Act. 

Business Merger to Run Offshore Wind Power Sales Platform Not Prohibited

The FTC decided at the 1758th Commissioners' Meeting on Jul. 2, 2025 to approve the merger of China Steel, CPC, Chunghwa Telecom, ASE Technology, United Microelectronics and Tung Ho Steel to jointly manage Taiwan Smart Electricity and Energy Co., Ltd. (hereinafter referred to as TSEE).

The six enterprises intended to run TSEE together to purchase and sell offshore wind power. The condition complied with the merger pattern described in Subparagraph 4, Paragraph 1, Article 10 of the Fair Trade Act and also achieved the filing threshold. Therefore, the companies filed a merger notification.

Because the six companies all needed renewable energy, they hoped to operate an offshore wind power sales platform together to increase flexibility in the purchase of power. At that time, TSEE did not engage in any other renewable energy business, but it planned to negotiate with Phase 1 and Phase 2 (3-1 and 3-2) developers of zonal development in the future to purchase offshore wind power and sell it to electricity businesses and end users. The shareholders would be given priority to buy wind power. However, the amount was limited and the power had to be used in the corporation.


When reviewing the case, the FTC solicited the opinions of the competent authority, wind farm developers, competitors, scholars and specialists and also took into consideration the scope of operation of TSEE, the condition of the wind power procurement

market and competition in the renewable energy sales market. The conclusion was that strict buyer qualifications already existed in the offshore wind power market and would not change because of the merger. At the same time, the market power of TSEE would be limited and the company would still face existing competitors while there was still installed capacity of offshore wind power in the market available to other parties. In other words, there would be no crowding out effect.

As a new entrant, TSEE expressed that it would try to access clients through various channels. Meanwhile, as the renewable energy also included photovoltaics and other types of energy, there were many competitors, and thus it would be unlikely for TSEE to supply power to other electricity businesses and end users or sell power at prices higher than the market rate to create foreclosure. Hence, there was no concern about significant competition restraints at the present stage. On the contrary, the merger would be beneficial to the government policy of liberalizing the offshore wind power and renewable energy sales market. Therefore, after careful evaluation of related factors, the FTC decided to approve the merger by citing Paragraph 1 Article 13 of the Fair Trade Act.

At present, the offshore wind power industry in the country is still in an early development stage. As the competition authority, the FTC will continue to keep an eye on changes in the renewable energy market and the level of the impact of transaction arrangements on competitive neutrality and innovation

incentives under the principle of transparency and non-discrimination to ensure that the renewable energy policy and competition policy can improve together. Hopefully, in a free and open market, the

overall economic benefit brought by the renewable energy policy can be shared by all the people both reasonably and efficiently and not fall into the hands of a small number of businesses. 

Concerted Action of Taipei and New Taipei City Recycling Businesses in Violation of the Fair Trade Act

The FTC was informed that the recycling businesses Tong Li Environmental Engineering Co., Ltd., Tong He Co., Ltd., Li Bao Recycling Co., Ltd. and Guo Sheng Recycling Co., Ltd. jointly decreased the purchase price of waste paper in Aug. 2023. At the 1768th Commissioners' Meeting on Sep. 10, 2025, the FTC decided that the practice was a concerted action forbidden by the Fair Trade Act and fined Long Li Environmental Engineering Co., Ltd. NT\$200,000 and each of the other three companies NT\$100,000.

Waste paper is the principal material used in the production of industrial paper. In the country, private individuals and small recycling stations are at the bottom of the waste paper recycling chain. They sell waste paper to recycling plants which then sell the paper to industrial paper manufacturers. The four above-mentioned companies operated recycling plants in Taipei City and New Taipei City and purchased waste paper from private individuals and small recycling stations.

In late Jul. 2023, Tong Li Environmental Engineering Co., Ltd. learned that paper mills had lowered the waste paper purchase price. To avoid a reduction in profit, the company and the three other companies exchanged waste paper price information via LINE and reached an agreement to reduce the waste paper purchase price by NT\$0.5 per kilogram on Aug. 1, 2023. They then notified their customers of the margin of the decrease and the starting date. The practice restricted the choice of private individuals and small recycling stations when looking for trading counterparts and affected the supply-demand function in the waste paper recycling market in the two cities. It was in violation of the regulation against concerted actions in Article 15 of the Fair Trade Act.

The FTC would like to remind concerned businesses that competitors exchanging information in writing, at meetings or through social media to discuss or jointly decide prices or quantities may be in violation of related regulations. They must be careful.




Two Businesses Violated the Multi-level Marketing Supervision Act by Starting to Engage in Multi-level Marketing to Sell Anti-Odor Socks without Filing with the FTC

The FTC decided at the 1754th Commissioners' Meeting on Jun. 4, 2025 that Feng Ying Consulting Co., Ltd. and Jie Yu Co., Ltd., both engaging in multi-level marketing, had violated Paragraph 1, Article 6 of the Multi-level Marketing Supervision Act by starting operation without filing with the FTC. The FTC fined each company NT\$500,000.

The FTC's investigation showed that Jie Yu had stopped operating from Jul. 2023 to Apr. 29, 2024, and Feng Yin took over to serve old and new customers from Apr. 2024. Both companies used an Order Trade online anti-odor socks wholesale system to make transactions, recruit members and issue bonuses. Members bringing in new downlines would be promoted and would receive upgrade bonuses for their new downlines and promoted members recommended by others. The issuance of bonuses and commissions was meant to increase sales of products. Hence,

the operation complied with the definition of multi-level marketing described in the Multi-level Marketing Supervision Act. However, neither of the companies filed with the FTC before starting business, and thus they were in violation of Paragraph 1, Article 6 of the Multi-level Marketing Supervision Act. Because the sales of both companies were considerably large and there were many member accounts, the offense was rather serious. Therefore, the fines were heavier.


The FTC would like to remind businesses to present statutorily required documents and register with the FTC according to Article 6 of the Multi-level Marketing Supervision Act before beginning multi-level operations. Otherwise, they will be penalized and their company image will also be tarnished. If people want to find out whether an enterprise has registered, they can visit the FTC website to check the list of registered multi-level marketing businesses. 

Ming Xuan Development and Xin Li Tian Advertising Posted False Housing Project Ads in Violation of the Fair Trade Act

The FTC decided at the 1757th Commissioners' Meeting on Jun. 25, 2025 that Ming Xuan Development Co., Ltd. and Xin Li Tian Advertising Co., Ltd. had violated Paragraph 1, Article 21 of the Fair Trade Act by constructing a model home with a mezzanine design and furnished for residential purposes when marketing the Ming Xuan Grandeur housing project located in Xinzhuang District, New Taipei City. The practice was a false and misleading representation with regard to content and use of product and could also affect transaction decisions. Therefore, the FTC fined Ming Xuan Development NT\$1.5 million and Xin Li Tian Advertising NT\$750, 000.

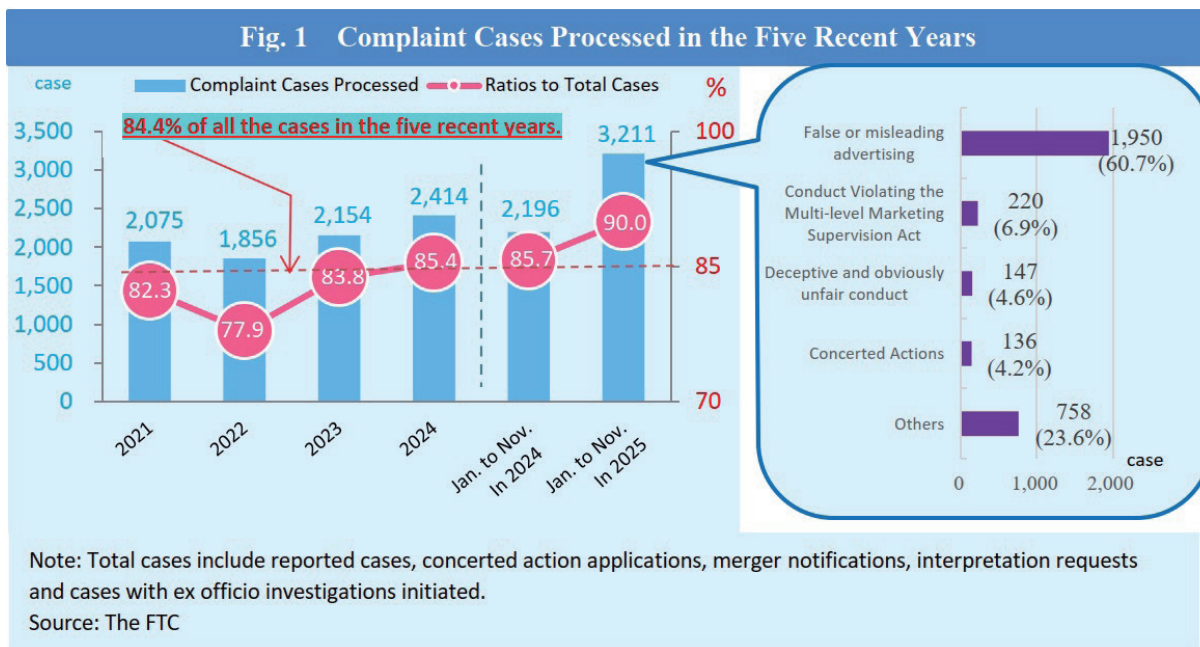
The 4th to 8th floors of the Ming Xuan Grandeur housing project were approved to be for office purposes and the 9th to 14th for residential homes. However, the 6th floor was displayed as a model home with bedrooms, bathrooms, kitchen and a mezzanine for salespeople to show to consumers and explain the housing project. It gave people the impression that they could legally use the unit they purchased as a residential home and put in a mezzanine. According to the New Taipei City Government, the 6th floor was approved for office

purposes and using it as a residential home was in violation of Paragraph 2, Article 73 of the Building Act. In addition, the as-built drawings of the project did not include any mezzanine design; a mezzanine put in to increase usable space would be an illegal structure. In other words, the model home gave consumers the impression that they could use it as a residential home and have a mezzanine built after buying a unit. In fact, however, having a mezzanine put in or using the 4th to 6th floors as residential homes would be in violation of building regulations. Therefore, the mezzanine in the model home and the use of a unit on the 4th to 8th floors for residential purposes were inconsistent with the fact and in violation of Paragraph 1, Article 21 of the Fair Trade Act.

The FTC would like to remind concerned businesses that whether a unit can be legally used as a home or whether there is a way to increase the interior space legally is a decisive factor when consumers consider making purchases or not. When posting ads, builders must make sure the content is consistent with the facts in order not to break the law. 

Statistics on Complaint Cases

Complaint cases received are cases in which informers present to the FTC personally signed written (including emails, faxes, etc.) or oral statements (which are filed as records or complaints) that describe concrete evidence of activities suspected of being in violation of the Fair Trade Act or the Multi-level Marketing Supervision Act or personally signed statements transferred from other agencies. According to statistics, the FTC received 3,211 reported cases between January and November 2025, an increase of 1,015 cases (46.2%) compared to the same period in 2024 and accounting for 90.0% (going up by 4.3%) of the 3,568 cases in total. The figure was the largest in the five recent years, from 2021 to the end of November 2025 (Fig. 1); judged by type of illegal conduct, false or misleading advertising cases accounted for over 60%. In total, the FTC received and processed 11,710 reported cases, or 84.4% of the total 13,871 cases.



Between January and November 2025, the FTC handled and closed 3,315 cases, made sanctions in 99 of them, and issued 117 administrative dispositions, representing increases of 57 cases (135.7%) and 64 cases (120.8%), respectively, compared to the same period in 2024; and 79 cases involving 103 businesses were sanctioned, totaling NT\$49.26 million, and representing increases of 37 cases (88.1%), 44 cases (74.6%), and NT\$9.43 million (23.7%), respectively, compared to the same period in 2024. In the five recent years, the FTC processed and closed 11,682 cases. Administrative sanctions were imposed in 256 cases, and 327 dispositions (warning letters) were issued. Fines were maintained in 241 cases. 352 businesses were sanctioned and the fines amounted to NT\$226.63 million (Table 1).

Table 1 Results of Complaint Cases Processed in the Five Recent Years

Unit: case; business; 10 thousand

Year	Number of closed cases (1)+(2)+(3)+(4)+(5)	Sanctions Made					No Sanctions Made (2)	Investigation terminated (3)	Suspension of Review (4)	Consolidated cases (5)
		Number of cases (1)	Number of dispositions issued	Fines were maintained						
				Number of cases	Number of businesses	Amount (10 thousand)				
Total	11,682	256	327	241	352	22,663	349	1	10,859	217
2021	2,125	27	33	32	41	1,125	77	-	1,928	93
2022	1,847	39	43	32	62	2,786	38	-	1,744	26
2023	2,116	46	77	54	85	9,738	61	1	1,990	18
2024	2,279	45	57	44	61	4,088	65	-	2,141	28
Jan. to Nov.	2,059	42	53	42	59	3,983	57	-	1,937	23
Jan. to Nov. in 2025	3,315	99	117	79	103	4,926	108	-	3,056	52

Notes: 1. Administrative sanctions: When an administrative sanction is made, it means that the FTC decides on sanctioning the offender and issues a disposition or a warning letter after concluding that the offender has violated regulations enforced by the FTC. The issuance of warning letters began in 2022.
 2. Cases with fines maintained: These are cases with all or part of the original sanctions maintained (including cases in which requests for administrative remedies were not filed or were filed and decisions were made or were final) and cases in which fines were imposed and requests for administrative remedies were filed, but the decisions were not final.
 3. Review suspended: cases not belonging to the jurisdiction of the FTC or transferred to other agencies according to agreements made between the FTC and other agencies

Source: The FTC

Analyzed by type of illegal conduct, the FTC issued 117 dispositions (warning letters) between January and November in 2025. The 65 false or misleading advertising cases, or 55.6%, formed the largest group, followed by 22 cases, or 18.8%, involving violation of the Multi-level Marketing Supervision Act. Fines of NT\$49.26 million were maintained. The NT\$29.70 million imposed for concerted actions accounted for 60.3% and the NT\$8.76 million, or 17.8%, imposed for false or misleading advertising came next. In the five recent years, the FTC issued 327 dispositions (warning letters). The 176 false or misleading advertising cases accounted for 53.8% and the 53 deceptive or obviously unfair conduct cases for 16.2%. The fines totaled NT\$226.63 million. NT\$131.35 million, or 58.0%, was imposed for concerted actions, followed by NT\$37.98 million, or 16.8%, imposed for false or misleading advertising (Table 2).

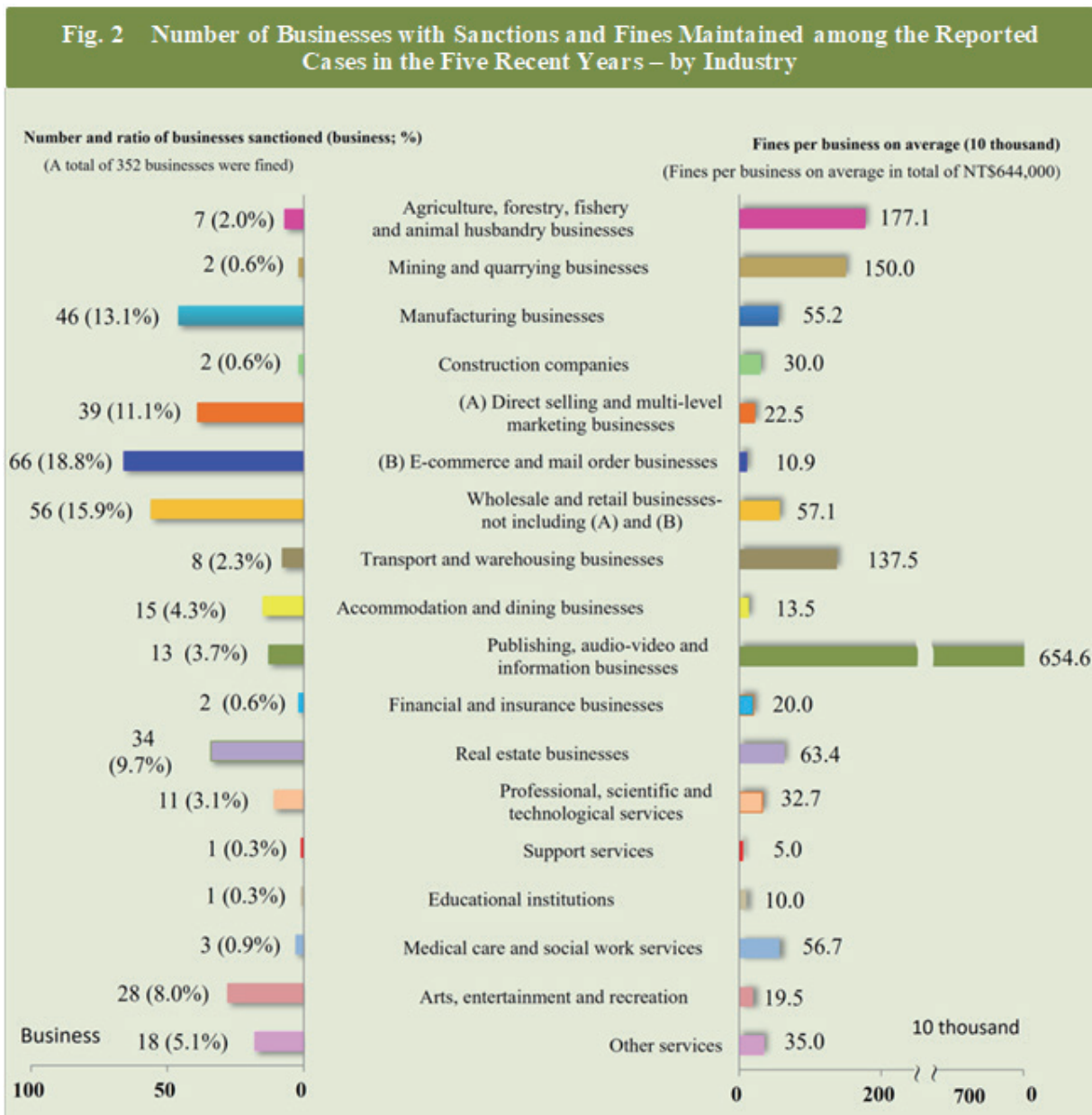
Table 2 Number of Dispositions (Warning Letters) and Amount of Fines Maintained – by type of illegal conduct

Unit: case; %; 10 thousand

Year-Month	Jan. to Nov. in 2024				Jan. to Nov. in 2025				The five recent years (2021 to Nov. 2025)			
	Number of dispositions (warning letters)	Percentage (%)	Amount of fines maintained	Percentage (%)	Number of dispositions (warning letters)	Percentage (%)	Amount of fines maintained	Percentage (%)	Number of dispositions (warning letters)	Percentage (%)	Amount of fines maintained	Percentage (%)
Type of illegal conduct												
Total	53	100.0	3,983	100.0	117	100.0	4,926	100.0	327	100.0	22,663	100.0
Merger	1	1.9	2,000	50.2	-	-	-	-	1	0.3	2,000	8.8
Concerted actions	13	24.5	490	12.3	15	12.8	2,970	60.3	41	12.5	13,135	58.0
Resale Price Restriction	-	-	-	-	1	0.9	30	0.6	3	0.9	90	0.4
Other Competition Restraints	-	-	-	-	2	1.7	40	0.8	3	0.9	90	0.4
False or misleading advertising	26	49.1	908	22.8	65	55.6	876	17.8	176	53.8	3,798	16.8
Deceptive and obviously unfair conduct	13	24.5	575	14.4	13	11.1	540	11.0	53	16.2	2,613	11.5
Conduct violating the Multi-level Marketing Supervision Act	1	1.9	10	0.3	22	18.8	470	9.5	52	15.9	937	4.1

Note: Some cases involved two or more violations; therefore, the aggregate of illegal conduct cases could exceed the total number of dispositions (warning letters).
Source: the FTC

Judged by industry, the FTC issued 327 dispositions (warning letters) in the five recent years. The fines imposed on 352 businesses were maintained. The 66 wholesale and retail online shopping and mail order businesses, or 18.8%, formed the largest group, followed by the 56 wholesale and retail businesses, or 15.9%, not including online-shopping, mail order and multi-level marketing businesses, and then the 46 manufacturing businesses, or 13.1%. Fines of NT\$226.63 million were maintained. On average, each business was fined NT\$644,000. The average fine of NT\$6.546 million per business imposed on the publication, audio-video and ICT industry was the highest, mainly because of the fines totaling NT\$76 million imposed on Taiwan Mobile and Chunghwa Telecom in 2023 for their joint action of canceling special call charge offers. Then came the NT\$1.771 million imposed on agriculture, forestry, fishery and animal husbandry businesses and the NT\$1.5 million on mining and quarrying businesses (Fig. 2).



FTC Activities in November and December 2025

- ▲ On Nov. 4, the teachers and students of the Department of Accounting of Ming Chuan University attended the Fair Trade Act and Multi-level Marketing Supervision Act Training Camp.
- ▲ On Nov. 5 and 10, the FTC held the 2025 Central, Southern and Eastern Region On-Campus Fair Trade Act and Multi-level Marketing Supervision Act Training Camp at the Department of Finance, National Taichung University of Science and Technology and the Graduate School of Science and Technology Law of National Yunlin University of Science and Technology, respectively.
- ▲ On Nov. 14, the FTC gave a speech entitled the Fair Trade Act and Analysis of Concerted Action Cases at the Southern Chinese Taipei Joint Services Center in Kaohsiung City.
- ▲ On Nov. 13, Professor Kuo Jungchin of the Graduate Institute of Financial and Economic Law, Southern Taiwan University of Science and Technology gave a speech entitled Ex Ante Competition Supervision: An Inspiration from the Digital Markets, Competition and Consumers Act of the UK at the invitation of the FTC.
- ▲ On Nov. 25, the FTC conducted the 32nd Competition Policy and Fair Trade Act Workshop in Taipei City.
- ▲ On Dec. 5, the FTC held an international antitrust presentation entitled When Competition Meets Sustainability – New Global Tendencies in Competition Supervision in Taipei City.
- ▲ On Dec. 5, the FTC conducted the 2025 Various Aspects of Trading Traps presentation at the South District Senior Citizen Learning Center in Tainan City.
- ▲ On Dec. 19, the FTC conducted the Fair Trade Act and Multi-level Marketing Supervision Act Training Camp at the Department of Accounting Information of Takming University of Science and Technology.
- ▲ On Dec. 23, the FTC gave a presentation on the Fair Trade Commission Disposal Directions (Guidelines) on Selling Presale Houses in Taipei City.
- ▲ On Dec. 26, the FTC held the 2025 Central, Southern and Eastern Region On-Campus Fair Trade Act and Multi-level Marketing Supervision Act Training Camp at the Center for General Education of National Taitung University.



1. Professor Kuo Jungchin of the Graduate Institute of Financial and Economic Law, Southern Taiwan University of Science and Technology giving a speech entitled Ex Ante Competition Supervision: An Inspiration from the Digital Markets, Competition and Consumers Act of the UK at the invitation of the FTC.
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FTC International Exchanges in November and December 2025

From Nov. 10 to 14, the FTC attended the 2025 ICN Cartel Workshop and related meetings in Seoul, Korea.

From Dec. 1 to 5, the FTC attended the OECD December Routine Meeting and Global Forum on Competition in Paris, France.



1. The FTC attending the 2025 ICN Cartel Workshop in Seoul, Korea.

2. FTC Acting Chairperson Andy C.M. Chen attending the Global Forum on Competition and sharing law enforcement experience in the country during a meeting in Paris, France.