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Wholesalers Violated the Fair Trade Act by Announcing Betel Nut Prices in Advance

The FTC decided at the 1768th Commissioners' Meeting on Sep. 10, 2025 that a man surnamed Chang had violated Subparagraph 4, Article 20 of the Fair Trade Act by determining and announcing piper betle and betel flower prices to stop wholesalers and distributors from engaging in price competition, a practice that could lead to competition restraints. In addition to ordering Mr. Chang to cease the unlawful act, the FTC also fined him NT\$300,000.

The FTC's investigation showed that Mr. Chang, a wholesaler in Taitung County, began to collect supply-demand information in 2016. He decided the closing prices of piper betle and betel flowers on his own and announced them on the eve of the trading day through the Taitung piper betle and betel flower farm price group on LINE as well as on the Formosa piper betle forum on Facebook and other social media to serve as the basis for calculating the prices for wholesalers, distributors and retailers. Then, in the following month, Mr. Chang announced the wholesale prices of piper betle and betel flowers to be the settled basis for calculating prices for betel nut farmers. Wholesalers and distributors only had to make transactions accordingly to make a profit. As a result, wholesalers and distributors had no need to engage in price competition because there were no incentives to do so.

Having once served as a supervising director in the Taitung County Piper Betle and Betel Flower Production and Marketing Association, Mr. Chang was familiar with the way in which wholesalers operated through the association. Therefore, he provided piper betle and betel flower price information to prompt businesses at various production and marketing stages to trade accordingly. Since the conduct was in violation of regulations against concerted actions, he was sanctioned by the FTC. However, Mr. Chang went on to set and announce piper betle and betel flower prices to urge wholesalers and distributors to continue to calculate their prices accordingly. Because all betel nut sellers in the country could easily access such price information while the trading counterparts of wholesalers and distributors all demanded to trade

in this way, the prices set by Mr. Chang eventually became the benchmark when wholesalers and distributors made pricing decisions. Needless to say, the mechanisms of free pricing and price competition were suppressed. Pricing flexibility was jeopardized and price competition was weakened in the piper betle and betel flower market. Furthermore, competition restraints were created. The practice was in violation of Subparagraph 4, Article 20 of the Fair Trade Act.

The FTC would like to urge agricultural product vendors to be aware of Fair Trade Act regulations. They should not try to influence or interfere with the pricing policy of competitors. Prices must be determined by each vendor and its trading counterparts. They must respect market mechanisms in order not to break the law and be penalized. 


Huiju Co. Violated the Fair Trade Act by Not Delivering on Promises and Not Fully Disclosing Important Information

The FTC decided at the 1783rd Commissioners' Meeting on Dec. 24, 2025 that the promise made by Huiju Co. when recruiting franchisees at the 2023 Taipei International Chain and Franchise Spring Exhibition that those joining the franchise that year would be able to place their "Gourmet Kitchen" vending machines in certain spots was a false and misleading representation with regard to content of service and could also affect transaction decisions because the company was unable to keep the promise. The FTC fined the company NT\$400,000. In the meantime, before contract signature, the company did not fully disclose to prospective franchisees important information regarding the expenses needed to purchase products before and during operation as well as the venue revenue share. The FTC fined the company NT\$400,000. The fines totaled NT\$800,000.

When making a product presentation at the exhibition, the representative of Huiju Co. verbally promised prospective franchisees that they would be able to place the "Gourmet Kitchen" vending machines in certain locations in the premises of TSMC, UMC, Largan and ASE. However, the FTC's investigation showed that the vending machines could not be placed in the premises of all the aforesaid companies, for instance, UMC and Largan. The promise was an important consideration when prospective franchisees assessed the operational risk, return on investment, and payback period of different franchise brands. It could attract prospective franchisees and was a

key factor when prospective franchisees decided with which franchise they would work. Nevertheless, the promise was inconsistent with the fact and was able to cause prospective franchisees to have wrong expectations or make wrong decisions. It was a false and misleading representation in violation of Article 21 of the Fair Trade Act.

In addition, as the provider of franchise information, Huiju Co. did not fully disclose important trading information regarding the expenses needed to purchase products before and during operation and the venue revenue share prior to contract signature. The practice made it difficult for prospective franchisees to evaluate the amount of capital they needed to put in before and during operation and related restrictions. It not only impeded prospective franchisees from making the right judgment and jeopardized their interests, but also reduced the opportunities for them to join other franchises. The obviously unfair conduct was able to affect trading order in violation of Article 25 of the Fair Trade Act.

The FTC would like to remind all franchisers that their advertisements must not be exaggerated or false and must be supported by solid evidence. They are required to fully communicate with prospective franchisees and provide complete information with regard to franchise expenses and conditions in order to create a win-win situation for both sides and minimize franchise disputes. 

Dell Supply Chain Renewable Energy Group Purchase Approved with Conditions!

The FTC conditionally approved at its 1,778th commissioners' meeting on November 19, 2025, a joint procurement of renewable energy by Dell Global B.V. (Netherlands) and 11 of its supply chain affiliated businesses. The approval was granted under Article 15, Paragraph 1, Proviso 8 and Article 16, Paragraph 2 of the Fair Trade Act. The permit is valid for five years, from December 1, 2025, to November 30, 2030.

The first Case of an Exemption Approval for a Sustainable Development Centric Application for Concerted Actions

The FTC emphasized that, in response to global needs for environmental sustainability, it issued the "the Guidelines for Concerted Actions of Enterprises in Response to Environmental Sustainability" in February of this year. The Guidelines aim to promote competition, provide evaluation checklists, and help businesses assess whether their cooperative strategies truly benefit environmental sustainability and whether the strategies would affect market competition. Businesses may then apply for exemption from concerted action under the law.

In this case, Dell sought to increase the use of renewable energy among its domestic supply chain partners to meet global green supply chain requirements. Dell promoted joint procurement of renewable energy among its upstream enterprises, referencing the above Guidelines, and applied to the FTC accordingly. This marks the first time the FTC has reviewed and approved a concerted action exemption specifically related to environmental sustainability.

Focuses of the Review

The FTC explained that the businesses participating in this joint procurement of renewable energy mainly come from industries such as computer manufacturing, IC chips, liquid-crystal displays, memory, printed circuit boards, power supplies, and casings. Although these are distinct industries, they are all in need of renewable energy. Their common goal is to jointly procure inputs that contribute to environmental sustainability. Therefore, the relevant product market is defined as the "renewable energy market."

To conduct a comprehensive evaluation during the review process, the FTC convened meetings with renewable energy sellers, scholars, and experts to solicit opinions from industry, government, and academia. At the same time, it consulted with international competition law authorities for their opinions. The focuses of this review are as follows:

1. Assessment of Impact on the Functioning of Market Supply and Demand

(1)Based on the applicant's projection, its maximum volume of projected renewable energy procurement is relatively low, compared to the estimated tradable renewable energy market in 2030. The market has many suppliers and buyers, so this joint procurement is not likely to result in the acquisition or abuse of buyer's power.

(2)The concerted action involves transactions between renewable energy sellers and buyers. In practice, electricity sellers still offer small-scale renewable energy purchase plans for buyers, ensuring that

other businesses are not precluded from obtaining renewable energy.

(3) Although renewable energy is an input factor in product manufacturing, it is not the sole factor considered by brand-name computer companies when choosing their partners. Non-participating businesses can still compete on product price or quality, therefore the market remains competitive.

(4) In conclusion, the concerted action does not, at the current stage, have a significant impact on the supply-demand function of domestic renewable energy market.

2. Assessment of Benefits to the General Economy and Public Interest

(1) By pooling buyer power, this concerted action helps improve the balance of negotiating positions between electricity purchasers and sellers, attracts more electricity providers to participate in competition, and at the same time reduces transaction costs between participating enterprises and electricity sellers, enhances operational efficiency, and increases willingness to trade. It makes the acquisition of renewable energy more flexible and is positive for promoting the green energy transition.

(2) Electronics are an important export industry for the country. Greening production processes in response to international carbon reduction trends enhances the sustainability value of electronic products and market competitiveness. This concerted action is beneficial to the international competitiveness and industrial development of domestic electronics supply chain.

(3) The estimated procurement volume of this joint procurement could reduce carbon emissions by about 84 million kilograms of CO₂e per year, equivalent to the carbon absorption capacity of 346–760 Da'an Forest Parks. It is helpful in reducing environmental pollution.

(4) In conclusion, this concerted action enhances the international competitiveness of domestic electronics supply chain, improves industrial efficiency, and therefore is positive and exemplary in terms of sustainable development.

A Milestone: Integrating the Enforcement of Competition Laws with Sustainable Development

The FTC stressed that concerted actions among enterprises, if beneficial to industrial development, must be driven by economic efficiency or innovation effects to potentially qualify for an exemption.

This concerted action, at the current stage, is meaningful in multiple aspects—enhancing overall economic efficiency, promoting industrial development, and advancing environmental sustainability. Therefore, the FTC has granted approval, which marks an important milestone in competition law enforcement by taking into consideration benefits to sustainability.

Furthermore, considering that domestic renewable energy sector is still in its developmental and transitional phase, the FTC noted that the impact of this concerted action on the renewable energy market must continue to be monitored in light of supply and demand changes. To ensure oversight and monitoring of its implementation, the FTC has imposed the following remedies: the applicants must not share or disclose sensitive procurement or operational information; the applicants must not use this exemption to engage in other concerted actions; the concerted action must not refuse individual applicants from withdrawing, must not restrict their procurement quantities, or prohibit them from purchasing independently; the applicants must regularly report to the FTC on the implementation of the concerted action and submit relevant documents, including commercial power purchase agreements signed with electricity sellers.

New Zealand Fresh Milk Businesses Found Not to Be in Violation of the Fair Trade Act

No import duty was imposed on New Zealand liquid milk (Under current regulations, it is still referred to as "fresh milk"¹) after Jan.1,2025 and prices remained high.As a result, whether the pricing policy of related businesses was in violation of the Fair Trade Act became a concern.The FTC decided at the 1779th Commissioners' Meeting on Nov. 26, 2025 that, according to existing evidence, it was difficult to conclude that the three New Zealand fresh milk sellers, namely, Uni-President Enterprises Corp., Miseksi International Co., Ltd. and Taiwan Dairy Farm had violated the regulation against concerted actions set forth in Paragraph 1, Article 15 of the Fair Trade Act.

Limited market share of New Zealand fresh milk

In 2024, 452,000 tons of raw milk, most of which was made into fresh milk, were domestically produced and 39,000 tons of fresh milk were imported. In total, there were 491,000 tons in the milk market, of which domestically produced fresh milk accounted for over 90%. In that year, about 4,000 tons of fresh milk, or less than 1% of the domestic market share, was imported from New Zealand. New Zealand fresh milk sold in the country included NuZilk Grass-fed Milk from Uni-President, Farmlife New Zealand milk from Miseksi International and New Muland New Zealand milk from Taiwan Dairy Farm. These different brands

were available in various retail outlets for 89 to 129 NT dollars per liter during different periods. A US hypermarket also sold New Zealand milk, placing two 1.5L bottles in a pack. All these dissimilar brands only accounted for a small share in the fresh milk market and they had to face competition from domestic and other imported milk brands. Therefore, most of them were advertised as being from grass-fed or free-grazing cows for quality differentiation.

Low tariff cost

The Chinese Taipei-New Zealand Economic Cooperation Agreement signed in 2013 allowed 5,500 tons of liquid milk (including fresh milk and sterilized milk) to be imported from New Zealand and the volume would be increased by 1,500 tons every three years. The quota between 2022 and 2024 was 10,000 tons tax-free, but additional volumes would be taxed. Although a tariff was imposed on the additional volume, it only accounted for a small part of the total annual import cost. For New Zealand milk businesses, there were several pricing considerations, such as cold chain, transportation and brand positioning costs, and import duty was only one of them. The prices of the different brands of New Zealand milk varied and did not change in the past two years.

¹ On June 3, 2025, the Ministry of Health and Welfare announced amendments to the "Regulations Governing the Naming and Labelling of Fresh Milk, Long-Lasting Milk, Flavored Milk, Milk Beverages, and Milk Powder." The name was changed to "Regulations Governing the Naming and Labelling of Edible Animal Milk, Long-Lasting Milk, Flavored Milk, Milk Beverages, and Milk Powder." The term "fresh milk" was amended to "edible animal milk," and the product name should be labeled as "cow's milk," "goat's milk," etc. Only products that have obtained the "Fresh Milk Mark" issued by the central agricultural authority or the "Verification Mark" under the Agricultural Product Production and Verification Management Act may be labeled as "fresh milk." The amended regulations will take effect on July 1, 2026.


Change in general environment leading to an import cost increase

The FTC's investigation revealed that the international origin price of raw milk had fluctuated in recent years due to climate and disease factors. Between Jan. and May 2025, the farmgate milk price in New Zealand went up by 20% compared to the same period the year before. As a consequence, despite the tariff removal in 2025, farmgate price and wage increases, ocean freight fluctuations caused by changes in US tariff policy and the appreciation of the NZ dollar did have an effect on the price of New Zealand raw milk. Inspections of import documents and invoices showed that the overall New Zealand milk import cost did go up.

Investigations showing no evidence of a joint pricing agreement on New Zealand milk

Different brands of New Zealand fresh milk were brought in by the brand operators themselves or through importers before they were placed in retail outlets. The milk businesses negotiated the channel fees with retailers and the transaction terms usually

depended on the sales approaches and pricing policy of the retailer and the price negotiation ability of the supplier.


There were many fresh milk brands available in the market. New Zealand fresh milk had an extremely small market share and still had to face competition from domestic and other imported brands. The FTC's investigation showed that no competitors contacted each other or exchanged information about prices which were set differently to begin with. The prices they quoted to retailers were also dissimilar and the ways in which they promoted products and the prices they offered all varied. In conclusion, after investigating the case, the FTC decided there was no evidence to show that the companies selling New Zealand milk had established any pricing agreement. In other words, they had not violated the regulation against concerted actions set forth in Paragraph 1, Article 15 of the Fair Trade Act. However, the FTC will continue to keep an eye on competition in the domestic fresh milk market to deter unlawful activities. 

Smad Biotechnology Violated the Fair Trade Act by Using Keyword Searching Mechanisms Illegally

The FTC decided at the 1758th Commissioners' Meeting on Jul. 2, 2025 that Smad Biotechnology Co., Ltd. had violated Article 25 of the Fair Trade Act by using the names and business symbols of a competitor to produce keyword ads to mislead net users into thinking that the companies belonged to the same business entity or were associated. The obviously unfair conduct exploited the fruits of the efforts of others and was able to affect trading order. The FTC fined the company NT\$200,000.

The advertising company commissioned by Smad Biotechnology to produce the ads enabled the keyword insertion function and adopted Quaker Complete Nutrition Food, Glucerna, Abbott Ensure and Abbott as the keywords. When net users keyed in these words, headings of "NT\$100 discount for the first purchase of Quaker Complete Nutrition Food," "NT\$100 discount for the first purchase of Abbott Ensure" and "NT\$100 discount for the first purchase of Glucerna" popped up. Then, a user clicking a keyword ad would be linked to the company

website of Smad Biotechnology. The overall content gave net users the wrong impression that Quaker and Smad Biotechnology or Abbott belonged to the same business entity or had certain relations. Smad Biotechnology used the direction mechanism to attract more visits to its website and create transaction opportunities when net users clicked one of the keyword ads: Quaker Complete Nutrition Food, Glucerna, Abbott Ensure and Abbott. At the same time, visits to Quaker and Abbott websites decreased and the economic benefit that the business symbols of the two companies stood for was reduced. Consumers were confused and the unfair competition created was able to affect trading order. The practice was in violation of Article 25 of the Fair Trade Act.


The FTC would like to remind businesses that the ads they post should not mislead consumers into thinking that the advertiser and its competitor belong to the same business entity or that there are certain relations in between them. If they do so, they will be in violation of the Fair Trade Act. 

Holly Well international Violated the Multi-Level Marketing Supervision Act by Changing Sales Systems without Filing in Advance

The FTC decided at the 1776th Commissioners' Meeting on Nov. 5, 2025 that Holly Well International Limited Company, a multi-level marketing business, violated Paragraph 1, Article 7 of the Fair Trade Act by changing its sales system without filing with the FTC in advance. The FTC fined the company NT\$500,000.

Holly Well International (formerly called Ame Global Enterprise Co., Ltd.) registered with the FTC in Mar. 2024 as a multi-level marketing business, mainly to sell food and beauty products. Later, the FTC received reports that the company organized a 5-day 4-night Ame Global Incentive Tour to Vietnam for its members between Jul. and Aug. 2024 and a Global Profit Sharing activity from Feb. to May in 2025. Since the company did not file with the FTC beforehand,

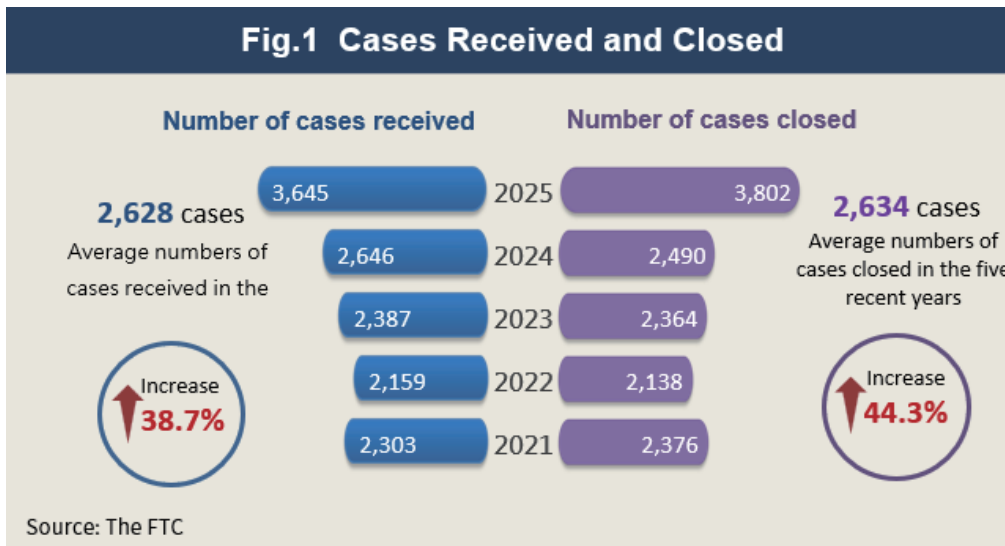
a violation of the Fair Trade Act was suspected. After an investigation, the FTC found out that the two events held by the company were normal multi-level marketing company activities and should have been filed in advance. After taking into consideration the influence of the big amount of money involved and the large number of people recruited in the market, the FTC fined the company NT\$500,000.

Since many enterprises have been sanctioned for not filing before changing their sales systems, the FTC would like to remind businesses to file before engaging in multi-level marketing activities. If there are questions, they can ask the FTC for information in order not to be penalized. 

Statistics on Cases Investigated

With the rapid development of the digital economy, the diversification of industrial competition and increased consumption awareness, transaction practices have become more complicated. To maintain trading order and promote fair competition, the FTC accepts complaints and investigates cases involving violations of the Fair Trade Act and the Multi-level Marketing Supervision Act.

In 2025, the FTC investigated 3,645 cases, including cases reported and those initiated by ex officio investigations, this being the highest number recorded between 2021 and 2025 and increasing by 38.7% compared to the average of 2,628 cases in the five recent years. The FTC closed 3,802 cases, representing an increase of 44.3% compared to the average of 2,634 cases in the five recent years (Fig. 1).



Among the 3,802 cases closed in 2025, after the deduction of cases not belonging to the FTC’s jurisdiction, cases justifiably unsound, cases with the review or investigation suspended due to obscurity of the content of the complaint and cases consolidated because of repeated reports, there were 301 cases involving the Fair Trade Act or the Multi-level Marketing Supervision Act (hereinafter referred to as the applicable cases). Administrative dispositions were decided in 148 cases and no sanctions were imposed in 153 cases, with both figures being the highest in the five recent years (Table 1).

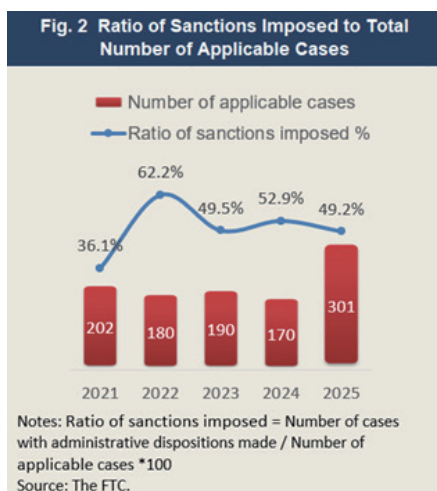
In 2025, the 148 cases with administrative dispositions issued accounted for 49.2% of the 301 applicable cases. Analyzed by the type of application, 50.0% were associated with competition restraints, an increase of 25.5% compared to the average for the five recent years. In comparison, the number of cases in which sanctions were imposed for unfair competition and violations of the Multi-level Marketing Supervision Act was slightly lower than the average for the five recent years (Table 1, Fig. 2~3).

Table 1 Case Handling Results

Unit: case; 10 thousand

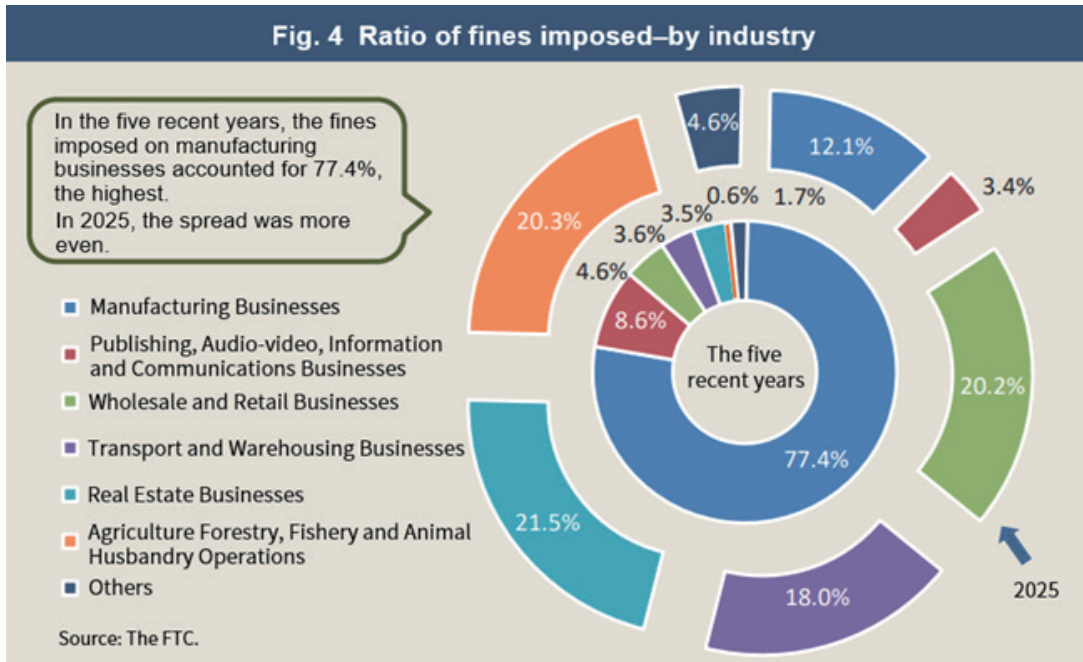
Year	Number of cases closed	Applicable cases							Review (investigation) suspended	Case consolidation
		Total	Administrative dispositions			No sanction imposed	Others			
			Number of Cases	Number of dispositions (warning letters) issued	Amount of fine imposed (NT\$10 thousand)					
Total (2021-2025)	13,169	1,043	517	603	220,076	522	4	11,878	249	
2021	2,376	202	73	84	154,721	127	2	2,068	106	
2022	2,138	180	112	117	7,846	67	1	1,928	30	
2023	2,364	190	94	126	33,755	95	1	2,153	21	
2024	2,490	170	90	107	17,648	80	-	2,289	31	
2025	3,801	301	148	169	6,106	153	-	3,440	61	

Notes: 1. "Others" include cases with investigation and administrative disposal (provision of administrative guidance to enterprises) suspended according to Article 28 of the Fair Trade Act.
 2. "Case consolidation" refers to the combination of cases because of a same unit repeatedly reporting the same fact or different units reporting the same fact.
 Source: The FTC.



The FTC made administrative dispositions in 148 cases in 2025, issued 169 dispositions (warning letters) and imposed fines amounting to NT\$61.06 million. Judged by industry, the NT\$13.10 million (21.5%) imposed on real estate businesses was the highest amount, the NT\$12.40 million (20.3%) imposed on agriculture forestry, fishery and animal husbandry operations came second, and the NT\$12.31 million (20.2%) imposed on wholesale and retail businesses came third. There were 517 cases with administrative dispositions decided in the five recent years. The FTC issued 603 dispositions (warning letters) and the fines imposed added up to NT\$2.20076 billion. Analyzed by industry, the NT\$1.70391 billion (77.4%) imposed on manufacturing businesses was the highest amount, followed by the NT\$188.75 million (8.6%) on publishing, audio-video, information and communications businesses and then the NT\$100.87 million (4.6%) on wholesale and retail businesses. As indicated above, the spread of the businesses fined in 2025 was more even. In the five recent years, fines were mainly imposed on manufacturing businesses (Table 1, Fig. 4).

Fig. 4 Ratio of fines imposed—by industry



FTC International Exchanges in January and February 2026

From Feb. 4 to 7, the FTC attended the 20th East Asia Top Level Officials' Meeting on Competition and the 17th East Asia Conference on Competition Law and Policy in Tokyo, Japan.

From Feb. 5 to 10, the FTC attended the APEC Economic Committee First Meeting (EC1) in Guangzhou, China.



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1. FTC Acting Chairperson Mr. Chen attending the 20th East Asia Top Level Officials' Meeting on Competition and serving as a presenter.
2. The FTC attending the APEC Economic Committee First Meeting (EC1) in Guangzhou, China.