

**MERGER CONTROL: COMPARATIVE ANALYSIS BETWEEN  
INDONESIA AND SINGAPORE'S COMPETITION COMMISSION  
REGIME**

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**ABSTRACT**

This thesis compares the merger control systems of Indonesia's KPPU and Singapore's CCCS, focusing on regulatory frameworks and assessment methodologies. Indonesia employs a post-merger notification system with asset and sales thresholds, while Singapore's voluntary system emphasizes substantial lessening of competition (SLC) through detailed economic analysis. The study highlights differences in how both agencies assess market concentration, barriers to entry, and efficiencies. Singapore's CCCS adopts a more comprehensive, forward-looking approach, emphasizing innovation and consumer welfare, while Indonesia's KPPU focuses more on market structure. The findings suggest potential improvements for KPPU's merger assessment to better align with competition policy goals.

**Keywords:** Mergers and Acquisitions, KPPU, CCCS, Competition Law, Singapore, Indonesia

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## **PENGENDALIAN MERGER: ANALISIS KOMPARATIF ANTARA REZIM KOMISI PERSAINGAN USAHA DI INDONESIA DAN SINGAPURA**

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### **INTISARI**

Tesis ini membandingkan sistem pengawasan merger antara KPPU Indonesia dan CCCS Singapura, dengan fokus pada kerangka regulasi dan metode penilaian. Indonesia menerapkan sistem notifikasi pasca-merger dengan ambang batas aset dan penjualan, sementara sistem sukarela Singapura menekankan pada pengurangan persaingan yang signifikan (SLC) melalui analisis ekonomi yang mendetail. Studi ini menyoroti perbedaan dalam cara kedua lembaga menilai konsentrasi pasar, hambatan masuk, dan efisiensi. CCCS Singapura mengadopsi pendekatan yang lebih komprehensif dan berwawasan ke depan, dengan penekanan pada inovasi dan kesejahteraan konsumen, sementara KPPU Indonesia lebih berfokus pada struktur pasar. Temuan ini mengusulkan perbaikan potensial bagi penilaian merger KPPU agar lebih selaras dengan tujuan kebijakan persaingan.

**Kata Kunci:** Penggabungan dan Pengambilalihan, KPPU, CCCS, Hukum Persaingan Usaha, Singapura, Indonesia

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