Jurnal Kajian Pembaruan Hukum (2025) 5:2 315-344
DOI: https://doi.org/10.19184/jkph.v5i2.53699
Published by the University of Jember, Indonesia
Available online 30 November 2025

Antitrust Law Reform in Emerging Economies: A Comparative Study between Indonesia and Oman

Dwi Edi Wibowo*
Universitas Pekalongan, Indonesia

Aurea Qonita Wibowo
Universitas Sebelas Maret, Indonesia

Souad Ahmed Ezzerouali
Dhofar University, Oman

ABSTRACT: This study aims to analyse anti-monopoly law reform efforts in developing countries by conducting a comparative study between Indonesia and Oman. This research is normative legal research using conceptual and legislative approaches. The research findings confirm the urgency of anti-monopoly legal reform in developing countries as an important instrument for creating a fair, competitive, and sustainably innovative market. The reform aims not only to meet international standards but also to be grounded on the principles of social justice, economic democracy, and national legal sovereignty amid global economic dynamics and digital technology. Philosophically, this reform is necessary to protect the public interest from monopolistic practices that widen economic disparities and undermine general welfare. A comparative study between Indonesia and Oman reveals differences in the context and approach to reform, with Indonesia focusing on updating laws and strengthening dispute resolution mechanisms, while Oman integrates regulations with Islamic law and economic diversification strategies. Both emphasise institutional strengthening, regulatory harmonisation, and increased awareness among business operators as key to the reform's success. The results of this comparison open opportunities for the exchange of experiences to enrich anti-monopoly legal reform strategies, supporting the creation of competitive and inclusive markets, as well as sustainable economic growth and the equitable distribution of community welfare in developing countries.

KEYWORDS: Anti-monopoly; Business; Developing Countries; Legal Reform.

HOW TO CITE:
Wibowo, Dwi Edi, et.al., *"Antitrust Law Reform in Emerging Economies: A Comparative Study between Indonesia and Oman"* (2025) 5:2 Jurnal Kajian Pembaruan Hukum 315-344. DOI: <https://doi.org/10.19184/jkph.v5i2.53699>.

Submitted: 30/08/2025 Reviewed: 02/10/2025 Revised: 18/10/2025 Accepted: 28/11/2025

* Corresponding author's e-mail: dwiedi.unikal@gmail.com

I. INTRODUCTION

Antimonopoly, or antitrust, law is a branch of law that regulates and prevents monopolistic practices and unfair business competition that can harm consumers and undermine competitive market mechanisms.[1] In the 21st century, antimonopoly law has become increasingly crucial amid the rapid development of technology and economic globalisation, which has led to the concentration of market power among a number of large companies, especially in the information technology, e-commerce, and digital communications sectors.[2] Giant technology companies have the capacity to create high barriers to entry for new businesses, control consumer data on a massive scale, and use their dominant position to stifle innovation and harm consumers through practices such as predatory pricing, product tying, and market access restrictions.[3] Therefore, the effective application of antimonopoly law becomes an important foundation for maintaining healthy competition, supporting innovation, protecting consumers, and ensuring fair wealth distribution in this increasingly complex and integrated digital economy.

21st-century antimonopoly law must be designed to address new challenges such as data monopolies, market-controlling algorithms, and hidden collusion that is difficult to detect, while maintaining a balance between regulation and market freedom so that innovation and investment continue to flourish without sacrificing justice and the welfare of the wider community.[4] The development of antimonopoly and business competition law worldwide is primarily driven by the need to create a healthy and fair business climate in an increasingly complex, global economy. One of the

---

1 Varial Ashari Djafar, "Competition Law Perspective on The Assessment of Conglomerate Merger in Indonesia (Case Study: PT. Aplikasi Karya Anak Bangsa (Gojek) with PT. Tokopedia)" (2022) 11:5 Legal Brief 3444–3455.

2 Gaung Aidaferti Zelina CH, "Cross-Border Competition Framework: Implementation Of The Extraterritoriality Principle In The Application Of Competition Law In Indonesia Under Law Number 5 Of 1999" (2023) 7:1 Santhet (Jurnal Sejarah Pendidikan Dan Humaniora) 190–199.

3 Akhmad Farhan Nazhari & Naufal Irkham, "Analisis Dugaan Praktik Predatory Pricing dan Penyalahgunaan Posisi Dominan dalam Industri E-commerce" (2023) 3:1 Jurnal Persaingan Usaha 19–31.

4 Hongquan Yang, "The Privacy, Data Protection and Cybersecurity Law Review: China" (2021) Https://ThelawreviewsCoUk/ 1–12.

main reasons is the emergence of monopolistic practices and unfair business competition that can cause market distortions, such as market domination by one or more large businesses that hinder competition, unilaterally set prices, and harm consumers and other businesses. Along with the development of globalisation and international economic integration, the need for regulations governing business competition has become increasingly urgent so that the market economy can operate efficiently and foster innovation and public welfare.[5] In addition, antimonopoly law also serves as a tool to address the negative impacts of unhealthy business practices, such as mergers that harm certain parties, abuse of dominant positions, and collusion among businesses.

From a legal-political perspective, antimonopoly law exists as a response to the need to maintain a balance between the interests of large businesses and small businesses and consumers, in line with the principles of economic democracy that reject economic domination that harms the people.[6] In many countries, the adoption of business competition law is also influenced by pressure and demands from international and global organisations, such as the WTO, IMF, and regional trade cooperation, which demand order and transparency in business relations between countries. Therefore, antimonopoly law has developed as an important instrument for enforcing healthy competition, which is the foundation for sustainable and equitable economic growth in the 21st century.

Antimonopoly law or antitrust law is essential in both developed countries (Global North) and developing countries (Global South) because both face fundamental challenges in creating competitive, healthy, and fair markets. In developed countries, antimonopoly law is needed to regulate the dominance of large companies that often have enormous market power, especially in the technology and digital industries, which can stifle innovation, create barriers to entry for new businesses, and engage in

---

[5] I Gede Agus Kurniawan et al, "The Business Law in Contemporary Times: A Comparison of Indonesia, Vietnam, and Ghana" (2024) 7:2 Substantive Justice International Journal of Law 114–141.

[6] Muchamad Zaenal Arifin et al, "The Ratification of Omnibus Law: A Sign of Democratic Deconsolidation in Indonesia" (2022) 6:1 JSW (Jurnal Sosiologi Walisongo) 13–28.

practices that harm consumers and business competition.[7] Meanwhile, in developing countries, this law is also important as a tool to strike a balance among large, medium, and small businesses, as well as to protect consumers from monopolistic practices and unfair competition. In addition, in developing countries, the supervision and enforcement of antimonopoly law serve as instruments to promote inclusive economic growth and support the principles of economic democracy that reject economic domination that harms the wider community.[8] Antimonopoly law is also highly relevant to efficiently allocating resources, maintaining market fairness, promoting innovation, and improving public welfare by fostering a conducive business climate and healthy competition. In both developed and developing countries, dynamic economic development and globalisation demand adaptive and effective business competition laws to address increasingly complex and sometimes hidden monopolistic practices, making antimonopoly law a key pillar in maintaining national and global economic stability and sustainability.

This research aims to analyse efforts to reform antimonopoly law in developing countries by conducting a comparative study between Indonesia and Oman. A comparison of antimonopoly law between Indonesia and Oman is important in the context of antimonopoly law reform in developing countries for several strategic reasons that can enrich and strengthen the legal framework in each country. This is because both Indonesia and Oman have different economic and social conditions but face similar challenges in regulating healthy business competition amidst the dynamics of the global market and the development of the digital economy, so comparative studies can reveal effective approaches that are appropriate to each local context. This research is oriented to answer two problem formulations, namely, first, the urgency of antimonopoly law reform in developing countries: a philosophical and legal perspective, and

---

[7] I Gede Agus Kurniawan et al, "Utilitarianism Versus Communalism: A Legal Theory Analysis of Intellectual Property Rights Ethics in Global North and South" (2025) 8:1 Jambe Law Journal.

[8] Irfa Nugroho, Arinto, Ronaboyd, Emmilia Rusdiana & Sonny Zulhuda Prasetio, Dicky Eko, "The Impact of Labor Law Reform on Indonesian Workers : A Comparative Study After the Job Creation Law" (2024) 8:1 Lex Scientia Law Review 67–108.

second, a legal comparison of antimonopoly law reform in developing countries: a legal comparison between Indonesia and Oman.

II. METHODS

This research, which analyses efforts to reform antimonopoly law in developing countries through a comparative study of Indonesia and Oman, is normative legal research.[9] The primary legal materials in this research are laws and regulations on antimonopoly (antitrust) law in Indonesia and Oman. The secondary legal materials used are books, journal articles, and research results that discuss antimonopoly law and business law in Indonesia and Oman. The non-legal material is a legal dictionary. The approaches used are conceptual, statutory, and comparative approaches. The analysis of legal materials is carried out prescriptively, in which laws and regulations related to antimonopoly or antitrust law in Indonesia and Oman are analysed with reference to legal theories, concepts, and principles to formulate legal prescriptions or solutions addressing the legal issues presented.[10]

III. THE URGENCY OF ANTIMONOPOLY LAW REFORM IN DEVELOPING COUNTRIES: A PHILOSOPHICAL AND LEGAL PERSPECTIVE

Black's Law Dictionary affirms that antitrust law is a body of laws designed to protect trade and commerce from restraints, monopolies, price-fixing, and price discrimination.[11] Antimonopoly law is a legal system that aims to prevent the formation of monopolies and unfair business competition practices that can harm the public and the economy in general. The historical development of antimonopoly law can be traced back to the

---

[9] I Made Pasek Diantha, *Metodologi Penelitian Hukum Normatif*, cetakan ke edn (Jakarta: Prenadamedia Group, 2017).

[10] Achmad Irwan Hamzani et al, "Legal Research Method: Theoretical and Implementative Review" (2023) 10:2 International Journal of Membrane Science and Technology 3610–3619.

[11] Henry Campbell Black Bryan A Garner, *Black's Law Dictionary*, 11th edn (Minnesotta: West Publishing Co, St. Paull, 2019).

United States in the late 19th century with the birth of The Sherman Antitrust Act in 1890, which was the first law to regulate the prohibition of monopolistic practices and illegal trade restriction actions, which was later followed by a series of subsequent legislation such as the Clayton Antitrust Act and the Federal Trade Commission Act in 1914 as well as other regulations that further strengthened the antimonopoly legal framework in the United States, which emerged as a response to the dominance of large companies that formed trusts and cartels that hindered fair market competition; this law was born as an answer to public and business actors' concerns about uncontrolled market dominance that could harm consumers and the national economy.[12] In addition, antimonopoly regulations have also developed in other countries with adjustments according to their respective legal and economic contexts.

Antimonopoly law is also a reflection of the spirit of an open economy and healthy free competition that can encourage production efficiency and innovation, as well as ensure that consumers obtain products at reasonable prices and good quality, so that the development of antimonopoly law from initially focusing only on controlling monopolies and cartels has now expanded to include various prohibitions on business practices that harm market competition such as price-fixing, unfair market domination, and mergers or acquisitions that can eliminate healthy competition in the market.[13] Thus, antimonopoly law is an important instrument in maintaining a competitive and fair market balance amidst the dynamics of economic globalisation and modern business development.

Antimonopoly law or antitrust law is based on several important principles that form the foundation for regulating business competition to remain healthy and fair in the market and protect the public interest, with the main principle being the principle of economic democracy which

---

[12] Daniel Francis, "The 2023 Merger Guidelines and the Arc of Antitrust History" (2025) 39:1 Journal of Economic Perspectives 3–28.

[13] M Afif Hasbullah, "Linking Anti-Trust Laws With Industrial Development: Highlighting The Prevalence of Anti-Trust Laws Within The Indonesian Manufacturing Sector" (2023) 17:1 International Journal of Criminal Justice Sciences Criminal Justice Sciences (IJCJS)-Official Journal of the South Asian Society of Criminology and Victimology 274–286.

emphasises the importance of balance between the rights of businesses and the broader public interest, so that the market is not dominated by one party or group of businesses that can harm consumers and other businesses; one of the important principles in antimonopoly law is the prohibition of monopolistic practices and unfair business competition, which includes actions such as joint price-fixing, market allocation, cartel formation, and abuse of dominant position that effectively limit freedom of competition in the market.[14] This principle serves as a deterrent to prevent the abuse of economic power that could harm consumers with unfair prices and poor-quality products. In addition, the principle of protection of healthy business competition affirms that antimonopoly law not only opposes market domination but also supports the creation of a conducive business climate by providing equal business opportunities for large, medium, and small businesses, thereby creating economic efficiency and improving the welfare of society at large.[15] The principles of legality and legal certainty are also crucial in providing clear boundaries regarding prohibitions and legal consequences that can be taken by authorities such as the Business Competition Supervisory Commission (KPPU), which is authorised to supervise, prosecute violations, and impose administrative sanctions including the cancellation of agreements, termination of monopolistic activities, and fines.[16] Furthermore, the principles of per se illegal and the rule of reason are important methodological principles in the application of antimonopoly law, where some actions are considered directly illegal without the need to prove their negative effects (per se illegal), while others

[14] Daniel F Spulber, "Antitrust and Innovation Competition" (2023) 11:1 Journal of Antitrust Enforcement 5–50.

[15] Lunita Jawani, "Prinsip Rule of Reason terhadap Praktik Dugaan Kartel Menurut Pasal 11 Undang-Undang Nomor 5 Tahun 1999 tentang Larangan Praktek Monopoli dan Persaingan Usaha Tidak Sehat" (2021) 1:2 Jurnal Humaya: Jurnal Hukum, Humaniora, Masyarakat, dan Budaya 99–106.

[16] Rahmad Hidayat, "Keterlambatan Pemberitahuan Akuisisi Pada Perusahaan Yang Terafiliasi Ditinjau Dari Hukum Persaingan Usaha Di Indonesia (Studi Putusan Komisi Pengawas Persaingan Usaha (Kppu) No. 27/Kppu-M/2019)" (2021) 1:4 Dharmasisya 2059.

are measured based on their concrete impact on market competition (rule of reason).[17]

The principles of transparency and accountability are also realised through open legal processes and the presence of supervisory institutions that prioritise thorough fact-checking. All of these principles work together to support the main objective of antimonopoly law, which is to ensure that market competition is not only open and free, but also fair and able to improve efficiency and innovation for the sustainable welfare of society, while also preventing monopolistic and collusive practices that lead to the abuse of market dominance that harms the public interest.[18] The philosophical dimension of antitrust law or antimonopoly law includes theoretical and normative reflections on the objectives, principles, and functions of the law in the context of society and the state, which depart from a moral and social foundation to maintain a balance between economic freedom and the protection of public rights. Fundamentally, the philosophy of antimonopoly law is rooted in the core idea of economic democracy, which emphasises that the market must function fairly and openly without destructive domination by certain economic forces, so that the law acts as a state instrument to regulate competition so that it can run healthily and efficiently for the common good.[19] From the perspective of classical legal philosophy, antimonopoly law also reflects a state effort to limit the abuse of private economic power that can threaten individual freedoms and consumer rights, based on the principle that uncontrolled economic power is as dangerous as absolute political power, so the function of antitrust law is not only limited to controlling monopolistic practices but

[17] Maria Jose Schmidt-Kessen, "The Relevance of Mandatory Human Rights and Sustainability Due Diligence for the Greening of EU Antitrust Law" in *Business and Human Rights* (Brill | Nijhoff, 2025) 123.

[18] Mustafa M Soumadi, "Intellectual Property and Patent Rights Protection for Innovators in Jordan Intellectual Property and Patent Rights Protection for Innovators in Jordan" (2023) 7:1 Business Ethics and Leadership 12–24.

[19] Weikai Chen, Ningzhi He & Hao Qi, "The Evolving Role of State-Owned Enterprises in China's Economic Stabilization" (2025) 1:1 Science & Society: A Journal of Marxist Thought and Analysis 1–3.

also maintaining the principles of justice and freedom in the social order.[20] Lebih jauh lagi, filsafat hukum ini menyeimbangkan antara kebebasan berusaha dan kebutuhan intervensi negara, dengan mengakui keberadaan persaingan yang asimetris dan risiko monopoli yang dilegalkan khususnya di era ekonomi digital yang ditandai oleh dominasi platform dan big tech.[21]

This approach also underscores the moral aspects that underlie the determination of the boundaries of business actions and the legitimacy of legal intervention, noting that without strict rules and effective law enforcement, unhealthy business practices will harm consumers, innovation, and the overall market structure. Therefore, the philosophical dimension of antimonopoly law integrates normative, social, and economic analysis to form a strong foundation for the formation and enforcement of business competition law, which is not only a legal technicality but also an instrument of social justice and the management of economic power in a democratic state, so that antimonopoly law becomes a crucial element in maintaining sustainable economic and social stability amidst the complexities of business relations and power in modern society. The philosophical dimension of antitrust law or antimonopoly law, when viewed from the perspective of utilitarianism as put forward by figures such as Jeremy Bentham, Rudolf von Jhering, and other utilitarian figures, can be understood as a normative approach that assesses law based on its ability to create the greatest utility for the greatest number of people in society, where antimonopoly law functions as an instrument to achieve social welfare by ensuring competitive and efficient markets so that consumers benefit in the form of fair prices, good quality goods and services, and continuous innovation.[22]

Jeremy Bentham, as a pioneer of utilitarianism, laid the foundation for this thinking by explaining that the purpose of law is to provide the greatest

---

[20] Juthamas Thirawat, "E-commerce in asean: an emerging economic superpower and the case for harmonizing consumer protection laws" (2022) 18:2 South Carolina Journal of International Law and Business 39–87.

[21] Anita Wijayanti, Hendra Kartika Titisari & Agni Astungkara, "Platform and e-commerce design for Indonesian family businesses" (2023) 9:3 Van Hien University Journal Of Science 1–15.

[22] Yang Jikai, "Discussion on Utilitarianism and Rights" (2024) 7:6 Academic Journal of Humanities & Social Sciences 25–27.

happiness and prevent as much suffering as possible, so that antimonopoly legal policies are considered legitimate and justified if they produce maximum social benefits by preventing monopolistic practices that damage competition and have negative impacts on the public.[23] Rudolf von Jhering developed this view by focusing on the social theory of utilitarianism, which emphasises that law should be seen as a tool designed rationally and systematically to meet social interests and achieve the goal of general welfare, where antimonopoly law plays a role in organising and adjusting the individual interests of business actors with the interests of society so that there are no detrimental conflicts, and ensuring that economic power does not operate destructively.[24] Within this framework, antimonopoly law not only considers the economic aspects of market efficiency, but also includes the moral consideration that monopolistic practices and abuse of market power must be prevented in order to protect the rights of consumers and other business actors, thus involving sustainable distributive justice. Furthermore, the implementation of utilitarianism in antimonopoly law includes an evaluation of the social and economic consequences of a monopolistic action, prioritising the principle that antimonopoly policies and regulations taken must be able to provide the greatest total utility, not just technical efficiency alone, so that various policies such as the prohibition of cartels, mergers that reduce competition, and supervision of dominant positions are aimed at maximising collective welfare. This also recognises that in some cases, the sacrifice of certain efficiencies may be justified if there is an increase in benefits in a fairer distribution of welfare among groups in society. Thus, the philosophical dimension of antimonopoly law in the perspective of utilitarianism places law as an essential moral and social tool to regulate economic relations in order to create harmony between freedom of enterprise and protection of the public interest, as well as a reflection of the values of the greatest utility that

---

[23] Scott Jacques, "The Story of Jeremy Bentham on Police: Bridging the Bentham Project to Criminology" in *Jeremy Bentham on Police* (London: UCL Press, 2021) 12.

[24] Shuyang Liu, "Development of Contemporary Utilitarianism" in *The Contemporary Evolution and Reform of Utilitarianism Interests Politics Series* (Singapore: Springer, 2023) 175.

demand a dynamic balance in market behavior and its regulation in order to achieve a just and prosperous society.

Antimonopoly law or antitrust law has a very important role in developed countries such as the United States and countries in Western Europe, often referred to as global north countries, because this law functions as the main instrument to maintain the order and health of the market in the free market economic system they adhere to, with the main objective of protecting healthy competition and preventing monopolistic practices and cartels that can harm the interests of consumers, small and medium-sized businesses, and overall economic stability. In the United States, for example, since the enactment of the Sherman Antitrust Act in 1890, which was later strengthened by other laws such as the Clayton Act and the Federal Trade Commission Act in 1914, antimonopoly law has been directed at eliminating barriers posed by the size and strength of companies that form trusts and cartels that restrain competition, and prohibiting mergers or acquisitions that could significantly reduce market competition.[25] This is important so that the market remains dynamic, innovative, and efficient, so that consumers obtain quality products and services at competitive prices, while businesses have equal opportunities to compete without having to face market dominance by a handful of large companies that can abuse their power to set high prices and stifle innovation; while in Western Europe, especially in the European Union, similar competition rules are implemented through legal instruments such as the Treaty on the Functioning of the European Union (TFEU) Articles 101 and 102, which prohibit anti-competitive agreements and abuse of dominant positions, as well as strict merger control mechanisms, which form the basis for regulations aimed at keeping the market competitive in order to support inclusive and sustainable economic development and protect consumer interests in the multinational economic area; overall, the existence of antimonopoly law in these developed countries reflects a collective awareness that although the free market provides space for economic freedom, legal intervention is absolutely necessary to avoid

[25] Friso Bostoen & Nicolas Petit, "Antitrust rules and remedies against platforms' treacherous turns" (2024) 1:1 European Law Journal 1–24.

imbalances of economic power that can cause market distortions and social injustice, so that this law not only protects economic efficiency, but also contributes to political stability, strengthening economic democracy, and protecting consumer rights in an increasingly complex society.

In addition, the technical and institutional development of antimonopoly law in these developed countries also promotes strict and independent law enforcement, as well as transparent and accountable litigation and administrative processes, thus providing a deterrent effect for businesses that violate the law and strengthening public confidence in a fair and competitive economic system; thus, the importance of antimonopoly law in the United States and Western Europe does not only stem from economic needs, but is the foundation for modern market governance that promotes social justice and the welfare of the wider community, as well as a model that is widely adopted and used as a reference by other countries in developing their business competition law systems in this era of globalisation.

Antimonopoly law or antitrust law is very important in developing countries, commonly referred to as the global south, because it has a strategic function in creating a competitive, innovative, and just market that can encourage inclusive and sustainable economic growth, especially in a context where the economies of developing countries are very vulnerable to domination by a number of large companies that can abuse their dominant position to exploit the market and hinder the emergence of small and medium-sized enterprises (SMEs).[26] The existence of antimonopoly law in these developing countries is an important instrument in preventing unhealthy business competition practices such as cartels, monopolies, predatory pricing, and exclusive market control, which often cause market distortions and widen socio-economic disparities, so that this policy is not only oriented towards economic efficiency but also towards distributive justice that provides space for SMEs to survive and thrive amidst fair competition. In addition, antimonopoly law helps create a conducive

[26] Dwi Desi Yayi Triana Mahdi, Rafi Oktario, "State-Owned Enterprises Restructuring and Its Challenges in Business Competition from the Perspective of Antitrust and Competition Law in Indonesia" (2024) 8:2 UNRAM Law Review 258–261.

business climate by encouraging increased innovation and investment in various sectors, which in turn can strengthen national competitiveness at the global level, especially in the face of the challenges of the digital economy that open up opportunities as well as the risk of greater concentration of economic power. Developing countries also face obstacles such as weak law enforcement, limited resources, low awareness of business actors towards the principles of healthy competition, and regulatory challenges that need to be adapted quickly to the dynamics of modern markets, so that collaboration between the government, competition supervisory institutions, business actors, and the public is needed to ensure that antimonopoly policies can run effectively. More broadly, with strong antimonopoly laws and consistent implementation, global south countries can reduce economic disparities, support equal opportunities, optimise national economic efficiency, and create a solid foundation for inclusive and sustainable economic development, which ultimately helps advance the welfare of society as a whole and reduce dependence on monopolies and oligopolies that are detrimental.

Antimonopoly law is very important in developing countries or the Global South because it is a strategic instrument for creating a competitive market, encouraging innovation, and protecting consumers and small and medium-sized enterprises (SMEs) from harmful market-dominance practices. In many developing countries, the concentration of economic power is often high due to the dominance of large companies, which can use their position to hinder competition and eliminate smaller competitors through unhealthy practices such as cartels, price wars, and control of resources. With strong antimonopoly laws, developing countries can limit such actions, creating a fair and open business climate in which new businesses and SMEs have equal opportunities to grow and contribute to national economic growth. In addition, antimonopoly policy helps maintain market efficiency and reduce economic inequality arising from unchecked market power, thereby positively impacting equitable social welfare and economic stability. However, the implementation of antimonopoly law in developing countries faces a number of challenges, including weaknesses in law enforcement, a lack of resources and capacity in supervisory institutions, and low awareness among the public and business actors of the importance of healthy

competition. Therefore, close cooperation between the government, competition supervisors, the private sector, and the public is needed to optimise the implementation of antimonopoly law. Comprehensively, antimonopoly law in developing countries is an important foundation for inclusive and sustainable economic development, encouraging the development of a dynamic market while avoiding dependence on monopolies and oligopolies that can trigger unhealthy business practices and damage national social and economic balance.

The urgency of antimonopoly law reform in developing countries, which can be seen from a philosophical and legal perspective, arises as an absolute necessity to answer various increasingly complex challenges in the era of globalisation and rapid digital economic development, where antimonopoly law plays a strategic role as a market regulatory instrument to maintain healthy business competition, prevent monopolistic practices and unhealthy business competition that can damage the national economic order and harm consumers and small and medium-sized enterprises (SMEs). From a philosophical perspective, this reform is based on the principles of distributive justice and economic democracy that demand legal protection for all elements of society so that their rights and interests are not ignored by the abuse of economic power by certain business groups, so that antimonopoly law not only functions as an economic regulatory tool but also as a manifestation of social justice values that form the basis of the formation of a modern rule of law. Legally, reform is needed because existing regulations are beginning to show limitations in anticipating new developments such as the dominance of digital platforms, control of big data, and market algorithms that can control competition secretly without the need for conventional direct intervention, so that without responsive legal updates, the implementation of antimonopoly rules risks becoming obsolete and ineffective in dealing with very dynamic modern business models. Furthermore, legal reform is also important to overcome various structural obstacles such as weaknesses in law enforcement, limited resources of competition supervisory officials, and lack of synergy between business competition policies and other economic policies, for example, efforts to protect SMEs that must be integrated in a balanced manner so as

not to hinder healthy competition but still provide adequate business space for small businesses.

IV. COMPARISON OF ANTIMONOPOLY LAW REFORM IN DEVELOPING COUNTRIES: COMPARISON OF LAW BETWEEN INDONESIA AND OMAN

A comparison of antimonopoly law reform in developing countries between Indonesia and Oman has fundamental and strategically significant reasons for building a healthy and fair business competition system in both countries, which are facing similar economic and regulatory challenges, but with different social, economic, and legal cultural contexts. The development of antimonopoly (antitrust) law in Indonesia began with the urgent need to regulate fair and efficient business competition to encourage national economic growth, especially after the Asian financial crisis of 1997–1998, which triggered massive economic and political reforms.[27] Before the enactment of Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition, regulations regarding monopolies and unfair business competition in Indonesia were still limited and scattered in the articles of the Civil Code (KUHPer), which did not explicitly regulate monopolistic practices and forms of unfair business competition comprehensively.[28] During the New Order era, although there was talk of the need to regulate business competition, its implementation remained very limited because economic power tended to be concentrated in certain groups.

The acceleration of the formation of this antimonopoly law occurred during the reform era after the economic crisis, driven by international pressure from the International Monetary Fund (IMF) which required structural reforms in the Indonesian economy to be more transparent, competitive, and open, thus encouraging the government and the DPR to use their initiative rights in formulating the Law which was finally passed on March 5, 1999. Law No. 5 of 1999 comprehensively regulates the

---

[27] Zulfikar Judge Olivya, "Analisa Hukum Penetapan Harga Dalam Monopoli Dan Persaingan Usaha Tidak Sehat" (2023) 2:2 Jurnal Hukum Indonesia 105–108.

[28] Nurhayani Neng Yani, *Hukum Perdata* (Bandung: CV Pustaka Setia, 2015).

prohibition of monopolistic practices and unfair business competition with the aim of creating healthy business competition in order to increase economic efficiency and public welfare with principles that are in line with Pancasila and the 1945 Constitution, especially Article 27, Article 31, Article 33, and Article 34, which emphasise social justice in the national economic system.[29] Since its enactment, this law has also established an independent supervisory institution, namely the Business Competition Supervisory Commission (KPPU), which has the function of investigating, enforcing, and providing recommendations regarding violations of business competition law.[30] Nevertheless, in practice, Indonesian antimonopoly law faces significant challenges, such as weak law enforcement due to limited resources, the complexity of cases involving large businesses, and a lack of awareness of the importance of healthy competition among businesses and the public.

Recent developments demand revisions and updates to regulations to be more responsive to the dynamics of the modern economy, including the influence of the digital economy, the dominance of technology platforms, data control, and increasingly sophisticated and hidden monopolistic practices. From a historical and juridical perspective, the journey of Indonesian antimonopoly law reflects the state's efforts to transform from a concentrated and closed economic system into an open and competitive market, which reflects the aspirations of socio-economic justice based on the principles of economic democracy in a dynamic national economy and in accordance with the times, while preparing Indonesia to face global competition with a strong legal foundation and independent and effective institutions.[31]

---

[29] Ubbadul Adzkiya', "Analisis Maqashid Al-Syariah dalam Sistem Ekonomi Islam dan Pancasila" (2020) X:1 Jurnal Ekonomi Syariah Indonesia 23–35.

[30] Ni Luh Made Mahendrawati, "Prohibition of Monopolistic Practices and Unfair Business Competition in Indonesia: A Legal Mechanism to Balance the Public Interest" (2021) 10:5 International Journal of Criminology and Sociology 1023–1028.

[31] Vera W S Soemarwi & Maharani Prima, "Challenges of the Business Competition Supervisory Commission Competency in the Implementation of an Exclusive Dealing Agreement" (2022) 655:1 Proceedings of the 3rd Tarumanagara

Law No. 5 of 1999 comprehensively regulates the prohibition of monopolistic practices and unfair business competition with the aim of creating healthy business competition for the sake of efficiency and public welfare, from the perspective of Pancasila principles and the provisions of the 1945 Constitution which emphasise social justice and economic democracy.[32] This Law also established the Business Competition Supervisory Commission (KPPU) as an independent institution to supervise and enforce business competition law; nevertheless, significant challenges are faced in its enforcement, such as limited resources, the complexity of cases involving large businesses, and a lack of awareness of the importance of healthy competition; modern economic dynamics, such as the digital economy, control of big data, and technology platforms, demand revisions to regulations to be more responsive in facing hidden and sophisticated monopolistic practices. Historically, the development of Indonesian antimonopoly law reflects a transformation from a concentrated economic system to an open and competitive market, in line with the aspirations of social justice and economic democracy that form the foundation of national development and readiness to face global competition with a strong legal foundation and effective enforcement institutions.[33]

The development of antimonopoly law or antitrust law in Oman is a relatively new phenomenon compared to Western countries, but in recent years, it has made significant progress, showing Oman's commitment to building a healthy and transparent business competition system as part of its economic diversification and national development vision. The history of Omani antimonopoly law can be marked by the issuance of the "Competition Protection and Monopoly Prevention Law" through Royal Decree No. 67 of 2014, which is the main legal product that regulates the supervisory mechanism for monopolistic practices, restrictive agreements,

---

International Conference on the Applications of Social Sciences and Humanities (TICASH 2021) 481–484.

[32] Jawani, *supra* note 15.

[33] M Afif Hasbullah, "Strategies and Best Practices Firms Should Adopt in Compliance with Business Competition Law: The Role of Cybercrime in Indonesian Perspective" (2022) 16:2 International Journal of Cyber Criminology 87–103.

abuse of dominant positions, and regulation of mergers that potentially reduce market competition.[34] The Law lays a clear legal foundation for the enforcement of antitrust rules by establishing prohibitions against anti-competitive behaviors such as price fixing, market division, and barriers to entry for other businesses, as well as providing strict sanctions in the form of fines and imprisonment that apply not only to companies but also to company management proven to have violated the rules; in addition, Oman developed implementation guidelines (Guidelines on Anti-Competitive Behaviour) published by the Telecommunication Regulatory Authority (TRA) since 2013, which serve as technical guidance in the application of antitrust rules, adapting to international best practices and local market conditions based on ex-post supervision of business behavior; institutionally, Oman has established a competition authority that has the authority to oversee the implementation of the law and handle violations with the main objective of opening the market to more businesses, promoting economic efficiency, and protecting consumer interests from detrimental monopolistic practices.[35] The development of antitrust law in Oman is inseparable from the country's economic context, which still relies on the oil and gas sector. Therefore, competition regulation is key to supporting economic diversification into other, more competitive and innovative sectors, especially in facing the challenges of the digital economy and international market integration. Although Oman's antitrust law is still relatively young, it has been recognised by various international institutions as one of the fastest-growing in the Middle East, and has also experienced increased law enforcement effectiveness and standardisation, harmonisation with global conventions and rules. Therefore, this development marks an important paradigm shift in the management of Oman's domestic market from a more traditional system towards a more open, dynamic, and equitable market, through a legal framework that is becoming solid and adaptive to address unhealthy business practices and strengthen national competitiveness in the global economic arena.

---

[34] Reyadh Faras & Abbas Al-Mejren, "How Comprehensive are Competition Laws? The Case of the GCC Countries" (2025) 48:Issue 1 World Competition 153–178.

[35] Nora Memeti & Agata Jurkowska-Gomulka, "SOEs, Foreign Investments & Competition: A View from the Gulf States" (2021) 44:Issue 4 World Competition 507–526.

The development of antitrust law in Indonesia and Oman has similarities and differences that reflect the social, economic, and legal culture of each country, which together form a framework for regulating business competition aimed at creating a healthy, fair, and efficient market. From the perspective of similarities, both countries recognise the urgency of regulating monopolistic practices and unfair business competition as part of efforts to build a competitive economic system, which in turn aims to eliminate market distortions, protect consumers, and provide space for small and medium-sized businesses to grow. Both countries also place antitrust laws as legal instruments that must be implemented with special supervisory institutions that have the authority to take action against monopolistic and cartel practices, as well as oversee mergers that may reduce market competition. Indonesia regulates this with Law Number 5 of 1999, which establishes the Business Competition Supervisory Commission (KPPU) as an independent institution, while Oman adopted the "Competition Protection and Monopoly Prevention Law" with the establishment of a competition authority that performs similar functions, albeit in a different institutional context.[36] From the perspective of differences, the history and historical relationship of antitrust law in the two countries are very contrasting. Indonesia began responding to the need for antitrust regulation with the establishment of a law in the post-economic crisis reform era of 1997-1998, influenced by legal models from the United States and Europe, using a civil law system with law enforcement based on the rule of reason approach. Meanwhile, Oman only issued its formal regulations in 2014 with a relatively new legal system and a strong influence from Islamic law and international trade law, with a supervisory approach that was initially more administrative and adaptive to the market conditions of the Middle East. The level of law enforcement and business awareness in Indonesia is more developed, although it still faces significant challenges such as resources and case complexity, while Oman is still in the stage of building institutional capacity and strengthening a more formal and systematic antitrust legal process.

---

[36] Pierre El Khoury, "Unfair competition in the Arab world: a remedy completing IP limits?" (2024) 19:2 Journal of Intellectual Property Law and Practice 162–169.

Oman's economic context, which is highly dependent on oil and gas, influences the focus of its antitrust regulations to support economic diversification, while Indonesia, with a more diverse and larger economy, needs to regulate a broad and plural market. These differences require the adaptation of policies and law enforcement methodologies that are appropriate to the national context, making the comparison of these two legal systems very important as learning material and a source of innovation in the antitrust law reforms of each country, as well as an effort to harmonise in the face of the challenges of globalisation and technological developments that affect patterns of business competition transnationally. Overall, these similarities and differences reflect the dynamics of antitrust law adaptation in developing countries that seek to balance the principles of economic efficiency, consumer protection, and social justice, with unique local characteristics, so this comparison serves as a strategic asset in improving the effectiveness of business competition law in Indonesia and Oman in the long term. The development of antitrust law in Indonesia and Oman has similarities and differences that reflect the social, economic, and legal culture of each country with the aim of regulating business competition to be fair, healthy, and efficient. Both recognise the importance of regulating monopolies and unfair competition and have laws and special supervisory institutions, Indonesia with Law No. 5 of 1999 and KPPU, Oman with the Competition Protection and Monopoly Prevention Law and competition authority. Indonesia is influenced by US and European law, using a civil law system and a rule of reason approach, while Oman only issued regulations in 2014 with the influence of Islamic law and international trade law, as well as a more administrative approach.

Law enforcement and business awareness in Indonesia are more developed despite facing challenges, while Oman is still strengthening institutional capacity and formal legal processes. Oman's oil- and gas-dependent economy differs from Indonesia's more diverse economy, necessitating policy adaptation to the national context. This comparison is important as a learning material and legal innovation, as well as harmonisation in facing globalisation and technology that affect cross-border competition. These similarities and differences show the dynamics of antitrust law adaptation in developing countries that seek to balance economic efficiency, consumer

protection, and social justice with local characteristics, so this comparison becomes a strategic asset in improving the effectiveness of business competition law in both countries. The development of antitrust law in Indonesia and Oman has similarities and differences that reflect the social, economic, and legal culture of each country, which together form a framework for regulating business competition aimed at creating a healthy, fair, and efficient market; from the perspective of similarities, both countries recognise the urgency of regulating monopolistic practices and unfair business competition as part of efforts to build a competitive economic system, which in turn aims to eliminate market distortions, protect consumers, and provide space for small and medium-sized businesses to grow; both countries also place antitrust laws as legal instruments that must be implemented with special supervisory institutions that have the authority to take action against monopolistic and cartel practices, as well as oversee mergers that may reduce market competition; Indonesia regulates this with Law Number 5 of 1999, which establishes the Business Competition Supervisory Commission (KPPU) as an independent institution, while Oman adopted the "Competition Protection and Monopoly Prevention Law" with the establishment of a competition authority that performs similar functions, albeit in a different institutional context; from the perspective of differences, the history and historical relationship of antitrust law in the two countries are very contrasting, where Indonesia began responding to the need for antitrust regulation with the establishment of a law in the post-economic crisis reform era of 1997-1998, influenced by legal models from the United States and Europe, using a civil law system with law enforcement based on the rule of reason approach. Meanwhile, Oman only issued its formal regulations in 2014 with a relatively new legal system and a strong influence from Islamic law and international trade law, with a supervisory approach that was initially more administrative and adaptive to the market conditions of the Middle East.

The level of law enforcement and business awareness in Indonesia is more developed, although it still faces significant challenges, such as resources and case complexity, while Oman is still in the stage of building institutional capacity and strengthening a more formal and systematic antitrust legal process. In addition, Oman's economic context, which is

highly dependent on oil and gas, influences the focus of its antitrust regulations to support economic diversification, while Indonesia, with a more diverse and larger economy, needs to regulate a broad and plural market. These differences require the adaptation of policies and law enforcement methodologies that are appropriate to the national context, making the comparison of these two legal systems very important as learning material and a source of innovation in the antitrust law reforms of each country, as well as an effort to harmonise in the face of the challenges of globalisation and technological developments that affect patterns of business competition transnationally. Overall, these similarities and differences reflect the dynamics of antitrust law adaptation in developing countries that seek to balance the principles of economic efficiency, consumer protection, and social justice, with unique local characteristics, so this comparison serves as a strategic asset in improving the effectiveness of business competition law in Indonesia and Oman in the long term.

The efforts and legal reform measures related to the development of antitrust law in Indonesia and Oman demonstrate the seriousness of both countries in facing modern economic challenges and maintaining healthy business competition, albeit with different contexts and stages. In Indonesia, the antitrust law enacted through Law No. 5 of 1999 continues to be the focus of reform in order to respond to the dynamics of the digital economy, the dominance of technology platforms, and increasingly disguised monopolistic practices, so the government and the DPR (House of Representatives) have made various efforts to reform the law, including incorporating certain changes in the Job Creation Law of 2023, which transfers business competition disputes from ordinary courts to commercial courts to improve the quality of the judicial process and evidence, as well as opening up opportunities for the formation of special business competition judges to handle complex cases. There is also strong encouragement from organisations such as the Anti-Monopoly and Competition Law Consultant Association (AMCO), which is urging a comprehensive revision of Law No. 5 of 1999 so that regulations are more adaptive to the times and modern market challenges, including strengthening the KPPU's institutional capacity and increasing its authority and adequate resource capacity to strengthen law enforcement. The main challenges in Indonesia's

antitrust law reform include limited human and financial resources, the complexity of business competition law issues, and inconsistent rulings, which indicate the need for closer synergy between the KPPU and the judicial system so that cases can be handled effectively and provide a real deterrent effect. Meanwhile, in Oman, antitrust institutions and regulations are still relatively new and are part of a broader economic reform to diversify the economy from the oil sector to other sectors, so legal reforms focus on developing a more solid legal framework through Royal Decree No. 67 of 2014 on the Competition Protection and Monopoly Prevention Law, which forms the foundation of antitrust regulation and is accompanied by technical guidelines for implementation that are adapted to local business culture and international standards.

The competition authority in Oman continues to strengthen its supervisory capacity and law enforcement by imposing strict sanctions against anti-competitive business behavior and promoting awareness and transparency among businesses. Although Oman faces constraints in resources and law-enforcement experience, these reforms are proceeding with contextual adjustments to the national legal system, integrating international trade law with Islamic law. Overall, antitrust law reforms in both countries emphasise strong law enforcement, effective supervisory institutions, regulatory updates responsive to technological developments and globalisation, and increased public and business awareness as key factors in creating a healthy, inclusive, and sustainable business competition climate, thereby reducing detrimental monopolistic practices and supporting equitable economic growth. The existing differences in context and approach present opportunities for exchange of experience and learning that can enrich antitrust law reforms in both countries to face increasingly complex and globalised market challenges.

The efforts and legal reform measures related to the development of antitrust law in Indonesia and Oman demonstrate the seriousness of both countries in responding to the increasingly complex dynamics of modern markets, which demand more adaptive, effective, and equitable competition regulation, although their contexts and focuses have distinct characteristics. In Indonesia, antitrust law reform stems from the need to address various

rapidly evolving market challenges, especially in confronting the digital economy phenomenon and the dominance of large companies. This has prompted the government and the DPR (House of Representatives) to revise Law No. 5 of 1999, with one significant step being the transfer of business competition violation objection processes from district courts to commercial courts, which is expected to improve the quality of evidence and judicial processes, as well as the possibility of forming special business competition judges to handle complex cases. Additionally, various organisations, such as AMCO, actively encourage strengthening the institutional capacity of the Business Competition Supervisory Commission (KPPU) by providing adequate authority, enabling it to conduct more effective supervision and take firm action against businesses proven to engage in monopolistic practices and unfair business competition. However, major challenges still include limited resources, complex evidentiary issues, and the coherence of court decisions, all of which require increased institutional synergy.

Meanwhile, in Oman, antitrust law reform is relatively newer and forms an integral part of the ongoing economic diversification strategy, based on Royal Decree No. 67 of 2014 concerning the Competition Protection and Monopoly Prevention Law, which serves as the primary legal foundation for regulating business competition. This is accompanied by technical guidelines from the competition authority that adapt the law's implementation to local market conditions and international standards, and integrate principles of Islamic and international trade law. Oman focuses on strengthening the capacity of supervisory institutions and robust law enforcement mechanisms, as well as efforts to educate and promote business awareness of the importance of healthy competition. The differences in legal, cultural, and economic contexts mean that antitrust law reforms in both countries have distinct characteristics, yet the commitment to improving the effectiveness of regulation and law enforcement remains a common goal. Overall, antitrust law reforms in Indonesia and Oman prioritise strengthening supervisory institutions, updating regulations responsively to technological developments and globalisation, increasing public and business awareness, and robust law enforcement as foundations for creating a competitive, fair, and sustainable market, thereby reducing

detrimental monopolistic practices and supporting inclusive and equitable economic growth.

VI. CONCLUSION

The urgency of antitrust law reform in developing countries is pressing and fundamental, as such laws serve as vital instruments for creating fair, competitive, and sustainably innovative markets. This reform is not merely about meeting international standards but is also rooted in the principles of social justice, economic democracy, and national legal sovereignty, which must be strengthened in the face of global economic and digital technology dynamics. Strengthening the institutional capacity of competition supervisory bodies with adequate capacity and authority is key to enforcing effective sanctions, both administrative and criminal, as well as the importance of harmonising regulations that are responsive to global business changes. Philosophically, this reform also demands the protection of the broader public interest from monopolistic practices that tend to widen economic disparities and undermine public welfare. Without comprehensive and well-planned reforms, antitrust laws risk losing their relevance and effectiveness as tools for realising inclusive, equitable, and democratic economic development in developing countries. Thus, antitrust law reform becomes a strategic prerequisite in ensuring equitable distribution of prosperity and strengthening the foundations of the national economy amidst global challenges.

The comparison of antitrust law reforms in Indonesia and Oman illustrates how both countries are striving to adapt business competition regulations to the dynamic challenges of the modern economy, albeit in different contexts and stages. Indonesia emphasises the updating of Law No. 5 of 1999 and strengthening the institutional capacity of the Business Competition Supervisory Commission (KPPU) through increased capacity, authority, and innovation in dispute resolution mechanisms, such as transferring cases to commercial courts and planning the formation of special business competition judges. On the other hand, Oman is developing a relatively new antitrust legal framework based on Royal Decree No. 67 of 2014, adapting law enforcement to local culture and

principles of Islamic law, while focusing on economic diversification from the oil sector to non-oil sectors. Both face challenges of resources and enforcement complexity but equally emphasise strengthening supervisory institutions, harmonising regulations with technological developments and globalisation, and increasing business awareness as key to successful reform. These characteristic differences actually open up opportunities for learning and exchange of experiences that can enrich reform strategies, ensuring that antitrust laws in both countries are able to create competitive, inclusive, and equitable markets, while supporting sustainable economic growth and equitable distribution of public welfare.

ACKNOWLEDGMENTS

None.

ARTIFICIAL INTELLIGENCE USE STATEMENT

The author states that, when preparing this manuscript for submission to *Jurnal Kajian Pembaharuan Hukum*, artificial intelligence (AI) was not used.

REFERENCES

Adzkiya', Ubbadul, "Analisis Maqashid Al-Syariah dalam Sistem Ekonomi Islam dan Pancasila" (2020) X:1 Jurnal Ekonomi Syariah Indonesia 23–35.

Arifin, Muchamad Zaenal et al, "The Ratification of Omnibus Law: A Sign of Democratic Deconsolidation in Indonesia" (2022) 6:1 JSW (Jurnal Sosiologi Walisongo) 13–28.

Bostoen, Friso & Nicolas Petit, "Antitrust rules and remedies against platforms' treacherous turns" (2024) 1:1 European Law Journal 1–24.

Bryan A Garner, Henry Campbell Black, Black's Law Dictionary, 11th edn (Minnesotta: West Publishing Co, St. Paull, 2019).

Chen, Weikai, Ningzhi He & Hao Qi, "The Evolving Role of State-Owned Enterprises in China's Economic Stabilization" (2025) 1:1 Science & Society: A Journal of Marxist Thought and Analysis 1–3.

Diantha, I Made Pasek, Metodologi Penelitian Hukum Normatif, cetakan ke edn (Jakarta: Prenadamedia Group, 2017).

Djafar, Varial Ashari, "Competition Law Perspective on The Assessment of Conglomerate Merger in Indonesia (Case Study: PT. Aplikasi Karya Anak Bangsa (Gojek) with PT. Tokopedia)" (2022) 11:5 Legal Brief 3444–3455.

Faras, Reyadh & Abbas Al-Mejren, "How Comprehensive are Competition Laws? The Case of the GCC Countries" (2025) 48:Issue 1 World Competition 153–178.

Francis, Daniel, "The 2023 Merger Guidelines and the Arc of Antitrust History" (2025) 39:1 Journal of Economic Perspectives 3–28.

Gaung Aidaferti Zelina CH, "Cross-Border Competition Framework: Implementation Of The Extraterritoriality Principle In The Application Of Competition Law In Indonesia Under Law Number 5 Of 1999" (2023) 7:1 Santhet (Jurnal Sejarah Pendidikan Dan Humaniora) 190–199.

Hamzani, Achmad Irwan et al, "Legal Research Method: Theoretical and Implementative Review" (2023) 10:2 International Journal of Membrane Science and Technology 3610–3619.

Hasbullah, M Afif, "Linking Anti-Trust Laws With Industrial Development: Highlighting The Prevalence of Anti-Trust Laws Within The Indonesian Manufacturing Sector" (2023) 17:1 International Journal of Criminal Justice Sciences Criminal Justice Sciences (IJCJS)-Official Journal of the South Asian Society of Criminology and Victimology 274–286.

Hasbullah, M Afif, "Strategies and Best Practices Firms Should Adopt in Compliance with Business Competition Law: The Role of Cybercrime in Indonesian Perspective" (2022) 16:2 International Journal of Cyber Criminology 87–103.

Hidayat, Rahmad, "Keterlambatan Pemberitahuan Akuisisi Pada Perusahaan Yang Terafiliasi Ditinjau Dari Hukum Persaingan Usaha Di Indonesia (Studi Putusan Komisi Pengawas Persaingan Usaha (Kppu) No. 27/Kppu-M/2019)" (2021) 1:4 Dharmasisya 2059.

Jacques, Scott, "The Story of Jeremy Bentham on Police: Bridging the Bentham Project to Criminology" in Jeremy Bentham on Police (London: UCL Press, 2021) 12.

Jawani, Lunita, "Prinsip Rule of Reason terhadap Praktik Dugaan Kartel Menurut Pasal 11 Undang-Undang Nomor 5 Tahun 1999 tentang Larangan Praktek Monopoli dan Persaingan Usaha Tidak Sehat" (2021) 1:2 Jurnal Humaya: Jurnal Hukum, Humaniora, Masyarakat, dan Budaya 99–106.

Jikai, Yang, "Discussion on Utilitarianism and Rights" (2024) 7:6 Academic Journal of Humanities & Social Sciences 25–27.

Khoury, Pierre El, "Unfair competition in the Arab world: a remedy completing IP limits?" (2024) 19:2 Journal of Intellectual Property Law and Practice 162–169.

Kurniawan, I Gede Agus et al, "The Business Law in Contemporary Times: A Comparison of Indonesia, Vietnam, and Ghana" (2024) 7:2 Substantive Justice International Journal of Law 114–141.

———, "Utilitarianism Versus Communalism: A Legal Theory Analysis of Intellectual Property Rights Ethics in Global North and South" (2025) 8:1 Jambe Law Journal.

Liu, Shuyang, "Development of Contemporary Utilitarianism" in The Contemporary Evolution and Reform of Utilitarianism Interests Politics Series (Singapore: Springer, 2023) 175.

Mahdi, Rafi Oktario, Dwi Desi Yayi Triana, "State-Owned Enterprises Restructuring and Its Challenges in Business Competition from the Perspective of Antitrust and Competition Law in Indonesia" (2024) 8:2 UNRAM Law Review 258–261.

Mahendrawati, Ni Luh Made, "Prohibition of Monopolistic Practices and Unfair Business Competition in Indonesia: A Legal Mechanism to

Balance the Public Interest" (2021) 10:5 International Journal of Criminology and Sociology 1023–1028.

Memeti, Nora & Agata Jurkowska-Gomulka, "SOEs, Foreign Investments & Competition: A View from the Gulf States" (2021) 44:Issue 4 World Competition 507–526.

Nazhari, Akhmad Farhan & Naufal Irkham, "Analisis Dugaan Praktik Predatory Pricing dan Penyalahgunaan Posisi Dominan dalam Industri E-commerce" (2023) 3:1 Jurnal Persaingan Usaha 19–31.

Neng Yani, Nurhayani, Hukum Perdata (Bandung: CV Pustaka Setia, 2015).

Nugroho, Arinto, Ronaboyd, Irfa, Emmilia Rusdiana & Sonny Zulhuda Prasetio, Dicky Eko, "The Impact of Labor Law Reform on Indonesian Workers : A Comparative Study After the Job Creation Law" (2024) 8:1 Lex Scientia Law Review 67–108.

Olivya, Zulfikar Judge, "Analisa Hukum Penetapan Harga Dalam Monopoli Dan Persaingan Usaha Tidak Sehat" (2023) 2:2 Jurnal Hukum Indonesia 105–108.

Schmidt-Kessen, Maria Jose, "The Relevance of Mandatory Human Rights and Sustainability Due Diligence for the Greening of EU Antitrust Law" in Business and Human Rights (Brill | Nijhoff, 2025) 123.

Soemarwi, Vera W S & Maharani Prima, "Challenges of the Business Competition Supervisory Commission Competency in the Implementation of an Exclusive Dealing Agreement" (2022) 655:1 Proceedings of the 3rd Tarumanagara International Conference on the Applications of Social Sciences and Humanities (TICASH 2021) 481–484.

Soumadi, Mustafa M, "Intellectual Property and Patent Rights Protection for Innovators in Jordan Intellectual Property and Patent Rights Protection for Innovators in Jordan" (2023) 7:1 Business Ethics and Leadership 12–24.

Spulber, Daniel F, "Antitrust and Innovation Competition" (2023) 11:1 Journal of Antitrust Enforcement 5–50.

Thirawat, Juthamas, "E-commerce in asean: an emerging economic superpower and the case for harmonizing consumer protection laws" (2022) 18:2 South Carolina Journal of International Law and Business 39–87.

Wijayanti, Anita, Hendra Kartika Titisari & Agni Astungkara, "Platform and e-commerce design for Indonesian family businesses" (2023) 9:3 Van Hien University Journal Of Science 1–15.

Yang, Hongquan, "The Privacy, Data Protection and Cybersecurity Law Review: China" (2021) Https://ThelawreviewsCoUk/ 1–12.