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RAQOBAT SIYOSATI VA RAQAMLI PLATFORMALAR: O'ZBEKISTON UCHUN TAKLIFLAR

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Tayanch so'z va iboralar: raqamli platformalar, innovatsiya, bozor konsentratsiyasi, raqamli iqtisodiyot, raqobat siyosati.

Annotatsiya

Mazkur maqolada raqamli platformalarni tartibga solishga qaratilgan xalqaro raqobat siyosatlarini tahlil qilinib, yetakchi mintaqalar va mamlakatlarning eng yaxshi amaliyotlari aniqlanadi hamda O'zbekistonning "Raqamli O'zbekiston - 2030" strategiyasi doirasida tartibga solish tizimini modernizatsiya qilish uchun tavsiyalar berildi. Shuningdek, maqolada turli siyosiy yondashuvlar - jumladan, oldindan belgilangan (ex-ante) tartibga solish, xulq-atvor kodekslari va mintaqaviy hamkorlik modellarining iqtisodiy va ijtimoiy ta'siri solishtirma asosda baholandi.

COMPETITION POLICY FOR DIGITAL PLATFORMS: RECOMMENDATIONS FOR UZBEKISTAN

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Abstract

This article examines international competition policies designed to regulate digital platforms, identifies best practices from leading regions and countries, and offers recommendations for Uzbekistan as it seeks to modernize its regulatory framework under its "Digital Uzbekistan-2030" strategy. In doing so, it compares different policy approaches-including ex-ante regulation, code-of-conduct measures, and regional collaboration, assessing their economic and social impacts.

Introduction

The global shift to digital platforms has redefined economic relationships, spurred innovation, and enabled businesses to scale across borders. Yet, this transformation has come at a cost for a state: increased market concentration, opaque algorithmic practices, and an imbalance of power between global platforms and local stakeholders (Gawer, 2022; McIntyre et al., 2021). Besides, it also intensifies competition as platform aggregators attempt to monopolize access or enforce restrictive practices (Cutolo & Kenney, 2021). Dominant firms often deploy self-preferencing, exclusive default arrangements, and control over vertically integrated services to suppress

competition (Cr mer et al., 2019; Hagi  & Wright, 2020). These practices, well-documented in cases involving Google, Amazon, Apple, and Meta, have triggered enforcement across the EU, US, UK, and Australia. Governments are therefore tasked with strengthening antimonopoly regulation to protect consumers and maintain fair competition in the digital environment (World Bank Group, 2021).

Governments around the world are increasingly aware that conventional state regulation techniques may be insufficient to address digital issues. Instead, innovative competition policies and proactive approaches, such as the European Union's Digital Markets Act (DMA) and regional cooperation initiatives in ASEAN, have emerged to mitigate

potential market abuses and ensure a level playing field. In Figure 1, a dotted upward-sloping line indicates the overall positive trend in global digital antitrust enforcement activity across the 13-year period. Despite fluctuations, the long-term trajectory suggests increasing regulatory scrutiny and case resolution in digital markets worldwide.

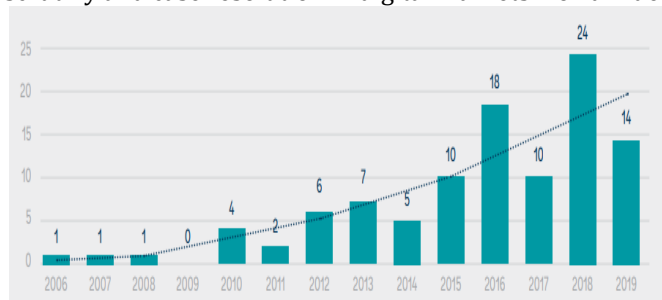


Figure 1. Total Worldwide Cases per year

Source: WBG, Markets, Competition and Technology Unit, Global Digital Antitrust Database

Uzbekistan's digitalization is evolving rapidly. 93% internet usage (2024/25 survey), e-commerce revenue around US\$416m (2024), and strong marketplace growth - creating urgency to adapt international lessons (UzDaily.uz, 2024). Legal instruments, such as the decree of the President of Uzbekistan No. 6019, have been implemented to reduce state participation in the economy and protect competition in digital markets. Investments in digital infrastructure are intended to lower barriers to entry and foster a more competitive environment in the digital marketplace. Even though "Digital Uzbekistan-2030" strategy emphasizes platform development, e-government services, and regional digital integration, yet it lacks tailored competition rules for gatekeeper platforms. As international evidence reveals harm from digital concentration, Uzbekistan must move swiftly to design context-appropriate digital competition policies, not merely replicate foreign models. Despite these significant initiatives, competition-related challenges - **dominance of large digital platforms, unfair pricing practices, and data transparency and algorithmic fairness** remain in Uzbekistan's digital market. Therefore, the OECD's review of Uzbekistan's competition law flags the need for a framework for regulating digital markets, while UNCTAD (2025) notes low dominance thresholds that already capture global gatekeepers (OECD).

Methods

This study utilizes a **comparative policy analysis** methodology to explore how various countries, and regional blocks regulate digital platforms, a diverse array of World Bank **data sources** with particular emphasis on approaches to competition policy. The analysis is grounded in the evaluation of both *ex-ante* (preventive) and *ex post* (reactive) regulatory frameworks, considering their structural design, enforcement mechanisms, economic outcomes, and overall suitability for implementation in developing economies. Through this lens, three primary case studies were selected to serve as the empirical foundation of the research.

First, the **European Union's Digital Markets Act (DMA)** was examined for its pioneering *ex ante* regulatory

model targeting dominant "gatekeeper" platforms. Second, the **ASEAN Competition Action Plan (ACAP) 2025** was reviewed to understand how regional collaboration and harmonized approaches function across economically diverse Member States. Finally, the study drew broader experiences from the **Global South** developing countries that are currently shaping or refining their digital competition policies under constrained regulatory and institutional capacities. Additionally, platform-specific enforcement cases were analyzed to provide a practical understanding of how competition issues manifest across different jurisdictions and regulatory environments.

To tailor the international insights to the local context, the study also conducted a detailed **contextual application to Uzbekistan**. This involved examining the "Digital Uzbekistan-2030" strategy, relevant presidential decrees, national digital infrastructure developments, and ongoing regulatory enforcement trends. These sources allowed for an assessment of how applicable and adaptable global regulatory models are within Uzbekistan's socio-economic and institutional environment. Together, these methodologies and sources informed the comprehensive and context-sensitive policy recommendations proposed in this study.

Results and discussions

European Union and the Digital Markets Act

The European Union has pioneered extensive regulatory reforms aimed at addressing the challenges posed by digital platforms. The Digital Markets Act (DMA) represents a paradigm shift in competition policy by introducing *ex-ante* measures that set binding rules for designated "gatekeepers" in the digital market. These rules cover various aspects such as **data sharing and portability, transparency requirements, fair access and nondiscrimination**.

In terms of **data sharing and portability**, the Digital Markets Act (DMA) requires platforms to make user data available in a standardized format to promote interoperability and prevent market lock-in. A practical illustration of this principle can be seen in the **EU's 2022 Amazon Marketplace/Buy Box commitments**, which addressed the misuse of third-party seller data, discriminatory Buy Box practices, and the tying of Prime logistics. As part of the remedy, Amazon was required to introduce a second Buy Box to ensure fairer visibility for competing offers (European Commission). The DMA also emphasizes **transparency requirements**, compelling digital gatekeepers to disclose how their algorithms operate, particularly those that influence search visibility and product rankings. This was central to the **2017 Google Shopping case**, where the European Commission found that Google had engaged in self-preferencing by prioritizing its own comparison-shopping service in search results. Follow-on litigation continues to assess the scale of damage caused by this conduct (European Commission). Equally important are rules ensuring **fair access and non-discrimination**, which obligate dominant platforms to provide fair terms and conditions for all market participants. A key example is the **Apple anti-steering case (2024-25)**, in which the European

Commission fined Apple for restricting App Store developers from directing users to cheaper alternatives outside the platform. Subsequent DMA enforcement also found both Apple and Meta in breach of user-choice obligations, reinforcing the need for robust rules that guarantee smaller competitors a level playing field (European Commission).

The anticipated economic impact of the DMA is significant, with projections suggesting modest improvements in macroeconomic indicators such as GDP growth and price reductions. Importantly, the DMA serves as a model of effective ex-ante regulation, emphasizing the need to curb anti-competitive behavior before it can escalate into severe market distortions.

ASEAN's Tailored Regional Approach

Southeast Asia provides another compelling case study in the regulation of digital markets. The ASEAN region, characterized by its diversity in economic development and regulatory frameworks, has developed a tailored approach through regional initiatives like the ASEAN Competition Action Plan (ACAP) 2025.

The ASEAN approach to regulating digital markets is characterized by several key features that reflect both regional diversity and the need for coordinated oversight. A central element is **regional harmonization**, as Member States' competition policies remain largely national in scope. To address this, ASEAN is working toward establishing common regulatory goals and building cross-border regulatory capacity, thereby enabling more consistent enforcement across the region. Another important feature is the **focus on consumer education**, with policy documents emphasizing the importance of informing consumers about their rights in digital marketplaces and raising awareness of anti-competitive practices that could harm them. Finally, ASEAN has introduced **transparency and accountability initiatives** that echo elements of the EU's model. Policymakers advocate for mandating that digital platforms provide greater transparency regarding their algorithms and data practices, ensuring that markets are not manipulated in ways that disadvantage local businesses. Together, these measures aim to balance consumer protection with fair competition while recognizing the unique developmental contexts of ASEAN Member States.

ASEAN's approach does not advocate for a one-size-fits-all solution; rather, it acknowledges the regional disparities in development levels and tailors regulatory measures to suit local circumstances while upholding international best practices. This context-sensitive method provides valuable insights into how Uzbekistan might design its competition policy in a similar developmental phase.

Insights from Other Regions and Global South Experiences

In many developing countries, digital platforms pose additional challenges due to the significant power imbalances between global platform giants and local businesses or consumers. Studies indicate that in the global South, the risks associated with digital platforms are compounded by weaker regulatory capacities and fewer resources to enforce strict competition standards. For instance, in terms of regulatory **responsiveness**, data

from a World Bank global database of antitrust actions illustrates that competition authorities in several developing countries have increasingly focused on digital platforms, reviewing mergers and investigating anti-competitive mergers. These efforts highlight both the urgency and the complexity of enforcing competition policy in rapidly developing digital economies.

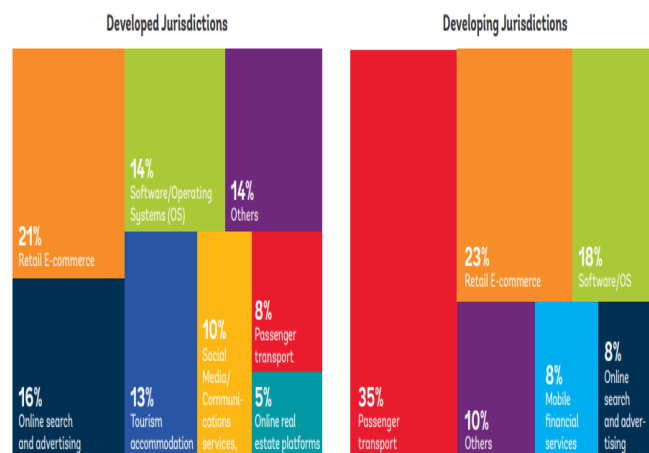


Figure 2. Sectoral Distribution of Antitrust cases in the Digital economy by income level

Source: WBG, Markets, Competition and Technology Unit, Global Digital Antitrust Database

In comparing the sectoral distribution of antitrust cases across developed and developing jurisdictions, clear differences emerge in both focus and scope, reflecting the maturity of digital markets and the capacity of competition authorities (Figure 2). In **developed economies**, enforcement activity is relatively diversified. The largest share of cases targets **retail e-commerce (21%)**, followed closely by **online search and advertising (16%)**, and **software and operating systems (14%)**. By contrast, **developing economies** display a more concentrated enforcement pattern, with **passenger transport (35%)** dominating as ride-hailing platforms transform urban mobility. **Retail e-commerce (23%)** and **software/operating systems (18%)** are also major areas of scrutiny, reflecting the centrality of these sectors to consumer access and business activity. Meanwhile, smaller proportions are found in **online search and advertising (8%)**, **mobile financial services (8%)**, and **other categories (10%)**, which together highlight an emerging but still limited expansion of enforcement into adjacent markets. This comparison suggests that while developed jurisdictions pursue a **multi-sectoral regulatory agenda**, developing jurisdictions focus more narrowly on sectors with immediate consumer and market relevance. For Uzbekistan, which combines rapid digital adoption with evolving regulatory capacity, this indicates the importance of prioritizing sectors such as **e-commerce, mobility, and core digital infrastructure** in the short term, while gradually broadening oversight to include areas like digital advertising, tourism platforms, and social media as institutional capacity strengthens.

From **local regulatory adaptation** point of view, some developing countries have opted to implement policies that are explicitly designed to address the power

imbalances inherent in digital platforms. This includes stricter rules on data collection and targeted advertising, as well as the adoption of "Net neutrality" principles to ensure equal access for consumers.

Conclusion and policy recommendations

Digital platforms represent both a transformative opportunity for economic innovation and a potential threat to market fairness if left unchecked. The international experiences of the European Union's Digital Markets Act and ASEAN's regional regulatory initiatives offer critical lessons for Uzbekistan as it seeks to modernize its competition policy framework in the digital age. Based on international experiences and the current landscape in Uzbekistan, the following policy recommendations are proposed to establish a robust competition framework for digital platforms.

To strengthen its competition framework for digital platforms, Uzbekistan should **adopt an ex ante regulatory approach** inspired by the European Union's Digital Markets Act (DMA). This would involve setting clear threshold criteria, such as market share or user base size, to designate certain firms as "gatekeepers" and subject them to specific compliance obligations. These obligations should include mandatory disclosures on key aspects of platform operations, such as algorithms, data-sharing practices, and pricing strategies, as well as pre-set corrective measures that are automatically triggered when violations occur. Such proactive measures would prevent anti-competitive behavior before it becomes entrenched, positioning Uzbekistan at the forefront of modern digital regulation. Alongside this, enhancing **transparency and algorithmic accountability** is vital. Platforms should be required to publish regular reports detailing how algorithms influence product rankings and consumer information. Independent third-party audits could verify compliance, while accessible consumer reporting channels would ensure that suspected manipulations are investigated promptly. These steps would reduce information asymmetry, foster trust, and encourage fairer business practices.

Equally important is the need to **foster regional collaboration and integration**, given the inherently cross-border nature of digital markets. Uzbekistan should actively engage in regional competition policy forums, such as those under the Eurasian Economic Union (EAEU), to harmonize standards and build collective capacity. Developing joint investigation protocols and data-sharing agreements would strengthen enforcement against transnational anti-competitive behavior, reduce duplication of efforts, and promote consistency across jurisdictions. At the same time, **consumer protection and digital literacy** must be prioritized. This includes mandating clear consent mechanisms for data collection, launching consumer education campaigns to raise awareness of digital rights, and potentially establishing a "digital ombudsman" to oversee complaints and provide redress. Finally, reforms should actively **support innovation and local competitors**. Startups could be incentivized through grants, tax breaks, and low-interest loans, while data portability requirements would lower

switching costs and reduce dependence on dominant platforms. Investments in research and development would further nurture homegrown technological capabilities. Taken together, these measures would not only strengthen Uzbekistan's ability to regulate digital platforms but also create a dynamic and competitive marketplace that benefits consumers, fosters innovation, and stimulates long-term economic growth.

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