



Egypt/Armenia New MoU on Competition Law Enforcement: Institutional Expansion and Practical Limits

Competition enforcers in the MENA region have continued to deepen their institutional ties through new bilateral agreements and multilateral initiatives. Over the past months, competition authorities have signed several memoranda of understanding (MoUs) aimed at facilitating cooperation in antitrust enforcement and merger control (see our June 2025 article on inter-agency cooperation among MENA competition authorities [here](#)).

In particular, since the entry into force of Egypt's pre-closing merger control regime in June 2024 and even before that, the Egyptian Competition Authority (**ECA**) has been notably active in establishing cooperation frameworks with peer authorities in the Middle East, North Africa, and beyond. The most recent example is the MoU signed in December 2025 between the ECA and the Competition Protection Commission of the Republic of Armenia (**CPC**), under which the heads of both authorities agreed to cooperate in the fields of competition law enforcement and policy development.

This MoU represents the third cooperation agreement concluded by the ECA in 2025, following the MoUs signed in April 2025 with the UAE Ministry of Economy and with the Eurasian Economic Commission (EEC) of the Eurasian Economic Union. Prior to these, the ECA had already entered into bilateral arrangements with a number of other competition authorities, including: the Competition Authority of the Republic of Türkiye (September 2024); the Competition Commission of India (June 2023); Nigeria's Federal Competition and Consumer Protection Commission (January 2023); Saudi Arabia's General Authority for Competition (October

2022); Greece's Hellenic Competition Commission (October 2022); and the COMESA Competition and Consumer Commission (CCCC) (August 2016).

The recent ECA–CPC MoU is intended to provide a framework for cooperation and the exchange of expertise in competition law enforcement and policy. According to the public statements released, the agreement covers the sharing of information and experience, the conduct of joint studies, and the organization of training programmed and staff exchanges. Egyptian officials have presented this step as part of a broader strategy to enhance market efficiency, support the investment environment, and further position Egypt as a leading competition authority in the region. As with most similar instruments, however, the full text of the agreement and its operational details have not been made public.

In parallel to these bilateral initiatives, the ECA remains actively engaged in multilateral fora for competition authorities. The ECA–Armenia MoU was signed on the margins of the Organization for Economic Co-operation and Development (OECD) Global Competition Forum in Paris, illustrating once again the role of the OECD as a key convening platform for enforcement agencies. The OECD and the United Nations Conference on Trade and Development (UNCTAD) also continue to play a central role in organizing the annual Arab Competition Forum, in which Egypt has been a particularly active participant.

More broadly, UNCTAD supports capacity building across the region through its technical assistance programs and its competition training centers for the Middle East and Africa. The ECA, for example, has made regular use of UNCTAD's Training Centre in Cairo to co-host workshops, seminars and technical courses for case handlers and economists.

These multilateral initiatives complement the growing network of bilateral MoUs by providing continuous opportunities for dialogue, training and the exchange of best practices.

Cooperation in practice: visibility versus impact

There is little doubt that the ECA is pursuing an increasingly outward-looking strategy and is keen to be perceived as a well-connected authority, both regionally and internationally. Following a period during which merger control played a relatively limited role in its enforcement agenda, the ECA is now investing significant efforts in building its profile as an active and modern competition authority, closely engaged with global developments and aligned with international best practices.

The question remains, however, to what extent these cooperation agreements translate into tangible effects in day-to-day enforcement, and in particular in merger control. As is typical for such instruments, the MoUs generally contain broadly framed commitments to promote fair competition and to exchange experience and expertise. The ECA–CPC agreement follows the same pattern. In practice, instances of formal coordination of investigations or systematic cross-notification of merger reviews between MENA authorities remain limited. Cooperation most often materialises through informal exchanges at conferences, technical workshops, or training programmes, rather than through coordinated case handling.

From a practitioner's perspective, this is particularly relevant in the context of multi-jurisdictional merger filings. Based on our experience, and with the notable exception of the ECA's cooperation with the CCCC, there are no

indications of the ECA having become aware of transactions not notified to it through exchanges with foreign authorities. This, of course, does not exclude the possibility that some exchanges may still take place. It does, however, suggest that, for the time being, merger assessments in the region remain largely conducted on a stand-alone national basis, notwithstanding the growing web of cooperation arrangements.

That said, the broader trend towards convergence should not be underestimated. MENA jurisdictions are progressively aligning their merger control regimes and substantive assessment standards, which is likely to reduce friction in cross-border transactions and to facilitate, over time, more structured forms of coordination. In this respect, the expanding network of bilateral MoUs and the continued engagement in multilateral platforms may be seen as laying the institutional groundwork for deeper cooperation in the future, even if their practical impact on case handling remains, for the moment, relatively modest.



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