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25 June, 2021

Ms Phillipine Mpane
The Competition Commission of South Africa
DTI campus
Mulayo, Block C
77 Meintjies Street
Pretoria

By email: phillipinem@compcom.co.za
CC: tamarap@compcom.co.za

Dear Ms. Mpane

RE: THE AMENDMENT OF THE SMALL MERGER GUIDELINES

We understand that the Competition Commission of South Africa (**Competition Commission**) is considering amending its Guidelines on Small Merger Notification (**Guidelines**) and has invited interested parties to submit comments on the proposed changes to the Guidelines.

The IBA Antitrust Section, which is broadly representative of the global antitrust community, regularly makes submissions in stakeholder consultations regarding the development and implementation of competition laws. The Section's Merger Working Group has prepared the enclosed submission for your consideration.

The Co-Chairs and representatives of the Mergers Working Group would be delighted to discuss the enclosed submission in more detail with representatives of the Competition Commission.

Yours sincerely,

Daniel G. Swanson
Co-Chair Antitrust Section

Thomas Janssens
Co-Chair Antitrust Section