



17 September 2026

To
Staatssekretariat für Wirtschaft SECO
Direktion für Wirtschaftspolitik
Holzikofenweg 36
3003 Bern

By e-mail: wp-sekretariat@seco.admin.ch

To Whom it May Concern

Re:

REVISION OF THE ORDINANCE ON SANCTIONS IMPOSED FOR UNLAWFUL RESTRAINTS OF COMPETITION (CARTEL ACT SANCTIONS ORDINANCE, CASO) AND REVISION OF THE ORDINANCE ON THE CONTROL OF CONCENTRATIONS OF UNDERTAKINGS (MERGER CONTROL ORDINANCE, MCO)

The Merger, Cartels and Unilateral Conducts Working Groups (“WG”) of the Antitrust Section of the International Bar Association (“IBA”) hereby enclose for your kind consideration suggestions regarding the revision of the Ordinance on Sanctions Imposed for Unlawful Restraints of Competition (Cartel Act Sanctions Ordinance, CASO) as well as regarding the revision of the Ordinance on the Control of Concentrations of Undertakings (Merger Control Ordinance, MCO).

The IBA Antitrust Section would be grateful for your kind consideration of the enclosed suggestions. The chairs of the WG and the officers of the Antitrust Section of the IBA would be delighted to discuss the enclosed submission in more detail, should that be of interest.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Andrew Ward".

Andrew Ward

**Working Group Officer
Antitrust Section
International Bar Association**