

October 5, 2026

Attn: Ms. Nguyễn Phương Anh
National Competition Commission
Ministry of Industry and Trade
25 Ngô Quyền, Cửa Nam Ward
Hà Nội, Viet Nam

RE: Comments of the Association for Competitive Technology on the Draft Decree on Administrative Penalties in the Competition Sector (Replacing Decree No. 75/2019/NĐ-CP)

Dear Ms. Nguyễn Phương Anh:

The Association for Competitive Technology (ACT) welcomes the opportunity to comment on the draft Decree on administrative penalties in the competition sector (Draft Decree), which the Ministry of Industry and Trade (MOIT) published for comment on September 22, 2026. The Draft Decree would replace Decree No. 75/2019/NĐ-CP, as amended by Decree No. 102/2026/NĐ-CP, and would set the penalties and remedies for the conduct that the pending Law Amending and Supplementing a Number of Articles of the Law on Commerce, the Competition Law, the Law on Foreign Trade Management, and the Law on Protection of Consumer Rights (Draft Amending Law) would add to the Competition Law.

ACT is a not-for-profit policy trade association that represents the global small business technology developer community. Our members build apps, software, and connected devices, and many of them reach customers in Viet Nam through software platforms and online marketplaces that provide security, payment, and distribution services that a small company could not build on its own. These companies need competition rules that protect them from abuse without weakening the trusted platform services on which their businesses depend.

Because the Draft Decree attaches penalties to the new prohibitions in the Draft Amending Law, the same principles should guide both.¹ The new platform-related prohibitions in Article 27 should

¹ ASS'N FOR COMPETITIVE TECH., *Comments on the Draft Law Amending and Supplementing a Number of Articles of the Law on Commerce, the Competition Law, the Law on Foreign Trade Management, and the Law on Protection of Consumer Rights* (June 20, 2026), <https://actonline.org/wp-content/uploads/2026/09/ACT-Comments-re-MOIT-Amendments-20-June-2026-EN-w-appendix.pdf>; ASS'N FOR COMPETITIVE TECH.,

apply only where case-specific harm to competition is shown, firms should be able to rely on an objective justification for their conduct, and security exceptions should be broad enough to cover the threats that platforms face. Whatever form the final Competition Law takes, the Draft Decree should not penalize conduct on a lower standard than the law itself sets, and its penalties and remedies should be proportionate to the harm that the conduct causes.

ACT welcomes several features of the Draft Decree. MOIT proposes to remove the remedy of compelled restructuring of a dominant firm, recognizing in its explanatory materials that this remedy intervenes deeply in property rights and business autonomy and that the same goals can be met through less restrictive behavioral measures. MOIT also proposes to remove the withdrawal of licenses and practice certificates and the remaining provision on revocation of business registration certificates as supplementary penalties, which it considered excessive. The Draft Decree sets out a method for calculating illegal profits in place of case-by-case discretion, and, in Article 48, applies the more lenient rule to conduct that ended before the Decree takes effect. These changes make the penalty regime more predictable, and our recommendations below, which the Annex to this letter applies article by article, would extend that approach to the rest of the Draft Decree.

I. Penalties for the New Abuse of Dominance Conduct Should Require Case-Specific Harm and Allow Objective Justification

Article 12(1)(g) through (k) would fine a dominant firm 1 to 10 percent of its turnover in the relevant market for four new categories of conduct, namely favoring the products or services of the firm or its affiliates, limiting the ability of customers or users to choose or switch to other providers, restricting customers' access to or sharing of copies of data from their own transactions, and using non-public data generated or provided by users or other businesses to compete with them. Article 13 applies the same categories to firms in a monopoly position. Much of this conduct is procompetitive, since integrating products and services, setting security conditions for access to a platform, and using data to improve a service can lower costs, improve quality, and protect users. The size of a firm or the number of its users does not by itself show that it has harmed competition.

The Draft Decree already includes effects language in each of these provisions, and points (g), (i), and (k) refer to conduct that causes harm to customers or users rather than conduct that is merely likely to do so. ACT supports retaining that standard and recommends that point (h), which currently has no customer harm element, include the same requirement. We also ask that the Draft Decree make clear that the foreclosure and customer harm elements in these points are cumulative, and that a fine may be imposed only where the competent authority has established, on the facts of the case, that the firm holds a dominant or monopoly position, that the conduct has caused or is likely to cause a significant restriction of competition in the relevant market, that the conduct has caused harm to customers or users, and that the conduct lacks an objective justification.

Objective justifications should include protecting security, privacy, and the integrity of a platform, preventing fraud, protecting intellectual property, complying with law, and improving the quality of

Supplemental Comments on Article 27 of the Draft Law Amending and Supplementing a Number of Articles of the Law on Commerce, the Competition Law, the Law on Foreign Trade Management, and the Law on Protection of Consumer Rights (Sept. 20, 2026).

a product or service. Recognizing these justifications across Article 12(1)(c) through (k) and Article 13 would keep the Draft Decree consistent with an effects-based approach to the Draft Amending Law. These recommendations concern the new categories of conduct, and ACT does not ask MOIT to weaken the existing provisions on unreasonable prices and conditions imposed by dominant firms, which remain important to small developers, including when they face unreasonable terms for licenses to standard-essential patents (SEPs).

II. Security, Privacy, and Curation Measures Should Not Be Penalized

Small developers depend on software platforms to review apps for malware and fraud, to protect payment and personal data, and to remove bad actors, because these services give a new developer the immediate consumer trust that it would struggle to earn alone, and several provisions of the Draft Decree could expose those measures to penalty unless MOIT clarifies them.

Points (h) and (i) of Article 12(1) exclude restrictions that are needed to protect personal data, business secrets, or cybersecurity, while points (g) and (k) contain no exception at all. These exceptions leave out many of the measures platforms use to protect consumers and developers, and we recommend that they extend to all four points and cover fraud prevention, protection against malware and other threats to platform integrity, protection of intellectual property, consumer protection including the protection of children, and compliance with law. For data access and sharing under point (i), the Draft Decree should also make clear that Viet Nam's personal data protection law governs any data that relates to third parties, and that a firm may verify the security of a recipient before sharing data with it.

Article 29 would create a new unfair competition offense for refusing to grant, setting unreasonable conditions for, unilaterally revoking, suspending, or not renewing, or discriminating between similarly situated partners or customers in granting, maintaining, or terminating distribution or selling rights without a legitimate reason, where this obstructs another business. Because this offense does not depend on market power, it could be read to reach ordinary app review decisions, marketplace seller policies, and account suspensions. Obligations to carry or reinstate business users make it harder for platforms to remove those with a record of deceptive design or privacy violations, to the detriment of the developers who compete with them fairly. ACT therefore recommends that MOIT:

1. Clarify that Article 29, which requires an abuse of the right to grant or terminate distribution or selling rights, addresses contractual distribution and dealer relationships and does not apply to a platform's review, ranking, or removal of apps, listings, or accounts under its published policies.
2. Recognize the enforcement of published policies on security, fraud, intellectual property, consumer protection, content, and quality as a legitimate reason under Article 29.
3. Confirm that different treatment based on objective and published criteria is not discrimination under Article 29(1)(c).
4. Provide that the remedy in Article 4(11), which Article 39(3) would make available for Article 29 violations, does not require a firm to reinstate or restore access for a business that was removed for violating such policies.

III. Fines Should Be Proportionate to the Gravity of the Conduct and the Harm It Causes

Under Article 5(9), a fine starts at the midpoint of the applicable range and rises to the maximum when two aggravating circumstances are present. Several of the aggravating circumstances in Article 6(2) would be present in almost every case against a larger firm. Point (h) applies where the products involved in the conduct account for 30 percent or more of the relevant market, which is the same share at which Article 24(1) of the Competition Law presumes a single firm to be dominant, so in abuse of dominance cases the facts that establish the offense would often also count against the firm as an aggravating circumstance. Point (i) applies where the products or services involved are worth VND 10 billion or more over the whole period of the conduct, and point (k) applies to conduct lasting more than one year. Together these points would place most abuse of dominance cases at or near the maximum fine without any assessment of how serious the conduct was or how much harm it caused.

ACT recommends that the Draft Decree reserve the largest turnover-based fines for the most serious abuses involving genuine market power, and that it make fines expressly proportionate to the gravity, duration, and actual or likely harm of the conduct. In applying that principle, ACT recommends that MOIT:

1. Avoid counting a circumstance that is an element of the offense, such as a market share that establishes dominance, as an aggravating circumstance.
2. Measure the value threshold in Article 6(2)(i) against the size of the relevant market or the firm, rather than set it as a fixed amount that nearly any established business will exceed.
3. Add to Article 6(1), as mitigating circumstances, an effective compliance program, good-faith reliance on published guidance, and the fact that the conduct falls under a newly created prohibition that has not previously been enforced.
4. Make warnings and lower fines available for micro, small, and medium-sized enterprises (MSMEs) and new entrants, including for a first violation of a new category of conduct and where relevant market turnover is zero. The Draft Decree provides only fines for these violations, and Article 5(4) would raise the zero-turnover fine tenfold, from VND 100 to 200 million under the current Decree to VND 1 to 2 billion.
5. Preserve proportionate penalties for procedural economic concentration violations under Article 22. The current regime provides a lower range of VND 500 million to 1 billion for smaller firms and caps penalties at 5 percent of relevant market turnover, while Article 22 would impose a uniform range of VND 1 to 2 billion. These offenses concern notification and standstill obligations rather than a finding that the transaction itself significantly restricts competition, so smaller firms should keep the lower range and the turnover cap.
6. Link any increase under Articles 24 to 31 to the scale of the harm rather than to the number of provinces reached or the channel through which a business sells. These articles double the fine where conduct reaches two or more provinces, and Article 30 also does so for conduct in an electronic environment that can reach a large number of customers, as does

Article 31 for any conduct in an electronic environment. A business that sells online reaches customers in every province from its first day, and the conduct in Article 31 takes place online by definition, so the doubled amount could become the standard fine for digital businesses.

IV. Remedies Should Be Necessary, Proportionate, and the Least Restrictive Effective Option

MOIT's rationale for removing compelled restructuring applies with equal force to the open-ended behavioral remedies that the Draft Decree adds. Article 4(13) would allow the authority to require a firm to stop using, and to modify, an interface, process, feature, or method of interaction. Article 4(16) would allow any other measure the authority considers necessary, including changes to business methods, conditions, or policies, and Articles 12(2)(d) and 13(2)(d) apply it to most of the new categories of conduct. Article 4(5), which Articles 12(2)(c), 13(2)(c), and 28(3)(c) apply to unreasonable pricing and sales below cost, would subject a firm's prices and trading terms to state control. Remedies of this kind can reach the design of products that millions of consumers use and the security features on which small developers rely.

Any decision imposing these remedies should explain why the remedy is necessary to end the violation, why it is no more onerous than necessary, and why no less restrictive measure would be equally effective. Remedies should be tied to the specific conduct found unlawful, should take account of security, privacy, technical feasibility, and intellectual property, and should allow the firm to propose its own means of compliance. Remedies should also have a defined duration and be subject to review. Price control under Article 4(5) should be a last resort for a limited period rather than a general means of regulating the fees that platforms charge for their services, and the divestiture remedy in Article 4(4), which Article 39(3) would also make available in unfair competition cases, should be limited to prohibited concentrations.

V. Calculating Illegal Profit and Limitation Periods

Articles 8 and 9 could be read to treat all revenue from sales in the relevant market during the violation, for up to three years, as revenue from the violation, less only the direct costs of generating it. Read that way, the calculation would capture profit the firm would have earned without the violation, and it would overstate profit for software businesses in particular, because most of their costs are research, development, and shared infrastructure costs that Article 9(4) could exclude as not directly related. We ask that illegal profit be limited to the additional profit that the violation produced compared with what the firm would have earned without it, that reasonably allocated indirect costs be deductible, that a firm have the opportunity to review and contest any estimate made under Article 9(5) or 9(6), and that the authority take any amount recovered into account when it sets the fine.

Article 7(2) would count the five-year limitation period for the principal violations from the date of the decision to open an investigation. As drafted, this appears to allow a penalty for conduct that ended many years before an investigation began. ACT recommends that the limitation period run from the end of the conduct, as Article 7(3) already provides for other violations.

VI. Liability for Facilitating a Violation Should Be Limited to Knowing and Material Participation

Article 36 would fine anyone who organizes, coerces, mobilizes, calls for, or assists a business in prohibited conduct by intentionally providing material, technical, technological, financial, information, or other support. The fine would be VND 500 million to 1 billion where the underlying conduct is a prohibited restrictive practice and VND 50 to 100 million where it is unfair competition, up from VND 30 to 50 million under the current Decree. ACT welcomes the requirement of intent, although it attaches only to the assisting prong, and the provision could still reach providers of cloud, payment, advertising, app distribution, and software services whose general-purpose tools a customer later misuses. MOIT's submission describes the Draft Amending Law as requiring that the assisting party know that its support directly creates the conditions for the violation. We recommend that liability require actual knowledge of the specific violation and a direct and material causal link between the support and the violation, and that the Draft Decree provide a safe harbor for general-purpose service providers that maintain reasonable compliance programs.

VII. Interface Design and Commercial Indications

ACT shares MOIT's goal of stopping deceptive interface design. Fake scarcity claims, hidden options, and obstacles to cancellation harm consumers and the developers who compete fairly with businesses that use them, and app stores and marketplaces already enforce rules against these practices. Article 31 would treat such designs as unfair competition, but deceptive and misleading presentation of information to consumers is also addressed by the Law on Protection of Consumer Rights and the Law on E-Commerce. ACT therefore recommends that MOIT designate a single lead framework for this conduct so that a business does not face two proceedings and two penalties for the same design choice.

Within Article 31, ACT recommends that MOIT retain the requirement that the design be intended to compete unfairly, limit the offense to designs that materially distort customer decisions, and confirm that security confirmations, identity verification before a payment or cancellation, parental controls, privacy-protective defaults, and accurate information about limited-time offers are not violations. For small developers, a first violation should lead to guidance or a warning before a fine, and the doubling in Article 31(2) should be addressed as described in Section III.

ACT supports Article 30, which addresses signs and information that confuse customers about the source of a product or the identity of a business. Small developers are frequent victims of copycat apps that use their names, logos, and graphics to mislead users. ACT recommends that the Draft Decree make clear that liability rests with the business that uses the confusing sign, and not with a platform that hosts a third-party listing and acts on notices of infringement.

VIII. The Draft Decree Should Follow the Final Law, Avoid Overlapping Penalties, and Allow Time for Compliance

Because the Draft Decree implements a law that the National Assembly has not yet adopted, ACT recommends that MOIT align the text with the final Competition Law and consult again on the revised Draft Decree before it is issued. ACT also recommends that MOIT:

1. Identify the other laws referred to in Articles 12(1)(l) and 13(1)(d) and ensure that the same conduct cannot be penalized under both the Competition Law and another law.

2. Have the National Competition Commission publish guidelines on the new categories of conduct, with examples of conduct that is lawful, before any penalty is imposed for them.
3. Allow a reasonable implementation period under Article 47, apply penalties under Article 48(2) for the new categories of conduct only to conduct that continues after that period ends, and confirm that Article 48(1) does not permit penalties under the new categories for conduct that ended before the Decree takes effect.
4. Require each decision to explain how the fine was calculated, including the turnover used and each aggravating or mitigating circumstance applied, and confirm that firms have access to the case file, that business secrets and source code provided to the authority remain confidential, and that existing rights of complaint and appeal are unaffected.

IX. Conclusion

ACT appreciates MOIT's work to modernize Viet Nam's competition penalties and its willingness to remove measures that proved disproportionate in practice. Our recommendations are intended to keep the Draft Decree focused on conduct that harms competition while protecting the security and trust on which small developers rely to reach Vietnamese consumers. ACT would welcome the opportunity to meet with the National Competition Commission to discuss these comments and to support MOIT's engagement with Vietnamese and international MSME developers.

Sincerely,

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Annex. Article-by-Article Comments on the Draft Decree

Provision	Comment	Recommendation
Article 3(2) and Articles 8 and 9 (illegal profit)	Illegal profit could be read as all revenue from the relevant market during the violation, for up to three years, less direct costs. Read that way, it captures profit the firm would have earned lawfully and could exclude the research, development, and infrastructure costs that make up most of a software business's costs. Articles 9(5) and 9(6) allow the authority to estimate profit from its own evidence.	Limit illegal profit to the additional profit produced by the violation. Allow reasonably allocated indirect costs. Give the firm an opportunity to review and contest any estimate. Take amounts recovered into account when setting the fine.
Article 4(5) and Articles 12(2)(c) and 13(2)(c) (control of prices and trading terms)	State control of a firm's prices and trading terms is among the most intrusive remedies available. It applies to unreasonable pricing and sales below cost and could be used to regulate the fees platforms charge for their services.	Treat price control as a last resort for a defined period, require a reasoned finding that no less restrictive remedy would be effective, and provide for periodic review.
Article 4(11) (restoring distribution or selling rights)	Although Article 29(3) does not list it, Article 39(3) would allow this remedy for Article 29 violations. The remedy extends to access to supply, selling licenses, and other business conditions, and could require a platform to reinstate an app, seller, or account removed for violating its published policies.	Provide that the remedy does not require reinstatement of a business removed under published security, fraud, intellectual property, consumer protection, content, or quality policies.
Article 4(13) (interfaces, processes, and features)	The remedy reaches product design and could affect security features and products used by many consumers.	Tie the remedy to the specific conduct found unlawful, take account of security, privacy, technical feasibility, and intellectual property, and allow the firm to propose its own means of compliance.
Article 4(16) (other necessary measures)	The remedy is open-ended and expressly extends to changes in business methods, conditions, and policies. Articles 12(2)(d) and 13(2)(d) apply it to most of the new categories of conduct.	Require a reasoned finding that the measure is necessary, no more onerous than necessary, and the least restrictive equally effective option, with a defined duration and review.

Provision	Comment	Recommendation
Article 5(4) (zero turnover)	The fine where relevant market turnover is zero rises tenfold, from VND 100 to 200 million to VND 1 to 2 billion. This falls heavily on MSMEs and new entrants that have not yet earned revenue.	Make warnings and lower fines available for MSMEs and new entrants, including for a first violation of a new category of conduct.
Article 5(5) (turnover across related markets)	In vertical cases, turnover from all relevant markets is aggregated. For multi-sided businesses this could count the same activity more than once.	Clarify that only turnover earned in Viet Nam in markets directly affected by the conduct is counted, and that the same revenue is not counted twice.
Article 5(9) and Article 6 (calculating the fine)	Fines start at the midpoint and reach the maximum with two aggravating circumstances. Points (h), (i), and (k) of Article 6(2) would be present in most cases against established firms, and the 30 percent share in point (h) is the same share at which Article 24(1) of the Competition Law presumes a single firm to be dominant.	Do not count an element of the offense as an aggravating circumstance. Measure the value threshold in point (i) against the size of the market or firm. Add an effective compliance program, good-faith reliance on published guidance, and the first enforcement of a new prohibition as mitigating circumstances. Reserve the largest fines for the most serious abuses involving genuine market power.
Article 7 (limitation period)	Article 7(2) counts the limitation period for the principal violations from the decision to open an investigation, which appears to allow penalties for conduct that ended long before.	Count the limitation period from the end of the conduct, as Article 7(3) provides for other violations.
Article 12(1) generally (abuse of dominance)	The new and expanded points cover conduct that is often procompetitive, and points (c) through (k) contain no general objective justification. ACT does not seek to weaken the existing provisions on unreasonable prices and conditions, which protect small developers, including in the licensing of standard-essential patents.	Require proof of dominance, a significant actual or likely restriction of competition in the relevant market, actual harm to customers or users, and the absence of an objective justification before a fine is imposed. Recognize security, privacy, platform integrity, fraud prevention, intellectual property, legal compliance, and product quality as objective justifications.

Provision	Comment	Recommendation
Article 12(1)(g) (self-preferencing)	Integration of products and services often lowers costs and improves quality. The point requires that the conduct cause harm to customers or users, which ACT supports.	Retain the requirement of actual harm to customers, make the foreclosure and harm elements cumulative, and apply the exceptions recommended for points (h) and (i).
Article 12(1)(h) (choice and switching)	The point has no customer harm element, and its exception covers only personal data, business secrets, and cybersecurity. Controls on pre-installed and third-party software are central to the security model that protects consumers and small developers.	Add the customer harm requirement used in points (g), (i), and (k). Extend the exception to fraud prevention, malware and platform integrity, intellectual property, consumer and child protection, and legal compliance.
Article 12(1)(i) (access to and sharing of data)	Copies of transaction data may include data about third parties, and data may be requested on behalf of recipients whose security has not been verified.	Extend the exception as recommended for point (h), confirm that the personal data protection law governs data about third parties, and allow firms to verify the security of a recipient before sharing data.
Article 12(1)(k) (use of non-public data)	Platforms use data to detect fraud, secure their services, and improve quality. The point contains no exception.	Clarify that the point does not cover aggregated or anonymized data, data the firm generates by operating its own service, or use of data for security, fraud prevention, or service quality, and apply the exceptions recommended for point (h).
Articles 12(1)(l) and 13(1)(d) (abuse prohibited by other laws)	The provisions do not identify the other laws, and the same conduct could be penalized twice.	Identify the relevant laws and provide that conduct penalized under another law is not penalized again under the Decree.
Article 13(1)(c) (unilateral changes to contracts)	Platforms update their terms to address new security threats, legal requirements, and product changes.	Confirm in guidance that changes to terms made with reasonable notice for these purposes have a legitimate reason.

Provision	Comment	Recommendation
Articles 14 to 22 (economic concentration)	Article 22 would replace the current size-tiered fines, which set a lower range of VND 500 million to 1 billion for smaller firms and cap fines at 5 percent of relevant market turnover, with a single range of VND 1 to 2 billion for every firm. Acquisitions are an important path to growth and exit for small technology firms.	Keep the lower range and the turnover cap for smaller firms in procedural cases, impose divestiture or other structural remedies only where a significant restriction of competition in Viet Nam has been established, and limit the divestiture remedy in Article 4(4) to prohibited concentrations.
Articles 24 to 31 (doubled fines)	Fines double where conduct reaches two or more provinces, and Article 30 also doubles fines for conduct in an electronic environment that can reach a large number of customers, as does Article 31 for any conduct in an electronic environment. Online businesses reach customers in every province by default, and Article 31 conduct is always online.	Link any increase to the actual scale of harm rather than to the number of provinces reached or the sales channel.
Article 28 (sales below total cost)	Free, freemium, introductory, and promotional pricing, and pricing on one side of a multi-sided service, are common in digital markets and help new entrants attract users.	Confirm in guidance that these pricing models are not sales below total cost that are likely to eliminate competitors absent clear evidence of that effect.
Article 29 (distribution and selling rights)	The new offense does not depend on market power and could reach app review, marketplace seller policies, and account suspensions. Must-carry obligations make it harder to remove bad actors.	Limit the article to contractual distribution and dealer relationships. Recognize enforcement of published policies as a legitimate reason. Confirm that treatment based on objective, published criteria is not discrimination.
Article 30 (confusing signs and information)	ACT supports this provision. Copycat apps that use a developer's name, logo, and graphics harm small developers and their users.	Clarify that liability rests with the business that uses the sign and not with a platform that hosts a third-party listing and acts on notices.

Provision	Comment	Recommendation
Article 31 (interface design)	ACT shares the goal of stopping deceptive design. The same conduct is also addressed by consumer protection and e-commerce law. Points (b) and (d) could reach security confirmations, verification steps, and privacy-protective defaults, and Article 31(2) doubles every fine because the conduct is always online.	Designate a single lead framework. Retain the unfair competition intent requirement and require material distortion of customer decisions. Confirm that legitimate security, verification, parental control, and privacy features are not violations. Remove the doubling in Article 31(2) or tie it to the scale of harm. Provide guidance or a warning for a first violation by a small developer.
Article 32 (information requests)	Late responses draw a warning, and incomplete, missing, or inaccurate responses draw fines.	Allow reasonable time for responses, keep requests proportionate to the case, and take account of legal limits on the disclosure of personal data or data held abroad.
Article 36 (facilitation)	ACT welcomes the intent requirement, which applies to the assisting prong. Fines rise from VND 30 to 50 million under the current Decree to as much as VND 1 billion. The provision could still reach general-purpose cloud, payment, advertising, app distribution, and software services that a customer misuses.	Require actual knowledge of the specific violation and a direct and material causal link and provide a safe harbor for general-purpose service providers that maintain reasonable compliance programs.
Article 42 (procedure)	Penalty decisions affecting turnover-based fines and product design require clear reasons and fair process.	Require each decision to explain how the fine was calculated. Confirm access to the case file, the confidentiality of business secrets and source code, and existing rights of complaint and appeal.
Articles 47 and 48 (effective date and transition)	The Decree implements a law that has not yet been adopted, and firms will need time to adjust products and contracts to the new categories of conduct.	Align the Decree with the final law and consult on the revised text. Provide a reasonable implementation period, publish guidelines before penalties are imposed, and apply penalties for the new categories only to conduct that continues after the implementation period.