

Competition Agency Procedures (CAP) Framework – 2026-27 Work Plan

CAP Mission

The benefits of the ICN Competition Agency Procedures (**CAP**) are as obvious today as they were at its enactment in 2019: procedural fairness in investigations is critical to the effectiveness and credibility of competition agencies. The CAP provides a framework of principles and best practices for agencies to use to reach that goal. As a non-binding, opt-in framework, the CAP uses the ICN infrastructure to increase visibility of the principles and to promote agreement among competition agencies that operate in differing legal regimes and enforcement systems.

Current Co-Chairs

Competition Agency	Agency representative names	Contact emails
US DOJ	Leah McCoy	leah.mccoy@usdoj.gov
Germany BKartA	Shiraz Richter	shiraz.richter@bundeskartellamt.bund.de
Poland UOKiK	Hanna Koehler Martyna Derszniak Monika Mika	hanna.koehler@uokik.gov.pl martyna.derszniak-noirjean@uokik.gov.pl monika.mika@uokik.gov.pl

CAP Strategic Goals

1. Encourage all current CAP signatories to confirm their participation and commitment to the CAP principles.
2. Promote awareness of the importance of procedural fairness and globally accepted due process norms.
3. Gather information on CAP areas of particular interest to inform further work.
4. Promote CAP principles via programming to address areas of interest.
5. Encourage non-signatory competition agencies to sign on to the CAP.

Section One: Projects for 2026-27

Pursuant to strategic goals, CAP will undertake the following projects during the 2026-27 ICN year-

Project title	Description of final work product	Project duration	Final output type and delivery date	Lead contact
Project 1: Encouraging current CAP signatories to reaffirm their commitment to the CAP and seeking new signatories to the CAP	Posted CAP templates are updated, new signatories to the CAP	Multiyear	Updated CAP participant lists and templates	USDOJ –Leah McCoy leah.mccoy@usdoj.gov BKartA – Shiraz Richter shiraz.richter@bundeskartellamt.bund.de Poland - Hanna Koehler hanna.koehler@uokik.gov.pl Martyna Derszniak martyna.derszniak-noirjean@uokik.gov.pl Monika Mika monika.mika@uokik.gov.pl
Project 2: Promote awareness of CAP	Promote awareness of the CAP principles across different audiences	Multiyear		Same contacts
Project 3: Working with agencies and NGAs in close cooperation with the NGA Liaison, the group will develop a document focusing on the ways in which counsel interacts with agencies: “NGA Good Practices / Guiding principles for Engagement.”	A short document encouraging counsel to interact with agencies in a manner consistent with the principals of the CAP.	1-2 years, 2026-2028	Short guidance document.	Same contacts.

Milestone date	Format type	Description
10 Sep , 2026	Email	Email to CAP members to update participant lists and encouraging members to give input to work plan
17 Sep, 2026	CAP promotion at ICN Kick-off Call 2026-27	Promote the CAP at the annual ICN Kick-off Call
Sep, 2026	Email	Email to individual CAP members: 1) for those that have not yet updated their CAP template, requesting them to submit updated version; 2) recommending posting CAP templates on agency websites; and 3) requesting that agencies seek out and provide contact info for NGAs interested in the CAP projects.
10 November 2026	Webinar	Webinar on topics suggested by NGAs.
November, December 2026	Email	Email to NGAs, soliciting topics they would like to see address in NGA good Practices / guiding principles for Engagement and establish a drafting group
May, 2027	AC-2027 Plenary and BOS	Topics TBD

Section Two: Completed Projects in 2025-26

Project title	Description and output	Link to final WG product <i>E.g. webinar recordings, PowerPoint slides, reports on ICN website. Where possible, please provide a link.</i>
Update old templates	CAP Participants were requested to update their templates in 2025-26. Several updates were received and uploaded to the website	https://www.internationalcompetitionnetwork.org/frameworks/competition-agency-procedures/cap-templates/
Webinar	“From Principles to Practice: Insights on the Treatment of Confidential Information and Other Aspects of Procedural Fairness” January 29, 2026	https://www.internationalcompetitionnetwork.org/frameworks/competition-agency-procedures/
Report	CAP Report outlining and summarizing CAP initiatives from 2025-26. As an added value to this report a poll was prepared. The poll was based on two purposes: (i) to highlight the mutual benefits of CAP, and (ii) to identify areas where challenges still exist, what will help in planning CAP future work.	Tbd