



MEMO

TO: MANAGER, PLANNING, POLICY AND RESEARCH DEPARTMENT

THRO: PLANNING, POLICY AND RESEARCH DEPARTMENT

ICN UCWG WEBINAR: THE SYNERGIES BETWEEN UNILATERAL CONDUCT ENFORCEMENT AND MERGER REVIEW VIRTUAL MEETING HELD ON 20TH FEBRUARY 2025 FROM 4:00PM – 6:30PM

A. INTRODUCTION

The conversation, was focused on the deployment of Artificial Intelligence (AI) for consumer protection and related areas. These discussions involve participants from various countries and organisations, aiming to share experiences and insights on leveraging AI in their work. The topics covered range from the challenges of AI adoption in diverse contexts to specific AI tools and projects being developed. The overall context suggests a collaborative effort to understand and implement AI solutions within consumer protection agencies. Increased demand for digitalisation, both as an external driver (e.g., government policies in Korea) and an internal factor (e.g., time-consuming information collection), is a significant backdrop to these discussions.

B. DISCUSSION

The discussions highlight several key aspects of AI deployment in the context of consumer protection and related fields:

- **Challenges of AI Adoption:** A significant concern raised is the high cost and poor internet infrastructure in many African countries, which poses a challenge to businesses leveraging AI. This broader point is echoed in a presentation slide highlighting limited digital infrastructure and low internet penetration as key digital challenges impacting AI enforcement. Data availability and fragmentation, where consumer complaints and digital transaction data are scattered across multiple platforms, also hinder effective AI implementation. Furthermore, regulatory capacity limitations, including a lack of in-house AI specialists and financial constraints, present additional hurdles. The need for continuous monitoring and updates of AI tools is also identified as a challenge.
- **The Importance of Context and User Needs:** Participants emphasised that AI tools developed should cater to the specific market needs and requirements of each country.

Ensuring that these tools are user-friendly for specialists is also crucial to facilitate their job. It was also stressed that AI should be deployed because it is the *best* solution, not merely because it is a novel technology. Simpler methods should be considered, and solutions do not need to be perfect to add significant value.

- **Specific AI Tools and Initiatives:** The Korean team elaborated on a "dispute settlement drafting tool" which automatically takes information from SONET (an internet system for consumer complaint management) and fills it into a report template, standardising the initial draft of dispute settlement decision reports. They also explained "consumer counselling" as the initial stage where agents provide advice to consumers based on relevant laws and dispute settlement standards. Poland is working on a project to detect dark patterns, having tested their chatbot on several types. Zambia is integrating AI into its Commission's enforcement, developing a market surveillance tool for data analysis and a case management system with a chatbot to automate complaint handling and allow consumers to track their cases online. Korea has an "AI-Based Knowledge Platform" in different phases, aiming to facilitate consumer complaint management and increase work efficiency, including a chatbot and an intelligent search engine.
- **Inter-Agency Cooperation and Data Challenges:** The discussion touched upon inter-agency cooperation, noting that consumer protection authorities have sometimes lagged behind financial authorities in AI adoption due to challenges in creating data sets, as some do not even collect consumer complaints centrally. This highlights the critical role of data quality and preparation for effective AI. Collaboration with psychologists and IT specialists is seen as essential for an interdisciplinary approach to analyse online mechanisms affecting consumers and verify information.
- **Technical Issues in AI Deployment:** Challenges such as "AI hallucination" (incorrect patterns and prediction errors due to incomplete or biased data) and interoperability issues with existing systems were discussed, along with countermeasures like improving data bias, continuous testing, and fine-tuning the integration between systems.

C. WAY FORWARD

The discussions indicate several steps and ongoing efforts moving forward:

- **Refinement and Further Development of Tools:** The checklist being developed by the working group will be refined based on the discussions held. The dispute settlement drafting tool is currently undergoing system improvement based on feedback, with test operation planned for March. Similarly, the chatbot in development is out of service for system improvement, with plans to upload standard responses and conduct further testing.
- **Sharing of Information and Resources:** Presentations from the webinar will be shared with participants via a link on WeTransfer and potentially uploaded to an event page. Recordings of the events will also be made available online or via WeTransfer.



- **Continued Collaboration and Engagement:** The working group encourages participants to share further experiences, comments, and advice as the checklist is reviewed. Attendees were also invited to the United Nation Review Conference on Competition and Consumer Protection in Geneva in July.
- **Addressing Future Challenges:** The need to design and tailor appropriate technical solutions, potentially outsourcing tasks, and ensuring continuous monitoring and updates of AI tools for effective detection of dark patterns on the internet are identified as future challenges. The focus remains on ensuring that AI implementation is strategic and user-centred.
- **Official Launch of New Tools:** The 'Work Guide Bot' and 'Knowledge Vine II' are expected to have an official launch between March and April, accompanied by an introductory briefing. A manual on knowledge management is also tentatively planned for the second half of 2025.

In conclusion, the discussions reflect a collaborative and iterative process of exploring and implementing AI within consumer protection agencies, acknowledging both the significant potential and the inherent challenges, while focusing on practical tool development and future collaboration.

Prepared by
Candy Ochieng.