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# Anti-Profiteering Provisions Under GST: Effectiveness and Loopholes

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***Abstract-* This study examines the anti-profiteering provisions in the Central Goods and Services Tax Act, 2017 (Section 171), that require businesses to pass on benefit of tax rate decreases or input tax credits to customers by reducing prices. It discusses the institutional framework of the National Anti-Profiteering Authority (NAA), the Competition Commission of India (CCI), and the Directorate General of Anti-Profiteering (DGAP), drawing comparisons to the frameworks in Australia and Malaysia. A review of case law, reports, and stakeholder submissions raises a number of issues, including the absence of a standard formula, complexity of supply chains, and issue high compliance costs. Finally, the study offers recommendations for developing simplified methodologies, sectoral benchmarks and a market-based oversight concerning GST 2.0.***

***Index Terms*— GST, Anti-profiteering, Tax reform, Input Tax Credit, Consumer welfare**

## I. INTRODUCTION

The Goods and Services Tax (GST), in accordance with Section 171 of the CGST Act, protects consumers by ensuring that price reductions occur in the event of a reduction in the tax rate or benefits are passed on to consumers in the form of price reductions. The National Anti-Profiteering Authority (NAA), in conjunction with the Competition Commission of India (CCI) and Director General of Anti-Profiteering DGAP, enforce the law, and penalties can initially take the form of refunds or interest, or even further price reductions. These efforts are coordinated with support from the GSTN and rely on the GST Council to monitor and help ensure compliance in a fair and transparent market.

The anti-profiteering provisions under Section 171 of the CGST Act require the reduction of price from a legal reduction in tax or ITC benefits. This provision has undergone scrutiny and enforcement from the NAA between 2017 - 2022, and currently by the CCI and the DGAP. It was inspired by the experience of VAT in India in 2005 (over the enquiry of businesses withholding tax-reducing benefits). Other countries relied on either competition law or consumer protection regimes (rather than a direct law like India did).

Working of Anti-Profiteering framework and measures

The anti-profiteering provisions require that any reduction in tax rate or benefit of input tax credit (ITC) must be passed on to consumers through a proportionate reduction in price. The provisions thus ensure that tax benefits are not allowed to be retained by the supplier. Complaints from consumers, taxpayers, or the Government are considered by the Screening and Standing Committees, before investigation by the DGAP. Following DGAP's report, the Competition Commission of India (CCI) will replace the NAA from 2019, to order for price reduction, refund with interest (not exceeding 18%), penalty, or cancellation of GST registration. The mechanism seeks to increase transparency and reduce unjust enrichment of the supplier.

Significance of the study

This research is important as it investigates India’s anti-profiteering provisions under Section 171 of the CGST Act and related Rules to expose the drawbacks of the current regime and implement it in practice with evidence-based recommendations for reforms to the policy. The project seeks to help shape anti-profiteering under the GST 2.0 whether this is by refining the methodologies, updating statutory provisions, or reforming the institutions of enforcement.

Objective of the Study

- To evaluate the umbrella's success in passing through tax benefits, including the lack of a formula, and compliance burdens within the complex chain of supply.
- To look into the recent policy developments including the sunset clause in 2024 and its impact in dynamics on anti-profiteering going forward.
- To discuss practical suggestions and recommendations to strengthen the framework while balancing consumer protection and ease of business.

Research Questions

- Has the anti-profiteering provision under GST achieved its objective of ensuring tax reductions and ITC benefits are passed on to consumers through lower prices?
- What challenges in implementation, such as absence of clear computation methods, complex supply chains, and frequent litigation, have limited its effectiveness?
- How have these challenges influenced compliance, enforcement, and overall consumer welfare outcomes?
- Should the anti-profiteering framework be continued, reformed, or replaced in light of the GST Council's sunset clause and evolving GST 2.0 proposals?

## II. REVIEW OF LITERATURE

Legal Provisions, Official Documents and Case Laws

GST's anti-profiteering rules laid out in Section 171 of the CGST Act, 2017 ask that any reduction in a tax rate or input tax credit (ITC) benefit must be passed on to the consumer as price reductions that are commensurate. There have been difficulties in disciplining the undefined word "commensurate." The National Anti-Profiteering Authority (NAA) exercised its powers with the assistance of the DGAP, to begin with, but moved away from the NAA to the Competition Commission of India (CCI) in December 2022.

Multiple iconic cases that reveal the implementation issues involved Hindustan Unilever Ltd (2019; ₹534.89 crore), Patanjali Ayurved Ltd (2020), Abbott Healthcare (2019; ₹96.59 lakh), Nestlé India (2020), Reckitt Benckiser (2020), Karnataka Real Estate Developers Association (2021), Johnson & Johnson (2022), and Prasad Media (2020; ₹30.13 lakh). Reports have also noted the absence of a standard formula for evaluating benefit passed on in price as well as heavy burdens placed on compliance and inconsistent enforcement and lengthy debates weighing consumer protection against business viability.

Practical scenarios, Lack of Clear Formula and Supply Chain

As per available literature and official documents, there exists a disconnect between the policy objectives associated with anti-profiteering and real-world implementation. For instance, the lack of a consistent formula for the calculation of "commensurate reduction in price" has resulted in a conflicting interpretation of DGAP and NAA decisions, and contributed to rampant litigiousness. Multiple layers of supply chains only dilute the potential benefits, with different consequences for manufacturers, wholesalers, and retailers in the FMCG and construction sectors. Industry assessment has shown that MSME compliance has considerable burdens due to keeping required records, and reporting to DGAP. Although evidence is mixed, some consumers benefitted from implementation, but the administrative burden overall seemed to increase. Courts including the Delhi high court have upheld the legality of section 171 however, they indicated the vagueness of the terms "commensurate" and "profiteering" complicated enforcement as originally intended.

Sunset Clause, Policy and Power Shift and Impact

Recent updates to the anti-profiteering framework constitute a significant shift, particularly with the insertion of a sunset clause in the Finance Act and CBIC notifications that bring these provisions to an end after December 2024. After the NAA transferred enforcement to the CCI in 2022, the regime will, however slowly, transition from the punitive nature of the enforcement obligations, toward a market-based model predicated on enhancing competition while reducing compliance costs on businesses. Although the regulatory uncertainty and preventive stage of consumer protection remain a concern, the experiences of other countries that have eliminated temporary anti-profiteering provisions, namely Australia and Malaysia, grappled with the same difficult balance between regulation, market efficiency, and consumer protection, revealing how best to respond to market volatility is a universal bloc. The success of India's regime in handling the transition to self-regulation, and complementary enforcement-regimes, remains to be seen.

International Experiences

Malaysia introduced GST in 2015 with formula-based anti-profiteering rules comparing pre- and post-GST profit margins. Initially broad but later simplified due to difficulty in enforcement. Over-regulation led to litigation and compliance costs. In Australia, GST was introduced in 2000; anti-profiteering managed by Australian Competition and Consumer Commission (ACCC). It initiates Public Compliance Commitments from corporates, retail price monitoring before and after GST, ban on misleading pricing claims, and profit margin rule limiting unjustified price hikes beyond 10%. Australia's success attributed to three-year preparation, public awareness, and clear enforcement framework.

## III. OBJECTIVE ANALYSIS

Evaluate success in passing through tax benefits, including the lack of a formula, and compliance burdens.

- Review of Policy Intent vs. Practice

Section 171 of the CGST Act seeks to ensure that the benefits of reduced taxation rates or the availability of input tax credits flow to the ultimate consumer in the form of lower prices being charged for good and services. The aim was to introduce fairness, transparency and consumer welfare within GST. However, the application of the law has been variable and uncertain. Although authorities have directed that millions of dollars be refunded and/or remitted, the application of tax law remains complicated in practice. Industry has indicated that compliance measures have been focused on the procedural requirements of the tax law, not necessarily tied to the outcome of returning the benefits provided under the GST law to the consumer. In practice, the law has not had a significant impact on consumer welfare, despite strong public policy intent.

- Absence of a Clear Formula

An important shortcoming of the anti-profiteering mechanism is the lack of a uniform model to evaluate a "commensurate reduction in price". Each DGAP inquiry and NAA ruling used a different approach - such as comparisons of base pricing, weighted averages, or margin analysis. As a result, different criteria were applied, leading to varied interpretations and litigation. Since there is no identifiable computation model, businesses are left in uncertainty in certain situations and must face the prospect of different criteria being applied in different business sectors and under different facts in each case. This uncertainty causes confusion, creates administrative burden, and leads to unequal enforcement, which hinders predictability and fairness, which are necessary for the effective implementation of anti-profiteering mechanisms under GST.

- Supply Chain Complexity and Compliance Burdens

GST is incorporated into all levels of the supply chain, from manufacturers through to retail, therefore accurately tracking tax benefits can be complex. You can easily lose tax benefits during the contracting and price mechanism within a multi-tiered sector like FMCG or real estate, with benefits ultimately passed mostly to consumers. The model requires significant record-keeping and documentation through the processes, including data around price, input costs, and changes in tax. To support DGAP investigations, considerable evidence must be submitted by the organizations under investigation which may also place undue burden on smaller organizations that do not have the tax expertise. Industry associations often state that compliance costs outweigh the commercial benefits, which may provide a disincentive for achieving efficiency and make operations more difficult for many organizations.

- Effectiveness

Evidence from the field indicates that anti-profiteering legislation under Section 171 has provided a degree of consumer refunds, and reduced the informational opacity associated with fees and price, but has contributed only marginally to desired economic outcomes. Delays in providing consumer relief have arisen due to prolonged investigations, disparate methods for data analysis, challenges in verifying data, and consumers have been only partially benefitted. The unpredictability of enforcement actions lost their optimal regulatory role because there is an absence of agreed upon formulas or benchmarks at the sector level. Businesses have baffled and no clear way to liberal or measure compliance with Section 171, and consumers experience only a partial benefit. The framework could be strengthened with more clear and prescriptive calculation methods, an agreed upon benchmark for a sector, and evidence-based enforcement mechanisms that could lead to more efficiencies to avoid litigation, and create a fairer balance in the feasibility of business and protection of consumers.

Look into the recent policy developments including the sunset clause and its impact going forward.

- The Sunset Clause, Policy Shift and Transition of Powers

The Finance Act and CBIC notifications allowed for a sunset clause which comes into effect in December 2024, marking a transition away from the punitive anti-profiteering regime under the NAA to a market-based approach based on competition under the CCI. This transition is meant to foster self-regulation and sustain an anti-profiteering principle under competition law. In December 2022, jurisdiction was passed from the NAA to the Competition Authority with DGAP keeping its investigation roles, supporting an enforcement framework based on competition law and transitioning to more proactive and market driven enforcement and accountability.

- Policy and Market Impacts

The sunset clause is hoped to lighten compliance costs and stimulate voluntary compliance by businesses. It supports 'fair pricing' by encouraging self-regulation to minimize litigation or administrative delays. However, we still do not know how it will impact consumer protections and fair market practices. Assignment changes may also be difficult for those in more traditional areas like FMCG or real estate under the new regime. The overall objective is to balance ease of doing business with consumer welfare using softer and simplified competition-led price discipline approaches.

- Compare International Practices

The transition towards an alternative policy in India resembles the short-lived anti-profiteering regimes of Australia and Malaysia. Australia adopted a limited system that required monitoring by the ACCC and undertakings toward voluntary compliance, along with stronger monitoring of prices, but eventually removed the ability to engage in enforcement. Malaysia also developed a system based on formulaic rules for profit, but then moved to simplify this system based on the difficulty of monitoring and enforcement, which raised concerns about compliance. In these cases, phased systems have typically provided consumer protection at times with lower regulatory burden. India can use these lessons around transparency, accountability, and compliance to help bolster the GST 2.0 Framework both in sustainable and effective manners.

- Future Dynamics and Policy Outlook

As the NAA ended, CCI becomes the lead enforcer for anti-profiteering policies, moving towards the analysis of market behavior, monitoring anti-competitive practices, etc., and away from direct price enforcement. This change may foster voluntary compliance but possibly create ambiguity immediately following the change in enforcement and will rely on solid guidance relative to reporting standards, benchmarks and clarified reporting directions/standards. This change represents an advancement in policy toward a more mature form of policy redesign exploring market-led regulation, and improving enforcement, compliance costs, and protecting consumers; all while enforcing competition rules and regulation in a meaningfully lawful transparent manner.

Discussing practical suggestions and recommendations

- Synthesis of Key Challenges

Examination of Section 171, institutional roles (NAA, DGAP, CCI), and the sunset clause shows continuing concerns: no standardized formula for "commensurate reduction," excessive compliance burden and low consumer awareness. The GST advantages are often diluted by the complexities of supply chains, because small and medium enterprises (SMEs) must continue significant record keeping and reporting to the DGAP.

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The transition to CCI-led oversight under the sunset clause has both tremendous market-based regulatory opportunities and transitional uncertainty. All these issues underline the need for clear processes and targeted procedural changes so that compliance will be improved efficiency and better consumer protection.

- Stakeholder Perspectives

Businesses and consumers view anti-profiteering differently. Businesses, especially small and medium enterprises (SMEs), face uncertainty and the burden of administration in the process of cost functions to calculate and report price reductions. Consumers value the notion of benefit pass-through for some products, even if they do not realize they could complain about it. In the official documents of government policy and industry submission, it was noted that while enforcement was improved with transparency, not all businesses enforced price declines consistently. Bridging the gap meant being business-friendly and consumer-friendly all in a compliance environment that effectively achieved compliance with managing burdens of compliance in the concept of fairness and accountability.

- Lessons from Global Practices and Recommendations

Examples from abroad such as Australia, Malaysia, and Singapore demonstrate effective approaches in terms of formula-based calculation, temporary enforcement, price monitoring, and transparent reporting. India can adopt comparable mechanisms by introducing a standard calculation, streamlining compliance and consumer awareness requirements, and developing sectoral benchmarks. In the long-term future, the oversight role should transition into the CCI's competition-based framework, which would eliminate subjectivity, litigation, and administrative burden while allowing for consistent enforcement by the CCI.

- Policy Outlook and Balanced Approach

An improved anti-profiteering framework should support both consumer security and ease of doing business. A standard method of calculation, simpler reporting and consumer education will alleviate red tape and promote transparency to consumers. Industry benchmarks promote consistency and competition-based deregulation encourages proper pricing practices without punitive action. In addition to the transition to a sunset clause, these mechanisms are designed to support consumer confidence, improve compliance efficiency, and foster a transparent, market-oriented GST environment.

## IV. FINDINGS

Has the anti-profiteering provision under GST achieved its objective of ensuring tax reductions and ITC benefits are passed on to consumers through lower prices?

- Case Law Analysis

Examples include Hindustan Unilever (2019), Patanjali (2020), Abbott Healthcare (2019), Nestlé (2020), and Reckitt Benckiser (2020), where some passed GST benefits to consumers while others did not. For example, HUL passed on ₹534.89 crore while other competitors only offered some relief. Complicated supply chains and varying methodologies due to different states further diluted what was meant to be passed on to consumers.

- Legal Provision Review

According to Section 171 of the CGST Act, the reduction in prices and benefit of ITC that is consumers can be based on tax attached to the benefit of ITC. Because there is no formula for determining a "commensurate reduction," inconsistent applications and litigation followed. Thus, while the intent is to protect consumers, the practice of enforcing the law sometimes strays from the intent of the law, exposing gaps in enforcement and misleading assertions regarding the efficacy of consumer protection policy.

- Policy Document Analysis

DGAP and NAA reports cite refunds of more than ₹4,000 crore and upwards of 700 enforcement actions. In view of these reports, the relevant procedural complexities, the loss of procedural consistency, and the high cost of compliance (particularly for medium-sized and small firms) undermine meaningful implementation of these requirements. Although we intended to improve consumer welfare, these inefficiencies and the inconsistent implementation of anti-profiteering under GST have curtailed overall success.

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What challenges in implementation, such as absence of clear computation methods, complex supply chains, and frequent litigation, have limited its effectiveness?

- Documented Challenges from Literature

The literature regularly highlights three challenges. One is the absence of one standard formula, leading to different methods for calculating "commensurate reduction in price" in different cases. A second challenge is that complicated supply chains dilute or delay the GST benefits to the end consumer because the benefits could be absorbed at the manufacturer, wholesaler, or retailer level. A third challenge is compliance requirements (especially for SMEs), which produce onerous compliance obligations, including detailed reporting and documentation with price mapping based on myriads of records and reporting to the DGAP. In sum, all three issues prevent the straightforward flow of benefits while also creating businesses issues.

- Legal Analysis

Court judgments and settlements demonstrate litigation as a key barrier. Ambiguous terms like "commensurately" and "profit" raise disputes regarding the estimation of hours, timelines, and penalties. Each one, HUL (2019), Abbott (2019), and the Karnataka Real Estate Developers Association (2021), evidenced the difficulty in establishing a suitable reduction, ideally with prompt adjudication of many months. The ambiguities can create significant administrative costs for enforcement and discourage compliance within inter-sectoral arrangements.

- Secondary Reports & Commentaries

These challenges have also been reiterated in official reports and commentaries from experts. DGAP and NAA notes point to differences in investigative approaches and timeframes for followership, while industry perspectives highlight the substantive costs of compliance and the challenges in tracking a compliance framework. Finally, think-tank research and sectoral reports suggest that while the intentions of the policy are clear and relevant, structural barriers, vague rules, and disaggregated enforcement practices inhibit the overall effectiveness of the enforcement of anti-profiteering measures.

The anti-profiteering provisions are not effective due to ambiguous formulas, intricate supply chains, and subsequent litigation as well as having high compliance costs. Collectively, these issues decrease the clarity and speed in transferring GST benefits to consumers.

How have these challenges influenced compliance, enforcement, and overall consumer welfare outcomes?

- Analysis of Enforcement Reports

The DGAP, NAA, and CCI reports demonstrate that compliance differed significantly across sectors. For some companies, the changes were immediate, despite previously charging the higher price prior to the GST cut, while others required more time to explore potential non-compliance or would only conduct partial investigations. Trends suggested that businesses with structural accounting systems that also served as pricing systems could comply more quickly than SMEs, who face challenges with old accounting records to consider and reports to complete. Overall, businesses complied inconsistently because there was no standardized method of computing anti-profiteering compliance.

- Legal Interpretation Review

Judges and other authorities have treated “profiteering” and “commensurate reduction” differently across various cases. Because there exists ambiguity, enforcement has relied on discretion, and compliance issues have turned into lengthy litigation. For example, in the Karnataka Real Estate Developers Association case (2021), the issue of how to apply the provision for long-term contracts was highlighted, while other fast moving consumer goods (FMCG) cases focused on explicating profit margin calculations. Variations in interpretation across cases ultimately created uncertainty for ordinary business operators, eroded a uniform culture of compliance, and complicated enforcement.

- Scenario Analysis from Literature

Sector examples generally indicate that consumers realized benefits that were limited or delayed. For instance, FMCG products realized benefits that were only partially passed on, and price changes on long-term contracts for real estate were resistant to change.

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The benefits were also diluted, as they were absorbed by complexities in the supply chain. While some consumption patterns improved consumer welfare through refunds and price changes, administrative delays and inconsistent implementation of the measures limited overall impact, increasing uncertainty about the effectiveness of anti-profiteering measures in producing their intended consumer protection outcomes.

The effects of ambiguity in the formula, complexity in the supply chain, and uncertainty in the law have created mixed compliance, inconsistent enforcement, and at most, partial improvements for consumers.

Should the anti-profiteering framework be continued, reformed, or replaced in light of the GST Council's sunset clause and evolving GST 2.0 proposals?

- Policy Analysis

The Finance Act and the various notifications from the CBIC promulgating the sunset clause (December 2024) indicate a conscious move away from NAA-led punitive enforcement towards a market-based regulatory model under the CCI. The intention is to lessen compliance costs and burdens, promote self-regulatory compliance, and ensure anti-profiteering scrutiny operates in the larger context of competition law principles. The transition also reflects a developing GST 2.0 framework where enforcement will have a focus on market conduct rather than micro-level price regulation. This policy direction suggests that maintaining the original character of the prior framework may not be ideal.

- Comparative Literature Review

There are valuable lessons to learn from overseas examples. Australia imposed temporary restrictions on price profiteering and relied on the ACCC to monitor prices through voluntary compliance pledges and prices restrained by margin rules. Initially, Malaysia also enforced formula-based rules, but found it ultimately unsustainable, enforcing the rules effectively. Both examples show that a temporary, formulaic, and transparent approach can apply a workable balance between protecting the consumer and regulatory burden considered. India should similarly consider a revised model under GST 2.0, whereby regulators can investigate the market while ensuring benefits to consumers are passed on without excess regulatory burden.

- Synthesis of Official and Academic Opinions

Reports, expert commentaries, and official statements suggest a middle path: reform rather than a complete replacement. Recommendations involve continuing the anti-profiteering principles, but with standardized calculation methods, simplified reporting, benchmarks that are effective in each sector, and competitive enforcement under the CCI. This provides protection to consumers while reducing litigation and administration and associated costs. Included in the consensus from most scholars and policy analysts is the view that replacing this framework completely creates a regulatory gap and that reform is consistent with the goals of GST 2.0 and the sunset clause.

The anti-profiteering framework should be amended instead of eliminated by embracing market-based oversight, simplifying regulatory compliance, and sustaining consumer welfare in the context of the new GST 2.0.

## V. SUGGESTIONS AND RECOMMENDATIONS

Standardized Computation Method

To clarify the ambiguity in a determination of "commensurate reduction in price," the government and/or CCI should formulate a cost standard methodology for use as a baseline cost to assess price reductions in competition - including industry benchmarks, sector specific weighted averages and/or reference pricing - and guidelines for price reduction and/or profit returns. These guidelines will improve the likelihood of reducing disputes, litigation and enhance compliance certainty.

Simplified Compliance and Reporting

Compliance costs, particularly for SMEs, act as a deterrent to proper compliance. Simplification options might include:

- Digital record submissions via the GSTN
- Small business exemptions based on a certain threshold

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- Templates that automate the reporting of compliance and/or reporting to demonstrate compliance.

All of the above will reduce compliance costs and increase voluntary compliance.

Consumer Awareness and Sectoral Monitoring

Consumers need to understand their rights, and sectors need customized benchmarks. This can be done by:

- Public awareness and grievance mechanisms that consumers can easily access
- Periodic tracking of prices and margins by CCI or sector regulators
- With respect to industry-specific supply chains, the industry to voluntarily commit to compliance

Consumer empowerment coupled with industry-focused oversight will lead to enhanced practical enforcement.

Market-Oriented Oversight under GST 2.0

With the sunset provision eliminating the need for NAA-led punitive intervention, the framework should transition to a market surveillance-based enforcement model under GST 2.0. This means enforcement will be centered around market behavior as opposed to the previous model of micro-related price intervention, incorporating periodic audits and investigations in cases of suspected profiteering. The supervision of anti-profiteering practices should be aligned with principles of competition law, which will balance consumer protection and ease of doing business, while promoting self-regulation and protecting consumers' interests in a transparent and competitive environment.

## CONCLUSION

The anti-profiteering provisions in Section 171 of the CGST Act were meant to ensure that taxpayers are passing tax benefits, including tax rate reductions and input tax credits, to the consumer through lower prices. However, when reviewing various government reports, case law, and literature, the framework has been inconsistently and complexly implemented. The lack of a standardized formula to determine "commensurate reduction," the complicated nature of multi-tiered supply chains, and the burdensome compliance costs have significantly reduced the promised consumer benefits. The framework has been somewhat successful in identifying and remitting the profiteered amount (albeit only partially), but the mixed methodologies and problems of lengthy investigations largely undermined its overall effectiveness. Moreover, the effect of the framework has been largely procedural in nature; consumer protection was seen to be more of a principle than a reality in the markets.

The initiation of the sunset clause, which will come into effect in December 2024, indicates an important policy transition from implementation of a punitive model to competition-based oversight of the CCI. This is a signal of India's movement towards a free market coordinated regulatory system that is aligned with the practices of the broader global community. Moreover, as per comparative experiences from Australia and Malaysia, temporary, formulaic, and transparent methods of measuring performance can protect consumers while measuring the degree of administrative control on the business community. However, the Indian model needs to protect the consumers' interest while providing for an ease of doing business and thus should provide standard calculation, compliance, and awareness of value.

In the future, as GST transitions to GST 2.0, the anti-profiteering mechanism should continue to evolve into an improved competition-based system instead of simply being abolished. The reform focus should be on the standards for simple calculation, reasonable benchmarks for each sector, and ongoing updating of standards through compliance based on technology to reduce disputes and promote self-governance. A CCI market surveillance model based on regular monitoring of issues, consumer education, and transparency of the system could maintain accountability and a measure of checks and balances without overregulation. In conclusion, the future of anti-profiteering in India involves having a balance between regulatory clarity for consumers and appropriate market flexibility or space while ensuring consumer interests are protected, and developing a GST ecosystem that is fair, efficient, and competitive.

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