

# The Implementation of China's Fair Competition Review System: A SWOT Analysis of Shanxi Province in China

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## Abstract

The Fair Competition Review System constitutes a key measure for deepening the reform of the market economic system and constructing a unified national market. As a typical resource-based region, Shanxi Province has long been confronted with multiple challenges, including a single industrial structure and administrative intervention. During the critical period of energy transition, the province is in urgent need of relying on the Fair Competition Review System to dismantle policy barriers and boost the endogenous driving force of the market. This study systematically reviews the progress achieved since the implementation of Shanxi Province's Fair Competition Review System in January 2017. By integrating characteristic local review cases and policy cleanup data, it summarizes the effectiveness and innovative practices in the comprehensive coverage of the system and the enforcement of reviews. On this basis, employing the SWOT analysis method, the study conducts an in-depth analysis of the internal strengths and weaknesses, as well as external opportunities and threats, inherent in Shanxi's implementation of the system. Targeted optimization strategies are proposed in four dimensions: deepening precise policy alignment by leveraging top-level design and digital economy dividends; addressing the fragmentation in review enforcement through capacity building and regional coordination; curbing regional policy games via rigid institutional constraints; and mitigating external economic fluctuations through industrial risk early warning and third-party evaluation. The research findings could provide theoretical references and practical pathways for Shanxi Province and other similar resource-based regions nationwide to curb administrative monopolies, optimize the business environment, and advance the construction of a unified national market against the backdrop of the Carbon Peak and Carbon Neutrality goals.

## Keywords

Fair Competition Review System; Resource-based Regions; Business Environment; SWOT Analysis.

## 1. Introduction and Literature Review

The implementation of the Fair Competition Review System represents a major strategic decision made by the Central Committee of the Communist Party of China (CPC) and the State Council. It plays a crucial role in correctly balancing the relationship between government and market, ensuring the decisive role of the market in resource allocation, and improving the efficiency of government functions. The formal promulgation of *The State Council's Opinions on Establishing a Fair Competition Review System in the Market System* (hereinafter referred to as the "Opinions") on June 14, 2016, marked the formal establishment of the Fair Competition Review System in China [1]. On June 29, 2021, the *Detailed Rules for the Implementation of the Fair Competition Review System* (hereinafter the "Detailed Rules") further refined the review

standards and procedural mechanisms of the system[2]. On June 24, 2022, the revised *Anti-Monopoly Law of the People's Republic of China* formally incorporated the Fair Competition Review System, legally affirming its importance[3]. The *Regulation on Fair Competition Review* (hereinafter the "*Regulation*"), effective from August 1, 2024, was the first administrative regulation to provide comprehensive, systematic, and detailed provisions on the objects, standards, mechanisms, supervision, and safeguards of fair competition review, filling the legislative gap for the system[4]. On April 20, 2025, the *Measures for the Implementation of the Regulation on Fair Competition Review* (hereinafter the "*Implementation Measures*"), an important supporting rule, came into effect. Summarizing experience from the *Regulation's* implementation, the *Implementation Measures* aim primarily to enhance rigidity and operability, providing comprehensive details on review standards, mechanisms, and responsibilities, thus offering a reference basis for the concrete implementation of the Fair Competition Review System[5]. By August 2024, a total of 1.618 million policy measures had been reviewed nationwide, 4.47 million stock documents had been screened, and 93,000 had been revised or repealed[6]. A series of policies and measures hindering fair competition among enterprises and restricting the free flow of goods have been effectively corrected, significantly safeguarding market fairness and competition and the construction of a unified national market.

Existing literature on the Fair Competition Review System primarily revolves around the following aspects: research on the role of the Fair Competition Review System in building a unified national market[7][8]; empirical studies on the Fair Competition Review System[9][10]; case studies on the Fair Competition Review System[11]; and comparative studies between the Fair Competition Review System and the EU State Aid mechanism[12]. Research on the implementation and optimization of the Fair Competition Review System at the local level is gradually becoming a new focus. Pu (2024), against the background of optimizing the business environment, explored the practical dilemmas faced by local governments in advancing the implementation of the Fair Competition Review System and proposed coping strategies[13]. Chen (2023) examined the practical explorations and optimization paths for deepening the implementation of the Fair Competition Review System in China's Pilot Free Trade Zones (Ports)[14]. Ma (2024) applied the SWOT model to specifically analyze the dilemmas and optimization suggestions for the Fair Competition Review System in the Yangtze River Delta region[15]. Tang (2020), using the practice of Sichuan Province as an example, explored how to promote the implementation of the Fair Competition Review System mechanism within the context of building a rule-of-law business environment[16]. Ge and Wang (2021), taking the practice of Gansu Province as an example, discussed how to promote the implementation of the Fair Competition Review System under the dual circulation background, proposing specific optimization paths[17]. Xu and Liu (2022), using Anhui Province's practice as an example, proposed concrete measures to strengthen the implementation of fair competition policies[18]. Li et al. (2024) studied the dilemmas faced in implementing the Fair Competition Review System in the Xinjiang Pilot Free Trade Zone and proposed solutions[19]. Existing research provides a good foundation for local practices of the Fair Competition Review System but has not yet analyzed or sorted out the implementation of the system in Shanxi Province.

As a typical resource-rich province in China, Shanxi has long relied on traditional industries such as coal, facing historical issues like government intervention in the market and administrative monopoly. Due to an unreasonable resource endowment structure, imbalanced industrial structure, and insufficient enterprise innovation capacity, it also faces a series of difficulties, including challenges in industrial restructuring and low energy utilization efficiency. With the continuous advancement of the "dual carbon" goals and the resource-based economy transformation strategy, there is an urgent need to break down policy barriers through the implementation of the Fair Competition Review System to promote the healthy development of

emerging industries and market-oriented mechanisms. Against this backdrop, this study employs the SWOT analysis method to conduct a comprehensive analysis of the internal strengths and weaknesses, as well as external opportunities and threats, faced by Shanxi Province in implementing the Fair Competition Review System. Through an in-depth analysis of these core factors, a comprehensive understanding of the implementation progress and challenges of the system in Shanxi can be achieved, leading to targeted optimization suggestions. This provides solid theoretical and practical support for the high-quality economic transformation and further optimization of the business environment in Shanxi. Furthermore, it offers important reference and insights for similar resource-based regions in optimizing their fair competition review mechanisms.

## 2. Implementation Status of the Fair Competition Review System in Shanxi Province

### 2.1. Comprehensive System Coverage and Multi-point Breakthroughs in Mechanism Innovation

Shanxi Province strictly implemented the decisions and deployments of the Central Committee and the State Council, actively promoting the implementation of the Fair Competition Review System. In accordance with the task set by the State Council in 2019 to “achieve full coverage at the national, provincial, municipal, and county levels of government by the end of the year” [20], Shanxi utilized various means such as inspections, research, and law enforcement. Centered on the *Regulations of Shanxi Province on Optimizing the Business Environment*, the province promoted the issuance of the *Work Plan for Strengthening Anti-Monopoly and Deepening the Implementation of Fair Competition Policies in Shanxi Province*, established a three-level joint conference system at the provincial, municipal, and county levels. By the end of 2019, full coverage had been achieved across 11 prefecture-level cities and 117 counties/districts. The joint conferences completed adjustments following institutional reforms to facilitate faster implementation of the Fair Competition Review System across the province. Simultaneously, four systems were formulated and issued: joint review, random inspection, third-party evaluation, and complaint reporting for fair competition review. The *Guidance for Operators in Shanxi Province on Anti-Monopoly Compliance* was revised to guide operators in establishing and strengthening anti-monopoly compliance management systems, reinforcing the main responsibility of enterprises, and making regulatory rules clearer and enforcement procedures more transparent. In 2024, provincial-level third-party evaluation of fair competition review covered 44 provincial-level units and over 2,000 policy documents. Ten major fair competition review cases involving issues such as restricting business operations, setting unreasonable market exit barriers, and excluding non-local operators from participating in local bidding activities were publicly released. In September 2025, the Provincial Administration of Market Supervision held a training session on fair competition review business, attended by over 90 personnel from 41 provincial-level departments. A total of 25 experts from various sectors including universities nationwide, judicial institutions, law firms, associations, enterprises, and third-party evaluation agencies were selected for the Fair Competition Review Expert Pool of Shanxi Province. Additionally, various localities in Shanxi issued policies to carry out fair competition review work. In September 2025, targeting key areas such as government procurement, bidding, and investment promotion, Taiyuan City issued its first *Operational Guidelines for Fair Competition Review*. Innovative mechanisms for fair competition review exhibited a distribution characteristic of “core cities leading, with differentiated breakthroughs in multiple localities.” Table 1 presents characteristic cases of the Fair Competition Review System implementation in Shanxi’s 11 prefecture-level cities.

**Table 1.** Characteristic Cases of Fair Competition Review System Implementation in 11 Prefecture-level Cities of Shanxi Province.

Prefecture-level City	Characteristic Case
Taiyuan City	Reviewed the draft <i>Three-Year Action Plan for the Construction of Jinchuanggu Innovation-Driven Platform</i> , identified suspected non-compliant clauses and proposed revisions, simultaneously reviewed 5 supporting policies to ensure compliance.
Datong City	Investigated and dealt with the case of Datong Huarun Gas Company abusing its dominant market position by designating exclusive operation for gas installation projects, imposing fines and confiscations totaling 8.5994 million yuan, breaking monopoly barriers in the public utilities sector.
Yangquan City	Conducted fair competition review in the intelligent connected vehicle field, cleared hidden restrictive clauses on map usage permissions, promoting equal participation of multiple non-local technology enterprises in local pilot projects.
Changzhi City	Carried out the “Green Sword to Protect Grain Safety” special operation, handled multiple agricultural law enforcement cases including the illegal pig slaughter case of a company in Tunliu District and the “Agricultural Materials Hype Group” selling fake fertilizer case in Qin County, ensuring fair competition in the agricultural materials market.
Jincheng City	Cleared clauses in a department document linking “local performance to bidding,” repealed the relevant policy, allowing qualified non-local enterprises to participate equally in bidding for local engineering projects.
Shuozhou City	Revised the management measures for “Multiple Surveys Integrated into One” in construction projects, canceled discriminatory clauses requiring “non-local institutions to establish local offices,” allowing qualified non-local surveying and mapping enterprises to participate in market competition without barriers.
Jinzhong City	The Municipal Government Information Office specially opened a “Fair Competition Review” column on the government website, promptly publicizing national and provincial policies and disclosing rectification of problematic documents.
Yuncheng City	Innovated the “Three Extensions” measure for e-commerce supervision, included 47 problematic online stores in key supervision, publicized abnormal information through platforms like 360 Browser, forming a closed-loop co-governance of “random inspection – handling – verification.”
Xinzhou City	As a pilot for the province’s “Three Blinds and One Random” review, completed blind submission, blind review, and blind selection for multiple government procurement projects, eliminating “favoritism bids,” enhancing transparency and fairness in government procurement.
Linfen City	Cleared a district’s policy linking “local supporting rate with awards/subsidies,” revised relevant documents, canceled discriminatory subsidy restrictions on non-local supporting enterprises, promoting fair competition in the industrial chain.
Lüliang City	Repealed the requirement of “locally registered independent legal person” for participating in Fenyang City’s consumption voucher activities, revised the “differentiated subsidies for anchor enterprises” policy in Zhongyang County, clearing clauses that exclude or restrict competition.

Source: Compiled based on materials including Shanxi Province Fair Competition Review Joint Conference briefings, China Anti-Monopoly Law Enforcement Annual Report, summaries of special actions to optimize the business environment in various prefecture-level cities of Shanxi, Shanxi Provincial Government Procurement Annual Reports, and officially publicized cases.

## 2.2. Normalization of Review Enforcement and Quantification of Cleanup Effectiveness

The promulgation and issuance of the *Implementation Opinions of the Shanxi Provincial People’s Government on Establishing a Fair Competition Review System in the Market System* (Jin Zheng Fa [2017] No. 2) on January 19, 2017, marked the formal implementation of the Fair Competition Review System in Shanxi Province. Since the release of the implementation opinions, the system has undergone a process of gradual familiarity, acceptance, and internalization across the province. By the end of 2019, full coverage of fair competition review had been achieved across the three levels of government. Governments at the provincial,

municipal, and county levels and their subordinate departments in Shanxi have established internal review mechanisms, clarified review objects, methods, standards, and strengthened supervision and constraints to ensure the orderly progress of document review work, indicating the normalization of review enforcement. Table 2 shows the cleanup data of fair competition review documents in Shanxi Province from 2019 to 2025. Shanxi's fair competition review has demonstrated quantified effectiveness in policy cleanup, with institutional rigidity continuously strengthened, achieving significant results in-depth advancement. The enforcement of the review mechanism shows a trend towards normalization and refinement. The overall number of stock policy documents screened and incremental documents reviewed has been increasing. In 2023, the province systematically screened 30,991 stock policy documents, of which 329 were repealed or revised; during the same period, 17,078 incremental documents were strictly reviewed, with 397 suggested for modification or adjustment. This work continued deeply in 2024, screening 11,500 stock policy documents, reviewing 6,738 incremental documents, and suggesting modifications or adjustments for 141. In 2025, both stock document screening and incremental document review achieved a substantial quantitative breakthrough: 97,000 stock documents were screened, over 4,500 were repealed/revised; 55,000 incremental documents were reviewed, with 634 suggested for modification or adjustment. The data indicates that Shanxi Province has continuously strengthened and emphasized the implementation of the Fair Competition Review System.

**Table 2.** Cleanup Data of Fair Competition Review Documents in Shanxi Province, 2019-2025

Year	Stock Document Screening	Incremental Document Review	Key Notes
2019	Screened 3,906 stock documents; repealed 107, revised 54	Reviewed 3,299 newly issued documents (i.e., 351 from 30 provincial member units, 1,326 from 11 cities, 1,622 from counties)	First achieved full coverage of three-level joint conferences (provincial, municipal, county)
2020	Screened 34,070 stock documents; repealed 214, revised 21, retained 4 under exception provisions	Municipal joint conference offices conducted random inspections on incremental policy documents issued by subordinate counties (districts) and relevant departments; over 4,000 documents inspected province-wide	Focused on cleaning up 14 types of issues hindering fair competition in government procurement
2021	Screened 12,419 stock documents; repealed/revised 680	Reviewed 17,108 incremental documents	Special cleanup of illegal "three databases" setup issues in government procurement
2022	Screened 8,126 stock policy documents; repealed/revised 112	Conducted fair competition review on 9,132 policy measures involving market entity economic activities; modified/adjusted 67	Introduced third-party evaluation to enhance review professionalism
2023	Screened 31,000 stock policies; repealed/revised 329	Reviewed 17,078 incremental documents; modified/adjusted 397	Carried out special cleanup of measures hindering unified market and fair competition
2024	screened 11,500 stock policy documents	Reviewed 6,738 incremental documents; modified/adjusted 141	Focused on cleaning hidden barriers in bidding and government procurement
2025	Screened 97,000 stock documents; repealed/revised over 4,500	Reviewed 55,000 incremental documents; modified/adjusted 634	Focused on exclusion/restriction of competition behaviors in the digital economy

Source: Compiled based on information published on the official website of Shanxi Provincial Administration of Market Regulation.

### 3. SWOT Analysis of the Development of Fair Competition Review System in Shanxi Province, China

Table 3. SWOT Matrix Analysis

<b>Internal Factors</b>	<b>Strengths</b>	<b>Weaknesses</b>
	A. Sound top-level design and institutional framework B. Prominent innovation in review mechanisms	A. Dual deficiency in internal motivation and capacity of self-reviewing entities B. Applicability issues with third-party evaluation agencies
<b>External Factors</b>		
<b>Opportunities</b>	<b>OS Strategies</b>	<b>WO Strategies</b>
A. Support from national policies B. Dividends of digital economy transformation	Deepen policy alignment and upgrading, seize the dividends of digital economy transformation	Address shortcomings in grassroots capacity, resolve enforcement fragmentation through regional coordination
<b>Threats</b>	<b>ST Strategies</b>	<b>WT Strategies</b>
A. Regional policy games B. External economic fluctuations	Curb regional policy games through rigid institutional constraints, improve the quality of fair competition review	Establish industrial outflow early warning mechanisms, strengthen third-party evaluation to mitigate external economic fluctuations

#### 3.1. Internal Strengths (S)

*A. Sound Top-level Design and Institutional Framework.* On January 19, 2017, actively responding to the call of the State Council, the Shanxi Provincial Government issued the *Implementation Opinions of the Shanxi Provincial People’s Government on Establishing a Fair Competition Review System in the Market System* (Jin Zheng Fa [2017] No. 2), providing a solid policy foundation for implementing the Fair Competition Review System. Subsequently, relevant government agencies in various prefecture-level cities actively responded to the provincial government’s call, successively issuing implementation measures for the Fair Competition Review System tailored to local realities. To further promote the system’s implementation, Shanxi established a Fair Competition Review Joint Conference system. The provincial, municipal, and county-level joint conferences are all convened by leaders in charge of market supervision within the government, with participation from multiple departments, forming a work pattern led by government leadership, coordinated by market supervision departments, and implemented by functional departments. On November 10, 2022, the Office of the Shanxi Provincial Fair Competition Review Joint Conference issued the *Interim Measures for the Joint Review of Policy Measures under Provincial-level Fair Competition Review in Shanxi Province*, the *Measures for Random Inspection of Fair Competition Review in Shanxi Province*, the *Measures for Third-party Evaluation of Fair Competition Review in Shanxi Province*, and the *Measures for the Administration of Complaints and Reports on Fair Competition Review (Trial)*, establishing four systems: joint review, random inspection, third-party evaluation, and complaint reporting for fair competition review in Shanxi. Additionally, multiple related systems were formulated, such as the provincial, municipal, and county-level joint conferences issuing their respective *Working Rules for the Joint Conference*, and the Provincial Joint Conference Office researching and formulating the *Working System for Responding to Complaints and Reports on Fair Competition Review* and the *Rules for Joint Review of Major Policy Measures under Fair Competition Review*, further smoothing complaint and report channels and clarifying principles, conditions, formats, and timelines for joint review. Furthermore, units were urged to verify and rectify issues identified during inspections by the State Administration for Market Regulation, and third-party evaluations were actively carried out. In 2024, the *Notice*

of the Shanxi Provincial Development and Reform Commission on Thoroughly Implementing the Rules for Fair Competition Review in the Field of Bidding and Tendering was issued and printed, effectively linking with existing systems like the *Detailed Rules for the Implementation of the Fair Competition Review System*, vigorously cleaning up various transaction barriers and unreasonable restrictions in the bidding field, and continuously optimizing the market environment for fair competition. On December 17, 2025, the Shanxi Provincial Market Supervision Administration issued the notice on the *Working System for Handling Fair Competition Review Reports in Shanxi Province* (Jin Shi Jian Fa [2025] No. 246), further smoothing report channels and standardizing report procedures. Since the provincial government issued the implementation opinions on establishing the Fair Competition Review System in the market system in January 2017, Shanxi has continuously improved its top-level design and institutional framework, comprehensively implemented the Fair Competition Review System, prevented the introduction of measures that exclude or restrict market competition, helped eliminate various market barriers, and promoted the construction of a unified national market[15]. Table 4 lists some institutional documents issued by Shanxi provincial government agencies to promote the implementation of the Fair Competition Review System.

**Table 4.** Some Institutional Documents Issued by Shanxi Provincial Government Agencies to Promote the Implementation of the Fair Competition Review System

Release Date	Issuing Authority	Document Title
2017.01.19	Shanxi Provincial People's Government	<i>Implementation Opinions of the Shanxi Provincial People's Government on Establishing a Fair Competition Review System in the Market System</i> (Jin Zheng Fa [2017] No. 2)
2017.03.28	Yuncheng Municipal People's Government	<i>Notice of the General Office of Yuncheng Municipal People's Government on Establishing a Fair Competition Review System in the Market System</i> (Yun Zheng Ban Fa [2017] No. 20)
2017.06.02	Linfen Municipal People's Government	<i>Notice of Linfen Municipal People's Government on Establishing a Fair Competition Review System in the Market System</i> (Lin Zheng Fa [2017] No. 4)
2017	Jincheng Municipal People's Government	<i>Implementation Opinions of Jincheng Municipal People's Government on Establishing a Fair Competition Review System in the Market System</i> (Jin Shi Fa [2017] No. 35)
2017.10.17	Taiyuan Municipal People's Government	<i>Implementation Opinions of Taiyuan Municipal People's Government on Establishing a Fair Competition Review System in the Market System</i> (Bing Zheng Fa [2017] No. 58)
2019.11.27	Lüliang Municipal People's Government	<i>Notice of the General Office of Lüliang Municipal People's Government on Further Advancing Fair Competition Review in the Market System</i> (Lü Zheng Ban Fa [2019] No. 62)
2019	Xinzhou Municipal People's Government	<i>Notice of the General Office of Xinzhou Municipal People's Government on Further Advancing Fair Competition Review in the Market System</i> (Xin Zheng Ban Fa [2019] No. 111)
2020.03.20	Xinzhou Municipal People's Government	<i>Notice of the General Office of Xinzhou Municipal People's Government on Issuing the Work Plan for Cleaning Up Policy Measures Hindering the Unified Market and Fair Competition in Xinzhou City</i> (Xin Zheng Ban Fa [2020] No. 27)

2020.07.15	Jincheng City Urban Management Bureau	<i>Notice of Jincheng City Urban Management Bureau on Further Improving Fair Competition Review</i>
2021.07.22	Lüliang Municipal People's Government	<i>Notice of the General Office of Lüliang Municipal People's Government on Further Strengthening Fair Competition Review(Lü Zheng Ban Fa [2021] No. 44)</i>
2021.10.29	Xinzhou Municipal Development and Reform Commission	<i>Measures for Joint Review of Major Policy Measures under Fair Competition Review of Xinzhou Municipal Development and Reform Commission, Measures for Random Inspection of Fair Competition Review of Xinzhou Municipal Development and Reform Commission, System for Accepting and Responding to Complaints and Reports on Fair Competition Review in Xinzhou City</i>
2022.11.10	Office of Shanxi Provincial Fair Competition Review Joint Conference	<i>Interim Measures for the Joint Review of Policy Measures under Provincial-level Fair Competition Review in Shanxi Province, Measures for Random Inspection of Fair Competition Review in Shanxi Province, Measures for Third-party Evaluation of Fair Competition Review in Shanxi Province, Measures for the Administration of Complaints and Reports on Fair Competition Review (Trial)</i>
2023.02.21	Lüliang Municipal Human Resources and Social Security Bureau	<i>Notice of Lüliang Municipal Human Resources and Social Security Bureau on Carrying Out Self-inspection Work on Implementing the Fair Competition Review System(Lü Ren She Han [2023] No. 67)</i>
2023.03.08	Market Supervision Administration of Shanxi Transformation and Comprehensive Reform Demonstration Zone	<i>Fair Competition Review Work System of the Market Supervision Administration of Shanxi Transformation and Comprehensive Reform Demonstration Zone, Complaint and Report Reporting and Response Mechanism for Fair Competition Review of the Market Supervision Administration of Shanxi Transformation and Comprehensive Reform Demonstration Zone</i>
2023.07.14	Xinzhou Municipal Finance Bureau	<i>Notice of Xinzhou Municipal Finance Bureau on Further Improving the Fair Competition Review System for Government Procurement Documents</i>
2023.09.28	Yaodu District, Linfen City	<i>Notice of the General Office of Yaodu District People's Government of Linfen City on Carrying Out Work to Clean Up Policy Measures Hindering the Unified Market and Fair Competition(Yao Qu Zheng Ban Fa [2023] No. 53)</i>
2023.11.29	Shanxi Provincial Finance Department	<i>Notice of Shanxi Provincial Finance Department on Carrying Out Special Cleanup Work of Acts Hindering Fair Competition in the Government Procurement Field (Jin Cai Gou [2023] No. 43)</i>
2024.06.03	Shanxi Provincial Development and Reform Commission	<i>Notice of Shanxi Provincial Development and Reform Commission on Thoroughly Implementing the Rules for Fair Competition Review in the Field of Bidding and Tendering</i>
2025.12.17	Shanxi Provincial Market Supervision Administration	<i>Notice on the Working System for Handling Fair Competition Review Reports in Shanxi Province (Jin Shi Jian Fa [2025] No. 246)</i>

Source: Compiled based on information published on official websites of various levels of government agencies in Shanxi Province.

*B. Prominent Innovation in Review Mechanisms.* Since the implementation of the Fair Competition Review System in January 2017, Shanxi has actively innovated review mechanisms. These measures essentially constitute a “whole-process, closed-loop” system for implementing fair competition review. It ensures the effective operation of the system through three stages – “pre-event prevention, in-process review, post-event supervision/evaluation” and two dimensions – “capacity support, societal co-governance.” In the pre-event prevention stage, the fair competition review link is embedded into the document issuance procedure, clarifying responsible entities, which better solves the questions of “who does it” and “how to do it.” In the in-process review stage, systems such as self-review, joint review for major policy measures, and filing of review conclusions have been established. In the post-event supervision/evaluation stage, systems for periodic evaluation of policy measure fairness and regular random inspection supervision have been established. In terms of capacity building, government agencies at all levels in Shanxi continuously improve their professional capabilities, organize and participate in fair competition review business training through multiple channels and methods, and strengthen publicity efforts for fair competition review, actively carrying out activities like the Fair Competition Policy Publicity Week and promoting fair competition policies “into government agencies, into party schools, into enterprises.” The Fair Competition Policy Publicity Week activities have covered the provincial, municipal, and county levels, significantly enhancing the professional capabilities of reviewers and raising societal awareness of competition. In terms of societal co-governance, Shanxi actively mobilizes various social forces to participate in co-governance: soliciting public opinions during the policy formation stage to identify and correct potential issues of exclusion or restriction of competition early; introducing independent, professional third-party institutions to objectively evaluate major or complex policies; and smoothing complaint and report channels, introducing social supervision, and providing relief channels for market entities. Additionally, Shanxi also conducts research on the implementation of fair competition review work and establishes a mechanism for reporting on implementation, forcing the implementation of the system. On December 17, 2025, the top ten fair competition review cases in Shanxi for 2025 were announced. The illegal contents involved designating the use of services provided by specific operators, setting unreasonable market access barriers in policy measures, forcing non-local operators to establish local branches in disguised forms, adding market access approval steps and procedures, among other violations of relevant provisions in the *Regulation on Fair Competition Review* and the *Measures for the Implementation of the Regulation on Fair Competition Review*. Table 5 presents innovative measures and specific implementation cases of fair competition review mechanisms by relevant government agencies in Shanxi.

**Table 5.** Innovative Measures and Selected Cases of Fair Competition Review in Shanxi Province

Innovative Measures	Specific Case Examples
Embedding the fair competition review link into the document issuance procedure	Multiple provincial-level organs like the Shanxi Provincial Development and Reform Commission, as well as county-level governments and departments, have embedded the fair competition review link into the document issuance procedure, clarifying responsibilities at stages like document drafting, approval for issuance, and review by functional agencies, strengthening procedural checks from the document circulation stage.
Issuing calls for public comments on fair competition review	The Shanxi Provincial Department of Commerce has a dedicated “Fair Competition Review Opinion Announcement” section within the public opinion solicitation column on its official website, publicly soliciting fair competition review

	<p>opinions on policy measures related to economic activities to be issued. If the measures are considered to violate regulations such as the <i>Anti-Monopoly Law of the People's Republic of China</i> and the <i>Regulation on Fair Competition Review</i>, containing content that excludes or restricts market competition, feedback is invited to the Department's Legal Affairs Division.</p>
Filing of fair competition review reports	<p>The Taiyuan Municipal Government formulated and implemented a system for filing fair competition review conclusions, requiring administrative departments to submit filings to the Municipal Fair Competition Review Joint Conference Office when issuing relevant policy measures. Without filing, the municipal government and relevant departments will not arrange for document issuance, and municipal finance will not arrange fund allocation.</p>
Establishing self-review system, regular random inspection system, periodic policy evaluation system, joint review system for major policy measures, third-party evaluation system	<p>The Office of the Zhongyang County Fair Competition Review Joint Conference in Lüliang City issued a notice on establishing a self-review system, regular random inspection system, periodic policy evaluation system, and joint review system for major policy measures for fair competition review work; the Office of the Yangquan City Review Joint Conference organized personnel to conduct centralized random inspections of documents issued by the municipal government in the first half of 2021; the Office of the Jincheng City Fair Competition Review Joint Conference held a deployment meeting for the 2023 third-party evaluation and inspection of fair competition review work, commissioning Lixin Zhongzheng (Chongqing) Third-party Evaluation Consulting Co., Ltd. to conduct a centralized evaluation of the fair competition review work and effectiveness of relevant units in Jincheng City in 2023.</p>
Establishing fair competition review complaint and report channels	<p>Government departments at the provincial, municipal, and county levels in Shanxi have successively issued announcements on complaint and report channels for fair competition review, including the scope, methods, requirements, and channels for accepting complaints and reports. Acceptance channels include telephone, fax, email, mail, etc., and real-name reporting is encouraged.</p>
Organizing fair competition review business training through multiple channels	<p>In August 2022, the Shanxi Provincial Department of Culture and Tourism organized a special training on "Fair Competition Review Theory and Practice"; in September 2022, the Jincheng Municipal Finance Bureau used the Fair Competition Review System Training Video recorded by Lixin Zhongzheng (Chongqing) Third-party Evaluation Consulting Co., Ltd. to conduct special training for all financial cadres; in February 2023, the Office of the Taiyuan Municipal Fair Competition Review Joint Conference organized and held a municipal business training session on fair competition review work for 2023; in October 2023, the Provincial Organization Department and the Provincial Market Supervision Administration jointly held a provincial capacity enhancement training class on strengthening anti-monopoly and deepening the implementation of fair competition policies in Datong; in August 2024, the Shanxi Provincial Market Supervision Administration held a training class on the <i>Regulation on Fair Competition Review</i> in Taiyuan, attended by over 80 personnel from 45 provincial-level departments including the Provincial Development and Reform Commission and the Provincial Department of Education.</p>

<p>Holding Fair Competition Policy Publicity Week</p>	<p>In November 2022, the Taiyuan Xinghualing District Market Supervision Bureau launched the first China Fair Competition Policy Publicity Week; in September 2023, the Office of the Jincheng City Fair Competition Review Joint Conference, together with the Urban District, Zezhou County Market Supervision Bureaus, and the Development Zone Branch, held the 2023 Fair Competition Policy Publicity Week event at the City Children's Park; in September 2024, the Yuncheng City Market Supervision Bureau of Shanxi Province carried out the 2024 Fair Competition Policy Publicity Week event at the City Sports Park with the theme "Unified Big Market, Fair Competition for the Future"; in September 2025, the Taiyuan City Market Supervision Bureau of Shanxi Province carefully organized the 2025 China Fair Competition Policy Publicity Week activities.</p>
<p>Promoting fair competition policies into government agencies, party schools, and enterprises</p>	<p>In 2023, the Shuozhou City Market Supervision Bureau organized member units to extensively carry out publicity activities promoting fair competition laws and policies "into government agencies, into party schools, into enterprises," enhancing awareness of fair competition and fostering a culture of fair competition. Distributed 200 copies of publicity manuals on the <i>Detailed Rules for the Implementation of the Fair Competition Review System</i> and the <i>Provisions on Prohibiting the Abuse of Administrative Power to Exclude or Restrict Competition</i> to municipal agencies, delivered fair competition law popularization lectures to over 40 trainees, explained the <i>Guidance for Operators in Shanxi Province on Anti-Monopoly Compliance</i> to 48 enterprise leaders, visited 26 enterprises to post publicity posters with the theme "Unified Big Market, Fair Competition for the Future," and distributed over 100 copies of laws and regulations.</p>
<p>Conducting research on the implementation of fair competition review work</p>	<p>From November 30 to December 2, 2021, to further promote the implementation of the Fair Competition Review System, a Shanxi provincial research team led by Zhang Pengzhou, Deputy Director-General (Level 2) of the Provincial Market Supervision Administration, and four other members, conducted research and guidance on the overall implementation of the Fair Competition Review System in cities like Shuozhou, Linfen, and Xinzhou.</p>
<p>Establishing a mechanism for reporting on implementation status</p>	<p>Governments at the provincial, municipal, and county levels in Shanxi have all established mechanisms for reporting on the implementation status of fair competition review. Various government departments publish reports on the implementation of the Fair Competition Review System on their official websites, covering aspects such as overall organization of fair competition review, work mechanism construction, work quality, problems and difficulties in implementing the Fair Competition Review System, and next work plans and measures. In 2024 and 2025, Shanxi Province successively released annual top ten fair competition review cases.</p>

Source: Compiled based on information published on official websites of various levels of government agencies in Shanxi Province.

### 3.2. Internal Weaknesses (W)

*A. Dual Deficiency in Internal Motivation and Capacity of Self-reviewing Entities.* Under the current institutional framework, adhering to the principles of "who formulates, who cleans up"

and “who drafts, who reviews,” the self-review mechanism faces dual operational obstacles, seriously affecting system effectiveness. First, there is a structural lack of neutrality in reviewing entities[16]. Policy-making agencies have dual functions of regulatory design and evaluation/supervision. This overlapping of functions makes value conflicts inevitable. When policy objectives conflict with fair competition review requirements, administrative entities often prioritize achieving set policy goals, causing the review process to become formalistic. Policy measures with market access restrictions or competitive exclusion effects can still pass review as long as they align with departmental performance goals. This institutional bias severely undermines review effectiveness. Second, under the self-review model, reviewing entities lack sufficient motivation and enthusiasm[17]. Some implementing agencies have insufficient understanding of the strategic value of the Fair Competition Review System, exhibiting deviations in system understanding and distorted implementation. Administrative entities often prioritize achieving economic performance indicators during policy formation. This value ranking leads to tendencies towards local protectionism. When facing entry of non-local enterprises and industries into the local market, administrative means such as setting market barriers and implementing differentiated subsidies are used to intervene in factor flows. While this may increase local fiscal revenue in the short term, it essentially distorts market resource allocation mechanisms. This inertia of administrative intervention results in reviewing entities lacking internal drive for system implementation. Even when facing policy measures that clearly violate the principle of competitive neutrality, they tend to adopt selective review strategies, leading to ineffective reviews, perfunctory work, and failure to realize the system’s practical effectiveness. These problems also exist when government agencies at all levels in Shanxi implement the Fair Competition Review System. Some units have phenomena such as failure to review when required and incomplete review during the process, leading to failure to promptly clean up or repeal policy measures hindering fair competition. Some units have imperfect internal review mechanisms, non-standard review procedures, unclear responsibilities, and unfamiliarity with business, affecting review quality and efficiency. Some member units, especially those issuing fewer policy measures involving operator economic activities, still have issues such as non-standard procedures, lax standards, and low quality in fair competition review work. Formalistic reviews are more common, substantive reviews are fewer, easily leading to policy measures “taking effect with flaws.”

*B. Applicability Issues with Third-party Evaluation Agencies.* In the current practice of the Fair Competition Review System, the third-party evaluation mechanism exhibits obvious functional vacancy, and the value realization of professional institutions faces multiple institutional obstacles[18]. Examining its institutional causes, specific manifestations are as follows: First, there are normative defects in the selection mechanism for evaluation entities. According to relevant clauses in the *Guidelines for Implementing Third-party Evaluation of Fair Competition Review*, eligible evaluation agencies should possess standardized qualifications, professional capabilities, independence and neutral stance, and a sound organizational structure. However, Article 13 of the current regulations only provides principled statements, lacking operable provisions on key elements such as specific selection criteria and qualification certification procedures. This ambiguity in institutional design leads to the risk of excessive discretionary power for administrative entities, potentially causing non-professional preferential selection during the evaluation agency selection process, thereby affecting the objectivity and fairness of evaluation conclusions. Second, there are structural defects in the mechanism for converting evaluation results into practice. From an institutional positioning perspective, third-party evaluation agencies are auxiliary in nature, and the actual effectiveness of their professional evaluation conclusions is entirely dependent on the discretionary power of the policy-making authorities[19]. This institutional structure creates a mechanistic obstruction in the connection between evaluation reports and policy practice, leading to a consistently low rate of practical

conversion for professional evaluations. When evaluation results cannot be effectively integrated into the policy-making process, it not only wastes professional resources but fundamentally undermines the institutional function of the third-party evaluation mechanism.

### 3.3. External Opportunities (O)

*A. Support from National Policies.* As the national emphasis on the Fair Competition Review System continuously increases, relevant policies and regulations are continuously improved, providing a favorable external environment for the development of the Fair Competition Review System in Shanxi. The Third Plenary Session of the 20th CPC Central Committee explicitly proposed strengthening the rigid constraints of fair competition review, enhancing anti-monopoly and anti-unfair competition, and cleaning up and abolishing various regulations and practices that hinder a unified national market and fair competition. On June 6, 2024, the State Council promulgated the *Regulation*, which is China's first administrative regulation specifically targeting the Fair Competition Review System. It provides comprehensive, systematic, and detailed provisions on the objects, standards, mechanisms, supervision, and safeguards of fair competition review, filling the legislative gap for the system. Simultaneously, it brings government intervention policies and measures within the review framework, aiming to control the government's "visible hand," making it fully respect the laws of market fair competition and the decisive role of the market in resource allocation, breaking through hidden barriers restricting fair competition for market entities, and providing institutional support for continuously optimizing the business environment[20].

*B. Dividends of Digital Economy Transformation.* As a typical resource-based province in China, Shanxi has long relied on coal resources. With the development of new digital technologies such as big data, cloud computing, blockchain, and artificial intelligence, Shanxi is in a critical period of economic transformation and industrial upgrading. Creating a fair and competitive market environment is of great significance for promoting high-quality economic development. The digital economy breaks geographical restrictions, making Shanxi's market more open. Through fair competition review, more excellent non-local digital economy enterprises can be attracted to enter the Shanxi market, while encouraging local enterprises to go out and participate in national and even global competition. For example, in the cloud computing services field, fair competition review can prevent local enterprises from forming monopolistic power, ensure fair opportunities for non-local cloud computing service providers to operate in Shanxi, promote full market competition, and enhance the overall development level and innovation capability of Shanxi's digital economy. The implementation of the Fair Competition Review System helps break regional blockades and industry monopolies, promote the free flow of goods and factors, and stimulate market vitality and innovation momentum.

### 3.4. External Threats (T)

*A. Regional Policy Games.* Against the backdrop of regional economic integration and accelerated construction of a unified national market, various regions often adopt various policy measures to enhance the competitiveness of local industries to attract investment and promote economic development. These policy measures may include tax incentives, fiscal subsidies, land supply preferences, etc., aimed at providing a more favorable operating environment for local enterprises. However, these policy measures may also trigger unfair competition, constituting discrimination or exclusion against enterprises from other regions. To attract investment and enterprise settlement, some local governments may abuse preferential policies, such as providing excessive fiscal subsidies, tax reductions, etc., to specific enterprises. These preferential policies often lack transparency and fairness and may circumvent fair competition review through methods like "case-by-case handling" or "special matters handled specially," easily triggering emulation and competition from other regions, leading to intensified policy games. In the enforcement process of the Fair Competition Review

System, due to differences in understanding and implementation of regulations across regions, some areas may implement them with discounts or modifications. This phenomenon not only weakens the authority of the Fair Competition Review System but may also cause conflicts between regions.

*B. External Economic Fluctuations.* As a typical resource-based province, Shanxi's economic development heavily relies on traditional energy industries like coal and metallurgy. Fluctuations in the external economic environment can easily impact the Fair Competition Review System. First, coal, as Shanxi's core pillar industry, has a strong cyclical price influenced by the international energy landscape and domestic supply-demand. When prices of coal and other energy sources decline and market demand shrinks, profitability and capacity utilization of local coal enterprises drop directly, leading to reduced local fiscal revenue. Local governments may, for short-term growth stabilization and employment protection, introduce targeted subsidies, preferential capacity regulation, access restrictions, etc., to prevent local energy enterprises from falling into operational crisis. Second, in the performance evaluation system for local governments, short-term indicators like economic growth rate, employment rate, and fiscal revenue still carry significant weight. When external economic fluctuations put pressure on these indicators, the priority of meeting assessment targets becomes significantly higher than institutional compliance. For example, reducing tax and fee standards for local enterprises, relaxing environmental or safety access conditions, while imposing stricter standards on similar non-local enterprises. Such differential treatment essentially violates fair competition principles but may be packaged as economic stabilization measures, weakening the rigidity of the review system. Such policies may bypass fair competition review procedures or evade review through ambiguous wording, forming hidden exclusion against external enterprises. Finally, the symbiotic relationship between government and enterprises formed through long-term reliance on the energy industry in Shanxi becomes further entrenched in the mindset of "government protecting enterprises" during economic fluctuations, making it difficult for fair competition review to break existing interest patterns. Local governments and large local coal enterprises/state-owned enterprises have deep-seated interests in tax contributions, employment generation, etc. During economic fluctuations, the logic of "protecting enterprises equals protecting stability" becomes harder to shake. Furthermore, the cultivation of emerging industries has not yet formed a strong presence. During economic fluctuations, governments are more inclined to "preserve the old" rather than "innovate," providing insufficient support to industries like new energy and the digital economy that require a fair competitive environment. Instead, they may squeeze space for emerging industries by protecting traditional industries, indirectly weakening the practical value of fair competition review.

## **4. Optimization Strategies for the Development of the Fair Competition Review System in Shanxi Province**

### **4.1. Strengths and Opportunities (SO) Strategy: Deepen Policy Alignment and Upgrading, Seize the Dividends of Digital Economy Transformation**

First, fully utilize the support of national policies, especially the promulgation of the *Regulation on Fair Competition Review* and the release of the *Measures for the Implementation of the Regulation on Fair Competition Review* as important supporting rules. Shanxi should further refine specific implementation rules for the local fair competition review system. When formulating normative documents and other policy measures involving market access, industrial development, investment promotion, bidding, government procurement, business conduct norms, qualification standards, etc., that affect market entity activities, comprehensive fair competition review should be conducted to ensure seamless alignment with national

policies[9]. Shanxi's government departments and enterprises/institutions at all levels need to further conduct publicity and training on the Fair Competition Review System to enhance understanding and awareness across society in the province. Second, leveraging the opportunities presented by digital economy transformation, develop specialized review standards and processes, encourage and support fair competition within the digital economy sector. For example, establish digital economy fair competition demonstration zones to explore new models for fair competition review in the digital economy. Simultaneously, utilize digital technology means like big data and cloud computing, introduce professional information teams, or collaborate with universities and research institutions to jointly develop a digital platform for fair competition review suitable for Shanxi's actual conditions. This platform should realize functions such as online declaration of policy measures, automatic review, and result feedback, improving review efficiency and transparency. Third, promote cross-regional cooperation and supervision. In the context of regional economic integration, strengthen cooperation with neighboring provinces, jointly establish a cross-regional coordination mechanism for fair competition review, regularly exchange review experiences, share review results, and foster a sound regional ecosystem for fair competition. Simultaneously, accept supervision and guidance from the national level to ensure unified execution of review standards.

#### **4.2. Weaknesses and Opportunities (WO) Strategy: Address Shortcomings in Grassroots Capacity, Resolve Enforcement Fragmentation through Regional Coordination**

First, addressing the limitations of the self-review model, further refine the review process, clarify review responsibilities, and strengthen the neutrality and professionalism of reviewers. Second, further establish internal supervision mechanisms, regularly implement evaluation and assessment of review work to ensure review quality and efficiency, and ensure transparency and fairness in policy implementation. Simultaneously, strengthen training and education for reviewers, optimize training content, develop targeted training courses based on actual conditions, strengthen evaluation and feedback on training effectiveness, promptly adjust and improve training plans, and enhance their understanding and execution capabilities regarding the Fair Competition Review System. Employ diversified training methods, such as combining online and offline approaches, case-based teaching, regularly holding training classes and seminars, inviting experts and scholars for lectures and guidance, to improve the professional competence and business skills of reviewers, thereby enhancing the quality of fair competition review. Third, strengthen regional coordination and communication. Due to interest differences between regions, coordination is challenging. Establish a regional fair competition coordination mechanism, build mutual trust through regular meetings and information sharing, and jointly maintain a fair and competitive market environment. In dealing with regional policy games, strengthen communication and coordination with neighboring provinces, jointly formulate standards and rules for fair competition, and avoid vicious competition. Additionally, actively participate in the construction of the national-level Fair Competition Review System and policy formulation, strengthen communication and contact with relevant national departments, actively participate in policy discussions and formulation processes, propose constructive opinions and suggestions, and strive for more voice and influence.

#### **4.3. Strengths and Threats (ST) Strategy: Curb Regional Policy Games through Rigid Institutional Constraints, Improve the Quality of Fair Competition Review**

First, construct a regional collaborative review mechanism to curb regional policy games. Based on Shanxi's "three-level (provincial, municipal, county) joint conference system," jointly sign a *Regional Coordination Convention on Fair Competition Review* with energy provinces in the

Yellow River basin like Shaanxi, Inner Mongolia, and Henan, clarifying unified prohibition standards and review procedures. In areas prone to games like energy subsidies, industrial access, and investment promotion, establish an absolute prohibition list. Agree that policy reviews within the region must follow processes including preliminary review by implementing departments, re-review by market supervision departments, and joint review for major projects. This avoids one region simplifying procedures and forcing others to follow suit, thereby establishing a system for mutual recognition of regional review standards and linked supervision. Simultaneously, incorporate regional collaborative review into the national strategic policy framework. Leveraging national regional strategies like ecological protection of the Yellow River basin and the rise of central China, promote the inclusion of coordinated fair competition review standards into regional cooperation assessment indicators. Second, strengthen rigid constraints throughout the entire review process, using procedural closed loops to enhance review quality amidst games. Deepen Shanxi's innovative experience of embedding the review link into the document issuance procedure. All policies involving market entity economic activities must be subject to review. Clearly stipulate that unreviewed documents cannot be submitted for meetings, cannot be signed for issuance, and cannot be implemented. Policy drafters are responsible for the authenticity of review materials, department heads are responsible for the quality of preliminary review, and market supervision departments are responsible for the compliance of final review. Responsibilities are assigned to specific positions and individuals, with retrospective investigation and accountability for omissions or violations. Third, strengthen social supervision, encourage active participation from all sectors of society in fair competition review, establish an industrial outflow early warning mechanism, strengthen third-party evaluation to reduce interest intervention in competition review work, smooth reporting channels, and promptly accept and investigate acts violating fair competition principles. Utilize the power of social supervision to promote the effective implementation of the Fair Competition Review System. Additionally, improve the system of positive incentives and rigid constraints for fair competition review, promote the inclusion of fair competition review work into assessment and evaluation systems such as rule-of-law government construction and business environment optimization.

#### **4.4. Weaknesses and Threats (WT) Strategy: Establish an Industrial Outflow Early Warning Mechanism, Strengthen Third-party Evaluation to Cope with the Impact of Economic Fluctuations**

Utilize big data analysis technology, combine economic indicators such as enterprise registration/cancellation rates, investment flows, and changes in tax contributions to construct an industrial outflow early warning mechanism. Track movements in key industries in real-time, conduct real-time profiling and trend analysis on pillar and transformation industries like coal, modern coal chemical industry, new materials, and high-end equipment manufacturing. Accurately identify abnormal outflow risks caused by non-market factors and adopt corresponding policy measures for prevention and response. For instance, formulate preferential tax policies, provide high-quality public services, etc., to attract and retain industries. Establish industrial chain coordination mechanisms, encourage cooperation between local and non-local enterprises, reduce resource misallocation caused by market barriers. Simultaneously, transform industrial outflow risks into driving forces for optimizing the review system. Tracing identified review loopholes will directly point to weak links in fair competition review. Based on problems discovered through early warning and tracing, formulate a review rectification list, clarify responsible departments and deadlines, and link rectification effectiveness to annual assessments of city/county governments and relevant departments. Failure to rectify adequately will result in deduction of scores in fair competition review work assessments, strengthening the binding force of system implementation. Second,

in accordance with the *Guidelines for Implementing Third-party Evaluation of Fair Competition Review*, formulate specific selection criteria for third-party evaluation agencies to overcome the limitations of the self-review model. Establish a transparent selection mechanism, determine evaluation agencies through bidding, expert review, etc., ensuring the regularity, professionalism, independence, neutrality, and completeness of evaluation agencies. In the selection process, establish a transparent mechanism of “public bidding + expert review + credit verification.” Focus on examining the evaluation agency’s professional accumulation, analytical methods, and historical performance in key areas for Shanxi such as energy economy, resource-based industrial transformation, and digital economy, and conduct substantive review of its organizational and financial independence. Furthermore, it is necessary to build a unified, dynamic reserve pool for third-party evaluation agencies across the province, and classify and manage them according to their areas of expertise and competency levels. Classify third-party evaluation agencies into the pool based on professional fields (e.g., energy industry, digital economy) and qualification levels, establish a dynamic elimination mechanism for evaluation agencies. Agencies showing tendencies to cater to local protectionism should be directly removed, while agencies with rich evaluation experience in the energy field should be prioritized for review tasks during periods of economic fluctuation. In the review of policy measures, gradually expand the application scope of third-party evaluation. Particularly for policy measures involving significant economic interests or complex market competition environments, priority should be given to introducing third-party evaluation to reduce interest intervention caused by external economic fluctuations. Third, establish a feedback and application mechanism for evaluation results to ensure they are effectively utilized. Additionally, considering review costs, reasonably set evaluation fee standards and provide certain fiscal subsidies through means like government procurement of services. Encourage evaluation agencies to improve evaluation efficiency and quality while reducing costs. Simultaneously, encourage standardized evaluation processes, development of common analytical tools, exploration of regional bundled commissioning, etc., to enhance evaluation efficiency, reduce overall social costs, thereby ensuring this key mechanism for enhancing institutional rigidity can function in a long-term, stable, and efficient manner.

## 5. Conclusion

The implementation of the Fair Competition Review System in Shanxi Province is an important practice in regional economic transformation and market order reconstruction. Research indicates that after several years of continuous advancement, the system has achieved comprehensive coverage across Shanxi. The institutional framework has been continuously improved, review mechanisms have been consistently innovated, and review supervision has been continuously strengthened, with particularly quantified effectiveness evident in policy cleanup. However, facing internal limitations such as insufficient motivation for self-review and obstructed third-party evaluation mechanisms, as well as external challenges like regional policy games and external economic fluctuations, there remains room for enhancing the system’s actual effectiveness. Through the SWOT analysis framework, this study systematically identifies the internal and external factors in the development of the Fair Competition Review System in Shanxi, and accordingly proposes four types of strategic combinations. It emphasizes combining institutional strengths with digital economy opportunities, addressing shortcomings in grassroots capacity, strengthening regional coordination and procedural rigidity, and constructing industrial early warning and third-party evaluation safeguard mechanisms. These strategies not only help Shanxi further break administrative monopolies and optimize the business environment under the “dual carbon” goals and resource-based economy transformation but also provide reference paths for similar regions to improve their fair competition review systems. In the future, Shanxi needs to further explore areas such as

continuously refining review standards, deepening fair competition review in the digital field, and strengthening cross-regional coordination. It should promote the effective operation of the Fair Competition Review System, build a fair and orderly competitive environment, facilitate the free flow of various market elements within and outside the province, drive continuous optimization of Shanxi's business environment, promote high-quality transformation and development of Shanxi's economy, and advance the construction of a unified national market.

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