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competition law will in the end take the sole jurisdiction. In addition to the academic interest, this change is also of high practical interest, in particular in relation to the coordination between competition authorities (including the European Commission and national competition authorities) and NRAs.

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dominant firms under attack from competition law? In this study I aim to determine this. I track the historical development of competition law in three jurisdictions: South Africa, America, and the EU, with the aim of identifying traces, if any, of hostility towards dominant firms in the origins of competition law.

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tort competition and, accordingly, agreements that fix prices, is roughly comparable to section 1 of the US Sherman Act (US Code, Vol. 15), which prohibits agreements in restraint of trade.

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