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Ioannis Lianos
President of the HCC

President's Introductory Note

April 2021 marked the completion of almost one year since the imposition of restrictive measures due to the Covid-19 pandemic and the tectonic changes that occurred both in citizens' everyday lives and the operation of businesses, as well as in the organisation and operation of public services, such as the Hellenic Competition Commission ("HCC").

The main concern of the Authority's administration was to protect staff's health and safety while, under the new circumstances imposed due to the pandemic, attaining maximum efficiency in the HCC's operation to the benefit of consumers and the national economy.

The HCC's staff responded to these difficult circumstances in the best possible way, seamlessly continuing its work and advancing the assessment of important pending cases, many of which were brought before the Plenary of the Commission, thus reaching the final stage of their assessment.

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President's Introductory Note

It is noteworthy that, despite the difficulties arising because of the pandemic, with most of the staff in teleworking or special leave, 30% more cases per month were brought before the Plenary of the Commission compared to the period between January - September 2019, where these special circumstances did not exist, even with a slight decrease in staff number due to secondments and transfers. This confirms the significant progress of the HCC in maximising its efficiency and optimising the organisation of its human resources.

The pandemic period gave the HCC the opportunity to experiment with novel means of work, notably by capitalising on the systematic teleworking for its staff through an electronic services system, as well as by investing in its logistical infrastructure, which has been neglected in recent years despite the availability of financial resources. The past period has been particularly fruitful on this front, firstly with the HCC launching an innovative platform for real-time economic data collection and processing, the HCC's Data Analytics and Economic Intelligence Platform, secondly giving access to a range of digital services to citizens and, thirdly, making available for the first time to businesses, employees and consumers a digital tool for the anonymous reporting of information (whistleblowing), aimed at increasing the Authority's effectiveness in competition law enforcement.

In the same period, the HCC completed its Code of Procedures by issuing an internal version for the better organisation of its work as well as a concise version for the general public, to enhance the transparency of its procedures.

The development of the HCC's cooperation with consumer organisations, with which it has signed Memoranda of Cooperation, and the strengthening of its cooperation with the Cypriot Commission for the Protection of Competition, have also been important initiatives during this period.

It is worth noting that, despite the adverse circumstances, the HCC unfolded important aspects of its competition law enforcement planning during this period.

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President's Introductory Note

Following the initiation of important investigations in the banking sector in 2019, in the second half of 2020 the HCC initiated a Regulatory Intervention (market investigation) on competition issues in the press distribution sector, taking into account the conclusions in its Opinion on the distribution of the printed press in December 2019, and the ongoing cases with respect to this sector, aiming at a holistic approach to these issues with a view to ensuring the necessary legal certainty in the operation of the sector, from the perspective of competition law.

In the same period, the HCC launched a second Regulatory Intervention procedure (market investigation) in the construction sector, also a sector repeatedly dealt with in the past.

These efforts to systematically prioritise important sectors of the national economy in the context of competition law enforcement will be strengthened by the completion of the market-mapping project. The addition of the new article 21A of Law 3959/2011, enables the HCC to cooperate for a period of two years with scientists, economists and experts in technology and data science to complete the market mapping, but also to promote the Authority's technological and scientific upgrading. These groups will enhance the HCC's technocratic profile and contribute to staff training in new methodologies and technologies. In this context, strengthening HCC's cooperation with domestic and foreign Academic and Research Institutions is an objective of its administration.

During the same period, the HCC proceeded with the conclusion of Memoranda of Understanding with the University of the Aegean and the Athens University of Economics, and also participated in joint research projects with the BRICS Competition Centers, the U.S Stanford University while engaging in cooperation with other Competition Authorities, such as the Netherlands Authority for Consumers and Markets, as well as within the European Competition Network (ECN) and the United Nations Conference on Trade and Development (UNCTAD). It is also worth noting that it is the first time that a Greek official is elected as a regular member to the Bureau of the OECD Competition Committee, a role which enables me to better promote a progressive HCC's agenda in that international forum.

In conclusion, I would like to praise the efforts of the HCC's staff which, despite the various practical difficulties, contributed significantly with their considerable work and self-sacrifice to the HCC's important outcomes during this period, enabling the Authority to have a strong presence over the past period and lay solid foundations to further enhance its work when conditions get back to normal in the coming months.



Sustainable Development and Competition



Following the HCC's initiative to publish a Staff Discussion Paper on Sustainability Issues and Competition Law in the summer 2020, and in the aftermath of the successful international research conference organised by the HCC on 28 September 2020, which was attended, amongst others, by Her Excellency the President of the Hellenic Republic, Ms. K. Sakellariopoulou, the Minister of Development and Investment, Mr. A. Georgiadis and the Director General of the Directorate-General for Competition of the European Commission, Mr. Olivier Guersent, the HCC and the Netherlands Authority for Consumers and Markets have jointly commissioned a technical report to clarify the methodological issues raised by the introduction of indicators and analyses related to sustainable development into competition law and economics.



The HCC, in collaboration with the Netherlands Authority, invited Professors Anastasios Xepapadeas, Eftihios Sartzetakis and Roman Inderst to complete a technical report drawing on concepts and tools mainly from environmental economics in order to quantify the broader social benefits brought by environmental sustainability to a green and circular economy in the context of promoting effective competition.

The Technical Report on Sustainability and Competition was published in January 2021 also in view of the initiative undertaken by the European Commission in the context of the Green Growth (Green Deal), with the organisation of a Conference on Competition Law and Green Growth on the 4th of February 2021, following a relevant consultation launched at the EU level.

In her opening remarks at the Conference, the Executive Vice-President of the European Commission and Competition Commissioner, Margrethe Vestager, made special reference to the HCC, stressing that " some European NCAs, such as the Greek and the Netherlands Competition Authorities, have already brought significant inputs to this discussion".

The HCC and the Dutch Competition Authority are jointly leading the initiative of the Horizontals and Abuse Working Group of the European Competition Network (ECN) to coordinate a group of countries, including France and Germany, Finland, Hungary, Luxembourg and Ireland and representatives of the European Commission, with a view to drafting an outline of the participants' views on a range of issues raised by the integration of the sustainability concept in economics and competition law.

In addition, the HCC moved forward in setting up a sandbox, i.e. a safe space where firms can experiment with innovative products, services, business models and delivery mechanisms without immediately incurring all the normal regulatory consequences of engaging in such activity. The purpose of this initiative is to promote business initiatives that promote Green Growth, which is scheduled to be in place by June 2021.

For more information about the HCC's initiative on Sustainable Development, click [here](#).



Technical Report on Sustainability and Competition

The Technical Report focuses on concepts and tools mainly drawn from environmental economics to quantify the broader social benefits from environmental sustainability to a green and circular economy in the context of promoting effective competition.

Its aim is to examine a theoretical cartel case between rival companies aiming at promoting environmentally friendly practices through the analysis of a) the methods for assessing the particular environmental effects in the light of data available in the context of a specific case examination by competition authorities; (b) the methods for assessing the wider impact of such a cartel; (c) the possibility of using results from existing studies and databases and (d) the assessment on the basis of specific strategic goal.

The report is broadly organised in two parts. The first part introduces the main concepts of welfare economics in the presence of externalities. Even perfectly competitive markets fail when there is a failure to internalise such externalities, whether these externalities impact present-day members of society or future generations. The report provides a presentation of the basic welfare economic analysis incorporating individuals' choice for environmental quality. The choice of a wealth maximising criterion, in particular the Kaldor-Hicks criterion, for policy decision making is supported by arguing that, when such a criterion is adopted, a partial analysis may be conducted by calculating consumer welfare and its changes as well as potentially reduced environmental damages measured also in terms of welfare.

Building on this, the second, main part discusses various methods to measure such changes associated with reduced environmental sustainability/environmental damages under the concept of total economic value, which encompasses the overall welfare gains attributable to improvements in environmental quality (hence referring, in particular, to the use and non-use values of any environmental asset).

When this is feasible in a given context, such values can be elicited from individuals' preferences, as revealed in the market, in hypothetical choice scenarios or through stated preferences. The report discusses the underlying theoretical concepts as well as measurement techniques. When the use of an environmental good leaves a so-called behavioral trail in markets for non-environmental goods, revealed preference approaches may also be used to estimate use values, even when the considered good is itself not traded. Often, however, individuals may not be fully aware of the negative impact of certain emissions.



Then, the respective impact - for instance, on health, life expectancy, or morbidity - can be determined objectively. The report also draws awareness to the need to incorporate the (changing) preferences of future members of society and introduces the various techniques of how to integrate costs and benefits arising at different points in time. The tools discussed in this report have been widely adopted in empirical and policy works in environmental economics. Often, an analysis may, however, face time or resources constraints. The report discusses how results from existing studies and databases - notably, determined environmental (shadow) prices - may be harnessed. It also discusses cost-effectiveness analysis as an additional approach.

Thereby, the benefits of a considered agreement, for instance, may be obtained from saved abatement costs, under a given policy objective (such as an emission reduction target).

Figure 1

Table 1: Overview of methods presented in this report

I: Methods for environmental valuation using case-specific data	
(1) Methods based on market choices (potentially in surrogate markets)	Examples: – Discrete choice analysis of preferences revealed from actual purchases (e.g. of products that are more or less environmentally friendly) – Hedonic prices derived from surrogate markets, e.g. real estate prices
(2) Methods based on hypothetical choices or stated preferences	Examples: – Contingent valuation analysis based on surveys of stated preferences over hypothetical scenarios – Conjoint analysis of (pairwise) choice between different scenarios (e.g. products) – Subjective well-being valuation based on correlating stated well-being with observable (environmental) variables and monetary values
II: Valuation methods for estimating and aggregating case-specific impact	
(1) Dose-response approaches	Example: Estimating welfare through the impact on life expectancy or morbidity
(2) Averting and defensive behavior	Example: Estimating avoided costs of defensive expenditures
III: Valuation using data from existing studies and databases	
(1) Benefit transfer within a calibrated model	Example: Adjusting willingness-to-pay (e.g. obtained from contingent valuation) to different socioeconomics and demographics
(2) Environmental prices databases	Example: Using environmental prices aggregating all health-related costs from the emission of a particular substance in a specific country
IV: Valuation derived from stated policy objectives	
(1) Using market prices for permits or taxes on emissions	Example: CO ₂ prices from the EU Emissions Trading System
(2) Use of avoided abatement costs under a cost effectiveness analysis	Example: CO ₂ prices based on an analysis and ranking of the costs of alternative abatement methods

Figure 1 summarises the different techniques and methodologies analysed in the Technical Report



Activities of the HCC (October 2020 - April 2021)

Mergers

NORTH SOLAR SA - DEPA COMMERCIAL SA

By its unanimous decision, adopted by the Plenary on 16.04.2021, the Hellenic Competition Commission approved the notified transaction, in accordance with article 6 of Law 3959/11, as in force, regarding the acquisition by the company under the name "DEPA COMMERCIAL SA" of joint control, together with the existing shareholders/sellers, over the company «NORTH SOLAR S.A.», through the acquisition of 49% of the capital stock of "NORTH SOLAR SOCIETE ANONYME", which before the transaction was under the control of its existing shareholders/sellers. Particularly, the HCC decided, according to article 8 par. 3 of L. 3959/11, that the notified transaction, which appertains to article 6, par. 1 of L. 3959/11, does not raise serious doubts as to its compatibility with merger control rules in the relevant markets concerned by the concentration.

Click [here](#) for more information

AXA INSURANCE - ASSICURAZIONI GENERALI - SOCIETA PER AZIONI

By its unanimous Decision No. 732/2021, adopted by the Chamber Commission on 01.04.2021, the Hellenic Competition approved pursuant to Art. 8(3) of Greek Law 3959/2011, the proposed acquisition by the company under the name "Assicurazioni Generali - Societa per Azioni" of 99,9% of the shares of the company under the name "Axa Insurance S.A." Pursuant to the above decision, the Hellenic Competition Commission found that the proposed concentration which primarily concerns the wider market for life insurance, non-life insurance and reinsurance services and the sub-markets for risk insurance, of transported goods, of fire and nature elements and other property damage, while falling within the scope of Art. 6 of Greek Law 3959/2011, does not raise any serious doubts as to its compatibility with the competition rules in the relevant markets involved.

Click [here](#) for more information



Mergers

ALPHA SATELLITE TELEVISION SA and NEW TELEVISION SA - GREEN PIXEL PRODUCTIONS SA

On 24 March 2021, by its unanimous Decision No.728/2021, the Plenary of the Hellenic Competition Commission approved, pursuant to Art. 8(3) of Greek Law 3959/2011, the proposed transaction notified on 8/1/2021, concerning the acquisition of joint control by “ALPHA SATELLITE TELEVISION SA” (which operates the Greek TV station “ALPHA”) and “NEW TELEVISION SA” (which operates the Greek TV station “STAR”) over the company “GREEN PIXEL PRODUCTIONS SA” (a company active mainly in the production of television programs, movies and videos Pursuant to the above decision, the Hellenic Competition Commission found that the proposed concentration, which concerns the markets for (a) the production and supply of TV content; and (b) retail provision of TV services to end customers, while falling within the scope of Art. 6(1) of Greek Law 3959/2011, does not raise any serious doubts as to its compatibility with the competition rules in the relevant markets involved.

Click [here](#) for more information

MELBERY INVESTMENTS LIMITED - BELTERRA INVESTMENTS LIMITED.

By its unanimous Decision, adopted by the Plenary on 22 March 2021, the Hellenic Competition Commission (HCC) approved, under Greek merger control rules (ar. 8 (3) of Law No 3959/2011), as in force, the proposed acquisition of sole control of “MELBERY INVESTMENTS LIMITED” by “BELTERRA INVESTMENTS LIMITED”.

In particular, the Cypriot limited liability company “BELTERRA INVESTMENTS” notified to the HCC, in accordance with the provisions of article 6 par. 1-3 of law 3959/2011, as in force, the acquisition of full control of 70% of the Cypriot limited liability company “MELBERY”, in which the notifier already held, before the notification of the merger, a minority percentage of 30%, without the possibility of exercising control and, therefore, upon its completion, it holds 100% of its share capital and full control over it.

“MELBERY” indirectly holds 67% of the shares of the company “Thessaloniki Port Authority SA” (“THPA SA”). Therefore, after the clearance of the concentration, “BELTERRA INVESTMENTS LIMITED” acquires the sole control of the “THPA SA”.

The HCC’ Plenary unanimously approved, under Greek merger control rules (ar. 8 (3) of Law No 3959/2011), the acquisition notified on 08.02.2021 considering that, although it falls within the scope of article 6(1) of law 3959/2011, as in force, does not raise serious doubts as to its compatibility with merger control rules in the relevant markets concerned by the concentration.

Click [here](#) for more information



Mergers

OPAP SA - KAIZEN GAMING INTERNATIONAL LTD.

By its unanimous decision, adopted by the Plenary on 01 March 2021, the Hellenic Competition Commission (HCC) approved the proposed transaction according to article 8 par. 6 of L. 3959/11, as in force, consisting in a change from joint control, exercised by OPAP, Deep Investment Ltd and Padian Ltd over the Greek and Cypriot online betting and other online gambling activities of Kaizen Gaming International Ltd (former GML Interactive Malta Ltd) under the trade name Stoiximan (hereinafter also "Stoiximan Business"), to sole control by OPAP, through its wholly-owned subsidiary, OPAP Investment Limited, over Stoiximan Business. In particular, the HCC decided, according to article 8 par. 3 of L. 3959/11, that the notified transaction does not raise serious doubts as to its compatibility with merger control rules in the relevant markets concerned by the concentration.

Click [here](#) for more information

TOURISTIKES EPIHEIRISEIS MESSINIAS SA (TEMES SA) AND IOANNIS-IPPOKRATIS STASINOPOULOS - STADIO 2020

On 23.12.2020, by its unanimous Decision No. 724 /2020, the Chamber of the Hellenic Competition Commission approved, pursuant to Art. 8(3) of Greek Law 3959/2011, the proposed transaction notified on 23.10.2020, which concerns the acquisition of joint control by "TOURISTIKES EPIHEIRISEIS MESSINIAS SA" ("TEMES") and IOANNIS-IPPOKRATIS STASINOPOULOS over the company "STADIO 2020".

Pursuant to the above decision, the Hellenic Competition Commission found that the proposed concentration, which concerns the markets for the operation and management of athletic facilities relating to tennis, while falling within the scope of Art. 6(1) of Greek Law 3959/2011, does not raise any serious doubts as to its compatibility with the competition rules in the relevant market involved.

TEMES SA is controlled by Messrs. Achilleas, Konstantinos and Christos V. Konstantakopoulos and is a hotel business, owner of two five (5*) star hotels, two golf courses and accompanying tourist facilities in Messinia and shareholder of 51% in Ioniki Hotels and Businesses SA, owner of the Hilton Athens Hotel. Mr. Ioannis-Hippocrates Stasinopoulos is a prominent Greek businessman with direct and indirect participation in various companies in Greece and abroad, with Viohalco SA as the main company, based in Belgium. STADIO 2020 SA is a newly established single-member public limited company with Mr. Alexandros-Dimitrios Skarlatidis as a shareholder, with main activity the operation and exploitation of tennis sporting facilities. Currently, STADIO 2020 SA, under a relevant lease agreement with the Athens Olympic Sports Center "Spyros Louis" N.P.I.D. (OAKA), acquired the right to operate sixteen (16) tennis courts after these auxiliary facilities within OAKA.

Click [here](#) for more information



Mergers

FARALLON CAPITAL MANAGEMENT L.L.C. and PIRAEUS BANK SA - EUROMEDICA SA

The Chamber of the Hellenic Competition Commission approved, pursuant to Art. 8(3) of Greek Law 3959/2011, on 1.10.2020, the proposed transaction notified to it on 27.7.2020, which concerns the acquisition of joint control by the companies (a) FARALLON CAPITAL MANAGEMENT LLC, through the company “HEALTHCARE INVESTORS II (GREECE) LLC” and (b) PIRAEUS BANK SA, over assets and liabilities of the company EUROMEDICA SA. Pursuant to the above decision, the Hellenic Competition Commission found that the proposed concentration, which concerns the markets of private general clinics, private obstetric clinics, private diagnostic centres, private recovery and rehabilitation centres and private neuropsychiatric clinics, while falling within the scope of Art. 6(1) of Greek Law 3959/2011, does not raise any serious doubts as to its compatibility with the competition rules in the relevant market involved.

Click [here](#) for more information





Expected decisions on notified mergers

TEFORTO HOLDINGS LIMITED - AIOLIKO PARKO AETOS ENERGY SA/AIOLIKI HELLAS INDUSTRIAL & ENERGY SA/ AIOLIKO PARKO KATO LAKOMATA ANONYMI ENERGEIAKI ETAIRIA/VIOTIA AIOLOS PRODUCTION AND EXPLOITATION OF ENERGY SA/ANEMOS MAKEDONIAS ANONYMI ENERGEIAKI ETAIRIA/AIOLOS ANAPTIKSIKI KAI SIA FTHIOTIDA SA

On 31 March 2021, the HCC was notified of the proposed transaction concerning the acquisition of sole control by “TEFORTO HOLDINGS LIMITED” (a subsidiary MOTOR OIL GROUP) over the companies “AIOLIKO PARKO AETOS ENERGY SA,” “AIOLIKI HELLAS INDUSTRIAL & ENERGY SA”, “AIOLIKO PARKO KATO LAKOMATA ANONYMI ENERGEIAKI ETAIRIA”, “VIOTIA AIOLOS PRODUCTION AND EXPLOITATION OF ENERGY SA”, “ANEMOS MAKEDONIAS ANONYMI ENERGEIAKI ETAIRIA” and “AIOLOS ANAPTIKSIKI KAI SIA FTHIOTIDA SA” (the Acquired Companies).

The parties’ business activities are described as follows:

(i) TEFORTO HOLDINGS LIMITED is a holding company and, through its subsidiaries, manages the Renewable Energy portfolio on behalf of the MOTOR OIL Group. The main area of activity of the MOTOR OIL Group is the crude oil refining and the trading of petroleum products, while it also has a presence in the market of production and supply of electricity, (ii) The Acquired Companies are exclusively active in the production of electricity from wind parks.

e-TROPHY AUTOMOTIVE BRANDS SA and e-TROPHY SA OPEL HELLAS SINGLE-MEMBER PUBLIC LIMITED COMPANY

On 12.03.2021, the HCC was notified of the proposed transaction concerning the acquisition by TROPHY AUTO BRANDS SINGLE-MEMBER PUBLIC LIMITED COMPANY, under the trade names a) e-TROPHY AUTOMOTIVE BRANDS SA and b) e-TROPHY SA, based in Chalandri-Attiki, at 240-242 Kifissias av., legally represented by the President of the Board of Directors and Managing Mr. Polychronis Syggelidis, of the entire (100%) share capital and voting rights of the company under the name OPEL HELLAS SINGLE-MEMBER PUBLIC LIMITED COMPANY. After the completion of the above transaction, TROPHY AUTO BRANDS, owned by Polychronis Syggelidis, will acquire control over OPEL HELLAS SINGLE-MEMBER PUBLIC LIMITED COMPANY.

The business activities of OPEL HELLAS SA consist in: the import, distribution and marketing of new Opel passenger and light commercial vehicles, spare parts and accessories for such vehicles and the provision of technical information on repair and maintenance of Opel-branded vehicles.





Other cases

PRESS DISTRIBUTION MARKET (COMPLIANCE)

The Plenary of the Hellenic Competition Commission (HCC) convened on 14, 20 and 27 July 2020 to examine, upon the basis of the relevant Statement of Objections, pursuant to Article 25 paragraph 5 of Greek Law 3959/2011 (“Greek Competition Act”), the compliance of the company “ARGOS SA Press Distribution Agency” (ARGOS) with the operative part of the HCC Decision no. 687/2019.

In particular, the HCC with its Decision no. 687/2019, which was adopted in the context of an ex officio investigation of the HCC’s Directorate General for Competition according to Article 25 paragraph 5 of Greek Law 3959/2011, had decided, unanimously and in an open vote, to order interim measures vis-a-vis the said company in view of the urgency to directly prevent an imminent threat of irreparable harm to the public interest and after having considered that an infringement consisting in an abuse of ARGOS’ dominant position in the press distribution market was likely and probable. The HCC Decision no. 687/2019 was published on 15.05.2020 (GG B’ 1852/15.05.2020).

With respect to the review of compliance of ARGOS with the operative part of HCC Decision no. 687/2019 pursuant to Article 25 paragraph 5 of Greek Law 3959/2011, the Plenary of the HCC decided, in an open vote, on the following findings:

A. It found the non-compliance of ARGOS with points II.1, II.2 and II.3 of the operative part of the HCC Decision no. 687/2019, concerning, in particular:

- 1) the delay in the refunding of the deducted contributions for sixteen (16) publishing companies, in accordance with condition II.1.3 of HCC Decision no. 687/2019, within the period from 01.01.2020 until the date set for each publishing company and no later than 18.02.2020,
- 2) the non-entering by ARGOS into negotiations with one publisher, according to point II.2 of HCC Decision no. 687/2019, for the period from 06.12.2019 to 28.02.2020,
- 3) the non-taking into account, as far as the part on the entering into negotiations is concerned, of the parameter of a publishing company’s sustainability according to point II.2 of HCC Decision no. 687/2019, for the period from 06.12.2019 to 28.02.2020,
- 4) the failure to comply with the obligation of ARGOS to keep minutes during these negotiations with (7) publishing companies and present these minutes to the HCC, according to point II.2 of HCC Decision no. 687/2019, for the period from 25.01.2020 to 27.07.2020.
- 5) the failure to distribute, under the terms of the trading policy as it was applicable at the time of issuance of the HCC’s Decision on interim measures, for one (1) publishing company according to point II.3 of HCC Decision no. 687/2019, for the period from 01.01.2020, to 27.07.2020.

B. Imposed on ARGOS, by majority, for non-compliance with points II.1.3, II.2 and II.3 of the operative part of HCC Decision no. 687/2019, as mentioned above, and namely for the infringements described above in 1), 3), 4) and 5), for the periods referred to above, a total fine amounting to **€6,071.19**.

Γ. Threatened ARGOS, by majority, with a fine and penalty payment per day of infringement, to be imposed by a Decision confirming non-compliance or reoccurrence of the infringements found.

Δ. By majority, the HCC did not fine ARGOS for non-entering into and non-concluding negotiations with one publishing company, according to point II.2 of the above Decision for the above period.

Click [here](#) for more information



5th LYCEUM OF LAMIA

By its Decision No. 715/2020, the Grand Chamber of the Hellenic Competition Commission (HCC), decided that some of the firms which participated in the tender of the project "5th Lyceum of Lamia (Departments A1 and B), violated par. 1 of article 1 of Law No. 703/1977. The said decision of HCC concerns firms that participated in the abovementioned tender but did not take part in the Settlement Procedure.

The undertakings concerned participated in a horizontal concerted practice aimed at price fixing, bid-rigging through manipulation of the bidding procedures, within the meaning of the provisions in force, a practice which, according to settled case-law, inherently has a content which is, in nature, manifestly restrictive of competition and constitutes a clear violation of the provisions of Article 1 par. 1 of Law 703/1977 [and Article 1 par. 1 of Law 3959/2011, as in force]. By its unanimous Decision, the HCC imposed on the firms involved for the violation of Article 1 par. 1 of Law 703/1977, for the duration of participation of each undertaking in the violation, fines totaling approximately **218 thousand euros**.

Click [here](#) for more information

DEPA COMMERCIAL SA

The HCC Plenary convened on 21 December 2020 to examine, following the relevant Statement of Objections, pursuant to Article 25 par. 6 of Law 3959/2011, the request of DEPA COMMERCIAL SA for review of Commitment no. 3 undertaken by the company according to HCC Decision no. 551/VII/2012, as amended and applicable according to HCC Decisions no. 589/2014, 596/2014, 618/2015, 631/2016 και 651/2017.

Following the hearing before the HCC Commission, the subsequent deliberations between its members and the positive opinion of the Regulatory Authority for Energy (RAE) on the request of DEPA COMMERCIAL SA, the HCC, by its Decision no. 723/2020 Απόφαση της, adopted in Plenary, unanimously decided as follows:

- There has been a substantial change in the facts on which HCC Decision No. 551/VII/2012, as amended and applicable, was based regarding the Commitment no. 3 undertaken by DEPA COMMERCIAL S.A. and
- Accepted the request of DEPA COMMERCIAL S.A. for its exemption from the obligation to implement each one of the Commitments No 1, 2, 4, 5, 6 and 7 adopted by HCC Decision No. 551/VII/2012. Έκανε a program for the supply of natural gas volumes through electronic auctions, according to the HCC Decision no. 631/2016SS.





Other cases

DELTA - MEVGAL

The Plenary of the HCC convened on **17 March 2021** to assess, following the relevant Statement of Objections, the effectiveness of the Commitment A.1 - A.1.1 provided for in HCC Decision no. **650/2017** and the competitive conditions in the fresh cow milk market, in order to decide its removal or extension, pursuant to point A.1.2 of the commitments, for another (1) year.

In particular, according to the above commitment, DELTA SA and MEVGAL SA took on to procure (directly or through third parties) fresh cow milk from each of their milk producers, until 21.10.2017, in the Prefectures of Serres, Kilkis, Thessaloniki, Imathia, Kozani, Pella, Florina, Kavala, Xanthi, Grevena, Pieria and Chalkidiki under minimum guaranteed price, based on a specific mathematical formula. This commitment concerns all the milk producers which supplied "DELTA SA" and/or "MEVGAL SA" with fresh cow milk until 21.10.2017, but this business relationship was interrupted, with no fault, by the producers, and has possibly restarted.

By its **Decision no. 726/2021**, issued on the **1st of March 2021**, the Plenary of the HCC unanimously decided:

A. The extension of commitment terms A.1 - A.1.1 as defined in its Decision no. 650/2017 for one more year, that is, from 21.10.2020 to 20.10.2021.

B. The exclusion of the organic milk from the calculation of minimum guaranteed price as defined in the commitment terms A.1 - A.1.1

V. ZISIMATOU - TH. MARINIS O.E.

On 31.08.2020, the Hellenic Competition Commission (HCC) unanimously decided, by its Decision No. 717/2020, to reject the complaint submitted by the company "V. ZISIMATOU - TH. MARINIS OE" against 13 companies active in the wholesale distribution of tobacco products. The complainant had requested interim measures alleging violation of Articles 1 of Law 3959/2011 ("Protection of Free Competition") and 101 of the Treaty on the Functioning of the European Union. The HCC, within the framework of its powers, examined ex officio this case as a complaint for violation of the above articles, and concluded that the complaint was unfounded in its entirety.





Other cases

SECURITIES

The Grand Chamber of the Hellenic Competition Commission (HCC), by its unanimous Decision No. 721/2020, adopted under the simplified Settlement Procedure, according to article 25a of Law 3959/2011, as amended, and HCC Decision No 704/2020, following the submission of a relevant request by the parties involved, decided that the aforementioned companies infringed Articles 1 of L. 3959/2011, 1 L. 703/1977 and 101 TFEU. The Decision was adopted under the above simplified Settlement Procedure following the expression of interest by the parties concerned to engage in the settlement procedure and their consequent written reply that the Statement of Objections of the Rapporteur reflects the settlement submissions.

According to the grounds of the HCC's Decision, BRINK'S SECURITY SERVICES S.A. and BRINK'S AVIATION SECURITY SERVICES S.A. were engaged, as they have unreservedly accepted, during the period 2009-2011, to the extent that each of them is concerned, in anti-competitive actions consisting in distorting competition in breach of Articles 1(1) of L. 3959/2011, 1(1) of L. 703/1977 and 101 TFEU, in the market of security services. By the same Decision, the HCC found out that MEGA SPRINT GUARD S.A, DRASIS SECURITY GROUP S.A, DIAS SPRINT GUARD and STEFANIDIS D. KONSTANTINOS, during the period 2010-2012, participated, as they have unreservedly accepted, to the extent that each of them is concerned, in horizontal cartels (cartels between MEGA SPRINT - DIAS SPRINT GUARD και MEGA SPRINT - DRASIS - STEFANIDIS) in breach of Articles 1 L. 703/1977 and 1 L. 3959/2011, in the context of tendering procedures in the market of security services.

In the light of the above, the Hellenic Competition Commission imposed on the companies involved, for violation of Article 1 par. 1 of Law 703/1977, fines totaling approximately **688 thousand euros**. Regarding the other parties concerned by the HCC's ex officio investigation, which did not submit a settlement request, the procedure before HCC has been completed.

Click [here](#) for more information





Meetings of the HCC held within the period October 2020 - April 2021

ATTICA

The HCC (in plenary) assessed on April 19, 2021, following the relevant Rapporteur's Opinion, the conditions of competition and the effectiveness of the commitments undertaken by ATTICA under Decision No. 658/2018 ("Commitment Decision"). In accordance with section B5 of the Commitment Decision, the HCC had to decide upon the removal or extension, in whole or in part, of the relevant commitments under sections B1-B3.

SECURITIES

The HCC (in plenary) convened on 12 February 2021 to examine the case concerning the ex officio investigation, following a complaint, with regard to the parties involved which has not submitted a Settlement request, for infringement of Article 1 of Law 703/1977 in the market for security services.

Click [here](#) for more information

PPC-TEPNA

The HCC (in plenary) convened on 8 January 2021 to examine, following a relevant Statement of Objections, the ex-officio investigation for failure of notification and early implementation of a concentration concerning the establishment of a joint venture by the companies PPC Renewables and TERNAL ENERGY in the market for electricity production from renewable sources.

According to the SO, the critical fault on the part of the shareholders of the joint venture PPC-TERNAL in the present case for the specific failure to comply with the obligation of notification and, thus, the conditions for the infringement of the notification obligation are not fulfilled. Therefore, it was suggested not to impose on the companies PPC Renewables and TERNAL ENERGY for the establishment of a joint venture, according to article 4b par. 4 of law 703/1977, as in force at the critical time, for the violation of non-notification, and according to article 9 par. 1 of law 3959/2011, as in force, and article 4e par. 1 of law 703/1977, as in force at the critical time, for the infringement of the notification obligation and the early implementation of the said concentration.

Click [here](#) for more information





Meetings of the HCC held within the period October 2020 - April 2021

DIMKA-STAMATOULIS

The Plenary of the Hellenic Competition Commission (HCC) convened on 22 December 2020 to examine, upon the relevant Statement of Objections, alleged infringements by DIMKA SA (currently RESOUL SA) of Articles 1 and 2 of Law 3959/2011 (“Greek Competition Act”) and Articles 101 and 102 of the Treaty on the Functioning of the EU (“TFEU”) in the Greek market for general purpose gas appliances, following a complaint by STAMATOULIS SA and an ex officio investigation by the HCC’s General Directorate for Competition in the abovementioned market.

According to the Statement of Objections, the HCC is advised to find an infringement of Articles 1 and 2 of the Greek Competition Act as well as of Articles 101 and 102 TFEU by RESOUL SA, for the reasons set out in detail therein.

Click [here](#) for more information





Meetings scheduled for the coming months

The HCC meetings scheduled for the period May - June 2021, are:

5 May 2021: joint examination of the complaints by the companies GREEN OIL AEVE, ESK OIL AEVE as well as the Association of Collectors of Waste Oils concerning alleged infringements of Articles 1 and 2 of Law 3959/2011 (“Greek Competition Act”) and Articles 101 and 102 of the Treaty on the Functioning of the EU (“TFEU”) by the companies ELTEPE SA (now ENDIALE SA), CYCLON HELLAS (now LPC SA), ELTEPE Kinopraxia as well as G.D, in the Greek markets for the collection, treatment, disposal and remediation/recycling of waste lubricating oils, including all the waste management intermediate phases, as appropriate, from the collection to the reclamation of these oils.

10 May 2021: examination of the request of DEPA COMMERCIAL SA for review of, and possible exemption from the Commitments no. 3 undertaken by the company pursuant to HCC Decision no. 551/VII/2012, as amended and applicable undertaken pursuant to HCC Decisions no. 589/2014, 596/2014, 618/2015, 631/2016 και 651/2017.

13 May 2021: examination in the context of the ex officio investigation into the press distribution market, for possible infringement of Articles 1 and 2 of Law 3959/2011 and/or Articles 101 and 102 TFEU.

14 May 2021: examination, in the context of the ex officio investigation conducted by the Directorate-General for Competition, of the complaint lodged by INTERMED SA, to establish possible infringements of Articles 1 and 2 of Law 3959/2011 and 101 and 102 TFEU, by FREZYDERM SA, in the relevant market of production and marketing of cosmetic products, personal and baby care products, "parapharmaceuticals" and other related products.





Meetings scheduled for the coming months

17 May 2021: continuation of the hearing procedure on the case concerning: a) the complaint Ref. no. 6633 / 23.09.2016 of ALUMINUM OF GREECE BEAE, which was merged by acquisition by "MYTILINEOS SOCIETE ANONYME - GROUP OF ENTERPRISES" (now "IMERYS VOXITES GREECE SINGLE-MEMBER SA") and b) KERNEOS SA (now "IMERYS GREECE SA"), active in the market for the production and supply of bauxite, concerning alleged infringements of the provisions of Article 2 of Law 3959/2011 and/or Article 102 of the Treaty on the Functioning of the European Union (TFEU) and b) the ex-officio review of the compliance of "IMERYS VOXITES GREECE SINGLE-MEMBER SA" with the HCC Decision no. 690/2019, according to Article 25 par. 5 of Law 3959/2011.

18 May 2021: examination of the complaint Ref no. 5540/17.9.2015 of "AGNI INDUSTRIAL AND COMMERCIAL SA", following HCC Decision Ref. no. 708/2020.

27 May 2021: review of the compliance of the company "ARGOS SA Press Distribution Agency" with point II.3 of the operative part of HCC Decision no. 687/2019.

9 June 2021: examination of the notified transaction Ref. no. 10862/18.12.2020, according to Article 6 par. 4 of Law 3959/2011, concerning the acquisition by OPAP SA of sole control over the Greek and Cypriot activities regarding online games of Kaizen Gaming International Ltd (former GML Interactive Malta Ltd).





Meetings scheduled for the coming months

10 June 2021: examination of the alleged obstruction of the on-site inspection carried out by the Directorate-General for Competition in the context of the investigation into the press distribution market (Article 39 par. 5 of Law 3959/2011, as in force) by ALTER EGO MEDIA S.A. and natural persons.

15 June 2021: examination of the case concerning: a) the complaint by the company KOSTARELOS SA against companies active in the importation and distribution of wristwatches in breach of Articles 1 of Law 3959/2011 ή/ and 101 TFEU and b) ex officio investigation of the HCC's General Directorate for Competition in the Greek market for the sale/ distribution of wristwatches, in order to establish whether the requirements for the application of Articles 1 of Law 3959/2011 and/or 101 TFEU are fulfilled.

18 June 2021: examination of alleged infringements of Articles 1 of Law 3959/2011 and 101 TFEU in the context of the ex officio investigation by the HCC's General Directorate for Competition ("GDC") in the Greek market for cooling and heating systems/appliances.





Initiation of Regulatory Intervention Procedures (Market Investigation)

Regulatory intervention in the press distribution sector

The Hellenic Competition Commission (“HCC”) on 23.12.2020, based on Article 11 of Law 3959/2011 on regulatory intervention in sectors of the economy, decided ex officio to initiate the relevant procedure in the press distribution sector.

In the context of the above regulatory intervention, the HCC issued its views on 23.3.2021 and opened the 1st public consultation, with a duration of at least 30 days, inviting any interested party to submit its comments, positions and observations on the conditions of competition in the specific industry.

In its Opinion, the HCC focuses on the lack of conditions of effective competition in the press distribution sector taking into account the structural and institutional specificities of this sector, with the emphasis on the distribution agency level of the press distribution market. The document first presents the legal framework, structure and competitive conditions in the press distribution sector, in order to highlight those characteristics that exacerbate the lack of competition in the relevant markets. Then, the monopolistic structure of the relevant press distribution market is analysed in detail, and specifically of Argos Press Distribution Agency, and finally describes the identified competition issues.

The HCC has taken the initiative for a regulatory intervention in the Press Distribution Sector because it considers that the distortions of competition in the Press Distribution Sector cannot be addressed by the provisions on cartels, abuse of a dominant position or merger control. In particular, according to its views that have been opened to public consultation, the Authority a) found a lack of conditions of effective competition in this sector and b) concluded that the possible application of Articles 1, 2 and 5 to 10 of Law 3959/2011 is not sufficient to create conditions effective competition.



HELLENIC COMPETITION COMMISSION

market investigation in the Press Distribution sector



Regulatory intervention in the press distribution sector

The analysis focused on structural problems identified in the press distribution sector and especially in the relevant press distribution market, which cannot be resolved by the application of Articles 1, 2 and 5 to 10 of Law 3959/2011. According to the HCC, the press distribution market is characterised by quasi-natural monopoly elements and the participation of certain publishing companies in the share capital of the (sole) distribution agency, potentially weakens the competitive neutrality between the publishing companies.

Based on the theoretical analysis of vertical common ownership, the HCC's views hold that the current structure of the Argos Press Distribution Agency, with the participation of publishers in its share capital, creates potential incentives that trigger:

- Coordinated effects of concerted practices,
- Non-coordinated effects consisting in unilateral business decisions, which are likely to favor the shareholders-publishers,

With a view to complementing the theoretical analysis, the HCC assigned an internationally recognised group of experts to assess the publishers-shareholders' incentives. The analysis of the experts, with the constraints identified therein, indicates that, due to the ownership structure of Argos, there are incentives for the distribution price to be higher than it would be in case of non-participation of publishing companies in its share capital.

The full document of the HCC's views, which are opened to public consultation, is available [here](#) (in Greek).

For the follow-up of the regulatory intervention, click [here](#).



HELLENIC COMPETITION COMMISSION

market investigation in the Press Distribution sector



Regulatory intervention in the press distribution sector

The 1st public consultation will be open from 24-3-2021 to 22-4-2021. Interested parties are invited to send their comments online in writing (in an editable form), indicating their name, to the e-mail address competition@epant.gr by 22-4-2021. Any responses beyond this deadline and/or any modified responses in the context of the public consultation will not be accepted.

It is recalled that the HCC has already examined the relevant press distribution market in the context of a relevant Opinion, according to Article 23 of Law 3959/2011, which was published on 14 January 2020, and in which general concerns were expressed regarding its structure and organisation, and a package of relevant proposals was submitted to the State. To read the HCC Opinion, click [here](#).

It is also noted that the regulatory intervention procedure of Article 11 of Law 3959/2011 does not address the issues examined in the main proceedings concerning the distribution of the printed press in respect of the **commercial practices of Argos Agency**, on which the Commission will convene on **13.05.2021**.



HELLENIC COMPETITION COMMISSION

market investigation in the Press Distribution sector



Regulatory Intervention in the Construction Sector

The HCC adopted on 8.1.2021, within the scope of its powers, the decision to initiate the procedure referred to in Article 11 of L. 3959/2011 (regulatory intervention in a sector of the economy). In particular, the HCC decided to initiate this procedure to examine the construction industry, focusing on economic activities related to the development of building and infrastructure projects (including concessions), as well as to assess whether conditions of effective competition prevail in the specific industry.

The importance of the construction sector for the Greek economy and the interconnection of the construction activity with other industrial sectors and commercial activities constitute key factors for triggering the HCC's regulatory competence referred to in Article 11 of the Greek Competition Act.

The assessment of a possible regulatory intervention in the construction sector, in which many companies are active, was triggered, except from the concentration observed in some markets of the sector due to the significant cutbacks in its activities, by the phenomenon observed in the last two years regarding the structural change of the sector which is due to the gradual entry of investment vehicles, through the simultaneous acquisition of minority holdings, in large competing construction companies.

In addition, the HCC, applying national and EU competition rules, has systematically dealt with the construction industry, issuing important decisions over the last four years in the context of examining anti-competitive practices (bid-rigging in public tenders) adopted by companies active in the construction sector.



HELLENIC COMPETITION COMMISSION

**market investigation
in Construction Sector**



In the context of the above regulatory intervention, the HCC opened on 07/04/2021 a public consultation, which will last at least thirty (30) days, inviting any interested party to send its comments, positions and observations with regard to the competitive conditions in the above sector to competition@epant.gr (For more information, click [here](#)).

The analysis focused on structural problems identified in the construction sector and especially in the relevant market for public works, due to the oligopolistic structure of this market, which cannot be resolved by the application of Articles 1, 2 and 5 to 10 of Law 3959/2011.

The HCC Opinion highlights the lack of conditions of effective competition in the construction sector, notably in public works, with the emphasis put on the largest construction companies of 6th and 7th class, while taking into account the sector's structure. In particular, the HCC finds a significant concentration of the construction industry over the last decade with increasing barriers to entry in some of its sub-markets. In addition, it considers that the common ownership of a particular fund in the two largest competing construction companies may lead to the following theories of harm:

- Non-coordinated unilateral effects of reducing or mitigating competition incentives
- Coordinated effects of concerted practices

It is noted that the DGC, working in close cooperation with academic experts on common ownership issues, conducted a quantitative analysis to assess the effects on effective competition that may have been caused by the common participation/ownership in the share capital of the two largest companies in the sector by a specific investment fund in the public works market. This analysis was mainly based on two elements:

- Quantitative estimates on the effective number of firms in the market
- Estimates on the effect of participation of a specific number of firms participating in major public tenders in discounts offered by tenderers.



HELLENIC COMPETITION COMMISSION

**market investigation
in Construction Sector**



Regulatory Intervention in the Construction Sector

The results of the above two estimates were further combined to calculate the quantitative effect of common ownership on the discounts from the initial budgeted values received by the contracting authorities in the tendering procedures for public works.

In addition, the above estimates regarding the effect of the number of firms participating in the tenders on the discounts offered by them (in combination with the data on the average number of firms participating in 6th class tenders compared to those of the 7th class) were used to quantify what the impact would be if the average number of firms participating in 6th class tenders participated in tenders with 7th class quantitative limitations.

It was estimated, for example, that for 960 6th and 7th class public projects with a total budget of € 10.98 billion for the period 2018-2020, the benefit of eliminating common ownership in the share capital of the two largest competing companies of the sector would be 238 million euros.

Furthermore, using the quantitative data on the tenderers' bids 6th and 7th class tenders, the average number of firms participating in each tendering class was calculated. If the 6th class companies participated in the 7th class public works tenders, the number of bidders would effectively increase by 3.61 (i.e 8.36-4.75 or about 56%). By analogy, if the bids in the tenders for public works from the 7th class firms, for the period 2018-2020, which amount to a total budget of 7.53 billion euros, are taken into account, the benefit would be 663 million euros.



HELLENIC COMPETITION COMMISSION

**market investigation
in Construction Sector**



Also, other issues identified from the legislative framework, taking into account the concerns expressed by firms active in the sector about their impact on the competitive conditions and the preliminary investigation carried out by the Authority, include:

- The issue of regulating unusually low bids,
- The issue of the reintroduction of the concept of the construction consortium after the selection of the project's contractor,
- The changes in the contract awarding criteria,
- The mode of organisation and, particularly, the classification criteria of the Register of Contractors of Public Works (R.C.P.W),
- The more intensive and extensive use of PPPs and concessions without a prior detailed analysis of the competitive conditions and impacts

After the end of the public consultation and if the HCC finds that there are still no conditions for effective competition in this sector of the economy, it will announce specific measures which are deemed to be absolutely necessary, appropriate and towards creating conditions for effective competition. The HCC shall adequately and appropriately make public its views on the announced measures and shall re-open them to public consultation. The public consultation lasts at least thirty (30) days.

The HCC, after the conclusion of this consultation and taking into account its results, may impose specific measures which are deemed absolutely necessary, appropriate and in compliance with the principle of proportionality to create conditions for effective competition. If the HCC finds that the lack of conditions for effective competition is due, inter alia, to legislation and regulations, it shall deliver an opinion, pursuant to Article 23 of Law 3959/2011, proposing their abolition or modification. The opinion of the HCC shall be submitted to the competent Minister and shall be notified to the Minister for Development and Investments. To read the full document of the HCC Opinion (in Greek), click [here](#).



HELLENIC COMPETITION COMMISSION

**market investigation
in Construction Sector**



Sector Inquiries

Sector Inquiry into Basic Consumer Goods

The HCC completed its sector inquiry into Basic Consumer Goods and published the Final Report on 5.3.2021, into production, distribution and marketing of basic consumer goods and, in particular, food products as well as cleaning and personal hygiene products.

The purpose of the inquiry was to identify possible competition problems in the retail market for basic consumer goods sold through supermarkets (and the related value chains) and put forward possible solutions.

Following relevant media reports regarding price fluctuation and formation for basic consumer goods at all levels of the market and due to the unsatisfactory response to the public consultation on the "Retail sales of Basic Food Products and Consumer Products", which was completed on 31.5.2020, the HCC decided to further, and more extensively, examine the issues dealt with but not appropriately outlined during the public consultation (e.g. price pass-through mechanism, market failures, etc.), through the investigative tools provided by Law 3959/2011 specifically in the retail sector of basic consumer goods sold through supermarkets.





Sector Inquiry into Basic Consumer Goods

Following the publication of the Interim Report, the public consultation as well as the analysis of data updates collected in 2020, the HCC published its Final Report, the main conclusions of which as well as the Authority's decisions regarding the proposed measures and solutions, are summarised as follows:

1. Due to the significant changes in consumer habits in recent months and the possible entry of new business models in the market, but also in view of the restriction of the scope of the present Inquiry on certain product categories, it is not considered necessary at this stage to launch a regulatory intervention in the sector. In particular, it is not deemed necessary at this stage to appoint an Ombudsman or Trustee who will negotiate with retailers or suppliers a Code of Conduct or Good Practice guide.
2. This possibility will be considered after the conclusions of the new Supermarket Sector Inquiry, which is planned in the medium term in two years and which will cover more, and possibly different, product categories, a choice that will be made based on the systematic processing of data collected by the HCC Economic Intelligence Platform already since January 2020.
3. It is necessary that the HCC continuously monitors the sector, both for the specific consumer products examined in this Inquiry, as well as for other products, food products or other consumer goods. This will be carried out by a Supermarket "Taskforce" which will be set up in HCC's DG. The Taskforce team will prepare a report on the competitive situation in the retail sector to be presented to the HCC's President every twelve months and will measure the bargaining power of the supermarket chains and suppliers. The final selection of the supply markets to be examined by the Sector in the medium term will be based on the findings of these periodic studies of the Taskforce team. The Taskforce team should also, in cooperation with other HCC's directorates and units, develop specific Guidelines, to be drafted in the first half of 2022, on the application of competition rules in the supermarket sector. These Guidelines will analyse the way in which the bargaining power and the specific methodology developed in this Study by the HCC will be taken into account in the investigation of dominant position cases in the market (including in relation to the definition of a relevant market), as well as commercial practices, which may involve unfair commercial practices, and which may constitute an abuse of a dominant position of an exploitative nature.



4. Several of the competition problems relate to the exercise of bargaining power and may possibly be resolved by a carefully designed application of Articles 1, 2 of Law 3959/2011 and 101, 102 TFEU. In view of the above, the following should be noted:

- When defining the geographic downstream market (i.e. the market for the sale to final consumers), the HCC will also take into account local competition.
- The application of case law criteria to a company with dominant position should take into account the characteristics of the specific sector and in particular the lack of intense competition for certain premium products (“Fast Moving Consumer Goods (FMCG)”) or the central role of certain markets or electronic platforms that may have a “gatekeeper” role in some markets and may distribute private label products.
- There is a particular interest in exploitative abusive practices, which consist of the imposition of unfair or burdensome terms by a dominant undertaking.

In light of the analysis carried out with regard to the distribution of vertical bargaining power in the market between suppliers and supermarkets in each of the supply chains, it is observed that in most of the above product markets suppliers hold the first place (most) of the bargaining power in the market in each supply chain (See Table below).

5. In order to deal with unfair commercial practices by undertakings with significant bargaining power, it is necessary to strengthen the HCC’s control mechanisms, especially through the use of digital technologies that will allow HCC to be informed directly through complaints or through systematic market monitoring. To this effect, the HCC is in the course of creating a whistleblowing system that will enable information provision without fear of being identified in any way.

6. It is also crucial to examine in detail the effects on competition of the restrictive measures applied on retail markets as a result of the COVID-19 pandemic.





Sector Inquiry into Basic Consumer Goods

Vertical market power (vertical HHI index) in the supply-chain-level for 11 product categories (Figure 2)

Figure 2

Supplier (SUPL)&Super Market (SM) / Product Category	Position and (Share) of vertical market power (SSBC)										
	Bread (toast)	Cereal	Pasta	Cold cuts	Yogurt etc	Feta cheese	Pulses	Coffee	Refreshments	Detergents	Toilet paper
SM_45				1 (25-35)%	1 (25-35)%			2 (15-25%)	2 (5-10%)		2 (15-25%)
SM_9	2 (10-15%)	2 (15-25%)					2 (5-10%)				
SUPL_1			2 (15-25%)								
SUPL_25						1 (35-45)%					
SUPL_12										2 (0-5%)	
SUPL_18								1 (75-85%)			
SUPL_20						2 (15-25%)					
SUPL_4									1 (75-85%)		
SUPL_78										1 (75-85%)	
SUPL_5		1 (35-45%)									
SUPL_52	1 (65-75%)										
SUPL_32							1 (75-85)%				
SUPL_63			1 (55-65%)								
SUPL_98											1 (35-45%)
SUPL_84				2 (25-35%)							
SUPL_85					2 (15-25%)						

Source: Processing of data collected by DGC
https://www.epant.gr/files/2021/supermarkets/exec_sum_supermarkets_final_en.pdf

Green color = Supermarkets

Yellow color = Suppliers



Sector Inquiry into Basic Consumer Goods

To read the Executive Summary, click [here](#)

To read the full text of the Final Report (in Greek), click [here](#)





Sector Inquiry into Fintech

Teleconference and sector inquiry

On 30 October 2020, the HCC has successfully completed the teleconference organised in the context of the sector inquiry in the Financial Technology Services (Fintech) which is undertaken with the collaboration of the Bank of Greece. The teleconference followed the written submissions by the companies and institutions concerned and served as an interactive forum for exchanging views on the competitive conditions prevailing in the Fintech sector.

The teleconference is part of the broader reform of the HCC's digital communication. In enhancing HCC's digital communication, the authority hopes to ensure a more direct contact with businesses as well as consumers and citizens for the benefit of Greece's economic growth.

The teleconference covered four key topics, namely:

- a) Fintech in Greece - state of play
- b) Payments Systems
- c) From Open Payments to PSD2 and Open Finance, as well as
- d) The Central Bank as a facilitator of innovation.

During the event, Heads of Competition Authorities, representatives of the Bank of Greece, prominent academics and market representatives presented on a wide range of current competition issues as well as the ability of modern technology tools to facilitate restrictions of competition in the digital environment.





Sector Inquiry into Fintech

Teleconference and sector inquiry

The teleconference was attended, through the HCC's platform, by many stakeholders including undertakings, associations of undertakings and traders, lawyers and economists, as well as academics, social partners and consumer organisations.

Participants had the opportunity to communicate in real time with the representatives of the HCC and the speakers, to raise questions and express their views on issues of their interest.

A teleconference video overview is available [here](#).





Sector Inquiry into Fintech

Teleconference and sector inquiry

In February and March 2021, the HCC has sent an on line questionnaire to companies active in the Fintech sector in Greece. The questionnaire is addressed to all traditional providers of fintech services (e.g. banks), and a significant number of startups and tech companies active in the provision of:

- Banking services,
- Payment services, loans, microlending, P2P lending, crowdfunding, buy now-pay later,
- Issue and provision of cryptocurrencies,
- Wealth and Asset Management,
- Personal Finance Management,
- InsurTech
- Technology services

The contribution of companies active in the sector or those that are considering entering the Greek market is valuable, in order to map the competitive conditions regarding fintech in Greece and to determine possible competition problems. Upon completion of the inquiry the HCC may issue specific remedies and undertake initiatives for improving competition in the broader Fintech sector to the benefit of undertakings and consumers. The answers will be used exclusively for the purposes of the sector inquiry. The identity of the respondents will be confidential. The questionnaire and the analysis of the responses is undertaken by the Directorate General of Competition of the HCC (Directorate IV) in collaboration with the chief advisor Fintech at the HCC, Professor Markos Zachariadis, Greensill Chair at Alliance Manchester Business School, University of Manchester & member of the World Economic Forum's Council on Responsive Financial Systems.

For any questions, please contact to the email address fintech@epant.gr.

Professor Markos Zachariadis holds the Greensill Chair of Financial Technology (FinTech) and is Full Professor of Information Systems at Alliance Manchester Business School (AMBS), University of Manchester. He is also a member of the World Economic Forum's Global Future Council on Responsive Financial Systems and a FinTech Research Fellow at the Cambridge Centre for Digital Innovation (CDI), University of Cambridge. Professor Zachariadis' research sits at the cross section of economics of digital innovation, financial technology studies, and network economics. He has studied extensively the economic impact of ICT adoption on bank performance, the diffusion of payment networks, and the role of data & standards in payment infrastructures (SWIFT), financial markets (LEI), and digital banking (Open Banking), among other things. His research has been published in top academic journals and has been awarded the NET Institute Award (NYU Stern Business School) for his study on the economics of payment networks, and the SWIFT Institute, SMS, and GRI Awards for his research on Open APIs and Digital Transformation in Banking.





Sector Inquiry into E-commerce

The HCC, acknowledging the growth of e-commerce, has swiftly proceeded with the collection and processing of large volumes of data in the context of its sector inquiry into e-commerce under Article 40 of Law 3959/2011. More specifically, after sending 685 extensive questionnaires to e-retailers, during the period November 2020-March 2021, the Authority has also sent:

- 111 questionnaires to manufacturers/producers/sales representatives the products of which are sold online,
- 14 questionnaires to sectoral institutions, research centres, and associations of undertakings and
- 10 questionnaires to online platforms (marketplaces and search and price comparison platforms).

At the same time, it designed and implemented, for the first time in its history and with the scientific support of the E-Business Research Center of the Athens University of Economics and Business (ELTRUN), a nationwide online survey, through which consumers may provide assistance to the HCC's effort to:

- illustrate the penetration of e-commerce before and after the outbreak of the COVID-19 pandemic,
- describe the competitive conditions prevailing in the digital environment,
- highlight specific issues relating to the use of e-commerce by consumers, and
- identify any practices that may be detrimental to consumer welfare

Interested consumers can participate in the opinion poll until 31/4/2021.

For more information about the design and implementation of the sector inquiry into e-commerce, click [here](#).





Interchange Fees

The new competence of the HCC for implementing Regulation 2015/751 on interchange fees for card-based payments

Regulation (EU) 2015/751 on interchange fees for card-based payments (OJL 123, 19.5.2015, p. 1-15), together with Directive 2015/2366 on payment services in the internal (known as PSD2), is part of EU law for the completion of an integrated competitive market for electronic payments in Europe, with an immense importance for every EU citizen.

The Regulation concerns interchange fees, which are a main part of the fees charged to merchants by acquiring payment service providers for every card-based payment transaction. They are usually applied between the card-acquiring payment service providers and the card-issuing payment service providers belonging to a certain payment card scheme. Merchants in turn incorporate those card costs, like all their other costs, in the general prices of goods and services. Therefore, the regulation of interchange fees concerns **every citizen who buys goods and services**.

Competition between payment card schemes to convince payment service providers to issue their cards leads to higher rather than lower interchange fees on the market, in contrast with the usual price-disciplining effect of competition in a market economy. Thus, in addition to a consistent application of the competition rules to interchange fees, regulating such fees through Regulation 751/2015 would improve the functioning of the internal market and contribute to reducing transaction costs for consumers. In this context, the Regulation has set maximum interchange fees and imposed transparency obligations on banks and merchants. The Regulation, based on the experience of the European Commission from competition cases against Visa and MasterCard, aims to help the industry move forward, leaving behind anti-competitive practices for the benefit of merchants, consumers and payment service provider.

According to the Regulation, Member States shall designate, by 9 June 2016, competent authorities that are empowered to ensure its enforcement and that are granted investigation and enforcement powers, shall have adequate resources for the performance of their duties and shall require the competent authorities to monitor effectively compliance with this Regulation, including to counter attempts by the payment service providers to circumvent this Regulation, and take all necessary measures to ensure such compliance.



In addition, according to the Regulation, Member States shall lay down rules on penalties applicable to infringements of this Regulation and shall take all measures necessary to ensure that they are applied.

At the HCC's initiative, discussions began in early 2020 with the competent institutions on the definition of the principles that will be in charge of ensuring the implementation of the Regulation. Articles 84-86 of Law 4764/2020 "Arrangements for the protection of public health from the effects of the COVID-19 pandemic, strengthening public transport, acceleration of granting pensions, settlement of liabilities towards Local Authorities and other urgent provisions "(GG 256/A/ 23.12.2020), designate, inter alia, the competent authorities for the implementation of Regulation (EU) 2015/751 on interchange interchange fees for card-based payments.

The HCC is among the authorities designated as competent for its implementation, together with the Bank of Greece and the General Directorate of Consumer Protection of the Ministry of Development and Investments.

In short, the HCC is responsible for ensuring compliance with Articles 8 (excluding paragraph 2), 9, 10 (excluding paragraph 4) and 11 which include the following rules:

- (a) Any payment card scheme rules and rules in licensing agreements or measures of equivalent effect that hinder or prevent an issuer from co-badging two or more different payment brands or payment applications on a card-based payment instrument shall be prohibited. (Regulation, Article 8 "Co-badging")
- (b) "Unblending», i.e the obligation of each acquirer to offer and charge its payee merchant service charges individually specified for different categories and different brands of payment cards with different interchange fee levels unless payees request the acquirer, in writing, to charge blended merchant service charges. (Regulation, Article 9 "Unblending")
- (c) "Honour All Cards" rule, according to which payment card schemes and payment service providers shall not apply any rule that obliges payees accepting a card-based payment instrument issued by one issuer also to accept other card-based payment instruments issued within the framework of the same payment card scheme. (Regulation, Article 10, "Honour All Cards" rule).





(d) “Steering rules”, according to which Any rule in licensing agreements, in scheme rules applied by payment card schemes and in agreements entered into between card acquirers and payees preventing payees from steering consumers to the use of any payment instrument preferred by the payee shall be prohibited. This prohibition shall also cover any rule prohibiting payees from treating card-based payment instruments of a given payment card scheme more or less favourably than others. (Regulation, Article 11 “Steering rules”).

Law 4764/2020 provides that, by decision of the HCC, sanctions shall be imposed, according to Law 3959/2011, against any violator of the rules the observance of which it is responsible to ensure, as well as that the HCC shall publish on its website any decision imposing an administrative sanction or adopting any other measure for violation of the provisions the observance of which fall within its competence. The Law also provides that the HCC may enter into agreements and cooperation protocols with other competent authorities of other countries that apply the provisions of Regulation (EU) 2015/751, or similar provisions, in cooperation with the Bank of Greece and the General Directorate of Consumer Protection of the General Secretariat of Commerce and Consumer Protection of the Ministry of Development and Investments, as well as that it can issue guidelines regarding the exercise of its duties and the imposition of relevant sanctions.

The HCC, in collaboration with the Ministry of Development and Investments and the Bank of Greece, has already informed the European Commission of the determination of the competent authorities for the implementation of the Regulation and the content of Law 4764/2020 and participates in conferences of the intergovernmental committee for its implementation while, in the coming months, it intends to issue guidelines on the exercise of its duties under Regulation 2015/751 and Law 4764/2014. It is noted that, based on the Report of the European Commission of 29.06.2020 on the implementation of Regulation 2015/751, the rules falling within the competence of the HCC are among the rules for which systematic further research is required for their implementation (e.g rules on co-badging, steering, unblending).

For more information click [here](#) (pp. 10-11, 14-15)





Information Guide for Citizens

«Learn about us»

The HCC, with a view to providing more comprehensive information to the public (citizens and businesses), has published a short guide with useful information, Q&As, and examples, regarding competition issues, as well as about what falls within its competences and what does not.

The Guide helps citizens understand why competition law was adopted, how the enforcing independent authority was established, what falls within its competence and what does not, and advises them on how they can be protected from the various infringements and to which authority they can refer to.





In detail, the interested parties can find answers to the following questions on the HCC's website:

- What competition law is all about?
- What is the role of the Hellenic Competition Commission (HCC)?
- Is the HCC competent for profiteering cases?
- What is the structure (or organisation) of the HCC?
- What are the powers of the HCC?
- Which practices fall OUTSIDE the remit of the HCC?
- What does cartel mean?
- Competition Law and SMEs
- Which arrangements are prohibited?
- Are all restrictive practices presumed to be illegal?
- What exactly applies to vertical product-distribution agreements?
- What is an abuse of a dominant position?
- I have information about an unlawful practice. What should I do?
- How long the investigation will take?
- How can I contact the HCC to get more information?

To read the Information Guide for citizens and businesses, click [here](#) (in Greek)





COVID-19 Task Force

Task Force News

On April 15th 2020, the Directorate-General (DGC) of the Hellenic Competition Commission announced the activities of the task force for Covid19_Competition. The Covid19_Competition task force was set up on 20.3.2020 to monitor the systematic application of competition rules in light of the specific economic and social conditions due to the coronavirus pandemic. In particular, since the beginning of the pandemic, the DGC has been systematically monitoring the economic data of various sectors, in particular health products and services and basic consumer products and food as well as coronavirus detection tests, regarding possible price increases and potential shortages of these products throughout the value chain. The HCC has, thus, developed a strategy of targeted intervention through competition law enforcement, where necessary, or through regulatory interventions (market investigations).

Evaluation of data collected from wholesalers of medical disposables regarding the effects of the pandemic (COVID - 19) in the respective market - Continuation of the research

Following an electronic questionnaire sent on 20.3.2020 to approximately 4000 companies for the collection of data on the purchase and sale of medical disposables as well as the initiation of an ex-officio investigation in May 2020 in the markets throughout the entire production and supply chain of medical disposables, regarding potential violation of articles 1 and 2 of Law 3959/2011 and / or articles 101 and 102 TFEU, the HCC sent letters for the collection of information to 56 wholesalers of medical disposables, who had not responded to the original electronic questionnaire.

By means of these letters the Authority requested purchase and sales data for the period from November 2019 through April 2020 regarding specific categories of surgical masks, disposable gloves and antiseptics. Most of the companies that responded to the questionnaire are located in Attica and Thessaloniki. Following the analysis of the collected data, similar conclusions have emerged as those deriving from the evaluation of the data submitted through electronic questionnaires.



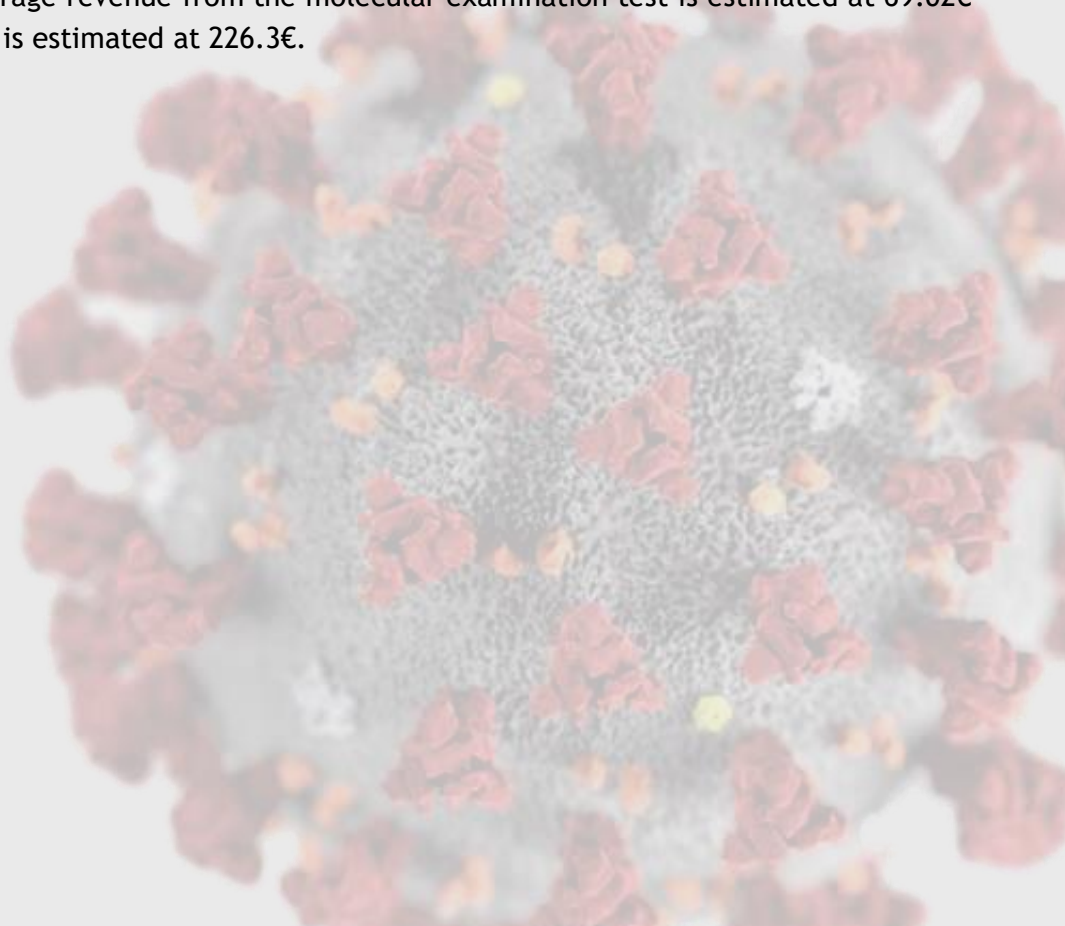
At the European level, 20 responses were collected; from 16 countries (the Netherlands, Denmark, Finland, France, Germany, Latvia, Slovakia, Sweden, Portugal, Hungary, Estonia, Croatia, Austria, Czech Republic, Slovenia, Luxemburg) and the European Commission. These responses indicated that no data was available or that they had not launched a similar investigation. Bulgaria, Italy and Romania have conducted an investigation and provided data.

The following information emerged from research regarding hospitals in relation to the period February - August 2020:

- The supply of public hospitals is carried out mainly by direct assignment (namely about 50% - 65% of cases), which limits the possibility of supplier coordination, which may have been possible in open procurement tenders.
- A few cases were identified in which open tenders were held (approximately 25%).
- The companies - suppliers of public hospitals, may be classified into two groups, on the one hand those based in Attica and on the other those based in Thessaloniki. The undertakings of the first group appear to choose to supply hospitals throughout the country, while those based in Thessaloniki seem to choose mainly the public hospitals of Northern Greece. It is noted that in most cases, each hospital's supplies of the said products are obtained from more than one company.
- A significant number of suppliers is observed in the cases of both public and private hospitals, without any indication of a systematic supply pattern. No indications have been identified of specific companies not engaging in supplies in a specific area or in a specific Hospital or Hospitals or of a geographical area or customer "belonging" to a specific supplier. No data indicating market sharing have been confirmed.



- No distinctive repetitive patterns of behavior have been detected in relation to the frequency with which suppliers win or lose bids in open tenders, since there are very few open tenders.
- A significant **fluctuation in prices/supply test** of public hospitals is observed. More specifically:
 - a) pricing of the molecular test for coronavirus detection ranged in the case of direct assignments from 20€ to 65€ per test, while in the context of tenders the test's pricing range was 25€ to 60€.
 - b) the antibody detection test was distributed, in several cases, free of charge to public hospitals by companies, while in the context of a tender it was priced at 15€.
- A **significant fluctuation** has been noted in the **average cost of examinations (average purchase price/supply test)** of private hospitals with a minimum price for the antibody test of 6.8€/test and a maximum price of 18.28€/test, and for molecular testing a minimum price of 44€/test and a maximum price of 90€/test.
- The supply prices for COVID-19 tests for public and private hospitals, both for antibodies and for molecular testing, seem to be on the same level.
- It is noted that due to the gradual normalization of the market and the increase of supply, the purchase costs of these exams may have decreased, a fact that is being investigated during the current period of updating the survey data for the period September-December 2020.
- A significant fluctuation has been observed of the average revenue (average sale price/test) for the reference period and is estimated at the levels of 31.4€ and 124.4€ for antibody tests and molecular tests, respectively. Minimum average revenue from the antibody test is estimated at 14€ with a maximum estimated at 55€. Minimum average revenue from the molecular examination test is estimated at 69.02€ and maximum average revenue is estimated at 226.3€.





From the analysis of the data collected and evaluated no indication has been identified to this day.

The Directorate-General of the Competition Commission is examining the data on prices also for the period August through December 2020.

Continuation of the ex-officio investigation in the markets for the supply of coronavirus detection tests and antibodies tests

The DGC has updated its research on the markets for the supply of the coronavirus molecular test and the coronavirus antibodies detection test, by collecting new data to identify potential anti-competitive practices for the period from September through December 2020 in the context of an ex-officio investigation in the markets (a) for the coronavirus SARS-CoV-2 detection test using the Real Time molecular testing method, (b) for the coronavirus antigen detection test by rapid test method (RapidTest) and (c) for the detection test for antibodies against coronavirus SARS-CoV-2, regarding potential violations of articles 1 and 2 of law 3959/2011 and / or articles 101 and 102 TFEU.

In particular, in January 2021, the DGC sent requests for information to 13 public hospitals (reference hospitals for COVID-19), universities, other involved public entities, institutes and 56 private hospitals and private diagnostic centers, requesting data on quantities and prices of supply and sale (charge) of the coronavirus detection test with the Real Time molecular test method, of the coronavirus antigen detection test with the rapid test method (RapidT) and the coronavirus antibodies detection test in reference to the months January 2020 through December 2020.

The collection of data is currently being completed so that the authority may proceed with its evaluation.

Finally, it is noted that the Hellenic Competition Commission, within the context of its competences, also reviews the accuracy of the data submitted by the companies based on articles 38 and 44 of law 3959/2011.

Continuation of ex-officio investigations in basic food markets

Following the initiatives undertaken by the Hellenic Competition Commission (HCC) in basic food markets during the outbreak of the COVID-19 pandemic, the DGC updated its research with new data regarding the market and value chain in the animal feed industry. Furthermore, the DGC proceeded to process the data collected in the categories of sheep and goats, citrus fruits, the market and the value chain of cereals and flour and eggs and poultry. The final report of the DGC on the above product categories addressed to the President of the HCC is expected in due course.



Outreach

Cooperation with Regulatory Authorities

International Digital Conference "Crossroads between Competition and Regulatory Policy: Prospects for Reform"



The Hellenic Competition Commission in collaboration with the Academy for Competition Policy and Law, held, on February 4, 2021, an International Digital Conference on "Crossroads between Competition and Regulatory Policy: Prospects for Reform".

Experts, from Greece and abroad, had the opportunity to present their positions in four different panels. The welcome address was delivered by Deputy Prime Minister, Panagiotis Pikrammenos, and the Minister of Development and Investment, Adonis Georgiadis.



International Digital Conference "Crossroads between Competition and Regulatory Policy: Prospects for Reform"

In the first panel, chaired by the President of the Hellenic Competition Commission Professor Ioannis Lianos, the former Prime Minister of Italy and former Commissioner for Competition at the European Commission Mario Monti, *analyzed the issue of the organization of responsibilities between the Hellenic Competition Commission and regulatory authorities, distinguishing between the opening of markets to competition through ex ante regulation and the ex post application of national and Union competition rules by competition authorities, specifying that Competition Authorities, not sectoral regulators, should retain the exclusive competence for ex-post implementation in all sectors of the national economy.* In fact, he noted that *any diverging division of competencies is not in line with best European practices and will not bring about positive results in the strategy of development of the Greek economy, especially in the digital age.* He therefore recommended *the reform of the Greek legal framework, in order to award these responsibilities exclusively to the Hellenic Competition Commission, while granting exclusive competence only over ex ante regulation to sectoral regulatory authorities.*

The Chairman of the OECD Competition Committee, Professor Frederic Jenny, presented a comparative analysis of the situation regarding the division of responsibilities in OECD countries and highlighted the specificity of the Greek legal order, noting that *only in Greece and Mexico (among OECD countries) competence for enforcing competition rules in the telecommunications sector have not been vested exclusively in the national Competition Authority.* In any case, he mentioned that *whichever model is ultimately chosen, it is important to maintain co-operation between the Competition Commission and the Regulatory Authorities, for example, by setting up a network of regulatory co-operation and competition.*

The President of the UK Regulatory Authority for Energy, Professor Martin Cave, analyzed the way in which this cooperation is taking place in the United Kingdom, and expressed the view that *the Competition Commission should not be excluded from any sector of the economy, but at least maintain joint competences.* The Chairman of the Belgian Competition Commission, Mr. Jacques Steenberghe, and the Chairman of the Lithuanian Competition Council, Mr. Sarunas Keserauskas had the opportunity to present their positions regarding the optimal interaction between ex ante regulatory policy and the implementation of competition law in the field of services of general interest from a legal policy perspective, *stressing the importance of the proper allocation of responsibilities so as to avoid problems and conflicts between regulators, and underlining the importance of the Competition Authority having the power to apply the rules of competition to all sectors of the economy.*



In the second panel, moderated by Dr Asimakis Komninos, partner at White & Case, entitled *"Towards a national network of competition and regulatory authorities"*, the Presidents of the Regulatory Authorities, I. Aggelopoulos (Regulatory Authority for Ports), A. Dagoumas (Regulatory Authority for Energy), K. Masselos (Hellenic Communication & Post Commission), I. Tsiaparikou (Regulatory Authority for Railways) and Ch. Tsitouras (Hellenic Civil Aviation Authority) and the President of the Hellenic Competition Commission (I. Lianos) expressed their views on the proposal of the legislative committee on the establishment of a network of regulatory policy and competition (largely on a positive note) and had the opportunity to outline their thoughts, positions and vision regarding the Greek circumstances. The Presidents of the Authorities presented their common concerns about the need to strengthen the independence and financial autonomy of the authorities and their ability to attract specialized staff.

In the third panel, Professor Ioannis Kokkoris, Queen Mary University, moderated the discussion on *"The optimal interaction between ex ante regulatory policy and the implementation of fair competition from an economic perspective: performance indicators"*, with the participation of Professor Nikolaos Economides, Stern School of Business, NYU, Professor Christos Genakos, Athens University of Economics and Business, Ms. Michal Halperin, President of the Israeli Competition Authority, Professor Tommaso Valletti, Imperial College Business School, (former Chief Economist at the European Commission) and Professor Nikos Vettas, Director General of the Foundation for Economic and Industrial Research and Athens University of Economics and Business. All participants underlined *the special significance of a proper division of responsibilities between regulatory authorities and the Competition Commission*, emphasizing the best European and international practices, the vast majority of which allocate competition law enforcement responsibilities in the telecommunications sector, as well as any other economic sector, to the Competition Commission.

All speakers mentioned that more intense competition, especially if the rules are applied by a Competition Authority with responsibility in all sectors of the economy, leads to greater investment and innovation.

Of particular interest was the position of the President of the Israeli Competition Commission, Mrs. Michal Halperin, according to which more intense competition led to an increase in investment.

The fourth panel entitled *"From managing the regulatory conundrum to developing regulatory synergies? The rationalization of the Greek economic regulation landscape"*, was coordinated by Journalist Mr. Tassos Telloglou. Participating as speakers were the Professor at the Law School of the Aristotle University and former Deputy Prime Minister Mr. Evangelos Venizelos, former Minister Mr. Stefanos Manos, the Professor at the Law School of the National & Kapodistrian University of Athens Mr. George Dellis, the Managing Senior Partner of the Law Firm Dryllerakis and Associates Mr. Ioannis Dryllerakis, the Professor at the Law School of the Democritus University of Thrace Mr. Michalis Marinos and the Professor at the Law School of the National & Kapodistrian University of Athens Mr. Spyridon Vlachopoulos.



The speakers agreed on the need to reform the legal framework governing the functioning, not only of the sectoral regulators and their cooperation with the Hellenic Competition Commission, by rationalizing the division of responsibilities, but also of all independent authorities in general, which face staffing problems and stressed the need for greater institutional cooperation, through the establishment of a network of cooperation, such as that proposed by the legislative committee for the amendment of Law 3959/2011.

The President of the Hellenic Competition Commission, Prof. Ioannis Lianos, closed the conference by stating that *all participants agreed on the immediate need for reform, especially regarding the issue of division of responsibilities in accordance to best international practices, but also for cooperation and exchange of expertise between authorities to create an ecosystem of cooperation.* He went on to stress the need to organize a network of co-operation between the authorities and not to create a new authority for resolving conflicts of competence, as this would not be cost effective, it would postpone problem solving, it would increase bureaucracy and costs to taxpayers and would adversely affect legal certainty for businesses, especially due to technological changes.

Finally, he noted that *any reform should be aimed at better serving citizens, to whom it should be clear which authority they need to approach to resolve their problems, observing for example that 12% of the letters of complaints by citizens received last year by the Hellenic Competition Commission on competition issues concerned the telecommunications sector, although the enforcement of competition rules in this sector does not fall within its competence.*

Watch the very interesting International Conference held in February, [here](#).





Signing of a Memorandum of Cooperation with RAE (Regulatory Authority for Energy)



From left: Ioannis Lianos, President of the Hellenic Competition Commission, Athanasios Dagoumas, President of the Regulatory Authority for Energy

On September 25, 2020, at the offices of the HCC, a Memorandum of Cooperation was signed between the HCC and the Regulatory Authority for Energy (RAE), to consolidate and strengthen the cooperation between the two Authorities, by taking advantage of both Authorities' experiences and by fostering closer ties between them.

Particular emphasis was placed on the establishment of joint working groups to undertake the formulation of guidelines, studies and research on issues of common interest, within the competences of the two Authorities.

The two Authorities agreed, inter alia, to undertake informative actions so as to promote policies and strategies to create awareness of economic operators/participants in the energy sector on matters relating to the responsibilities of the two Authorities, for the benefit of society, the economy and the public interest.



Signing of a Memorandum of Cooperation with RAL



On April 2, 2021, a Memorandum of Cooperation was signed between the HCC and the Regulatory Authority for Ports (RAL), by the President of the Hellenic Competition Commission Professor Ioannis Lianos and the President of RAL, Dr. Panagiotis-Iasonas Aggelopoulos, for the consolidation and strengthening of the cooperation between the two Authorities, by taking advantage of both Authorities' experiences and by fostering closer ties between them.

The HCC as the competent authority entrusted according to Law 3959/2011 with the preservation of the unhindered functioning of free competition and RAL as the competent regulator for the port industry and the rapporteur for the exercise of the contractual rights of the Greek state arising from concession agreements, agreed by way of the said Memorandum on the establishment of a strategic partnership between them and more specifically on:

- strengthening existing cooperation,
- the exchange of specialized knowledge and utilization of the experiences of the two Authorities with a view to the sound development of ports and their associated facilities, and the operation of competition within (intra-port competition) and between them (inter-port competition), and
- taking comprehensive and effective decisions on the basis of timely and effective cooperation and exchange of information and views in the areas of cooperation between the two Authorities.

Particular emphasis was placed on the establishment of joint working groups to undertake the formulation of guidelines, studies and research on issues of common interest, within the competence of the two Authorities.

The two Authorities agreed, inter alia, to undertake informative actions so as to promote policies and strategies to create awareness of economic operators / participants in the energy market on matters relating to the responsibilities of the two Authorities, for the benefit of society, the economy and the public interest.

The President of RAL stressed that "[t]he signing of the memorandum of cooperation between the two authorities, serves to ratify the already excellent cooperation in a spirit of mutual respect and mutual assistance. What is needed now is to increase regulatory efficiency in a technically efficient way, to stimulate competition for the benefit of companies in the industry and ultimately the consumer. "

The President of the HCC stated that: "[t]hrough the initiative we have undertaken during the last year to sign memoranda of cooperation especially with the independent sectoral regulatory authorities, to which RAL responded immediately, we aim at the optimal interaction between ex ante regulatory policy and ex post competition law enforcement in the port services sector. We expect that substantial cooperation, exchange of expertise between the two sides and implementation of the outlined actions, will yield multiple benefits to consumers and businesses."



Conferences - Meetings

International Digital Conference on "Common Ownership, Interlocking Directorates and Competition"

On Monday, December 7, 2020, an International Conference was held in English on "Common ownership, Interlocking Directorates and Competition: a transatlantic perspective".

A number of leading international Universities and Research Centers, in collaboration with the Journal of Competition Law & Economics (JCLE), collaborated to exchange views by experts in law and economics as well as policy makers from Europe and the US, on the effects on competition, in cases of common institutional investors or family funds with common ownership of different competing companies or managers who, without necessarily exercising control of these companies, nevertheless allow decisive influence over them, with potentially anti-competitive results.

Common ownership by institutional investors (or common family funds) has been the subject of intense debate in the antitrust community in recent years. Portfolio diversification strategies implemented by institutional investors may, in some areas, lead to the accumulation of financial ownership, with potentially anti-competitive effects. A related issue is that of interlocking directorates between competing companies (i.e. companies which share corporate board members). While in the US, the relevant legislation explicitly prohibits such an interconnection between competing companies, in the European Union there is no corresponding prohibition (except in Italy in the financial sector). This blurry business landscape resulting from common ownership and interlocking directorates may have an impact on competition.



Common ownership,
interlocking directorates & competition:
a transatlantic perspective

Monday 7th December, 2-6pm GMT/3-7pm CET

under the auspices of the Hellenic Competition Commission



International Digital Conference on "Common Ownership, Interlocking Directorates and Competition"

In the course of the conference it was discussed whether it is necessary for competition authorities in Europe and the US to intervene in the above issues by analyzing questions such as:

- What is the extent of common ownership and interlocking directorates in the US or Europe?
- Are there empirical studies on their impact on competition?
- To what extent is competition law in the European Union and the US equipped to deal with potential anti-competitive effects?

The conference was attended, apart from leading academics from Europe and the United States who have researched the issue, also by the President of the Hellenic Competition Commission, the Chairman of the OECD Competition Committee, the relevant sectoral Director of the European Commission, current and former Chief Economists of the European Commission, the Chief Economist of the UK Competition Commission, the former head of the US Federal Bureau of Competition during the Obama Administration, amongst others.

Read in detail about the Conference [here](#) and watch the relevant video, [here](#).





Teleconferences on Competition Law in the Digital Economy

In view of the forthcoming legislative developments, both at national and EU level, aimed at radically reviewing the application of competition rules in the digital environment - including the amendment of Law 3959/2011 (in progress) as well as the European initiatives for the adoption of a regulatory framework for digital services (Digital Services Act) and digital markets (Digital Markets Act) - the Hellenic Competition Commission ("HCC") has appointed Professor Michalis Iakovidis (London Business School) as Head Advisor to issues of Digital Economy, as well as an Advisory Committee of experts from leading international universities, headed by Professor Frédéric Jenny, Chairman of the OECD Competition Committee.

The HCC aims to participate actively in the relevant consultations held within the European Competition Network. To this end, it intends to maintain an open communication with representatives of Greek businesses in order to grasp the challenges which they face, as well as their understanding of the state of competition in the digital environment, in light of the specific characteristics of the Greek economy and the broader goal of this digital transformation.

In this context, the HCC organized on Friday, November 6, 2020, the first informal teleconference on digital economy issues. It was attended by representatives of digital businesses and developing startups, who had the opportunity to share their concerns about the conditions of competition in the digital environment and proposed solutions to strengthen the position of Greek businesses internationally. The round table discussion, which was moderated by the Professor of Law of the Democritus University of Thrace, Mr. Michael-Theodoros Marinos, was preceded by presentations on current issues of competition law and economics by: Mr. Ioannis Lianos, President of the HCC, Mr. Michael Iakovidis, professor at the London Business School and Mr. Nikolaos Economides, professor at the Leonard N. Stern School of Business at New York University. Further meetings were organized for December 2020 and January 2021.

The HCC aspires to continue the exchange of views with the business world on this issue and encourages any interested party to request and schedule a private tele-meeting with executives of the Authority regarding matters within its competence, making use of the new Digital Services tools of the HCC.



Training Day for the Greek & Cypriot Consumer Associations

ΕΠΙΤΡΟΠΗ ΑΝΤΑΓΩΝΙΣΜΟΥ ΕΛΛΑΔΑΣ - ΕΠΙΤΡΟΠΗ ΠΡΟΣΤΑΣΙΑΣ ΤΟΥ ΑΝΤΑΓΩΝΙΣΜΟΥ ΚΥΠΡΟΥ

ΗΜΕΡΙΔΑ ΕΠΙΜΟΡΦΩΣΗΣ ΕΝΩΣΕΩΝ ΚΑΤΑΝΑΛΩΤΩΝ



«Καταναλωτές και Δίκαιο Ανταγωνισμού: Νέες Προοπτικές»

Τρίτη, 16 Μαρτίου 2021, 14.00-18.00

LiveStreaming: www.epant.gr/consumers

On March 16, 2021, the HCC in collaboration with the Cypriot Commission for the Protection of Competition organized a teleconference for the Training of Consumer Associations on "Consumers and Competition Law: New Perspectives". The meeting was attended by representatives of the consumer associations ΕΚΠΟΙΖΟ, ΚΕΡΚΑ and ΙΝΚΑ-ΓΟΚΕ, with which the HCC has signed Memoranda of Cooperation as well as the Cypriot Consumers' Association and the Pancyprian Federation of Labour.

The Conference is part of a series of actions of the HCC in order to strengthen the participation of consumer associations in the implementation of competition law. In this context and continuing its cooperation with the Consumer Associations with which it has signed Memoranda of Cooperation, the HCC organized the session with the aim of strengthening the associations' role and educating them on competition issues, as it values the important role of consumer associations in a well-functioning competitive market.



Training Day for the Greek & Cypriot Consumer Associations

The meeting was opened by the President of the HCC Mr. Ioannis Lianos, who, among other things, stated that *"the protection of consumer welfare is the main purpose of competition law. Competition law needs to evolve its DNA to be able to apply in an even more complex economy, where globalization through the use of digital media and new technologies such as the Internet of Things, 3D printing and algorithms, will change the way we produce and consume. These changes prioritize the initiative to strengthen consumer organizations, which should develop the know-how and tools to contribute to promoting competition and consolidating the importance of protecting consumer surplus in contrast to or in parallel with other public policies, such as industrial policy, which puts producers first. In any case, the Hellenic Competition Commission has put consumers at the center of its actions from the very beginning of my administration. Cooperation with BEUC (European Consumer Organisation) is also a strategic goal of the Hellenic Competition Commission, in its effort to establish an international network of institutions with which it can cooperate."*

For her part, the President of the Cypriot Commission for the Protection of Competition, Ms. Loukia Christodoulou, pointed out the longstanding ties between the Competition Commissions of Greece and Cyprus within the framework of EU rules and went on to say that *"in the changing digital world in which technology and innovation bring about constant changes in markets and business practices, competition authorities are called upon to deal decisively with anti-competitive cartels and agreements as well as illegal and abusive behavior aimed at distorting and hindering competition"* and added that *"[the] state needs to invest much more in the application of Competition Law and to support our efforts to cope successfully with the globalization of markets, the digital economy and all new challenges. For these purposes, we must have the necessary tools and resources that will allow us to complete this project"*.





Training Day for Consumer Associations

The Secretary General of the Ministry of Development & Investment, Mr. Panagiotis Stamboulidis, and Mr. Antonis Ioannou, Deputy Director of the Consumer Protection Service in Cyprus, also made a short opening speech. Finally, opening remarks were made by representatives of consumer associations, Mrs. Eleni Alevritou (President, EKPOIZO), Mrs. Maria Sarantiti (Vice President, INKA-GOKE) and Mr. Nikolaos Tsemberlidis (President, KEPKA).

In the first part, the conference addressed issues related to both public and private enforcement of competition law. In particular, Mr. Andreas Themelis (Head, Department for Advocacy, DGC) and Ms. Maria Ioannidou (Rapporteur - Member of the HCC) discussed key concepts of competition law and policy and enforcement tools such as collective redress mechanisms. Ms. Sofia Dipla (Assistant Rapporteur, DGC) presented the topic of "Prioritization of cases: Decision on the HCC scoring system - HCC Decision No. 696/2019 - emphasis on complaints by consumer associations", while Ms. Charitomeni Bouga (Head, DGC) presented on the topic of "Form and procedure of filing complaints to the HCC". Following these presentations, Ms. Ch. Sideri (Director, Cypriot Competition Commission) proceeded to present a case study from Cyprus, while Ms. Maria Deredaki (Head, Office for Personal Data Protection, DGC) proceeded to an extensive analysis of cases of the HCC. In the second part of the meeting, representatives of Consumer Organizations from Greece and Cyprus made brief interventions regarding problems identified in the market and a discussion followed with the executives of the HCC.

You can watch the video of the teleconference held in March, [here \(in Greek\)](#).

ΗΜΕΡΙΔΑ ΕΠΙΜΟΡΦΩΣΗΣ ΕΝΩΣΕΩΝ ΚΑΤΑΝΑΛΩΤΩΝ

*«Καταναλωτές και Δίκαιο Ανταγωνισμού:
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Τρίτη, 16 Μαρτίου 2021, 14.00-18.00

LiveStreaming: www.epant.gr/consumers

ΕΠΙΤΡΟΠΗ ΑΝΤΑΓΩΝΙΣΜΟΥ ΕΛΛΑΔΑΣ - ΕΠΙΤΡΟΠΗ ΠΡΟΣΤΑΣΙΑΣ ΤΟΥ ΑΝΤΑΓΩΝΙΣΜΟΥ ΚΥΠΡΟΥ





Digital Services

The HCC has, especially during the last year, invested in innovation and digital upgrade. In this context, and in view of the need for digital transformation of government agencies and of meeting the needs of public service, especially during the pandemic, updated the digital services provided by the HCC's website to undertakings, public agencies and citizens.

The HCC expects that the "Digital Services of the Hellenic Competition Commission" will contribute, among other things, to the provision of integrated Digital Services to those interacting with the HCC, citizens, professionals and undertakings, but also the public agencies with which it interacts or cooperates, within the framework of its responsibilities. This will also contribute to increasing transparency, improving the efficiency and effectiveness of its investigative work, and improving the speed and quality of its work and the services it provides.

The new digital services of the HCC, offered to businesses, citizens and other public agencies, aim, especially in this difficult period of the COVID-19 pandemic, at providing the opportunity to perform electronically all the procedural issues of concern and / or at the collection of documents and information related to the work of the Authority, without the need for physical presence and / or telephone conversations. Furthermore, through an application, the interested parties have the opportunity to schedule a tele-meeting with HCC executives on issues that concern them.

From October until today, the digital services webpage has been renewed with the addition of the opportunity to provide information anonymously. A [form with detailed instructions for the use of digital services](#) is available on the HCC website (in Greek). To date, passwords for the use of the HCC's digital services have been issued to more than 50 individuals and legal entities.



**DIGITAL
SERVICES**



Digital Services

Specifically, the HCC's digital services concern:

- Anonymous Provision of Information,
- Electronic submission of a request for a tele-meeting / tele-conference with officials of the Hellenic Competition Commission,
- Electronic filing of a complaint using the complaint form,
- Notification of a concentration of undertakings electronically using the relevant notification form,
- Electronic submission of a request for derogation from the obligations of undertakings for suspension of a concentration,
- Online submission of a commitments proposal,
- Electronic submission of third parties' intervention,
- Electronic submission of a request (from public agencies) / query for an opinion on competition issues,
- Possibility of electronic information on the payment of the 1‰ fee of art. 17 of Law 3959/2011 and submission of an application for its refund,
- Electronic submission of general questions.

For information about the HCC's digital services click [here](#) (in Greek).



**DIGITAL
SERVICES**



Anonymous Provision of Information

stop them..

..anonymously



In March, the HCC introduced a further innovation in the way it communicates and interacts with citizens. **Information Whistleblowing**, also known as whistleblowing in other EU countries, is a tool that may prove very important for investigating cases involving anti-competitive practices.

This system has been used by the EU Competition Commission since 2017, as well as other countries, which by way of this system, receive a significant amount of information each year, thus leading to the initiation or successful completion of investigations.

The HCC whistleblowing system fully ensures the anonymity of citizens who, for example, due to their position in companies engaging in anti-competitive practices, have at their disposal key information.



Anonymous Provision of Information

This information may relate to the rigging of bids and tenders, the fixing of prices for products or services, the restriction or control of production, markets or technical development, the exclusion of competitors and products from the market, anti-competitive behavior by dominant undertakings that impose unfair prices or unfair trading conditions, infringements related to unfair commercial practices by undertakings with significant bargaining power in business supply chain relationships (e.g. relating to agricultural products and food and other consumer products).

These practices, which are prohibited by national and EU competition law, cause significant damage to the Greek economy and directly affect consumers.

At <https://epant.whistleblownetwork.net>, interested parties can read all the information that will make them feel safe and confident about the use of the anonymous information system regarding maintaining their anonymity, practical information for the use of the system, as well maintaining their anonymity throughout their communication with the HCC through a secure communication box (with their anonymity always guaranteed) and be informed about the progress of the case concerning them.

For more detailed information, please refer to a short note on the project "Digital Services of the Hellenic Competition Commission" ([User Guide for Digital Services](#)), as well as a relevant informative video ([Digital Services of the HCC](#)).





HCC Data Analytics and Economic Intelligence Platform

In recent months, the HCC has been in a constant race of "digital speeds". Its collaborations with experts of international stature but also its digital transformation have set it on equal footing with leading competition authorities.

In this context, the HCC has developed an important innovative tool, the "HCC Data Analytics and Economic Intelligence Platform". The new platform aims at easy and efficient data collection, processing, display and analysis and the development of screens for multiple market sectors. In this way, the Hellenic Competition Commission will be able to identify markets in which anti-competitive behavior is suspected.

This platform is used for the Commission's research during this critical period regarding COVID-19 (especially in the cases of medical disposables, fuel and food markets), and also in other sectors. The main advantage of the platform is that it creates a permanent infrastructure for future Commission investigations, as it permanently connects, through APIs, existing databases, which are updated in real time (inter alia the e-Consumer database, databases of the Athens Central Markets Organization, Diavgeia, e-fuels regarding fuel prices, etc.), with a central platform, which is also configured for the best detection of anti-competitive practices (through advanced screening).

The platform has also served as a basis for the subsequent Scientific Research Work on the topic "Computational methods and computational economics in competition law enforcement" undertaken by the Hellenic Competition Commission on behalf of the BRICS Competition Research Center, yielding a significant amount to the Commission, using the possibilities provided by the new provisions passed by the Parliament last January, according to which the Commission is given the opportunity for funding by international research projects.

Special mention to the HCC Intelligence Platform was made in the context of a research project on the use of new digital tools in the implementation of competition supported by the United Nations. The Competition Authorities of Brazil, Russia and South Africa collaborated with the Hellenic Competition Commission in this program. This gave the Hellenic Competition Commission the opportunity to further develop this innovative tool in the future, and to promote Greek know-how internationally.



HCC

DATA ANALYTICS & ECONOMIC INTELLIGENCE



HCC Data Analytics and Economic Intelligence Platform

Digital evidence research using innovative Big Data and Artificial Intelligence tools has now been applied to various HCC investigations with the procurement, after years of digital lag, of innovative search and data processing software processed by the newly established department for Digital Evidence Research, which was established last October.

The HCC using the electronic program at its disposal, is now developing its own databases (e.g. medical disposables). With the use of the software it is possible to send questionnaires requesting information to thousands of businesses simultaneously and to collect coded information to facilitate its further analysis. The resulting databases are introduced into the Commission's digital infrastructure and are accessible by the relevant sectoral directorate.

The "HCC Data Analytics & Economics Intelligence" platform was presented live to the public and the media through a special event using Live Streaming technology on Tuesday, April 6, 2021.

You can watch the video of the event (in Greek) [here](#).

ΠΑΡΟΥΣΙΑΣΗ ΠΛΑΤΦΟΡΜΑΣ

HCC
DATA ANALYTICS & ECONOMICS INTELLIGENCE

ΤΡΙΤΗ 6 ΑΠΡΙΛΙΟΥ 2021, 16:30 - 18:00

www.epant.gr/intelligence



Enhancing transparency and fair administration in the Hellenic Competition Commission

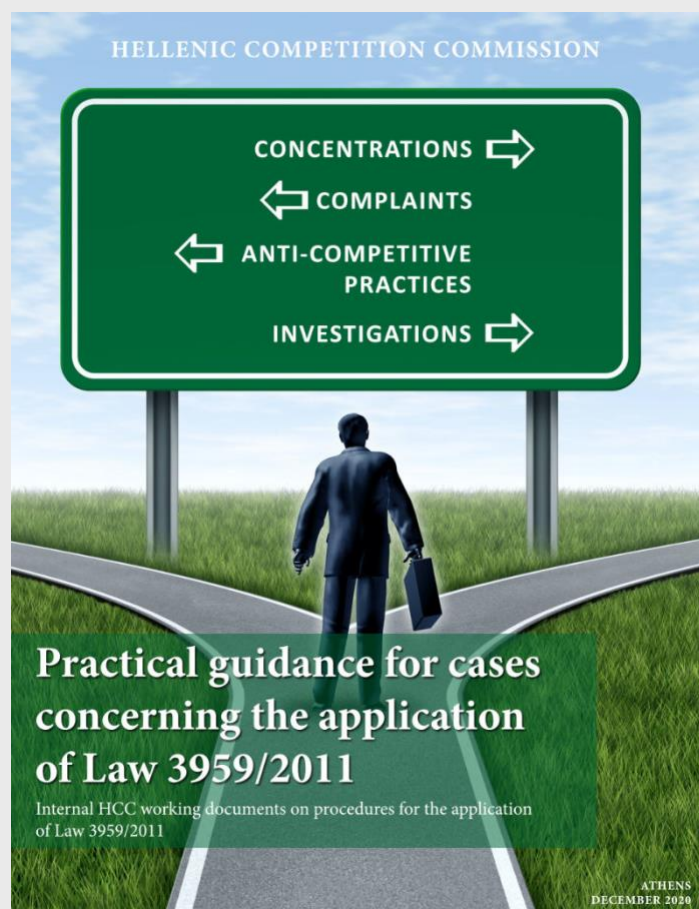
Publication of the HCC Manual of Procedures

On December 1, 2020, the Manual of Procedures was published on the website of the Hellenic Competition Commission www.epant.gr

This Manual is part of an extensive internal Code, where the procedures of the HCC are recorded and standardized for the first time, as they have been formulated and significantly reformed, in order to increase the efficiency of its operation. During the implementation of the above project, proposals and opinions of those interacting with the HCC (experts and agencies practicing and / or applying competition law) were collected and taken into account regarding the practices applied, potential improvements and means of reducing bureaucracy.

The publication of the Manual is part of the HCC's strategy to enhance its outreach and transparency of procedures.

You can study the Operational Procedures Manual of the Hellenic Competition Commission [here](#).





The new Organization Chart of the Authority

In the context of upgrading its services at all levels, the Hellenic Competition Commission drafted a new [Organization Chart](#) which was published in [October 2020 \(Government Gazette 4748 / B ' / 27.10.2020\)](#).

Following consultation with its employees and employee unions, the new HCC Organizational Chart was adopted and entered into force, introducing a new structure for the internal organization of the HCC and the Directorate-General for Competition (DGC). The main feature of this new structure is the strengthening of the functionality and flexibility of the Authority, based on the international standards of other Competition Authorities.

The features of the new structure are the replacement of the existing separate Legal and Economic Directorates by "mixed" Sectoral Directorates that focus on one or more, but adjacent or similar economic sectors, and are staffed with employees of relevant financial, legal and technical expertise. Furthermore, it provides for the creation of horizontal Departments for Economic and Digital Data Research (in addition to the existing Department for the Promotion of Competition Policies), as well as an Information Systems Directorate and a Chief Legal Officer Directorate.

From the first months of operation of the DGC under the new Organizational Chart, improvements in the efficiency of management of the affairs of the Authority have been evident, regarding the coordination of priorities within the sectoral Directorates and the provision of specialized advice by the Chief Legal Directorate as well as the Independent Department for Digital Evidence Research which manages the HCC Intelligence Platform and the independent Department for Research and Financial Documentation, which is tasked with updating the HCC Library, while it also has an active participation in the sectoral studies conducted by the sectoral directorates. In addition, the Department for the Promotion of Competition Policies has focused its attention on informing citizens and businesses by writing and posting targeted information but also by taking initiatives to inform public agencies.

Finally, new Directorates have been created that report directly to the President of the HCC (Directorate for Coordination and Secretariat and Directorate for International Relations and Communication), as well as the Office of the Legal Council of the State at the HCC.

Mrs. Ekaterini Mantzou, economist, took over as Director-General of the Hellenic Competition Commission on October 27, 2020.



Spotlight: The New Directorate for International Relations and Communication

This section of the newsletter will present the various Directorates and other Organizational Units of the Commission, with an emphasis on their activities and their staff which contributes to the work of the Commission.

The establishment of the new Directorate of International Relations and Communication marks the enhanced role of the Hellenic Competition Commission regarding outreach, advocacy and the successful development of strategic cooperation with the European Commission, National Competition Authorities at European and international level as well as with International Organizations and agencies of other countries.

The Directorate of International Relations and Communication, which reports directly to the President of the Hellenic Competition Commission, is primarily responsible for monitoring, participating in and communicating the issues relating to the functioning of free competition at national, European and international level.



Mary Chamilou
Director of International Relations & Communication



Georgia Kaoura
Head of the Department for International Affairs

It should be noted that the vast majority of National Competition Authorities at European and international level, have already established, many years ago, and operate directorates or independent departments of international relations and communication, to which attention is drawn in their capacity as an important factor for the shaping of competition policy of the authorities in these countries, due to their key role and the enhanced nature of their responsibilities.



Spotlight: The New Directorate for International Relations and Communication

The Directorate for International Relations and Communication creatively and constructively supports the work of all other Directorates, Branches and Departments of the Hellenic Competition Commission, with the aim of promoting their work and actions not only in the national but primarily in the European and international environment.

The operational objectives of the Directorate are mainly focused on the effective promotion and support of the mission, positions and aspirations of the HCC concerning its relations with the competent EU agencies, international Organizations, networks of Competition Authorities, National Competition Authorities or Agencies of other countries, as well as the contact and connection of the Administration and the Services of the HCC with the above international authorities, organizations and agencies.

Also, its main objectives are the implementation of actions with the aim of validly informing organizations and businesses on issues related to the main mission of the Hellenic Competition Commission and, in general, strengthening the outreach and advocacy efforts of the



Kostas Gourloumenos
Head of Digital Communication
& Public Relations Unit

The new offices of the Digital Communication
& Public Relations Unit





The structure of the new Directorate for International Relations and Communication

The Directorate for International Relations and Communication consists of the Departments:

- a) Department for International Relations and
- b) Department for Digital Communication and Public Relations.

a) the Department for International Relations has in particular the responsibility of communication and cooperation with the European Commission and the National Competition Authorities of the Member States of the European Union on issues that generally fall within the competence of the EU. In this light, it prepares, organizes and coordinates the representation of the HCC, in cooperation with the President, in the bodies, committees and working groups of the European Commission provided for in the Regulations, in the Organization for Economic Cooperation and Development (OECD), the International Competition Network (ICN), the European Competition Network (ECN), its participation in events, committees and working groups organized by the above Organizations or by other National Competition Authorities, as well as any other international cooperation. It is also responsible for the coordination, in cooperation with the other organizational units of the Hellenic Competition Commission, of the research programs of the European Union and international organizations, for the design and implementation of the public relations programs of the HCC as well as for the organization and observance of the Protocol of European and International Documents. The aim of the operation of the Department is to contribute to the consolidation of the mission of the Competition Commission as well as to be a model unit of communication and cooperation with the bodies of the European Commission and the International Organizations and bodies for the promotion and exchange of views and ideas on competition issues.

b) the Department for Digital Communication and Public Relations is mainly responsible for the communication and relations of the HCC with the media, providing information on the responsibilities and work of the HCC, the organization of press conferences, as well as the preparation and distribution of press releases and information leaflets, and organizing the various events of the HCC. It also supervises the website and the intranet of the HCC and the social network accounts and other electronic social media of the HCC and is responsible for the design, implementation and management of audiovisual and digital competition promotion material.





The new HUB for the trainees of the Hellenic Competition Commission



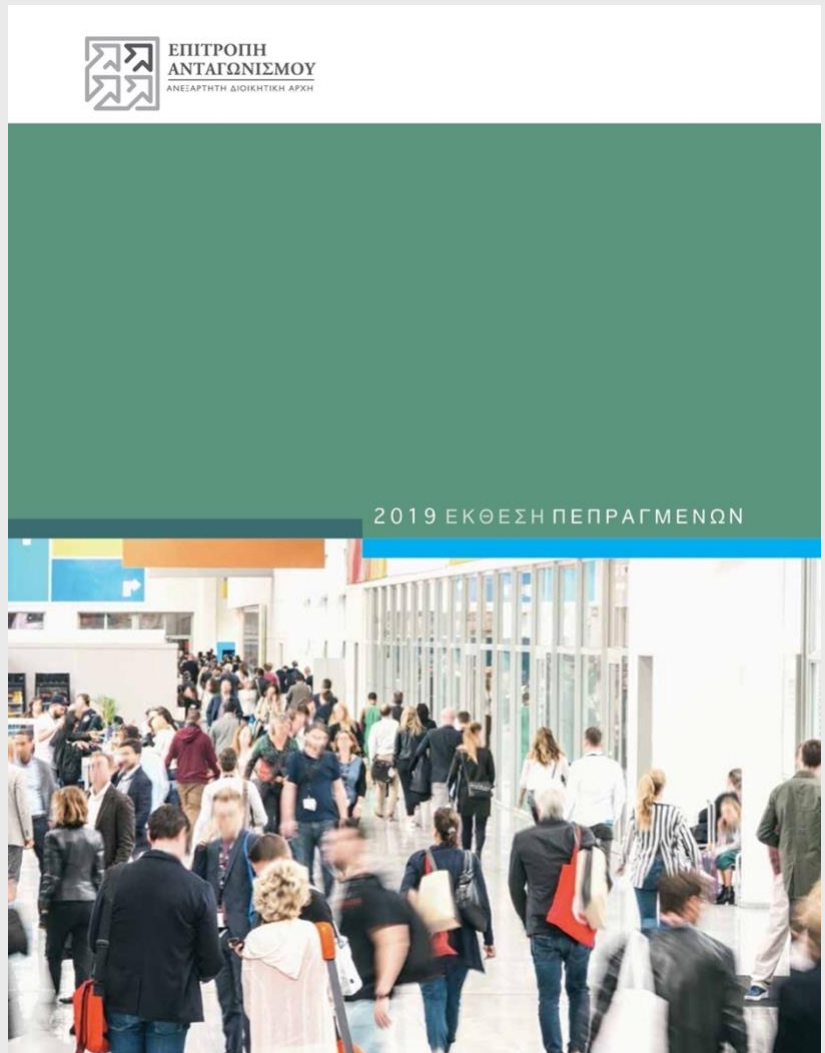
The Hellenic Competition Commission has invested in its relationship with young scientists. The training program of the HCC addressed to scientists in the fields of economics, law and computer science, has been a remarkable success. In October 2019 we received around 20 applications while in the last call the applications amounted to more than 150. The Commission has also concluded memoranda of cooperation with Greek Universities (Athens University of Economics and Business, University of the Aegean and soon with the Kapodistrian University of Athens - Law School). For the above reasons, the HCC wanted to set up a trainee HUB enabling trainees to support its work.

This new room is located in the new premises of the Commission where the new Directorates are also located (F Directorate of Media, Internet, Electronic Infrastructure and Directorate for International Relations). The space provides trainees with the opportunity to work in a modern environment while at the same time giving a youthful image to the Hellenic Competition Authority and connecting the student youth and young scientists and researchers with the objectives of the Authority.



Publication of the 2019 Annual Report

The Competition Commission issued its annual Activity Report for the year 2019 in December 2020. In addition to the detailed list of achievements and other information regarding the Commission, for the first time the Annual Report includes two special sections in which a central theme is presented ("special theme") as well as the section "Window with a view" with analyses and messages from personalities of the field of competition from Greece and abroad.



For the 2019 report, the special topic was "Competition and the Digital Economy". The central section on "Tackling Big Tech" by the EU: "We see the trees. The forest, though?" developed by Professor Michael G. Iakovidis (Sir Donald Gordon Professor of Entrepreneurship & Innovation, Professor of Strategy and Entrepreneurship, Chief Advisor to the Competition Commission for Digital Economy), while an analysis on "E-commerce in 2020: developments and challenges" was sent by the Hellenic E-Commerce Association (GRECA).

Furthermore, the section "Room with a View: The Challenges of Competition Law in 2030" included messages from the President of the Portuguese Competition Commission, Mrs. Margarida Matos Rosa, the Chairman of the German Competition Commission, Mr. Andreas Mundt, and the Chairman of the Dutch Competition Commission, Mr Martijn Snoep.

You can read the 2019 Annual Report (in Greek) [here](#).



Hellenic Competition Commission and Media

*Interview of the President of the HCC
Mr. Ioannis Lianos
in the Sunday Kathimerini
(April 18, 2021)*



The President of the Hellenic Competition Commission, Mr. Ioannis Lianos, featured in Kathimerini/Sunday ed. In an in-depth interview with Dimitra Manifava on Sunday, April 18, he spoke about Competition culture in country, the strategic planning and the actions of the Commission so far regarding businesses and consumers and its digital transformation, as well as the interventions that have been planned in various sectors of the Economy.

"The purpose of the Competition Commission is to shake stagnant waters by opening closed ecosystems, allowing innovative businesses to grow and lay the foundations for the digital and green transformation of the economy."

"We want to promote a new "image" for the Competition Commission: it must not only act as the market watchdog, but also intervene proactively to create, in particular, relatively new economic activities, such as green growth and digital economy, structures based on sound competition and an open economy. "

*"We have started an effort of advocacy/outreach activities, through conferences, meetings with institutions, setting up a website that offers specialized information to companies, while
"through the Commission 's strategically designed digital transformation, teleconference is enabled as well as continuous institutional communication between citizens and businesses and the Authority."*

"For the first time in the history of the Competition Commission, we proceeded with intensive planning of sectoral and regulatory interventions in various sectors of the economy."



*Read in detail the interview of
Mr I. Lianos:*

K. You recently published the HCC's preliminary views on the competitive conditions in the construction industry. Was this research aimed, inter alia, at preventing and deterring distortions of horizontal common ownership? Have you identified other sectors where similar phenomena are observed and if so, how does the HCC intend to act?

I.L. The Competition Commission has launched the most "interventionist" initiative provided by competition law, the regulatory intervention in the construction sector, with the aim of acting, both preventively and deterrently. The research raised the issue of the existence of horizontal common ownership that should concern us, under certain conditions, regarding all sectors that have an oligopolistic structure. In this case as well as in each individual case, we must consider the size of the market concentration, the ownership chain of the largest companies, the common shareholders in relation to their participation in corporate governance (passive or active), etc. The aim of the Competition Commission is to create those conditions that will improve the competitiveness of the markets in Greece, for the benefit of all - employees, businesses and consumers.

K. After three "competition toolboxes" of the OECD for Greece, do you think that the conditions of competition in the sectors that were the subject of the recommendations of the international organization have improved?

I.L. Undoubtedly yes. According to the OECD Product Market Regulation 2018 (PMR) index published in April 2020, which examines regulatory barriers and competition of businesses by sectors of the economy for all OECD countries, our country has improved compared to 2013. We are now approaching the average of the OECD Member States, as we achieve a performance indicator of 1.56 when the OECD average is 1.38. Please remember that the OECD in collaboration with the Hellenic Competition Commission prepared three toolboxes (2012, 2014, 2016). A total assessment of 2,312 laws and regulations was made (in 13 areas), 1,276 provisions were identified that potentially restrict competition and 775 relevant proposals were formulated. According to SEV (Hellenic Federation of Enterprises) data (2019) that assessed the extent to which these recommendations were implemented, it appears that more than 90% of the recommendations (from the three toolboxes) had been fully implemented, resulting in the elimination of a significant number of regulatory barriers to competition between companies in the domestic market. But there are areas of the economy where we can still make significant progress.



K. How would you rate the level of domestic corporate culture in terms of compliance with competition law and the level of state regulatory role (i.e. if the state still poses many regulatory barriers)?

I.L. I can compare compliance with competition law to a tango for two. Companies need to invest in compliance with competition law, and the Competition Commission needs to better communicate what it expects from companies so that there is legal certainty. Systematic compliance can create a culture of competition. However, I believe that compared to most European countries, we are still behind. In the Hellenic Competition Commission, we have started an effort to foster outreach activities and to inform companies, through conferences, meetings with institutions and websites that offer specialized information to companies. Through the strategically designed digital transformation of the Commission, the opportunity is provided for participation in teleconferences and for continuous institutional communication of citizens and businesses with the Authority. We also plan to adopt guidelines on various issues arising from the implementation of the legislation (something that has not been done before) in order to improve the compliance of companies with competition law. For the first time in the history of the Competition Commission, we proceeded to the intensive planning of sectoral and regulatory interventions in various sectors of the economy. An intervention has already been planned in the sectors of private health services, recycling and waste management. In our interventions so far, we have focused on regulatory barriers to competition which are the pathogenesis of the generally closed and stagnant economic model existing in the country. Each time we intervene, we will make suggestions and, where necessary, issue opinions. We intend to intervene on our own initiative in various other sectors of the economy, and certainly where market mapping indicates that there are problems.

K. About 1.5 years ago, the HCC began an investigation into bank charges. What stage is this research at? Do you think that after the intervention of the HCC and the state, the banking policy has changed to the benefit of consumers?

I.L. As you know, I am not allowed to comment on pending cases of the Directorate-General of the Competition Commission. I must emphasize, however, that we have started an unprecedented effort in the Greek banking market, which has remained undisturbed for decades. We have proceeded with the largest dawn raid ever carried out by the Hellenic Competition Commission, only two months after I assumed office, and this is a top priority for us. There is a large team in the Directorate-General (economists, lawyers and experts) called upon to scrutinize data of inconceivable volume. We use new investigative technologies, which I hope will allow us to move forward quickly. To anticipate the counter-argument, I will tell you that the average time needed to complete such an investigation examining potential horizontal collusion practices in Europe is -even now- well lengthier .



You should also consider that a lot of time and energy has been spent handling the objections and appeals of some banks. Also, the pandemic which followed and is still in progress has hindered our efforts. At this point I would like to remind you that the Commission has launched a Sectoral investigation in the Fintech industry, as we believe that regardless of any anti-competitive practices, there should be no barriers to competition through innovation, as Fintech companies in various markets in the financial sector, can put competitive pressure on banks e.g. to reduce supplies and improve their services for the benefit of consumers. We intend to promote this competition specifically through an Open banking and Open finance policy, as in other European countries and Israel, examples of which we are closely following.

K. Last year, the HCC intervened in the telecommunications sector through the assignment of a related study to the Finnish company Rewheel, which led the EETT (Hellenic Telecommunications and Post Commission) to assume that you were trying to take over its responsibilities. First of all, do you think that the responsibility of telecommunications should be transferred to the HCC? Does it create problems in the control of the industry and if so what is the existing model? What applies in other countries and what could alternatively be done in Greece?

I.L. Allow me to correct you. The Hellenic Competition Commission commissioned a study from an expert on the mobile telephony data market, and not as an intervention in the telecommunications market, as you mentioned. This study was undertaken in the context of our design which I mentioned to you, for sectoral research in e-commerce and the Fintech industry. It should be noted, however, that in all other European countries, including the OECD (excluding Mexico), the Competition Commission has the power to enforce competition law in all sectors of the economy, including telecommunications. This - and here I express my personal opinion - must be done in our country as well, as the HCC maintains exclusive competence in the application of Competition Law in the digital economy concerning e-commerce, the Fintech industry, digital advertising, in a few years the Medtech sector etc., but not in telecommunications, where the responsibility to enforce the competition rules lies with the EETT and where the Hellenic Competition Commission may intervene ex post, only if the EETT requests its contribution. I believe that due to this institutional originality and the difficult separation between responsibilities, problems may arise in the proper protection of competition, ultimately to the disadvantage of businesses and consumers.

.. to be continued on the next page



K. The HCC has often been accused of delays in issuing decisions, but also of subsequent ineffectiveness in enforcing the fines imposed. What is the reality at the moment regarding the pending investigations, but also in relation to the fines (are they overturned by the courts or significantly reduced)?

I.L. By 2020, the Competition Commission has significantly accelerated its processes at all levels, overcoming problems that have affected its operation in recent years.

The significant efforts of the staff in combination with the new organization, significantly accelerated the pace of examination of cases that had created a large "stock" and were pending for many years.

The creation of a special working group to deal with older cases and the strict adherence to deadlines, allowed the Commission to complete more than 120 cases by 2020, reducing the average completion time of pending cases, from about 8 years in September 2019 to 2 years in September 2020, while at the moment the average time is just under 2 years.

This important result is due not only to the closure of many old cases, but also to the initiation of new ones. As far as the fines are concerned, although they are imposed by the Commission, they are collected by the respective Tax Offices. In any case, the fines are paid (after the completion and examination of appeals) and the Commission monitors their collection at regular intervals in cooperation with the Tax Offices. Finally, the administrative courts uphold the majority of Commission decisions. Indicatively, it should be noted that out of the 9 decisions issued in 2020, 5 were upheld by the administrative courts, 3 were upheld but the fine was reduced and only in one case the court accepted the appeal and the decision of the Commission was annulled. Approximately the same rates of ratifications and of reduction of fines are observed in the European Commission and other Competition Commissions in Europe.

K. More than a year after the outbreak of the pandemic in Greece, how do you think the economy and entrepreneurship will be affected? Do you think that consolidation will increase in some sectors, possibly leading to phenomena of abuse of dominance? Does the fact that due to the pandemic so many direct assignments in public procurement have been allowed affect matters and if so, how?

I.L. I believe that the pandemic has significantly affected the economy and entrepreneurship in Greece and will continue to affect it in the near future. I will not mention the negative effects of the pandemic on businesses and employees, this is a common finding. But there have been some structural changes in the way businesses operate in Greece. I will refer to the explosive growth of e-commerce and digital services in general as well as the opening of markets in which traditionally there was no penetration of e-business in Greece.



I.I. This enables, for the first time, new business players to enter traditional markets and grow, possibly developing innovations and outreach activities. It is particularly important that these new players can in the future or relatively quickly compete with established companies in the market, which are usually old state monopolies that have been privatized and that due to their old investments in technologies but also their central position in the ecosystems they have created, can hinder the development of innovative businesses based on new technologies. This leads to a relative immobility of the economy.

To point out that the large Greek companies are almost the same in the last two to three decades, and relate to sectors of the traditional economy, without having yet created, like other countries of comparable size, large companies, mainly technological, with activity in the new sectors of the 4th industrial revolution. To this end, we are launching an innovative initiative in the Hellenic Competition Commission to create a sandbox - a testing ground for companies that want to invest in projects in sustainable development, and which need greater legal certainty in the implementation of competition law.

The purpose of the Competition Commission is to stir up stagnant waters by opening closed ecosystems, allowing innovative businesses to grow and lay the foundations for the digital and green transformation of the economy. We also want to promote a new “image” for the Competition Commission: it should not only act as the market watchdog, but it should also intervene proactively to create, based on relatively new economic activities, such as those of green growth and the digital economy, structures that are based on healthy competition in the open economy.

Regarding your question about direct assignments in procurement, let me mention that the Competition Commission does not have the power to examine whether the contracting authorities apply, or not, the law on public procurement (the competent authority is the HSPPA - Hellenic Single Public Procurement Authority). The HCC has jurisdiction only in cases of collusion of competing companies, of rigging tenders through the creation of cartels.

Appearance of the Head of the Department for the Promotion of Competition Policies, Mr. Andreas Themelis on the show "From 6 .." on ERT1 with Dimitris Kottaridis and Giannis Pittaras

Mr. Themelis had the opportunity to present the new system introduced for investigations by the Competition Commission, the <https://epant.whistleblownetwork.net/>

He explained how stakeholders can use it, the kind of information they can share with the Commission, without leaving any traces, that is, with guaranteed complete anonymity and without fear of retaliation.



Collaborations of the HCC

Memorandum of Cooperation between the Hellenic Competition Commission and the University of the Aegean



From left: Dean of the University of the Aegean, Professor Chrysi Vitsilaki, President of the Hellenic-Competition Commission Professor Ioannis Lianos

The Memorandum of Cooperation signed between the Hellenic Competition Commission and the University of the Aegean, by the President of the Hellenic Competition Commission Professor Ioannis Lianos and the Dean of the University of the Aegean Professor Chrysi Vitsilaki aims to consolidate and strengthen cooperation between the two parties.

Priority was given to the creation of a joint working group for maritime cabotage in order to create a digital space and an application to facilitate the participation of citizens (citizens science) in monitoring the operation of the relevant markets. Actions will include educating and raising public awareness, especially of students and researchers on healthy competition issues.

The team will work, among other things, to expand the HCC Economic Intelligence platform of the Hellenic Competition Commission and to process data from the prices applied to coastal and ferry connections in Greece, creating a database and special data processing algorithms (data analytics) in real time, which will be based on an application (app) that will be developed by the University of the Aegean and where citizens and consumers may enter price information with the aim to raise the awareness of the citizens against anti-competitive practices (competition advocacy).

On behalf of the University of the Aegean, the coordinator of the activities, Professor Maria Lekakou, participated in the meeting held at the offices of the Competition Commission on 8.1.2021, where she presented the main points of the cooperation and where the common actions for 2021 were decided, and exchanged the signed Memorandum of Cooperation with the President of the Commission.



Signing of a Memorandum of Cooperation between the Hellenic Competition Commission and the Athens University of Economics and Business



From left: Dean of the Athens University of Economics and Business, Professor Dimitrios Bourantonis, President of the Hellenic Competition Commission Professor Ioannis Lianos

On March 1, 2021, a Memorandum of Understanding was signed between the Hellenic Competition Commission and the Athens University of Economics and Business, by the President of the Hellenic Competition Commission, Professor Ioannis Lianos, and the Dean of the Athens University of Economics, Professor Dimitrios Bourantonis, for the consolidation and strengthening of the cooperation between the two parties.

In particular, in the context of achieving these objectives, a joint action plan was agreed by the two parties, which includes, inter alia:

- Cooperation between HCC executives and AUEB research teams, aiming at the development of joint research activities, and the mutual exchange of know-how
- Upgrading of skills, training, certification of knowledge, expertise and professional qualifications of HCC executives based on recognized standards
- Development of the special "internship" program for students (undergraduate, postgraduate, doctoral or postdoctoral) of AUEB at the HCC
- Collaboration on existing or new academic programs and design or creation of joint co-financed Programs
- Support for research activities in the field of Diploma Theses and Doctoral Dissertations, the topics of which fall within the thematic area of Competition law and economics, as well as applied data science
- Development of the program for targeted initiatives, to create a climate of understanding and cooperation between the two Parties (thematic meetings, conferences, lectures, workshops)
- Joint organization of scientific or research activities (e.g. conferences, meetings, events)
- Submission of proposals to co-financed national, European or international programs
- Optimal utilization of new financial / support tools.



Signing of a Memorandum of Cooperation between the Hellenic Competition Commission and the Athens University of Economics and Business

The Dean of AUEB, Professor Dimitris Bourantonis, referring to the event, stressed that “through substantial cooperation between both sides and the implementation of the described actions, we expect students and employees of businesses to benefit in many ways, through the connection of research and education with innovation and entrepreneurship”.

The President of the Hellenic Competition Commission stated the following: "Increasingly, Competition Authorities are facing significant challenges in an ever-changing economy, both due to technological and climate change, as well as changes in market structures and the way undertakings compete. The traditional toolkit and methodology available to Competition Authorities may not be enough to address new phenomena, such as the use of algorithms in business competition or the impact on privacy of mass collection and use of consumer data. Therefore, close cooperation is needed between the Competition Commission and the academic community in order to devise the necessary methodologies and to create the appropriate tools to enable the Competition Authorities to carry out their work effectively. Collaborations, such as the one between AUEB and the Hellenic Competition Commission, contribute to the more effective application of competition law, while creating a research ecosystem that enriches both the Competition Commission's actions and the educational process at the University, for the benefit of society and the economy. We look forward to an intensive and multidimensional collaboration with this prominent public university in economic studies and research in our country ".

From left: Mrs. Kalliopi Benetatou - Vice President of the HCC, Professor Dimitrios Bourantonis - Dean of AUEB, Professor Ioannis Lianos - President of the HCC, Professor Konstantinos Drakos - Deputy Dean of AUEB)





Election of the President of the HCC Mr. I. Lianos to the Board of Directors of the OECD Competition Committee



The President of the Hellenic Competition Commission, Mr. Ioannis Lianos, was elected as a regular member of the Board of Directors of the Competition Committee of the OECD for the year 2021. It is the first time that a Greek official is elected to this position, representing the Hellenic Competition Commission.

On his election, Mr. Lianos stated: *"The Board of Directors of the OECD plays an important coordination role within the OECD Competition Committee, setting the agenda for discussions at the most important international organization on competition issues. It is a great honor for me to be elected to this role by the members of the Board of Directors of the OECD and to work with exceptional colleagues from other OECD Member States. I see in this role not only the duty to represent the Hellenic Competition Commission, which for the first time participates in the Board of Directors, but also to promote a progressive agenda in competition law in a period of intense changes, both socio-economic and technological, as well as environmental".*



The Board of Directors of the Competition Committee of the OECD for 2021 consists of the following members:

Mr. Frédéric JENNY, President,
Ms. Sarah COURT (Australia),
Mr. Matthew BOSWELL (Canada)
Mr. Andrés BARRETO (Colombia),
Mr. Olivier GUERSENT (European Union),
Mr. Frédéric JENNY (France),
Mr. Andreas MUNDT (Germany),
Mr. Ioannis LIANOS (Greece),
Ms. Reiko AOKI (Japan),
Mr. Hyungbae KIM (South Korea),
Ms Alejandra PALACIOS PRIETO (Mexico),
Mr. Lars SØRGARD (Norway),
Ms. Margarida MATOS ROSA (Portugal),
Mr. Andreas HEINEMANN (Switzerland),
Mr. Andrea COSCELLI (United Kingdom).



Participation in Conferences

Participation of the President of the HCC, Mr. I. Lianos as a keynote speaker in the following conferences / workshops / webinars:

- 3/10/2020 Big Tech & Antitrust—Competition Policy in the Digital Age” hosted by Yale ISP and TAP@Yale “Restrictions on Privacy and Exploitation in the Digital Economy: Competition Law Perspective”
- 7/10/2020 The Ada Lovelace Institute and Inclusive Competition Forum Workshop invitation: Inspecting algorithms in competition investigations
- 19-23/10/2020 UNCTAD Review Conference
- 9/11/2020 EBRD Competition Community of Practice Launch Event: “Competition Policy in Times of COVID-19: A Balancing Act”
- 13/11/2021 “Competition law and sustainable development: Overcoming the dilemma?” Rome Conference Luis School of Law’s
- 17/11/2021 “New Challenges in Competition Law The digital Agenda and Green Growth” University deli Studi Firenze
- 18/11/2021 Sciences Po Annual Conference: EU Regulation of Digital Markets
- 24/11/2020 Responding to COVID-19 Crisis at Advanced EU Competition Law, Brussels conference
- 26/11/2021 Bruegel closed door event on regulation of platforms and competition policy-
- 30/11/2020 OECD Roundtable on Digital Advertising Markets
- 1/12/2020 OECD Hearing on Sustainability and Competition
- 2/12/2020 OECD Roundtable on the Role of Competition Policy in Promoting Economic Recovery
- 3/12/2021 OECD Hearing on Competition Economics of Digital Ecosystems
- 3/12/2020 "11th IELKA (Research Institute of Retail Consumer Goods) CONFERENCE "
- 4/12/2021 LATAM Roundtable I: European Competition Law Enforcement, Regulation And Trends Concerning Digital Platforms.
- 7/12/2021 JCLE Teleconference Common ownership, interlocking directorates & competition: a transatlantic perspective
- 18/12/2020 FAS Russia-BRICKS+VI International Online Conference
- 19/2/2021 Web-meeting of the Working Party on the Digital Markets Act
- 3/3/2021 OECD Competition Bureau Spring conference call
- 5/3/2021 « Ecosystems and competition law in theory and practice» in the Competition Policy Workshop paper co-presentation with Mr. Iakovidis
- 10/3/2021 Tele-event to inform HCC members about differences between free and unfair competition
- 18/3/2021 British Institute of International and Comparative Law “Sustainability Considerations in Competition Enforcement”
- 23/3/2021 PromthEUs Network Event “Challenges and policy dilemmas in the digital services under the new EU framework for markets”



HCC members participated in the following conferences / workshops / webinars:

Participation of the Vice President, Mrs. Kalliopis Benetatou:

- March 2-4, 2021, OECD-GVH, Virtual RCC Seminar, Tackling Bid Rigging in Public Procurement, a) CASE STUDIES Successful examples of bid rigging investigations, Mrs. Kelly Benetatou and Mrs. Lefkothea Nteka, Greece and Mr. Haim Arbiv, Israel, b) SIMULATION: INSIDE A BID RIGGING INVESTIGATION The key ingredients of an effective investigation: planning, evidence gathering, assessment and fines, Mrs. Kelly Benetatou and Mrs. Lefkothea Nteka, Greece, Mr Haim Arbiv, Israel, Despina Pachnou, OECD.

Participation of Rapporteur Maria Ioannidou:

- November 20th : The Evolving Governance of EU Competition Law in Time of Disruptions: a Constitutional Perspective (Maastricht University/ York University), Rethinking competition law remedies in a multilevel system
- December 11th: Competition Enforcement after Brexit: Merger Enforcement (Panel discussion) (British Institute of International and Comparative Law)





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