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Directorate for Financial and Enterprise Affairs
COMPETITION COMMITTEE

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Annual Report on Competition Policy Developments in Greece

-- 2024 --

This report is submitted by Greece to the Competition Committee FOR INFORMATION.

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Table of contents

Greece.....	3
Executive Summary	3
1. Changes to competition laws and policies, proposed or adopted	3
1.1. Summary of new legal provisions of competition law and related legislation	3
1.2. Other relevant measures, including new guidelines	3
1.3. Government proposals for new legislation	3
2. Enforcement of competition laws and policies	4
2.1. Action against anticompetitive practices, including agreements and abuses of dominant positions	4
2.2. Mergers and acquisitions	8
3. The role of competition authorities in the formulation and implementation of other policies, e.g. regulatory reform, trade and industrial policies	10
3.1. Strengthened Merger Control & Market Interventions.....	11
3.2. Data-Driven Market Monitoring	11
3.3. AI & Competition: A Public Discussion	11
3.4. Closer Collaboration with Academia	11
3.5. Public Engagement & Policy Advocacy.....	11
3.6. International relations	12
4. Resources of competition authorities	14
4.1. Resources overall (current numbers and change over previous year):	14
5. Summaries of or references to new reports and studies on competition policy issues	15

*Greece**

Executive Summary

1. Changes to competition laws and policies, proposed or adopted

1.1. Summary of new legal provisions of competition law and related legislation

- A. On 18.04.2024, the Hellenic Competition Commission (HCC) issued Decision No 844/2024 - GGB 2307/ B), according to Article 14 (2) (n) (aa) and (o) of Law 3959/2011, amending and replacing HCC Decision No 696/2019 on the determination and quantification of the criteria for case prioritisation and strategic priority setting pursuant to a point system entered into force in April 2024¹.
- The main amendments involve the harmonization of the priority setting system with the amendments introduced to Law 3959/2011 by Law 4886/2022 (such as the adoption of Article 1A²) as well as the modification of the definition of products and services of special interest.
- B. On 23.09.2024, a new codified version of the HCC Rules of Internal Procedure was issued (GGB 5338/B'), which included a new provision (Art. 27 par. 5A) extending the power of the HCC to issue preliminary/non-definitive decisions even where there is no need to conduct further investigation.
- C. On 04.11.2024, the HCC issued a new codified version of its Organisation (GGB 5525/B') including the amendments introduced by HCC Decision No 856/2024, which entered into force in October 2024³.

1.2. Other relevant measures, including new guidelines

1. n/a

1.3. Government proposals for new legislation

2. n/a

* This document is submitted by the Greek Delegation to the OECD Competition Committee for its forthcoming meeting and covers the period from January 1st to December 31st 2024.

¹ The text is available here <https://www.epant.gr/en/decisions/item/3011-decision-844-2024.html> (in Greek).

² On the prohibition of invitations to collude and announcement relating to communicating future pricing intentions for products and services between competitors.

³ The text is available here <https://www.epant.gr/nomothesia/nomoi-diatagmata/organismos-ea.html> (in Greek).

2. Enforcement of competition laws and policies

2.1. Action against anticompetitive practices, including agreements and abuses of dominant positions

2.1.1. Summary of activities of:

HCC Activities

3. In the field of antitrust law, the HCC dealt with 6 alleged infringement cases applying Articles 101 TFEU and the corresponding provision of national law Article 1 of the Greek Competition Law), All decisions were issued through the settlement procedure. Please see below 2.1.2 on description of cases.

Dawn raids

- On 24/01/2024, the HCC carried out unannounced inspections at the premises of companies active in the travel sector. The dawn raids were carried out in the context of an ex officio investigation into possible violations of Articles 1 of Law 3959/2011 and 101 TFEU. The HCC suspects that the inspected companies may have been involved in a cartel or may have facilitated a cartel infringement concerning the organization of educational trips for public and private schools.
- On 27/03/2024, the HCC carried out unannounced inspections at the premises of a large number of IT and related service providers. The dawn raids were carried out in the context of the HCC's ex officio investigation into possible bid rigging in violation of Articles 1 of Law 3959/2011 and 101 TFEU.
- On 26/06/2024, the HCC carried out unannounced inspections at the premises of a large number of companies. The dawn raids were carried out in the context of the HCC's ex officio investigation into possible bid rigging of public tenders concerning smart water meter systems for local water supply networks, in violation of Articles 1 of Law 3959/2011 and 101 TFEU.
- On 11/07/2024, the HCC carried out unannounced inspections at the premises of companies active in the urban waste management sector in Crete. The HCC suspects that participants may have engaged in bid rigging, in violation of Articles 1 of Law 3959/2011 and 101 TFEU.
- On 12/09/2024, the HCC carried out unannounced inspections in the ferry connection of Perama (Attica) - Paloukia (Salamis), in the context of an ex-officio investigation into the sector for ferry services, for possible anticompetitive practices consisting in a horizontal agreement and abuse of a dominant position in breach of Articles 1 and 2 of Law 3959/2011, as in force, as well as of Articles 101 and 102 TFEU by undertakings active in the above ferry line.
- On 29/11/2024, the HCC carried out unannounced inspections at the premises of undertakings active in the sector for the import/production, wholesale and retail of pet food (dog and cat food) in the context of its relevant ex officio investigation into possible anti-competitive vertical agreements in breach of Articles 1 of Law 3959/2011, as in force, and 101 TFEU.
- On the 17-18/12/2024, the HCC carried out unannounced inspections at the premises of an undertaking active in the market for the supply, trading, wholesale and retail sale of coffee, chocolate and infant nutrition, in relation to possible

anti-competitive horizontal and/or vertical agreements and possible abuse of dominant position in breach of Articles 1 and 2 of Law 3959/2011, as in force, and 101 and 102 TFEU.

Court decisions

4. The Athens Administrative Court of Appeals (“AACAA”) and the Council of State, which review all HCC’s decisions on the merits, issued and notified to the HCC overall seventeen (17) final judgments in 2024 (10 AACAA Decisions and 7 Council of State Decisions).

5. Out of those decisions:

- In seven (7) cases (6 AACAA and 1 Council of State Decisions) the HCC Decisions were upheld in their totality, that is the relevant appeals against HCC Decisions were rejected.
- In six (6) cases (6 Council of State Decisions) the appeals of HCC were accepted, and the cases were referred to the AACAA for a new judgement.
- In one (1) case of application for suspension of enforcement of HCC Decision, was accepted until the discussion of the appeal (the part subsequently withdrew their appeal)
- In two (2) cases of applications for suspension of enforcement of HCC Decision, these were rejected until the discussion of the appeals. (partially acceptance of the appeal concerned the amount of the fine that was reduced)
- In one (1) case (1 AACAA), the appeal was partially accepted

2.1.2. Description of significant cases, including those with international implications.

6. Key decisions and interventions in 2024 included the following decisions mentioned below;

- **Decision No. 870/2024:** Resale Price Maintenance in baby care products

7. The HCC, in the context of a settlement procedure, accepted the Settlement Proposals submitted by the companies "B. AND M. SKARMOUTSOS - TRADE OF CHILDREN'S GOODS S.A.", "PHARMEX ANONYME TECHNICAL TOURIST COMMERCIAL AND INDUSTRIAL COMPANY" and "REPRESENTATIVES-TRADE OF CHILDREN'S GOODS AND GYMNASTICS INSTRUMENTS PERAMAX S.A." and imposed reduced fines for setting resale prices in violation of articles 1 of the law. 3959/2011 and 101 TFEU, totaling €314,389.

8. The case concerns the markets for: a) import, wholesale and retail trade of breast milk pumping and management/storage products (such as breast pumps and related accessories), b) import, wholesale and retail trade of infant oral and feeding items (such as bottles, pacifiers) and c) import, wholesale and retail trade of baby strollers and child car seats.

9. The companies submitted a request to be included in the settlement procedure in accordance with the provisions of par. 16 of ECJ decision no. 790/2022. The three companies involved engaged in resale price fixing practices within the framework of a vertical cartel with their distribution networks. The companies systematically monitored retail prices and made demands on retailers to correct their prices, with which the retailers

complied. <https://www.epant.gr/apofaseis-gnomodotiseis/item/3110-apofasi-870-2024.html>

- **Decision No. 869/2024:** Bid Rigging in public tenders for cadastral services

10. The HCC, in the context of a settlement procedure, accepted the Settlement Proposals submitted by 18 companies operating in the markets for cadastral services and support services for the creation of a national cadastre throughout the Greek territory and imposed fines totaling 1,081,339.64 euros.

11. The case concerns anti-competitive practices of tender rigging. The investigation began in November 2021 in the market for cadastral services and support services for the creation of a national cadastre. In total, on-site inspections were carried out at 26 companies. One of the audited companies submitted an application to the Operational Program for exemption from the surcharges, in accordance with Decision 526/VI/2011 of the HCC. Eighteen of the audited companies were submitted to a Dispute Resolution Procedure, based on par. 14 of Decision HCC 790/2022.

12. The investigation found that some of the companies came into contact within the framework of meetings and personal contacts, in order to agree on the distribution among themselves of the individual twenty-eight (28) cadastral surveys of the tender announced by the National Cadastre and Mapping SA for the "Award of contracts for cadastral surveys & supporting services for the creation of a national cadastre in the rest of the country", by determining the lowest bidder for each of them. These undertakings participated in a horizontal cartel to rig tenders and specifically in an agreement or concerted practice regarding the allocation of the studies of the relevant tenders by determining the lowest bidder for each of these studies (horizontal market allocation cartel). With the above conduct, seen as a whole, the undertakings involved proactively reduced the uncertainty entailed by autonomous competitive conduct.

13. This horizontal cartel was of a single and continuous nature and extends overall (with individual variations for the undertakings involved) from September 2013 to December 2020. <https://www.epant.gr/enimerosi/deltia-typou/item/3075-deltio-typou-apofasi-epi-aftepaggeltis-erevnas.html>

- **Decision No. 853/2024:** Cartel in Banking Sector (see also decision 838/2023)

14. The HCC, in the context of a settlement procedure, and following the issuance of decision 838/2023 accepted the relevant Settlement Procedure submitted by the company "HSBC CONTINENTAL EUROPE" on 30.07.2024, and imposed a reduced fine for the commission of the established, based on the reasoning of the Decision, violation of article 1 of the law. 3959/2011 and 101 TFEU, totaling 21,375.94 euros.

15. HSBC participated jointly with other banking institutions in changing the pricing model (i.e., zeroing out commissions in bilateral contracts between banks and switching to charging a Direct Access Fee) for ATM cash withdrawal transactions using cards issued by domestic Payment Service Providers (PSPs) participating in the DIASATM system, in violation of the provisions of articles 1 par. 1 of Law 3959/2011 and 101 par. 1 of the TFEU. The passive role of HSBC in the above described practice and the limited number of ATMs that the Bank owned in the Greek Territory, do not, in the unanimous judgment of the HCC, remove the infringing nature of its participation in the above attributed infringement and cannot exempt it from its responsibility for its participation in it, given that in any case HSBC did not distance itself from it publicly in such a way that the other participants would consider that it was putting an end to its participation or did not report it to the administrative authorities. <https://www.epant.gr/apofaseis-gnomodotiseis/item/3032-apofasi-853-2024.html>

- **Decision No. 852/2024:** Geographic allocation of markets in super market products

16. The HCC in the context of a settlement procedure accepted the Settlement Proposal submitted by the association of undertakings “EL.OM.A.S. HELLENIC GROUP OF SUPERMARKETS LIMITED LIABILITY COMPANY” (ELOMAS)

17. The case concerns the market for the distribution of supermarket products at the retail level. The available information shows that ELOMAS received a series of written letters and complaints from its members requesting that one member’s stores not operate in a geographical area where another member of the Group operates. The letters and complaints in question invoked a general principle/rule of operation of the Group set out in a decision of its General Assembly, according to which its members had to maintain a specific geographical distance between their stores, and in particular at least 1000 meters in areas outside Athens and Thessaloniki and 300 meters within Athens and Thessaloniki.

18. Decision 852/2024 found that ELOMAS violated articles 1 of Law 3959/2011 and 101 TFEU by taking a prohibited decision on the geographical allocation of markets among its members.

- obliged ELOMAS – which has already amended, by way of self-commitment, its Articles of Association and Internal Rules of Operation and Ethics, providing for the obligation of its members to comply with the rules of competition law with an express reference to the prohibition of geographical allocation – to refrain in the future from the established violation of articles 1 of Law 3959/2011 and 101 TFEU.
- imposed a reduced fine of a total amount of 172,424 euros for the commitment of the established violation.

<https://www.epant.gr/enimerosi/deltia-typou/item/2885-deltio-typou-epivoli-prostimou-se-enosi-epixeiriseon-soyper-market-katopin-diadikasias-diefthetisis-diaforon.html>

- **Decision No. 849/2024:** Resale Price maintenance in electrical household appliance

19. The HCC, in the context of a settlement procedure, accepted the Settlement Proposal submitted by the company “MIELE-HELLAS, ELECTRICAL MACHINERY TRADING COMPANY, SINGLE-MEMBER LIMITED LIABILITY COMPANY” and imposed a reduced fine for the commission of the established, based on the reasoning of the Decision, violation of Articles 1 of Law 3959/2011 and 101 TFEU, for a total amount of 46,160 euros.

20. The case concerns the import, wholesale and retail markets of large/white household electrical appliances. According to the decision the undertaking in question infringed Articles 1 of Law 3959/2011 and 101 TFEU in that it engaged in a practice of fixing resale prices, with which the cooperating retail stores complied to a significant extent. The infringement lasted from 17.07.2021 to 24.06.2022.

<https://www.epant.gr/apofaseis-gnomotiseis/item/3163-apofasi-849-2024.html>

2.2. Mergers and acquisitions

2.2.1. Statistics on number, size and type of mergers notified and/or controlled under competition laws

21. In 2024 the HCC reviewed nineteen (19) merger filings pursuant to the Greek Competition Act. The most significant HCC decisions upon notified mergers are summarized below:

Overall number of merger notifications	29
Overall number of merger decisions	22 ⁴
Decisions adopted under simplified procedure	14 ⁵
Overall number of conditional clearances, i.e. clearances with remedies	2
Overall number of prohibitions	0
Overall number of withdrawn notifications/ abandoned transactions	0
Number of unconditional phase 1 clearances (if applicable)	20
Number of conditional phase 1 clearances (if applicable)	1
Number of unconditional phase 2 clearances (if applicable)	0
Number of conditional phase 2 clearances (if applicable)	1

22. In addition, 1 case which the HCC examined and decided that it did not fall within the conditions for notification to the HCC was closed.

2.2.2. Summary of significant cases.

- By **Decision 839/2024** the HCC the acquisition of sole control by the company “PROFARM SA” over the companies “PHARMA GROUP MESSINIAS S.A.”, “PHARMA GROUP ACHAIAS S.A.”, “PHARMA GROUP ARGOLIDAS S.A.”, within the meaning of article 5(2)(b) of Law 3959/2011. PROFARM SA and the target companies are pharmaceutical wholesalers that are active in the Greek territory in wholesale, distribution, exports of drugs and pharmaceutical products, pharmaceutical substances and parapharmaceutical products, medical products of general use, cosmetics, dietary products, baby foodstuff and milk, sanitary items for babies, pregnant women and women who have recently given birth, toiletries, orthopedics, medical tools, equipment and aids. <https://www.epant.gr/apofaseis-gnomodotiseis/item/3146-apofasi-839-2024.html>

⁴ Of which four decisions relate to merger notifications submitted in 2023. Three out of 25 decisions are no jurisdiction decisions. Three decisions pertained to three pairs of interrelated transactions (i.e. six notifications led to three HCC decisions).

⁵ Number of cases in which the Directorate-General for Competition and the Commissioner-Rapporteur submitted a “simplified SO” pursuant to the internal best practices of the HCC. The submission of a “simplified SO” is typically used when one of the following conditions are met:

- There is no horizontal or vertical overlap.
- There are no affected markets.
- One of the participating parties is acquiring exclusive control over an undertaking it already jointly controls.

In these cases, the HCC typically issues a summary decision.

- By **Decision no 840/2025**, adopted on the 19th of January 2024, the HCC approved the acquisition of joint control by the companies “TOURISM ENTERPRISES OF MESSINIA S.A.”, “LITTI ENTERPRISES COMPANY LIMITED” and “INTRACOM S.A. HOLDINGS” over “ATHENS BEACH CLUB SINGLE MEMBER S.A.” as, although falling within the scope of Article 6(1) of Law 3959/2011, it does not raise serious concerns as to its compatibility with competition rules in the individual markets concerned thereby. The above concentration concerns the market for organized beaches where at least umbrellas and sunbeds are available for rent and, at the same time, where one or more health regulated establishment(s) operate(s), in which the joint - target undertaking is active. <https://www.epant.gr/apofaseis-gnomodotiseis/item/2872-apofasi-840-2024.html>
- By **Decision no 843/2024**, adopted on the 5th of March 2024, the HCC approved, the acquisition by PUBLIC POWER CORPORATION (PPC) of sole control over DIXONS SOUTH - EAST EUROPE (DIXONS). PPC is active in the production and supply of electricity, mining, production, the supply and sale of energy raw materials and the provision of e-mobility products and services. DIXONS is active, through the chain of stores “KOTSOVOLOS”, in the sale of electric and electronic products. <https://www.epant.gr/enimerosi/deltia-typou/item/2822-deltio-typou-egkrisi-apoktisis-apokleistikoy-elegxou-apo-tin-dei-ae-epi-tis-dixons-south-east-europe.html>
- By **Decision no 845/2024** adopted on the 19th of April 2024, the HCC, approved, the acquisition by “HELLENIC HEALTHCARE HOLDING 3 (CYPRUS⁶) LIMITED” and “University of Nicosia” of joint control over (a) “University of Nicosia Greece Branch Medical Limited” and (b) “VANES Limited”. <https://www.epant.gr/enimerosi/deltia-typou/item/2845-deltio-typou-egkrisi-sygkentrosis.html>
- The HCC, on May 1, 2024, by its **Decision 847/2024**, approved the notified concentrations, concerning a) the creation of a joint venture (Joint Venture), through the acquisition of joint control, by the companies HELLENIC WINERIES S.A. and TOURISM ENTERPRISES OF MESSINIA S.A. and b) the change of control from exclusive to joint control over the company NAVARINO VINEYARDS S.A AGRICULTURAL WINEMAKING COMMERCIAL AND INDUSTRIAL SINGLE MEMBER S.A (NAVARINO VINEYARDS) by the companies PREMIA PROPERTIES and TOURISM ENTERPRISES OF MESSINIA S.A., as a single concentration. HELLENIC WINERIES S.A is a holding and investment company, active through its subsidiaries, inter alia, in the markets of winemaking and non-alcoholic beverages. TOURISM ENTERPRISES

⁶ Note by the Republic of Türkiye

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Note by all the European Union Member States of the OECD and the European Union

The Republic of Cyprus is recognised by all members of the United Nations with the exception of Türkiye. The information in this document relates to the area under the effective control of the Government of the Republic of Cyprus.

OF MESSINIA S.A is active in tourism. PREMIA PROPERTIES S.A is a real estate investment and management company. NAVARINO VINEYARDS is currently active in the production of wine grapes and the marketing of bottled wines under its own brands. The Joint Venture will be active in the production of wine grapes, the production and marketing of bottled wines and the (future) operation of a winery, including a catering facility. <https://www.epant.gr/enimerosi/deltia-typou/item/2850-deltio-typou-egkrisi-gnostopoiitheison-sygkentroseon.html>

- By its **Decision no 848/2025**, adopted on the 13th of May 2024, the HCC, approved, the acquisition of joint control by the companies “STRIX ASSET MANAGEMENT LTD” and “FARALLON CAPITAL MANAGEMENT L.L.C.” over “EUROMEDICA HEALTHCARE SERVICES S.A.”, The relevant product markets concerned by the concentration are as follows: a) the private general hospital market and b) the private diagnostic center market. The relevant geographic market is the entire territory of Greece. <https://www.epant.gr/apofaseis-gnomodotiseis/item/2864-apofasi-848-2024.html>
- By its **Decision no 855/2024**, adopted on the 30th of August 2024, the HCC, approved the merger between “PANCRETA BANK S.A.” and “ATTICA BANK S.A.”, by acquisition of the former by the latter company, and the acquisition of sole control by “THRIVEST HOLDING LTD” over “ATTICA BANK S.A.” after the completion of its merger with “PANCRETA BANK S.A.”. The above concentration concerns the broader banking sector and, in particular, the markets for a) retail banking deposits and loans, b) corporate banking deposits and loans, c) card issuing and acquiring, d) factoring, e) mutual funds-UCITS, f) financial market services and g) insurance mediation. <https://www.epant.gr/apofaseis-gnomodotiseis/item/2961-apofasi-855-2024.html>
- The HCC approved (**decision 865/2024**) the acquisition by IMITHEA SA of sole control over certain assets of EUROMEDICA SA and its parent companies. IMITHEA, controlled by the STRIX/BLANTYRE Group, is based in Athens and offers hospital services via the “Henry Dunant” hospital. The Target business comprises of several private clinics, rehabilitation centers and other holdings that are jointly controlled by STRIX/BLANTYRE and FARALLON Groups, as well as EUROMEDICA Rhodes, which is controlled solely by the FARALLON Group. <https://www.epant.gr/enimerosi/deltia-typou/item/3035-deltio-typou-egkrisi-apoktisis-apokleistikoy-elegxou.html>

3. The role of competition authorities in the formulation and implementation of other policies, e.g. regulatory reform, trade and industrial policies

23. In 2024, the Hellenic Competition Commission (HCC) strengthened its role as a key enforcer of competition law, expanding its enforcement activities and conducting dawn raids across multiple sectors to combat anti-competitive practices.

24. A major milestone was the publication of the HCC’s first-ever strategic plan, outlining its priorities for the next two years:

- Effective market interventions to safeguard competition,
- Promoting a competition culture among businesses and consumers, and
- Enhancing organizational efficiency through digital transformation and innovation.

25. With a vision to foster fair and dynamic markets that drive economic growth and benefit consumers, the HCC leveraged advanced tools and methodologies to enhance enforcement.

3.1. Strengthened Merger Control & Market Interventions

26. In 2024, the HCC handled 30 merger notifications, with two cases requiring commitments—one in Phase I and another in Phase II—to prevent excessive market concentration. Beyond merger control, the HCC deployed a wide range of legal tools, launching a sector inquiry into interest rates, conducting market mapping in key sectors such as food products and the broader food value chain, and publishing its first regulatory intervention report on the petroleum sector. Additionally, several antitrust decisions were issued, including a landmark case in the Cadastral Services sector, resulting in fines of approximately €1 million. It should also be noted that in 2024 the HCC dealt with a back log of pending complaints and investigations and filed approximately 20 cases, in essence this means that there will be no further action by the HCC. This filing requires a thorough assessment and decisions are subject to appeal to the Court of Appeals or the Council of State.

3.2. Data-Driven Market Monitoring

27. Leveraging its Data Analytics and Economic Intelligence Platform, the HCC intensified market monitoring, tracking price fluctuations and detecting distortions in crucial sectors, particularly in fuel and energy. This data-driven approach enabled swift interventions to safeguard competition and protect consumers.

3.3. AI & Competition: A Public Discussion

28. Recognizing the impact of artificial intelligence on competition, the HCC organized a public online webinar, bringing together experts from academia, regulatory bodies, and the private sector. The discussion explored AI's risks, challenges, and regulatory tools needed to ensure fair and competitive markets, underscoring the HCC's commitment to fostering dialogue and shaping forward-looking policies.

3.4. Closer Collaboration with Academia

29. The HCC further strengthened its ties with academia through signing MoUs with major universities, organizing study visits from Universities throughout Greece and co-organizing conferences. For example, a Memorandum of Cooperation with the University of Athens' Faculty of Law, was signed on September 20, followed by the 1st Interdisciplinary Competition Conference held under the theme: "Emerging Challenges in Competition Law Enforcement: Forging Links Between Enforcers and Academia."

3.5. Public Engagement & Policy Advocacy

30. The HCC played an active role at the 88th Thessaloniki International Fair in September, where its exhibition booth welcomed businesses, and consumers, as well as representatives from ministries and public organizations fostering awareness of competition law. As part of the fair, the HCC organized a conference on "Competition & Green Economy: A Matter for All", in collaboration with DIMEA, the Consumer Advocate, and the National Transparency Authority (EAD), focusing on competition's role in waste management and sustainability.

3.6. International relations

31. The HCC continues to invest in its international presence in the European Competition Network (ECN) the International Competition Network (ICN), the Organization for Economic Co-operation and Development (OECD and UNCTAD networks,

32. As regards the ICN the HCC continues to co-chair the “Agency Effectiveness” working group within the framework of the ICN. We are regular speakers at the plenary sessions and workshops.

33. As regards the OECD we are represented in the Bureau of the Competition Committee whilst actively participating in meetings as speakers and contributors. One notable example of advocacy related to OECD is our participation in a project led by the OECD aimed at combating bid rigging in public procurement. This 2-year project, starting in September 2024, aims at helping countries improve bid-rigging prevention and detection mechanisms. The project is funded by the European Union through the Technical Support Instrument (TSI) and includes the Federal Competition Authority of Austria (BWB), the Commission for Protection of Competition Republic of Bulgaria (CPC), the Croatian Competition Agency (CCA) the Commission for the Protection of Competition of Cyprus⁷ and the Competition Council of Romania (RCC).

34. Another very recent example is our participation in the CompeEUte project, an EU-funded initiative aimed at enhancing legal knowledge and skills of national administrative and civil judges in the application of competition law to the digital market. In Greece, the project is implemented by the Centre for European Constitutional Law (CECL) - Themistocles and Dimitris Tsatsos Foundation.

- Besides the HCC, the project is also supported by the National School of Judiciary (NSJ).
- The project involves a range of actions, such as:
- Analysis of Judges’ training needs in the field of EU competition law
- Development of an innovative training program, aimed at providing information on competition law fundamentals and rules, development of interdisciplinary skills and familiarization with basic economic principles and technical terminology required to understand the basic framework of competition law in the digital era
- Conducting training courses of scaling intensification, depending on the level of familiarity of the Judges involved

⁷ Note by the Republic of Türkiye

The information in this document with reference to “Cyprus” relates to the southern part of the Island. There is no single authority representing both Turkish and Greek Cypriot people on the Island. Türkiye recognises the Turkish Republic of Northern Cyprus (TRNC). Until a lasting and equitable solution is found within the context of the United Nations, Türkiye shall preserve its position concerning the “Cyprus issue”.

Note by all the European Union Member States of the OECD and the European Union

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- Development of digital asynchronous education programs, which can be leveraged in the future by judicial officers in collaboration with the NSJ, and
- Organization of working visits to the Hellenic Competition Commission and the Court of Justice of the European Union, as well as of an international conference in Athens that will be aimed at promoting pan-European cooperation, networking and cross-border dialogue on competition issues in the digital market. The project was launched in November 2024 and will run until April 2026.

35. With a clear strategic vision, enhanced enforcement, and deeper international collaboration, the HCC continues to promote fair competition, drive economic growth, and protect consumers, reinforcing its position as a leading authority in competition policy.

4. Resources of competition authorities ⁸

4.1. Resources overall (current numbers and change over previous year):

4.1.1. Annual budget (in your currency and USD):

2020	2021	2022	2023	2024
4.910.000	6.520.000	10.366.000	10.847.000	11.278.000
1,2271	1,1303	1,1273	1,1050	1,0399
6.025.061	7.369.556	11.685.592	11.985.935	11.727.992

4.1.2. Number of employees (person-years):

- economists: 36
- lawyers: 28
- other professionals: 9
- support staff: 26
- all staff combined: 99

4.1.3. Human resources (person-years) applied to:

- Enforcement against anticompetitive practices ²; • Merger review and enforcement;
- Advocacy efforts.

36. There is no separation of personnel based on types of cases (i.e. there is no cartel or merger-specific Unit or Directorate). The HCC's Directorate-General is organized in Directorates/Units by reference to sectors of the economy. Within these Directorates/Units, all NAC staff contribute to all areas of competition enforcement (mergers, anti-cartel, anti-competitive agreements, dominance-related issues) as well as on sector enquiries, sector regulatory interventions, according to their individual field of expertise. There are also independent units focusing on advocacy, legal support and economic research. The Directorate of International Relations and Communications is primarily responsible for monitoring, participating in and communicating the issues relating to the functioning of free competition at national, European, and international level and focuses on the participation and representation of the HCC in EU/international fora on competition related matters (ECN, ICN, OECD, UNCTAD), as well as on the development of cooperation with non-EU countries, and the organization of the HCC's communications' strategy.

4.1.4. Period covered by the above information: 01/01/2024 – 31/12/2024

⁸ If there is more than one authority, please give details for each. However, only Central Government competition authorities should be included, not State or provincial bodies. Local offices should be included where these are part of the central authority. ² Excluding unfair or misleading practices which fall under consumer protection provisions of the law, where these exist.

5. Summaries of or references to new reports and studies on competition policy issues

37. Over the past year, the HCC has undertaken significant analytical and policy-driven initiatives to enhance competition across key sectors of the economy. These efforts have been reflected in the publication of in-depth market mapping reports, sector inquiries, and informative and strategic guidance documents, reinforcing the Commission's commitment to market transparency and advocacy excellence.

38. In July the HCC initiated a **Sector Inquiry into Bank Deposits** to assess competitive dynamics and identify possible competition distortions [see: <https://www.epant.gr/en/information/sector-inquiries/bank-deposits.html>], while also published an interim report of the **Sector Inquiry on the Waste Management and Recycling Sectors**, accompanied by the launch of a public consultation to gather stakeholder feedback on market inefficiencies and regulatory gaps. [see: <https://www.epant.gr/enimerosi/dimosieyseis/kladikes/item/2893-endiamesi-ekthesi-kladikis-erevnas-stous-kladous-diaxeirisis-apovlition-kai-anakyklosis.html>].

39. In parallel, HCC conducted in-depth **market assessments** of the **Veterinary Pharmaceuticals Sector** [see: <https://www.epant.gr/enimerosi/xartografisi-sta-ktiniatrika-farmakeftika-proionta.html>], the **Animal Feed Industry** [see: <https://www.epant.gr/enimerosi/xartografisi-stis-zootrofes.html>], and the **Cheese Market** [see: <https://www.epant.gr/enimerosi/xartografisi-sto-tyri-feta.html>], analyzing markets' structural conditions, consumer behavior and market trends.

40. The HCC also published the **Interim Report in the petroleum industry**. On 28 November 2022, the HCC decided to look into the petroleum industry and, in particular, to assess the prevailing market conditions in terms of effective competition in the three production and distribution stages (refining, wholesale, retail) of petroleum products (unleaded petrol, diesel and heating oil) in the Greek market. These are prime basic necessities with low price-inelastic demand. The HCC's investigation focused on 95 octane unleaded petrol, diesel and heating oil and examined price pass-through in the oil production and distribution chain in the Greek market., mostly asymmetric adjustment of fuel prices in relation to costs (On 1.8.2024, the HCC published its preliminary views regarding the conditions of competition and invites all interested parties to contribute to the public consultation. The full text of the HCC's views is available [here](#).

41. The Commission also released **two (2) comprehensive newsletters** detailing its enforcement actions, advocacy initiatives and key policy developments [see: <https://www.epant.gr/enimerosi/dimosieyseis/enimerotika-deltia/item/2784-teyxos-8.html> and <https://www.epant.gr/enimerosi/dimosieyseis/enimerotika-deltia/item/2892-teyxos-9.html>], and published a specialized **Guide for Contracting Authorities**, providing best practices to foster competitive and efficient public procurement processes [see: <https://www.epant.gr/en/information/publications/guides/item/3072-guide-for-contracting-authorities.html>]. Reinforcing its role as a thought leader in competition policy, the HCC organized high-level discussions on emerging competition policy challenges featuring international experts. That is, HCC organized a conference on **Competition and the Green Economy** [see: <https://www.epant.gr/enimerosi/dimosieyseis/media/item/2958-antagonismos-prasini-oikonomia-mia-ypothesi-olon.html>], as well as a webinar on **Artificial Intelligence and Competition** [see: <https://www.epant.gr/enimerosi/dimosieyseis/media/item/3067-texniti-noimosyni-antagonismos.html>].

42. Through these initiatives, the HCC continues to advance its mandate of safeguarding competition, fostering economic resilience, and promoting informed policy discourse on contemporary regulatory challenges.