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Environmental Considerations in Competition Enforcement – Note by Greece

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This document reproduces a written contribution from Greece submitted for Item 1 of the 136th OECD Competition Committee meeting on 1-3 December 2021.

More documents related to this discussion can be found at
<https://www.oecd.org/daf/competition/environmental-considerations-in-competition-enforcement.htm>.

Please contact Mr Antonio Capobianco if you have questions about this document [Email: Antonio.CAPOBIANCO@oecd.org].

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Greece

1. Introduction

1. From the outset, while being mindful that the discussion for this roundtable intends to focus more specifically on *environmental and climate change* considerations as opposed to sustainability considerations at large, the Hellenic Competition Commission (HCC), would like to stress that it has chosen to adopt an understanding of sustainability that encompasses both environmental and social sustainability issues,¹ in line with well-accepted definitions of sustainability (e.g. drawing from the Brundtland Report² and the Sustainable Development Goals adopted by the UN General Assembly in 2015³) and the latest socio-ecological research.⁴ Since environmental and climate considerations are a subset of broader sustainability considerations, our approach to the former is conceptually the same as our general approach to the latter. We note, also, that the HCC generally opposes differentiating between environmental benefit agreements and other agreements that may have other sustainability benefits. We consider that there is ample support for this approach in the EU Treaties.⁵

2. In the following, we set out first some important aspects of the HCC's general approach to environmental and climate change considerations that we would like to highlight for the purposes of this OECD Roundtable (section 2), including a detailed description of our innovative "sandbox for sustainability and competition" project (section 2.3), before describing some relevant case law (section 3).

2. The HCC's approach and various relevant initiatives

3. In the face of the climate emergency and important social challenges that will certainly result from the Green transition, it is the HCC's conviction that it is important to equip all public policies with the tools to accommodate and enhance sustainability initiatives from both the public and the private sector. Business as usual is no more an

¹ HCC, Staff Discussion Paper on "Sustainability Issues and Competition Law", available at <https://epant.gr/en/enimerosi/competition-law-sustainability.html>.

² G Brundtland, 'Report of the World Commission on Environment and Development: Our Common Future', Annex to UN document A/42/427 - Development and International Co-operation: Environment (4 August 1987), pp. 24 and 54-57.

³ UN General Assembly Resolution of the 25 September 2015, 'Transforming our world: the 2030 Agenda for Sustainable Development' UN Document A/RES/70/1 (21 October 2015), p. 14.

⁴ For an application of socio-ecological method in competition law research, see M. C. Iacovides and C. Vrettos, 'Falling through the cracks no more? Article 102 TFEU and sustainability: the relation between dominance, environmental degradation, and social injustice' (2021) 9:3 *Journal of Antitrust Enforcement*.

⁵ E.g. Arts. 3(3) and 13(1) TEU, Arts. 7-11 TFEU, and Arts. 14, 29, 31, and 34-37 of the EU Charter of Fundamental Rights. See further, para. 7 of the Annual Report on Competition Policy 2018/2102(INI) by the Committee on Economic and Monetary Affairs of the European Parliament and Iacovides and Vrettos (n. 4), s. 4. On Art. 11 TFEU and competition policy specifically, see J. Nowag, *Environmental Integration in Competition and Free-Movement Laws* (OUP, 2016), 31-48.

option and the transition to an economy that is environmentally and socially sustainable is urgent. Systemic resilience should become a goal for public action.

4. Sustainability-oriented policies will benefit the well-being of citizens and consumers but may also be a means of acquiring a competitive advantage, thus serving a broader industrial policy agenda. Business requires some legal certainty, but also a complex system of nudges and incentives in order to integrate sustainability objectives in their business strategies.

5. Of course, governments need to develop overall strategies for the Green transition and use a mix of policies, such as innovation support for green energy, fiscal policies (tax and subsidies), carbon pricing and issuance of green bonds.

6. Competition authorities, such as the HCC, should also have a role in facilitating the transition to a Green economy. As part of realising its potential to facilitate in that transition, the HCC has taken various relevant initiatives such as:

- Drafting a Staff Working Paper on the topic, setting out in detail the relevant considerations;⁶
- Organizing a high-level conference on the topic;⁷
- Commissioning a Technical Report on Sustainability and Competition;⁸
- Co-leading (together with the Dutch ACM) a European Competition Network (ECN) project of the Working Group on Horizontals and Abuse “Sustainability and Antitrust” and managing to adopt (with the consensus of the whole group) nine proposals for moving forward; and
- Pursuing innovative initiatives such as a Sandbox on Sustainability and Competition (see further, section 4) and an Advisory Unit.

7. On account of these activities, overall, the HCC is considered one of the pioneers in the European Union when it comes to designing a coherent response to the challenge of integrating sustainability considerations in competition enforcement. In the rest of this section, we highlight some of our views and initiatives.

2.1. The HCC’s views on agreements with sustainability benefits

8. Certain inter-company agreements related to environmental schemes, involving companies and other stakeholders, can produce substantial benefits from an environmental perspective, while at the same time they may have the potential to limit competition (such examples include agreements to increase the collection of plastic waste, agreements to improve the efficiency of washing machines⁹, attempts to promote sustainable production

⁶ HCC, Staff Working Paper (n. 1)

⁷ See <https://epant.gr/en/enimerosi/competition-law-sustainability.html>.

⁸ R. Inderst, E. Sartzetakis, and A. Xepapadeas, ‘Technical Report on Sustainability and Competition’, available at <https://www.epant.gr/en/enimerosi/publications/research-publications/item/1284-technical-report-on-sustainability-and-competition.htm>.

⁹ See CECED (Case COMP IV.F.1/36.718) Commission Decision 2000/475/EC (2000) OJ L 187/47. In this case the Commission took into account the ‘collective environmental benefits’ arising by an agreement between washing machine manufacturers to cease production and importation of less energy efficient machines.

methods and ‘animal welfare’¹⁰, supermarkets developing systems to increase recycling, agreements that aim to reduce greenhouse gas emissions, in particular in the transport sector, or to develop a common data collection system for sustainability purposes, various agreements setting sustainability standards, for instance on the environmental quality from wastewater discharges, or agreements setting a sustainability certification scheme). In such cases the question is whether it is possible to adjust the issues causing competition concerns without harming the environmental sustainability objectives, thereby attaining the goals of the different policy areas involved. Joint commitments or other collective initiatives by industry players may be necessary in order to achieve meaningful change in key sustainability areas, and can be examined under both Art. 101(1) and Art.101(3) TFEU.

9. The HCC considers that it should make efforts to enforce competition law in a way that does not jeopardise private and public sustainability strategies. This is not about authorising what some have called ‘Green cartels’, but adopting a similar hospitable approach taken for R&D horizontal agreements and agreements promoting innovation. It is also important to take into account the fact that the consumers that may be affected by higher prices are those that have the lowest appreciation for the public good and therefore are the hardest to compensate. This is acceptable in the context of a transformational effort to shift consumer preferences towards more sustainable products under the guidance of the polluter pays principle. Of course, one needs to keep an eye for distributional implications, as these consumers may also be among the poorest in society.¹¹

10. Moreover, competition authorities should make the necessary investments in re-defining their role and objective function in a broader context that takes into account various sorts of externalities and their inter-generation effects rather than focusing on the simple price effects of market power. To this end, the HCC has explored these new approaches by commissioning (together with the Dutch ACM) a technical report exploring different approaches of integrating environmental and competition issues, addressing efficiency concerns by internalizing negative environmental externalities under different scenarios through a cost-benefit analysis but also seeking to adjust welfare analysis to a wider theorization of willingness-to-pay analysis allowing for uncertainty and more complex behavioural economics.¹²

11. Within the ECN project, the HCC also put forward various ideas for overcoming perceived obstacles to exempting agreements with environmental (and broader sustainability) benefits from the application of Art. 101(1) TFEU, in order to put in place the right incentives for investment in environmental sustainability by undertakings, which could affect the long-term consumer but also the well-being of the EU and its citizens.

12. First, we have proposed a broad definition of the concept of consumer (user), in order to overcome the (perceived) problem of “full compensation” posed by Art. 101(3) TFEU. In general, consumers cannot be considered as identical, as there may have a different willingness to pay for environmental/sustainability benefits. One way to deal with this problem is to define relevant markets more narrowly so as to include in each class/category consumers that have identical willingness to pay for environmental benefits.

¹⁰ The case known as the ‘Chicken of Tomorrow’ refers to a joint initiative by organizations from the poultry sector and supermarkets to introduce a sector wide sustainability policy. This initiative was disrupted by the Dutch Competition Authority (ACM). See ‘ACM’s analysis of the sustainability arrangements concerning the ‘Chicken of Tomorrow’ dated 26 January 2015.

¹¹ For this reason, combining environmental and social sustainability should be promoted, as we explained in section 1.

¹² HCC, Technical Report (n. 8).

This is not however something that would address the issue of the negative effects that a specific agreement harming the environment may have on those consumers that value highly the environment or sustainability (as in this case this will be considered as an out-of-market effect).

13. That said, in most cases involving other types of benefits (e.g. vertical restraints relating to selective distribution and building a brand image) we include different groups of consumers in the same relevant market and it is widely accepted that restraints imposed with the aim to attract marginal consumers may be justified on the basis that they increase *overall* the “value” of the product bundle, despite their price effects to this class of consumers, and therefore the negative distributional effects to inframarginal consumers having a low or no willingness to pay for these additional “benefits”. Hence, a requirement in Art. 101(3) TFEU that consumers receiving a sustainability benefit should be the same or substantially the same in order to perform a trade-off analysis with the anti-competitive effects, seems to consider the concept of consumer used in competition law as referring to a group of specific individuals, rather than an abstraction on the basis of the representative agent model. This, in our view, may not fully take into account the economic foundations of the analysis performed in competition law, the case law of the EU Courts and decisional practice. The gains for some individuals can be balanced against the losses for other individuals in the specific sociological category of “consumers”, in order to determine the relative goodness (efficiency) of a state of affairs.

14. As mentioned above, the HCC and ACM have commissioned a report that gives an extensive overview of the various methods that are available to assess the WTP of consumers for more sustainable products.¹³ They are especially relevant in the assessment in accordance with the current interpretation of Art. 101(3) TFEU which focuses on the effects for the consumers. Some of these methods can however also be used to assess the WTP of non-consumers. After all, when a more sustainable production leads to a more efficient use of common resources, this also has a positive effect on their welfare, which can in principle be measured in WTP surveys.¹⁴

15. Second, we argue for a dynamic understanding of consumers. On the one hand, a static understanding of consumers that focuses on the immediate effect of an agreement on the *current* consumers of the relevant market, without considering the long-term effects of such agreements, risks missing the fact that the threat of climate change and other environmental damage will affect such consumers in the future, through loss of life or a disruption of family life or both. An approach that does not integrate the broader impact that such an agreement may have on the structural positioning of these individuals in the future regarding possible harm to their interests resulting from lower level of sustainability misses this harm.

16. Furthermore, such a static analysis does not take into account the damage to future generations of consumers, the generations not yet born. The interests of future ‘consumers’ are assumed to coincide with the revealed preferences of the current ‘consumers’, for instance regarding the choice of lower prices vis-à-vis environmental/ sustainability damage, or the direction of innovation that is socially valuable, and does not factor in the analysis the possibility of such preferences evolving in the future, to the direction of “stated preferences”. Moreover, it does not take into account how these may be affected by the

¹³ Technical report (n. 8).

¹⁴ HCC Staff Discussion Paper (n. 1), para. 25 and I. Lianos, *Polycentric Competition Law* (2018) *Current Legal Problems* 161.

evolution of the values presently prevailing in society in favour of sustainable development, as this is indicated by the adoption of SDG goals and the Green Deal at the EU level.¹⁵

17. In our view, the concept of consumer in a relevant market is the wrong proxy to assess the anticompetitive effects of certain types of agreement. There is a risk that the current approach underestimates the long-term beneficial collective benefits of sustainability agreements, part of which may be apportioned to the users of the relevant product in question, while also enhancing variety, innovation, consumer choice, but also competition in other related markets and thus benefitting to the public overall.

2.2. Advice Unit

18. In view of the legal uncertainty and the recognised need for a rapid transition to the Green economy, more efforts should be made in order to provide undertakings with the legal certainty they need in order to make the necessary investments. This also requires more targeted competition law interventions that provide a clear set of rules to follow. Collecting information on the various business strategies and the issues they face in proceeding to this Green economy transition are also crucial so as to adapt competition law enforcement to the specific circumstances that are faced by each national economy in managing this process of major economic change.

19. This may require close collaboration with other regulatory authorities, in particular through discussions in the suggested national regulatory network for competition and regulatory policy, in light of the collaboration between competition authorities and sector-specific regulators in other jurisdictions¹⁶. Eventually, a common ‘Advice Unit’, formed by personnel from a variety of regulatory authorities, may be formed in order to provide informal steers on proposed sustainability-related innovations, across all fields of regulatory activity, to enable more direct communication between firms, the government and other stakeholders. This may help establish, if need be, bespoke regulatory frameworks that would promote investments for Green Growth, following a process of public engagement with all stakeholders, including representative citizens’ groups (civil society, NGOs).

2.3. Advocacy: the Sandbox for Sustainability and Competition

20. This process may be facilitated with the development of a competition law sustainability ‘sandbox’¹⁷ in order for the industry to experiment with new business formats that aim to realize more quickly and efficiently sustainability goals, and which involve

¹⁵ In this regard, it should also be noted that national courts have accepted the relevance of harm and benefits that are to accrue to future generations and even extraterritorially, when assessing whether a failure to reduce greenhouse gas emissions could amount to breaches of Articles 2 and 8 of the European Convention of Human Rights (which has equivalents in the Charter of Fundamental Rights): See, e.g. the Dutch Supreme Court Case 19/00135 *Netherlands v Urgenda* NL:HR:2019:2007.

¹⁶ See, for instance in France, <https://www.autoritedelaconurrence.fr/en/pressrelease/independent-public-and-administrative-authorities-develop-their-collaboration>.

¹⁷ A sandbox is defined as ‘a safe space where both regulated and unregulated 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’: Financial Conduct Authority, “Regulatory Sandbox”, (2015) Research Paper.

cooperation between competing undertakings or even more permanent changes in market structure in order to be accomplished.¹⁸

21. Sustainable development is currently a top public interest objective governing all areas of social and economic life. Competition policy, which defends and promotes competitive conditions in the economy in multifaceted ways, must be adapted towards the creation of solutions that promote sustainable development; it can therefore act in a complementary way to other initiatives; but it can also facilitate business initiatives aimed at the green transformation of the economy. In addition to enforcement, competition advocacy has a central role to play to support the necessary drastic process of changes that are required towards this objective.

22. The HCC initiated in 2021 an innovative project to start materializing this process – the so called “sandbox for sustainability and competition” project¹⁹.

2.3.1. Background

23. The proposal for the creation of a “sandbox” for sustainable development and competition in the Greek market, forms part of policies for the promotion and strengthening of competition by the HCC. It follows an extensive international discussion; through the publication in July 2020 of a working text on sustainability and competition law; the organization in September 2020 of an international conference on the same subject; the publication in February 2021 of a joint technical study with the Netherlands Authority for Consumers and Markets (ACM); and the participation of the Hellenic Competition Commission as a coordinator (jointly with the ACM) in the working group on this issue set up by the European Competition Network (more information here). The HCC also sent the original sandbox proposal for comments to expert economists, competition academics, leading professionals in the field of competition and sustainable development, as well as consumer organizations.

24. During the Summer of 2021 the sandbox proposal was put to a public consultation process, attracting both domestic and foreign commentary.²⁰

2.3.2. Logic of operation

25. The sandbox is a supervised -virtual- environment (a digital platform) where undertakings can undertake initiatives that contribute significantly to the goals of sustainable development while not significantly impeding competition. In this context, the proposal’s effects on both competition and sustainable development are assessed by the HCC in order to enhance legal certainty and reduce regulatory risk for investments in line with the broader public interest goals for sustainable development.

¹⁸ There is experience with regulatory sandboxes in the financial industry field, in particular Fintech. See, Industry Sandbox, ‘A Blueprint for an Industry-Led Virtual Sandbox for Financial Innovation’ (2016) Consultation Guide. The UK Financial Conduct Authority also recommended the establishment, with the support of Project Innovate, of a Fintech industry-led virtual sandbox, which would allow firms to experiment in a virtual environment without entering the real market, using their own or publicly available data and a sandbox umbrella company.

¹⁹ This part of the contribution draws from the original public consultation document that has been published by the HCC.

²⁰ Further information on the specifications of operation, examples of markets and practices that may concern the sandbox, as well as other information, can be found at the HCC’s dedicated website for the sandbox proposal, available in English at: <https://www.epant.gr/en/enimerosi/sandbox.html>

26. An additional problem justifying such intervention by the HCC arises from the presence of imperfect financial markets, which either do not provide the required investments in view of their narrowness or, due to regulatory risk, and thus require additional guarantees.

27. In this environment, small and medium-sized enterprises (SMEs), which form the majority of businesses in Greece (about 821,000 SMEs, generating more than ½ of the added value in the Greek economy)²¹, a unique phenomenon in the EU, would have found it increasingly difficult to attract investment for the green transformation of their activities.

28. Hence, the sustainable development competition law sandbox forms part of the HCC's efforts to enhance the dynamic efficiency of the economy and innovation. Thus, this attempt combines both the "traditional" goals of competition advocacy and those of sustainability.

2.3.3. *Idea*

29. The main idea behind the operation of the sandbox is that, if the HCC considers that the business proposal may contribute positively to the public interest, then the proposal can be implemented in the -Greek- market under the HCC's supervision for a certain period, in case specific competition law problems that require some form of monitoring may be identified. Therefore, this environment does not make it possible to avoid the application of competition rules in the market, nor can it be used for anti-competitive practices that simply contain some reference or a low contribution to sustainable development without overcoming the damage to competition caused (e.g. "green-washing" practices). On the contrary, it makes it possible to fully evaluate practices which make a significant contribution to the public interest by enhancing sustainable development.

2.3.4. *New "competition enforcement" culture*

30. The creation by the HCC of a supervised space for experimentation (i.e. the sandbox) for the promotion of innovative business initiatives in favour of sustainable development, inevitably includes the concept of introducing into the Greek market commercial logics and actions that had not previously been the subject of (or processed under) competition law. It also introduces the culture of promoting innovative business proposals and solutions (instead of taking a one-dimensional, law enforcement perspective), with a clear view to promote competition for sustainable development.

31. The purpose of the HCC is to contribute to the green transformation of the Greek economy according to the principles of competition and to the creation of a new economic model which, *ab initio*, will avoid the creation of monopolistic situations which would be particularly difficult to limit in later phases of green growth, because of market tipping. It also integrates HCC's commitment for openness in ecosystems. The cost to the HCC and to businesses of an *ex post* repressive policy, in the case where these anticompetitive structures and platforms are in place, would be particularly high and could create disincentives for green entrepreneurship.

²¹ See further Financing SMEs and Entrepreneurs 2020 : An OECD Scoreboard, which point out that the "99.9% (almost 100%) of Greek enterprises are SMEs, and the majority of SMEs are micro-enterprises. On average, micro-enterprises contribute more to employment and add more value in Greece than in other European countries", available at: <https://www.oecd-ilibrary.org/sites/0f52ae26-en/index.html?itemId=/content/component/0f52ae26-en>

2.3.5. Target markets & audience

32. The sandbox will engage various industrial sectors, such as technology, environment and energy, recycling/waste management, healthcare, but also other sectors which – in the first phase – will aim to promote the environmental objectives of sustainable development. At a later stage, these initiatives may also cover all other goals set by the 2030 Agenda for Sustainable Development. The proposal could also complement other initiatives/actions for sustainable development taken at a wider public policy level.

33. As aforementioned, the Greek market is primarily composed of SMEs, a structure unique to the EU. Hence, the main target audience of the sandbox proposal comprises of undertakings of that – small and very small- scale. SMEs mainly have limited resources. They necessitate cooperation to evolve their business model and to invest in “greener” – yet costlier- production. Cluster formations, cooperatives, and all forms of joint business activity will have to be available to implement such major transition that will inevitably require both technological and logistical support. From this perspective, the sandbox provides SMEs with the forum to organize and assist in the implementation of these initiatives.

2.3.6. Mechanism of operation

34. The sandbox consists of a mechanism for the submission (to the HCC) of business proposals aimed at creating or enhancing the conditions for sustainable development and which, in order to materialize, necessitate greater legal certainty in relation to competition law enforcement. For proposals submitted on the basis of specific specifications and guidelines, the HCC may – in certain cases – issue a “no-enforcement action letter” to interested parties (following relevant analysis and evaluation). On the basis of that issuance, participants will be able to implement their proposal under the supervision of the HCC within a specific time frame²².

35. The proposal mainly concerns *multilateral* behaviour (agreement, decision, etc.), either between competitors (horizontal) or within a supply chain (vertical). Nonetheless, in some cases, it may also concern *unilateral* behaviour. The sandbox will initially operate within targeted industries, such as energy, recycling/waste management, industrial production of consumer products, production and/or distribution of food, pharmaceuticals, healthcare, etc.

36. The evaluation process of the proposal that is submitted to the HCC will take into account the existing competition law framework (paragraph 1 of article 1 of Law 3959/2011 and / or 101 TFEU and / or paragraph 3 of article 1 of Law 3959/2011 and / or 101 TFEU, the various Guidelines that have been issued, etc.) and in particular the relevant case law that has developed regarding the evaluation and inclusion of broader public interest reasons. This legal framework will be evaluated together with a number of criteria and Key Performance Indicators (KPIs) which are based on and are related to sustainable development. The criteria are designed and structured on a set of objectives and conditions

²² The operation of the no-action letter presents analogies with the mechanism used by the European Commission for accepting cooperation for reasons of public health due to the pandemic (see e.g. “Matchmaking Event” (25/03/2021) COMP/E-1/GV/BV/nb (2021/034137) regarding the production of pandemic vaccines).

employing the methods analyzed in the HCC’s Technical Report for Sustainable Development²³.

37. There would be various “levels” in relation to the practices that will be evaluated and particularly serious limitations where evaluating the effects of their implementation in the market would require the contribution of consumers and/or other relevant stakeholders.

38. The no-action letter would be subject to a limited monitoring by the HCC and, depending on the possible anti-competitive effects, would be put to market testing but also subject to specific obligations, especially in order to avoid other anti-competitive practices. Therefore, the acknowledgment given on the basis of the evaluations conducted in the context of the sandbox would be subject to compliance with the specific obligations set in order to avoid practices that harm competition – this will look closely to the process of commitments before the HCC (without the potential infringement decision).

39. The companies will exit the supervised sandbox area when the implementation of the proposal is completed on the basis of the directions given from the HCC.

2.3.7. Purpose of the proposal

40. The purpose of the sandbox proposal is the creation in the Greek market of a supervised, space to attract innovative business proposals that contribute to sustainable development. Once the evaluation criteria are met, the HCC will be able to acknowledge that the specific business plans/models do not raise competition concerns through a new and fast process of submitting and evaluating these commercial transactions, and of monitoring their implementation.

41. The exercise would involve some process of balancing where, ultimately, the promotion of an outcome of wider public interest will be supported; this outcome includes business innovation itself as a step towards the ultimate goal of achieving sustainable development. This reasoning is compatible with competition law according to the relevant case law in terms of the inclusion of a superior public interest legitimate reason in implementing competition law provisions, in particular Article 1 of Law 3959/2011 and/or Art. 101 TFEU. One should also take into account the inherent importance of the competitive process for the faster and more efficient achievement of sustainable development goals. This weighting is therefore limited to the difficult cases (“hard cases”) in which some restriction of competition may be necessary to achieve the goals of sustainable development.

42. The design for the creation and operation of the sandbox takes into account various elements related to both the legal and economic analysis from the point of view of competition law; the analysis from the point of view of the criteria for sustainable development; the technological means to be used; the objectives for the achievement of sustainable development; the internal process, the staffing and operation of the HCC (operational capabilities); the real conditions in the Greek market and its potential for innovation.

43. The design of the sandbox configuration (project implementation and operation technology, rules and requested information, selection of participants, evaluation and analysis of proposals, etc.) will aim at the more efficient information management and lower administrative costs, both for the undertakings and for the HCC. The degree of

²³ The relevant documents can be found at the HCC’s website on “Competition Law & Sustainability” available in English at: <https://www.epant.gr/en/enimerosi/competition-law-sustainability.html>

involvement of the HCC will be that of monitoring (in the first phase through a screening process and in a second phase, if necessary due to the possible anti-competitive effects, through a thorough qualitative and quantitative assessment).

44. It can be noted that there is no similar effort elsewhere and the operation of such a sandbox can also contribute to the creation of added value for Greek companies and the Greek market (green model). In addition, the sandbox can be connected to other initiatives planned by various public bodies (e.g. actions for the circular economy), complementing and creating a public (eco-) system of actions and services offered for the green transformation of the Greek economy.