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The Interaction between Competition and Democracy – Note by Greece

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1. Introduction

1. This Note seeks to explore the interaction between competition and democracy based on the issues set out in the OECD Competition Policy Paper on “The Interaction Between Competition and Democracy”¹ and examples of the practice of the Hellenic Competition Commission.

2. Democracy and well-functioning markets share common goals of accountability, due process, freedom to compete, and fair opportunity to participate and are both against privilege and control by the few for the few². Further, without the foundations of democracy, such as the rule of law and the protection of civil and economic liberties, the ability of undertakings to compete in a market is restricted.

3. In this context, the link between competition policy and democracy has become increasingly relevant especially in an evolving landscape where technological advancement and globalization are reshaping market dynamics³. This link necessarily involves rigorously enforcing competition law on abuse of dominance and preventing powerful companies from exercising monopoly power and therefore guaranteeing economic liberty and equality of opportunity. Protection of the freedom of choice and opportunity for citizens are democratic and pro-competition values which reinforce each other to support a society that promotes general welfare.

4. Competition law may play a significant role in supporting democracy specifically in communication and the dissemination of information, issues directly linked to the ability of citizens to make autonomous choices, in the sense that they may deal with the diversity of ownership of media, the plurality of the concentration of communications and the press and it may control the manipulation and distortion to the flow of information. Taking into consideration that information is crucial to a democracy, in the sense that it allows citizens

¹ OECD (2024), “The interaction between competition and democracy”, OECD Roundtables on Competition Policy Papers, No. 316, OECD Publishing, Paris, <https://doi.org/10.1787/8b3a575f-en>.

² See Paper by Prof. Eleanor M. Fox “The Symbiosis of Democracy and Markets” for Session I at the 16th Global Forum on Competition on 7-8 December 2017 available at [https://one.oecd.org/document/DAF/COMP/GF\(2017\)5/en/pdf](https://one.oecd.org/document/DAF/COMP/GF(2017)5/en/pdf) , para 2.

³ Recently there has been increased discussion over the role of competition policy in supporting democracy. As former European Commission Executive Vice-President Margrethe Vestager noted in June 2024,

“at its core, competition policy is a democratic tool”. Speech by Executive Vice-President Margrethe Vestager at the Open Markets Institute event “Fixing the information Crisis Before It's Too Late (For Democracy)”, 27 June 2024, https://ec.europa.eu/commission/presscorner/detail/en/speech_24_3516 . See also Competition Policy Brief Issue 1 | March 2023 “A dynamic and workable effects based approach to abuse of dominance” available at https://competition-policy.ec.europa.eu/system/files/202303/kdak23001enn_competition_policy_brief_1_2023_Article102_0.pdf

where it is stated that “The case law has also confirmed that competition law can achieve broader objectives, as ensuring consumer choice is a means to ultimately guarantee plurality in a democratic society”

to choose wisely, this role of competition is important, although not always directly related to product markets where traditional competition law assessment takes place⁴.

5. This contribution explains how competition can affect democracy, by setting out some examples of legislation and initiatives undertaken by the Hellenic Competition Commission (“HCC”) in the wider media and press distribution sector and by describing institutional arrangements and policy initiatives linked to democratic principles.

2. Media markets and pluralism

6. Information plays a vital role in effective democracy, providing accountability to those in power and the means for citizens to understand which political choices may best suit their preferences. At the same time, competition in media markets could affect the information different citizens have access to. The importance of diversity of ownership within traditional forms of media, such as newspapers, TV and radio, has been well established in Greece, as the concerns around plurality of media ownership have led the legislator to establish special regimes to consider the impact of changes in media ownership on the diversity of information sources.

2.1. Merger control in the media sector in national competition law

7. Media mergers are considered to have a pivotal impact on the functioning of democracy mainly due to the important societal role of media. In addition to the general principles in merger control, media mergers introduce an additional layer of responsibility as media companies have the task of informing citizens, therefore, media pluralism, diversity and independence should be safeguarded in this context. Concentration of media companies consequently results in less or underrepresented opinions and interests. The above factors indicate that media mergers can impact democratic values and should therefore be carefully considered when being assessed by Authorities, in order to ensure a diverse media landscape.

8. The Greek rules concerning the assessment of mergers by the HCC are set out in Articles 5–10 of Law 3959/2011 on the protection of free competition (“Competition Act”). The European Merger Control Regulation (EUMR), EC case law, as well as all the relevant guidelines issued by the European Commission are taken into consideration by the HCC in interpreting and applying the Greek merger control regime.

9. However, media concentrations are reviewed under a different applicable legislative framework in Greece with thresholds and substantive criteria different from the ones that apply for other mergers. In particular, Law 3592/2007 on “Concentration and licensing of media enterprises” (“Media Law”) defines thresholds that trigger a merger obligation and sets the degree of concentration of media undertakings that can lead to a prohibition of a merger.

10. In particular, it provides that all concentrations in the media sector are subject to merger control if the turnover of each of at least two undertakings concerned exceeds 5 million euros in the national (Greek) market and 50 million euros combined turnover

⁴ See also OECD (2024), “The interaction between competition and democracy”, OECD Roundtables on Competition Policy Papers, No. 316, OECD Publishing, Paris, <https://doi.org/10.1787/8b3a575f-en>.

As above Chapter 2.3.6

worldwide. These thresholds are lower than those determined for transactions to be notifiable and subject to merger control for all other sectors.

11. Further, the Media Law (art. 3⁵) states that the concentration of undertakings is prohibited in case a dominant position is acquired because of the concentration or in the

⁵ See Article 3 “Concentration of market control” of Law 3592/2007

“1. Concentration of market control shall mean the percentage of public influence exerted by media in relation to ownership or participation in media of the same or other form (television, radio, newspapers and magazines) in the relevant market or in the individual relevant markets where the medium or media (television, radio, newspapers and magazines) operate(s).

2. The finding of a concentration of control in the media sector shall be carried out in accordance with the provisions of this Article and in addition to the provisions of Law 703/1977 on competition, as it was in force (now L. 3959/2011).

3. The concentration of control defines the concept of a dominant market position, which exists in the following forms:

a) Where the natural or legal person is active in one or more media of the same form, by acquiring a market share of over thirty-five percent (35%) in the relevant individual market (television, radio, newspapers and magazines) of the coverage of each medium.b) Where the natural or legal person is active in two or more media of a different form:

ba) either by acquisition of a market share of more than thirty-five percent (35%) in the relevant individual market of coverage of each medium, bb) or by acquisition of a market share: i) of more than thirty-two percent (32%) in all the two markets, if it is active in two different media of the same coverage, ii) of more than twenty-eight percent (28%) in all the three markets, if it is active in three different media of the same coverage and iii) of more than twenty-five percent (25%) in all the four markets, if it is active in four different media of the same coverage.

4. The criterion for finding a dominant position is, for television and radio, on the one hand, the advertising expenditure and the revenue from the domestic sale of a program or other radio and television broadcasting services on a twelve-month basis, and for newspapers and magazines, on the other hand, the total advertising expenditure and the total revenue from the domestic sales thereof on a twelve-month basis. Undertakings operating in more than one media of the same or a different form must keep separate advertising revenue accounts for each medium and depending on its coverage, which shall be reported in the balance sheet.

5. The abuse of a dominant position shall be prohibited. An abuse of a dominant position consists, in particular, in:

a) directly or indirectly imposing unfair purchase or selling prices or other unfair trading conditions,

b) applying dissimilar conditions to equivalent transactions with other trading parties, in particular through an unjustified refusal of sales, purchases or other transactions, thereby placing them at a competitive disadvantage,

c) making the conclusion of contracts subject to the acceptance of additional services by the contracting parties or concluding additional contracts which, by their nature or according to standard commercial practices, are not linked to the subject matter of such contracts,

d) limiting production, consumption or technological development to the detriment of consumers.

case a dominant position is established by one or more of the undertakings concerned. The law also sets out specific market shares that constitute a prohibited concentration depending on whether the undertakings concerned are active in the same type of media (television, radio, newspapers, magazines), ranging from 25 to 35%. Market shares are calculated based on advertising revenue plus sales revenue in all four product sub-markets.

12. The HCC applies the Media Law for the substantive assessment of mergers concerning *informative media*, while the Competition Act applies to the general framework and the administrative procedure to be followed before the HCC. In the case of concentrations of undertakings which operate *non-informative media*, the Competition Act applies exclusively.

6. *The abuse of a dominant position entails the adoption of measures and the imposition of sanctions, in accordance with the provisions of Law 703/1977 (Government Gazette 278 A), as it was in force (now L. 3959/2011).*

7 a) *A concentration of undertakings shall be prohibited either in the event that it is established, as referred to above, that one or more of the undertakings participating in the concentration hold a dominant position or in the event that a dominant position is acquired as a result of the concentration. The amount of the aggregate turnover of all undertakings participating in the concentration, referred to in Article 4a (1) (b) of Law 703/1977, as it was in force (now L. 3959/2011), is set, for the purposes of this paragraph, at the amount of five hundred thousand (500,000.00) euros.*

The amounts referred to in Article 4b (1) of Law 703/1977, as it was in force (now L. 3959/2011), of the aggregate turnover of all undertakings participating in the concentration are set, for the purposes of this paragraph, at the amount of five million (5,000,000) euros in the national market and fifty million (50,000,000) euros in the global market, respectively.

The above amounts may be adjusted by joint decision of the Minister of Development and the Minister of Press and Media.

b) *Any agreement between media undertakings within the meaning of Article 1 (1) of Law 703/1977, as it was in force (now L. 3959/2011), shall be prohibited, in particular through concerted practices between media operators, which has as its object or effect the obstruction, restriction or distortion of competition through indirect advertising and the advertising price fixing.*

8. *The above shall also apply in the case of associated undertakings, within the meaning of Article 42 (e) of Codified Law 2190/1920 (Government Gazette 37 A), as in force.*

9. *The percentage of concentration of market control is calculated in its entirety, both for each media undertaking and for the shareholders or partners thereof, within the meaning of paragraph 3 of Article 5, as well as for their intermediaries, within the meaning of paragraph 9 of Article 2 of Law 3310/2005 (Government Gazette 30 A), as in force.*

10. *The competence for assessing and finding a concentration of market control, adopting measures and imposing the relevant sanctions lies with the Hellenic Competition Commission. When exercising any such assessment, the Hellenic Competition Commission shall have all the competences and powers provided for under the applicable provisions.*

11. *The Hellenic Competition Commission has the power to initiate the above procedure ex officio or following a complaint.*

12. *The provisions of this Article also apply to radio and television services provided through broadcasting networks, for which a broadcasting frequency, as required, has been allocated for a radio and television signal or through broadband networks, the operation of which requires no frequency or requires a frequency different from those allocated for the broadcast of a radio and television signal”*

13. National legislation on media pluralism and competition law regulation are in a large part complementary⁶, in the sense that they primarily aim to protect different legitimate interests using for this purpose a different analytical methodology and that they can consequently be applied simultaneously and independently of each other (depending on the specific case before the HCC).

14. More specifically, the Media Law complements the Competition Act in the following ways:

- It links the notion of concentration of control to the notion of dominance
- It introduces specific market share thresholds, beyond which the merger should be prohibited
- It establishes lower revenue thresholds for the application of merger control in the media market.
- It predefines the relevant product (sub-)markets, distinguishing between TV, Radio, Newspapers and Magazines
- It establishes a specific methodology for the calculation of market shares (based on advertising revenue plus sales revenue in all four product sub-markets).
- Subject to the provisions of Article 3 of the Media Law, the notion of concentration of control in the field of *informative media* (Television, Radio, Newspapers and Magazines) is determined based on the provisions of said law and in addition to the provisions of The Competition Act. Mergers related to *non-informative media* (e.g. relating to entertainment) are regulated exclusively by the Competition Act.
- As HCC has assessed⁷ the definition of "concentration" in Article 5 par. 2 of the Competition Act has similarities but is not identical to the concept of control under Article 3 of Media Law. The latter is specific to media concentrations and includes elements such as influence on the public and ownership/participation in informative media of the same or different product markets (Television, Radio, Newspapers and Magazines). The concept of influence on the public is not explicitly defined in Media Law. It is, however, measurable by being linked to the concept of market control concentration (art. 3 par. 1) which is in turn linked to the concept of dominant position (art. 3 par. 3)⁸.

3. Opinion on the functioning of competition in the market of Press Distribution in Greece

15. The Greek Constitution empowers the state to take measures to safeguard a minimum level of pluralism by ensuring access to all the publications throughout the Greek territory. The key role of the media in shaping public opinion serves as a basis for specific

⁶ See HCC case No. 538/2012 available in Greek at <https://www.epant.gr/en/decisions/item/2035-decision-538-2012.html>

⁷ See case 679/2019 paras. 35-50 available in Greek at <https://www.epant.gr/en/decisions/item/1067-decision-679-2019.html>. See also Decision 659/2018 available in Greek at <https://www.epant.gr/en/decisions/item/1199-apofasi-659-2018.html>

⁸ See also HCC decisions 652/2017 available at <https://www.epant.gr/en/decisions/item/1070-decision-652-2017.html> , 655/2018 available at <https://www.epant.gr/en/decisions/item/1110-decision-655-2018.html>, 700/2020 available at <https://www.epant.gr/en/decisions/item/1179-apofasi-700-2020.html> .

arrangements aims at ensuring media pluralism (i.e. the presence of a sufficient number of media representing different and independent voices) and diversity of similar media (i.e. the presence of different political and cultural views). Free competition law helps to ensure pluralism by contributing to improving the conditions of economic competition in the market. This occurs either by introducing specific competition regulations in the media sector, and the press in particular, or by a congruent to these general constitutional principles and requirements interpretation and application of the general rules of competition law.

16. The HCC within the framework of its advisory powers, and in particular, its capacity to issue opinions on matters of its competence⁹, issued an Opinion in 2019 (HCC Opinion No 39/2019¹⁰, “the Opinion”) on the functioning of competition in the national market of Press Distribution. In the Opinion, the Authority addresses the structural weaknesses which characterize printed press distribution market in Greece and proposes a series of solutions to encounter them. Further, the Authority attempts to ensure free competition, in the light of the protection of a minimum level of pluralism and diversity of opinion, through the freedom of circulation, distribution and sale of printed publications.

17. The Opinion on the Press Distribution System found that the market is characterised by significant downturns due to a variety of causes, such as the economic crisis and the digital transformation of the press and the media industry has been undergoing radical changes and restructuring as a result of the adoption of new technologies, which offer new opportunities for all market players and consumers. The Opinion analyzed the existing structure of the printed-press distribution market and how this was affected by the closure of one of the two then existing printed-press distribution undertakings (agencies) in Greece, which changed the structure of the market from a duopoly (also operating for a period as a cartel) to a de facto monopoly, with a single active printed-press distribution agency (“ARGOS”), in which publishers holding a significant stake in the printed-press/newspaper market act as its shareholders.

18. It was found that the Printed-press distribution market in Greece is characterised by a number of structural weaknesses, such as: (a) the evolution of different conditions, in particular the condition of demand, which has been steadily declining over time for the printed-press products; (b) the legislative obligation to distribute press products throughout the Greek territory; (c) the particular importance of the sale of publications, in particular with regard to the overall cost of ARGOS, and (d) the revenue and business methods of publishing companies, the sale of publications (compared to the revenue coming from digital advertising). The above weaknesses have given the market in question the characteristics of a potential “natural monopoly” or “essential facility”, at least in the medium term. It is noted that, in theory, in market conditions with natural monopoly characteristics, the activity of only one company is considered to be more cost-effective, in terms of the cost of providing that service, than the operation of several companies.

19. The HCC considered not only quantitative but also qualitative parameters of the competitive process, and in particular the quality of products and services, based on consumer preferences. But since consumers could not express their preferences in a monopoly market (i.e. as the press distribution market), as by definition they have no alternative and the Constitution and the relevant legislative framework emphasize the protection of pluralism, it could be estimated that any negative effects on the principle of pluralism may constitute an element of social cost which should be taken into account,

⁹ Pursuant to Article 23 (1) of Law 3959/2011

¹⁰ See <https://www.epant.gr/en/decisions/item/1184-opinion-39-2019.html>

together with other parameters, by the HCC when considering whether there is a negative impact on effective competition, or not.

20. In conclusion, the Opinion proposed a series of measures concerning (i) the legal form of the printed-press agencies, (ii) changes to the existing institutional framework and/or (iii) measures concerning intervention in the press market itself, which aimed at ensuring both the benefits brought by effective competition to consumers and society, as well as to the pluralism of the press, in the sense of ensuring pluralism in media and the proper functioning of the market, not only in the present but also in the future. It further deemed as necessary that weighing of the various parameters at play should be carried out by State institutions, which enjoy broader legitimacy in weighing the general interest, even where this does not coincide with the protection of “effective competition”.

3.1. Regulatory Intervention in the Press Distribution Sector in Greece

21. The HCC Opinion highlighted concerns with respect to the structure and organization of the press distribution market and proposed to the regulator the adoption of a range of relevant measures to address such concerns. Subsequently the HCC issued a decision for distribution of printed press in accordance with article 11 of Law 3959/2011 (HCC Decision No. 768_2022). The purpose of Article 11 of Law 3959/2011 is to “create” conditions for effective competition in the said sector of the economy, rather than simply correcting the anti-competitive effects of specific practices, as is the case with the ex-post application of competition rules. In the relevant HCC decision, the market investigation aims at ensuring free competition, in light of the protection of a minimum level of pluralism and diversity of opinions, through the freedom of circulation, distribution, and sale of printed publications.

22. It was established that the press distribution market at the level of the distribution agency had the characteristics of a quasi-natural monopoly elements or essential facility, which, however, is private and non-regulated, and therefore constitutes per se a distortion of competition. At the same time, the HCC recognized that within the framework of the change in the shareholding structure of the agency in May 2021, the vertical common ownership of certain publishing companies remained and the incentive for vertical restrictions against competitors cannot be excluded in subsequent changes in the shareholding structure of the agency. The HCC decided to adopt a series of remedies:

1. The establishment of a system for prior notification of changes in the shareholding structure of the Press Distribution Agency to the Hellenic Competition Commission.
2. The Press Distribution Agency was obliged to take measures for the creation of “Chinese walls” that will prevent the leakage of commercially sensitive information to the notifying party under a) with respect to the commercial policy of the Press Distribution Agency regarding press distribution.
3. An Advisory Committee was established with the participation of representatives of all stakeholders involved in the entire value chain of newspaper distribution, with an advisory and consultative role on the proposed Commercial Policy of the Press Distribution Agency.
4. An Ombudsman was appointed to monitor compliance with the measures imposed by the HCC’s Decision.

4. HCC institutional independence

23. Competition law and policy requires independent institutions and should be conducted by accountable public bodies that are free from political interference and pressure. Institutional and procedural safeguards are inherent to democratic legal order. The HCC is an independent authority that enjoys administrative and financial autonomy.

24. It should be noted that in 2022, national competition law (the Competition Act L.3959/2011) which sets out the functions and competencies of the HCC, was amended to transpose Directive 2019/1 (the ECN+ Directive) into national legal order, introducing several provisions of both substantive and procedural law aiming at enhancing the HCC's independence and effectiveness. The key amendments to the competition legal framework, include, *inter alia*, safeguards to the Authority's independence, such as a more transparent selection procedure for the appointment of Members of the decision-making arm of the HCC, the abolition of a series of provisions regarding certain powers of the Minister of Development and the safeguarding of the Authority's efficient resources.

5. HCC Advocacy Efforts

5.1. Public Policy Design

25. The HCC has taken proactive steps to embrace democratic values in its policy. As a part of its effort to integrate democratic principles - such as transparency and accountability, the Authority publishes annual comprehensive reports, which are then distributed to all members of the Greek Parliament.

26. In addition, in its effort to promote open and fair market practices, the HCC has launched a guide entitled "*Promoting and Strengthening Competition in the Formulation of Public Policies*"¹¹ aimed at informing central government bodies and other public entities about the importance of safeguarding competition during the formulation of public policies. The guide serves as a valuable resource for policymakers as it outlines the fundamental legislative framework that governs business practices prohibited by competition law. It provides insights into key principles and regulations which promote fair competition and offers guidance on how to ensure that public policies are designed in a manner that supports and strengthens competition.

27. Through this guide, the HCC aims to raise awareness among policymakers regarding the significance of competition in achieving favourable economic outcomes and fostering innovation. By incorporating competition considerations into the policymaking process, it is possible to create an environment that encourages market competition, efficiency, and consumer welfare.

28. In particular, the guide:

1. addresses the obligations of the state in terms of adhering to the principles of free competition, drawing upon various sources such as:
 - the constitutional guarantee of free competition,
 - the requirement of cooperation in good faith between the EU and member states, and

¹¹ See, <https://www.epant.gr/enimerosi/dimosieyseis/odigoi/item/2528-odigos-gia-dimosies-politikes.html>

- broader EU law and jurisprudence.
 - 2. provides concrete examples of state measures that either comply with or infringe competition legislation.
 - 3. outlines the repercussions of such infringements for both the state and individuals affected.
 - 4. highlights the potential legal and economic consequences that may arise from infringing competition laws.
29. The guide further has the objective of:
- 1. Presenting the tools developed by the OECD and the EU for analysing the impact of state measures on competition. These tools provide a structured approach to assess the effects of government actions on competition and help policymakers make informed decisions.
 - 2. Introducing best practices for the preparation and adoption of government measures, and guidelines on how to ensure that policies and regulations are designed in a manner that promotes competition and avoids anti-competitive outcomes. emphasizing on the importance of conducting consultations with market players, seeking their input and feedback to ensure that policies are well-shaped and considering the perspective of stakeholders.

5.2. Public Procurement and Bid Rigging

30. Anti-competitive practices in public procurement alter the competitive condition of the procedure in favor of participating companies and to the detriment of the contracting authority and ultimately the consumers and the taxpayer. In this context, the integrity of competitive procedures in public procurement is particularly important for safeguarding the taxpayers' money, achieving policy objectives and providing higher-quality public services.

31. In Greece public procurement represents a significant part of the economy and a large proportion of the State budget¹². Collusion between bidders in public procurement is subject to both competition law enforcement and criminal prosecution. The Hellenic Competition Commission is responsible for detecting and punishing anti-competitive behavior in public procurement procedures. This plays an important role in enhancing and sustaining public trust, because practices such as bid rigging undermine this trust by enabling the exploitation of public procurement, to the detriment of public interest. In essence, competition law supports public confidence by ensuring the accountability and integrity of public procurement procedures and government bodies and public institutions involved in such procedures.

32. Other than various cases involving bid rigging, the HCC has also sought to raise awareness among public procurement agencies about the importance of well-designed tender procedures in reducing the scope for anti-competitive conduct. To enhance its

¹² It has been estimated that, over 250 000 public authorities in the EU spend around 14% of GDP on the purchase of services, works and supplies. In many sectors, including energy, transport, waste management, social protection and the provision of health or education services, public authorities are the principal buyers See Fit for Future Platform, Opinion on Public Procurement of 28.11.2023 available at https://commission.europa.eu/law/law-making-process/evaluating-and-improving-existing-laws/refit-making-eu-law-simpler-less-costly-and-future-proof/fit-future-platform-f4f-2021-2024/adopted-opinions_en.

advocacy role and to assist public contracting authorities to detect illegal behaviors in tender procedures the HCC has published a Guide for Public Contracting Authorities¹³ with the aim:

1. to provide useful tools to the contracting authorities to detect illegal collusion in tendering procedures,
 2. to help public sector officials to understand the anticompetitive behavior of a cartel, as well as the techniques used when targeting competitive bidding processes,
 3. to help them understand the responsibilities of the HCC to deal with cartels and the responsibilities of the contracting authorities in dealing with cartels so as to avoid potential liability in the event of facilitation even unintentionally or failure to inform the HCC timely,
 4. to inform the officials of the framework of sanctions that may be imposed for participation in a cartel,
 5. to highlight the specific procedures and technological tools that may be used for better detection of cartels.
33. Additionally, in its attempt to raise the public's awareness with regard to the social benefits competition offers to the economy and to effectively convey, competition issues, the HCC has developed new communication strategies within the set of its targeted advocacy initiatives. Under this scope, the HCC has launched a dedicated Anonymous Information Platform (*Whistleblowing system*) specifically designed for use by contracting authorities¹⁴.
34. The internal information available to contracting authorities in their role as contract-awarding / tender-launching bodies enables them to receive information and complaints about the participation of companies in such procedures. Contracting authorities can assist the HCC's work in uncovering cartel practices and / or behaviors, so that investigations can proceed swiftly and effectively, thus directly benefiting the Greek economy, consumers, and taxpayers. Through the dedicated anonymous information platform, employees of contracting authorities and other entities may share valuable information regarding tender and bid rigging practices, while ensuring their anonymity. The establishment of a whistleblowing system has been considered as a key step to counterbalance the fear factor and strengthen competition policy and implementation thereof has been re-enforced by a media campaign¹⁵. Further, the HCC has devised a plan to host a series of webinars with the aim of educating and increasing awareness of contracting authorities, including those at the local government level.

6. Conclusions

35. The link between competition and democracy is inherent and substantive. Effective competition policy promotes economic equality, innovation and accountability, which are fundamental factors for a democracy. Conversely, democratic principles ensure that competition remains fair and inclusive, protecting the interests of all stakeholders.

¹³ See, <https://www.epant.gr/enimerosi/dimosieyseis/odigoi/item/570-odigos-gia-anathetouses-arxes.html>

¹⁴ See, <https://www.epant.gr/en/bidrigalert.html>

¹⁵ See, <https://www.epant.gr/en/enimerosi/publications/media/item/2216-whistleblowing-system-for-contracting-authorities.html>

Democratic values embedded in competition law and policy may contribute to fostering fairness, stability and prosperity of consumers and society at large.

36. The above selected examples of legislation and enforcement in the media sector, along with issues on institutional organization and examples of advocacy efforts in policy design and public procurement, which of course are part of the overall enforcement and competition policy of the Authority, are some indicative examples of how this link has been manifested through the HCC's practice.