

Mr. Adonis Georgiadis  
Minister of Development and  
Investments  
Nikis 5-7 str.

GR - 10180, Athens

Ref.: BEUC-X-2021-117/MGO/ARE/cs

14 December 2021

**Subject: Greek draft law “Modernization of Competition Law for the Digital Age”.**

Dear Minister Georgiadis,

We are writing on behalf of BEUC, the European Consumer Organisation, and its Greek members EKPIZO and KEPKA in support of the draft law “Modernization of Competition Law for the Digital Age” amending Law 3959/2011<sup>1</sup>.

The well-functioning of markets and therefore the wellbeing of consumers depends on competition authorities having the necessary powers to enforce competition law where needed and, to be able to address the challenges in fast developing digital and related markets.

Greek consumers, like consumers across the European Union, should be able to benefit from innovative, open and fair markets. However, the reality tells a different story. Digital markets are dominated by a few players and, infrastructure markets, like telecoms, are not delivering the promised benefits of competition in the post-liberalisation era. Against this background, it is worth highlighting that the Greek mobile market was ranked the most expensive mobile market in the EU in 2020<sup>2</sup>. Comparatively, prices for mobile broadband and telephony in Greece are, across the offers studied, more than twice as expensive as the EU average<sup>3</sup>. This is simply not acceptable.

<sup>1</sup> Ref.: <http://www.opengov.gr/ypoiar/?p=12356>

<sup>2</sup> Ref.: [https://research.rewheel.fi/downloads/The\\_3-MNO\\_Greek\\_market\\_is\\_the\\_most\\_expensive\\_market\\_in\\_EU\\_PUBLIC\\_VERSION.pdf](https://research.rewheel.fi/downloads/The_3-MNO_Greek_market_is_the_most_expensive_market_in_EU_PUBLIC_VERSION.pdf)

<sup>3</sup> Ref.: <https://digital-strategy.ec.europa.eu/en/library/mobile-broadband-prices-europe-2019>

The proposed draft law seeks to update and upgrade the powers of the Hellenic Competition Commission (HCC) in order to ensure that public enforcement evolves alongside new market realities. It would also provide the HCC with the possibility to intervene, where needed and appropriate, in telecommunication markets. Providing a competition law enforcer like the Hellenic Competition Commission with full powers to apply competition law in the telecommunication markets would align the institutional framework in Greece with the situation in other EU Member States and ensure that undertakings active in the telecoms sector are also subject to active competition law enforcement to the benefit of Greek consumers.

We consider that it is essential to ensure that public authorities live up to the expectations of citizens and therefore we urge you to submit the proposed draft law to the Greek Parliament for its discussion and adoption.

Thank you for taking into account these considerations.

Yours sincerely,

Monique Goyens  
BEUC Director General

Eleni Alevritou  
EKPIZO Vice-President

Nikolaos Tsemperlidis,  
President KEPKA,  
Member of Economic and  
Social Council of Greece

Evangelia Kekeleki  
KEPKA General  
Secretary

C/c:

Sotirios Anagnostopoulos - Secretary General for Commerce and Consumer Protection.

Olivier Guersent – Director General, DG Competition, European Commission.

Ioannis Lianos – President, Hellenic Competition Commission.