ASSOCIATION YEAR 2021-2022 CHAIR Jonathan I. Gleklen Washington, DC CHAIR-ELECT Thomas F. Zych, Sr. Cleveland, OH VICE-CHAIR AND DIVERSITY OFFICER Fiona A. Schaeffer New York, NY COMMITTEE OFFICER Steven J. Cernak Novi, MI CONSUMER PROTECTION OFFICER Paula C. Martucci Fayetteville, AR **FINANCE OFFICER** Alysa Z. Hutnik Washington, DC **IMMEDIATE PAST CHAIR** Gary P. Zanfagna Washington, DC INTERNATIONAL OFFICER Hartmut Schneider Washington, DC MARKETING OFFICER Svetlana S. Gans Washington, DC PROGRAM OFFICER Scott A. Martin New York, NY PUBLICATIONS OFFICER Darren S. Tucker Washington, DC SECRETARY AND **MEMBERSHIP OFFICER** Melanie L. Aitken Washington, DC SECTION DELEGATES Arthur J. Burke New York, NY Renata B. Hesse Washington, DC **TECHNOLOGY OFFICER** J. Anthony Chavez Spring, TX COUNCIL MEMBERS D. Jarrett Arp Erika Brown Lee **Deborah Feinstein** Jamilla Ferris Megan Jones Deona Kalala Gabrielle Kohlmeier Charles Moore James J. O'Connell Maureen K. Ohlhausen Amanda P. Reeves Rebecca Valentine Suzanne E. Wachsstock Koren Wong-Ervin Judith A. Zahid NON-U.S. LAWYER REP Casey W. Halladay NON-LAWYER REP Philip B. Nelson STATE ATTORNEYS GENERAL REP Sarah Oxenham Allen Richmond VA JUDICIAL REP Amit Mehta Washington, DC BOARD OF GOVERNORS REP Richard M. Lipton Dallas, TX SECTION DIRECTOR Joanne Travis Chicago, IL



321 North Clark Street Chicago, IL 60654-7598 312.988.5550 antitrust@americanbar.org www.ambar.org/antitrust

August 26, 2021

Via email: sandbox@epant.gr

Hellenic Competition Commission Kotsika 1A & Patision 10434 Athens, Greece

Re: Hellenic Competition Commission's Sustainability Sandbox Proposal

Dear Sir/Madam:

On behalf of the American Bar Association Antitrust Law Section, I am pleased to submit the attached report in response to the Hellenic Competition Commission's proposal for the creation of a sandbox for sustainability and competition in the Greek market.

The views expressed herein are presented on behalf of the Antitrust Law Section. They have not been reviewed or approved by the House of Delegates or the Board of Governors of the American Bar Association and, accordingly, should not be construed as representing the position of the Association.

We appreciate your consideration of the Section's report in relation to this important initiative. If you have any comments or questions after reviewing our comments, we will be happy to discuss them.

Sincerely,

Jonathan I. Gleklen Chair, Section of Antitrust Law

Enclosure