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**με Ευρωπαϊκές Χώρες, χώρες Βόρειας, Κεντρικής, Νότιας Αμερικής
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Πληρεξούσιος Υπουργός Β΄

Θέμα: Έναρξη διαδικασίας δημοσίου σχολιασμού και υποβολής σχολίων για τη σύνταξη έκθεσης Γραφείου USTR «Special 301 Report on IPR», έτους 2025, περί προστασίας δικαιωμάτων διανοητικής ιδιοκτησίας

Σχετ. έγγραφα:

1. Το με ΑΠ 66325/11.12.2024 έγγραφο της Β3 Δ/νσης Διμερών Οικονομικών Σχέσεων με Ευρωπαϊκές Χώρες, χώρες Βόρειας, Κεντρικής, Νότιας Αμερικής & Καραϊβικής

Αξιότιμοι Κύριοι,

Αξιότιμες Κυρίες,

Σε συνέχεια του ως άνω σχετικού εγγράφου παρακαλούμε βρείτε ακολούθως την απάντηση και σχετική επικαιροποιημένη πληροφόρηση για το υπόλοιπο του έτους 2024 μέχρι και τον τρέχοντα μήνα εκ μέρους του Οργανισμού Πνευματικής Ιδιοκτησίας (ΟΠΙ) ως της αρμόδιας εθνικής αρχής για τα ζητήματα πνευματικής ιδιοκτησίας και συγγενικών δικαιωμάτων στη χώρα μας, συμπεριλαμβανομένης και της αποτελεσματικής αντιμετώπισης της προσβολής τους στο επιγραμμικό περιβάλλον.

Είμαστε στη διάθεσή σας για οποιαδήποτε περαιτέρω πληροφορία ή διευκρίνιση.

Με εκτίμηση,

Μαρία – Δάφνη Παπαδοπούλου, ΔΝ

Αναπληρώτρια Διευθύντρια ΟΠΙ

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Dear Sirs/Madams,

Following our respective notification from the Ministry of Foreign Affairs, please find hereinafter the updated information and contribution prepared by the Hellenic Copyright Organisation (HCO) with regard to the current Request for Comments and Notice of a Public Hearing concerning the 2025 Special 301 Review.

We would like to state that the HCO is the competent national authority for all copyright and related -rights issues including the effective tackling of the rights' infringement on the digital environment.

We remain at your disposal for any further information or clarification.

Best Regards,

Dr. Maria-Daphne Papadopoulou, LL.M. mult

Acting Director of the HCO

I. LEGISLATIVE AND SUPERVISORY WORK OF THE HCO

Within the context of its multiple responsibilities, the HCO had participated, among others, in the **national Working Group** examining and drafting the amendments of the Greek legislation which are required in order to run in compliance with Article 9 of the **Digital Services Act (DSA) concerning orders to act against illegal content**.

Accordingly, the Law No. 5099/2024 has been published in the Official Government Gazette (A' 48/05.04.2024). Article 12 of this Law provides that the judicial or public authorities shall ensure that the orders issued against one or more items of unlawful content to intermediary service providers shall comply with the conditions set out in par. 2 of Article 9 of the Act; otherwise, such orders shall be considered as void for the purpose of DSA.

Provided that the Regulation aims at ensuring a safe, predictable and trusted online environment, addressing, among others, the dissemination of illegal content online thus regulating the expeditious acts to be taken to remove or disable access to that content, **HCO prepared, in addition, a legislative update of Article 66E of the Law 2121/1993**. In particular, **an extra paragraph had been added to the said provision dictating that the orders of EDPPI shall comply with Article 9 of the DSA**.

Moreover, the HCO as the competent supervisory body of all collective management organizations and independent management entities operating in Greece, is constantly **monitoring their compliance with the relevant regime under various procedures and proceedings**. Since the role and purpose of the HCO is inexorably intertwined with the achievement of a **high standard of the implementation** of the relevant legal scheme in practice, it controls the proper and accurate operation of the said bodies, while also providing for the information to users for the purpose of enhancing and achieving a both **effective and transparent rights management** at national level in all fields including the licensing of works and other subject – matters of protection and subsequently the lawfulness of their use.

II. DEALING WITH ONLINE COPYRIGHT AND RELATED – RIGHTS INFRINGEMENTS

The Work of EDPPI

A. In Greece, a **Committee for the Notification of Copyright and Related Rights Infringements on the Internet (EDPPI)** was established under Article 52 of the Law No. 4481/2017 (Official Government Gazette (FEK) 248/A/20.07.2017) by the means of which Article 66E was added to the Greek Copyright Act, namely the Law No. 2121/1993 (Official Government Gazette (FEK) 25/A/04.03.1993)¹.

¹ <https://www.opi.gr/en/library/law-2121-1993#a66e>

Under this provision, which had been further amended during these years in order to broaden the competency of EDPPI, an **administrative, extra-judicial mechanism had been introduced into the Greek legal order under the aim of providing to copyright and related – rights holders, as well a prompt and effective tool against online infringements instead of the time-consuming and cost – effective court litigation.**

The details concerning the establishment of the Committee, its composition, operation and responsibilities, as well as the procedures to be followed for the imposition and recovery of the fines that EDDPI can impose in the case where its decisions had been circumvented, had been regulated under a number of **Ministerial Decisions**.²

The decisions of the Committee are publicly available at the official webpage of the HCO³, as well as the so – called “**black lists**”, namely the lists of the domain – names and/or IP addresses through which copyright and related – rights infringements⁴, as well as infringements related to live events⁵ had taken place following the Committee’s relevant assessments.

Within 2024 EDPPI issued 124 additional Decisions ordering in all cases the blocking of access to 810 IP addresses and 49 domain names. In their majority, the respective complaints concerned the blocking of access to illegal content - unauthorized transmission and communication to the public of sport events-, while certain applications referred to literary works.

B. As we had stated in our previous contributions, the competence of the Committee was expanded in 2020 -following a relevant amendment of Article 66E of the Greek Copyright Act **in order to be able to deal with dynamic – site blocking protecting as such simultaneously copyright and related rights on a ‘dynamic’ basis.**

Following this revision, numerous supplementary applications had been lodged -on the basis of paragraph 9 of Article 66E- leading as such to the issuing of **additional – supplementary acts** by EDPPI under which the number of the domain – names blocked had been **significantly expanded** since the Committee had determined large – scale infringements assessing the circumvention of its prior decisions.

C. In 2022, the Greek legislator opted for the introduction of an essential mechanism under the aim **of tackling piracy of live events.**

In this regard, paragraph 10A was added which provides for the right to ask for the blocking of access provided that the following prerequisites are cumulatively fulfilled:

² <https://www.opi.gr/en/committee/legislation-committee> (in Greek)

³ <https://www.opi.gr/en/committee1/decisions-committee> (in Greek)

⁴ https://www.opi.gr/images/epitropi/edppi_list_4_9_en.pdf

⁵ https://www.opi.gr/images/epitropi/edppi_list_10A_en.pdf

- a) a large – scale violation of protected copyright and related rights on the internet for events of either national or global viewing which are going to be transmitted simultaneously with their conduct, is imminent,
- b) the violation will take place, indicatively by certain uniform resource locator (URLs), IP addresses or domain names which support the unauthorized subscription connection by any means, and, in particular, by the use of passwords or of a decoder and,
- c) there is an urgent case of preventing an immediate, serious and imminent danger or an irreparable damage to the public interest or to the rightholder.

The relevant Explanatory Memorandum provided that such events are sport and cultural events.

Up to nowadays all relevant complaints concern sport events.

However, **the currently proposed amendment of the said provision includes, in addition, audiovisual works, as well as the protected content of sport events.**

Apart from this significant addendum that will expand the scope of applicants, it shall be noted that the proposed amendment includes also sport – events’ organizers who are explicitly granted with the right to fill an application before EDPPI.

Lastly, it is proposed to replace the aforementioned requirement of “subscription connection” by the concept of “connection of any means” meaning that the upcoming applications as accompanied with relevant documentation may concern all types of infringements that are taking place on the internet.

Also, within the context of this live – blocking mechanism, dozens of Decisions as well as of Supplementary Acts had been issued by the Committee.

It shall be noticed that this special case, which the Greek legislator had already introduced since 2021, runs in full alliance with current EU initiatives including the said Commission Recommendation and the subsequent ongoing work and co-operation on this issue with the Observatory of the EUIPO where the contribution of Greece which operates as a role model is significant.

D. The said numbers are constantly rising upwards highlighting the significant work of EDPPI, which had been communicated both at national level, as well as before WIPO and EU institutions and other conferences and seminars.

E. It shall be noticed in 2024 the HCO continued its collaboration with WIPO on the basis of the MoU signed in 2023. The HCO consists of an **accredited National Contributor at the [WIPO ALERT Database](#) supporting as such in practice the fight against copyright online piracy at international level.**

III. REPRESENTING GREECE BEFORE EU INSTITUTIONS and CONFERENCES – PARTICIPATION IN NEGOTIATIONS

- **HCO had participated in all negotiations concerning the establishment of several significant EU initiatives, as well as in all Copyright Contact Committees before the European Council, including the ones concerning the enforcement of copyright and related rights on the internet.**
- **Greece is also participating via the HCO to the Dedicated network of Administrative Authorities on Live Event Piracy (“Network”) that has been established following the issuing of the Commission Recommendation.**

In 2024, the 3rd meeting of the Network was held on December 2 and 3 at the European Union Intellectual Property Office (EUIPO) in Alicante, Spain.

The main topics of discussion were updates from the European Commission and EUIPO, national anti-piracy strategies, the impact of the Digital Services Act (DSA), lessons learned from the 2024 Olympics, technical blocking measures, and voluntary cooperation programmes between authorities and interested parties.

The representatives of the HCO contributed to the work of the Network by preparing special interventions concerning the developments in the combat against online piracy in Greece⁶.

It shall be noted that **Greece via the HCO consists of an important partner to this Network thus providing the relevant know – how and expertise that is built on the ongoing experience of the successful operation of the Greek administrative enforcement system.**

- **Moreover, in April 2024, the HCO became an Observer to the newly – established “Copyright Infrastructure Task Force”.**

This Digital Infrastructure Working Group on Intellectual Property is an EU-level multinational program that is analyzed to special meetings, presentations and other initiatives. As it is respectively stated, the Copyright infrastructure on national, EU and global level supports industry-specific initiatives to promote the proper functioning of the copyright system in particular to form an open rights data framework (ORDF) for new technologies.

In addition, the work produced at national level includes sub-groups on AI and copyright, which discuss topics such as practices in the use of AI (i.e. creativity,

⁶ <https://opi.gr/en/news/5584/> and <https://www.euipo.europa.eu/en/news/observatory/fighting-live-event-piracy-third-meeting-of-the-dedicated-network-of-administrative-authorities>

authorship), technology (i.e. identification, transparency) and legal issues (DSMD compliance, the Regulation on AI (AI Act) etc.)⁷.

- In addition, the **HCO participated in the 4th annual meeting of the Network of IP Academies (NIPA)⁸ that was held in Alicante on December 2 and 3, 2024.**

This meeting brought together representatives of all NIPA members, namely PES Talent Bank members and associated partners and EU national IP offices, to present and discuss further opportunities for cooperation and joint projects concerning among others enforcement of intellectual property. The topics covered during the meeting were:

The HCO participated in the meeting with a dedicated presentation on “Enforcement of copyright in Greece: the role of the administrative Committee in tackling online piracy”⁹.

IV. Educational campaigns and awareness raising

The HCO aiming to raise awareness on copyright protection, is active in many areas of interest and employs a variety of engaging strategies. These approaches can significantly enhance public understanding and appreciation of copyright protection among the general public and several other target groups. The awareness actions and campaigns vary every year depending on the HCO’s planning.

The HCO is in daily contact with citizens, governmental and non-governmental bodies, local government, cultural institutions, representative associations of users, such as chambers of commerce, through actions, meetings and mediations, while it has organized and participated in seminars, workshops and educational visits.

The HCO has also established and maintains strong links with the educational community. **The HCO’s Greek Copyright School programme celebrated in 2024 its 10th anniversary.** The HCO maintains the website copyrightschool.gr, which is an extremely useful tool for familiarizing young people with the principles of copyright law and fostering respect for it, social media accounts (Facebook and Instagram), and organizes educational seminars and visits (in person or online) to schools in order to keep in touch, inform and raise awareness of students and teachers at all levels on education and copyright protection issues. In addition, the HCO has so far been creating original materials for use by teachers and pupils in the classroom.

⁷ You may see more at the following link: <https://opi.gr/en/news/2290/>

⁸ This Network is a member of the Pan European Seal Training Program (PES Talent Bank) of the European Union Intellectual Property Office (EUIPO).

⁹ <https://opi.gr/en/news/5580/>

All HCO activities are available on its main website opi.gr

Find below a summary of the HCO's awareness actions and educational campaigns for 2024:

A. Antipiracy

1. European Network AGORATEKA - Website enjoylegal.gr

The purpose of enjoylegal.gr is to inform the public about the online platforms that have legal content, which is protected by copyright and related rights. The HCO brings together on enjoylegal.gr sites where internet users can watch or legally store films, series, television programmes and sporting events, but also listen to or download music, read or download books and magazines, as well as access images and video games.

[Enjoylegal.gr](https://enjoylegal.gr) is part of the Agorateka network (agorateka.eu), created by the European Union Intellectual Property Office (EUIPO). Agorateka is a pan-European portal that brings together national portals, such as [enjoylegal](https://enjoylegal.gr), from participating European countries, in particular from the Member States of the European Union. [Enjoylegal.gr](https://enjoylegal.gr) has been presented at meetings of the Working Groups and is considered as best practice in the area of redirecting users to legal content sources.

Visit [enjoylegal](https://enjoylegal.gr) [here](#).

B. Seminars - Conferences – MoUs

1. World Intellectual Property (IP) Day

The HCO organized on 23.4.2024 a scientific event on "**Copyright & Artificial Intelligence**" in collaboration with the Law School of the National and Kapodistrian University of Athens in the framework of their Memorandum of Cooperation.

The HCO, closely following all developments at EU and global level in the field of copyright and related rights, has chosen as the theme of this event the impact of artificial intelligence (AI) in copyright, participating with this initiative in the celebration of World Intellectual Property Day 2024¹⁰.

¹⁰ <https://opi.gr/en/news/2289/>

The HCO further organized and participated in seminars, conferences and meetings in Greece and abroad on issues of copyright protection.

For instance, on 16 and 17 May 2024, the HCO participated with a special presentation in the meeting of the **pan-European network Intellectual Property (IP) In Education** that took place in Heraklion, Crete¹¹.

Under the aim of strengthening its collaboration with judicial authorities, the HCO had also participated in a training seminar organized by the **National School of the Judiciary** that took place in Thessaloniki on 5 and 6 February 2024¹².

Moreover, a special event concerned the **involvement of the HCO to the academic area** since it became for the **first time in its history an editor of a significant collective work concerning the interpretation of the new rules of copyright law** as added with two different legislative instruments. **This work** is addressed to legal professionals, judges, researchers, rightholders and collective management entities, serving as such a valuable tool for understanding and applying the rules that protect creativity. In this regard, on 28.05.2024, a special scientific event was organized for the presentation of this work¹³.

Within this context it is noteworthy that the HCO explored also the interconnection between copyright law by participating in the celebration of the **European Heritage Days 2024**.

In particular, on September 27, 28 and 29, 2024, the European Heritage Days (EHD), which are a joint action of the Council of Europe and the EU, in which Greece has participated since 1996 with the national coordinator of the Directorate of Archaeological Museums, Exhibitions and Educators Programs of the Ministry of Culture, are celebrated. The HCO, as in 2023, had actively participated in the 2024 celebration by organizing a scientific event under the tile “The protection of cultural heritage from the perspective of copyright law”.¹⁴

2. Memorandum of Understanding between HCO – PES Talent Bank by EUIPO

On September 2024 the HCO and the European Union Intellectual Property Office (EUIPO) on August 2024 signed a Memorandum of Understanding (MoU) on the Pan-European Seal Professional Training Programme (PES Talent Bank).

¹¹ <https://opi.gr/en/news/2299/>

¹² <https://opi.gr/en/news/2299/>

¹³ <https://opi.gr/en/news/5026/>

¹⁴ <https://opi.gr/en/news/5282/>

The PES Talent Bank is an online platform that brings together private and public entities, including law and consulting firms, companies, EU and international organizations, national institutions and universities, interested in offering internships and/or employment opportunities to the PES alumni community.

Within the framework of this MoU, the HCO became a member of the general Network of IP Academies (NIPA) managed by the EUIPO in collaboration with the Pan-European Seal (PES) University members, the Talent Bank Associated Partners and the National IP Offices¹⁵.

C. Education


- **Website - copyrightschool.gr**

As mentioned above the HCO has created a website dedicated to the relationship between education and copyright protection. copyrightschool.gr was created to provide teachers and students with knowledge about copyright and to raise awareness among the educational community about the value of protecting copyright and related rights. The following material is available on the website: skills lab, educational programme, handbooks for teachers and students of primary and secondary education, videos, interactive games, infographics, comic book, posters, glossary, and answers to frequently asked questions, etc.

- **Social media (LinkedIn, Facebook, Instagram)**

In addition to its official website, the HCO maintains social media accounts (LinkedIn, Facebook and Instagram) in order to keep in touch, inform and raise awareness among students and teachers of all levels, as well as the public in general, on education and copyright issues.

The accounts maintained by the HCO are as follows:

 [linkedin](#)

[FB - \[copyrightschool\]\(http://copyrightschool.gr\)](#)

[IG - \[copyrightschoolgr\]\(http://copyrightschool.gr\)](#)

- **Skills Lab for the 5th grade of the Primary School - “Copyright in our lives”**

¹⁵ <https://opi.gr/en/news/5298/>

By decision of the Institute of Educational Policy (Ministry of Culture), the HCO's skills lab program titled "Copyright in our Lives" was approved. The programme is part of the sub-theme "STEM - Educational Robotics" of the theme "Creating and Innovating - Creative Thinking and Initiative". It includes seven workshops and it is addressed to students in the fifth grade of primary school and each workshop has a duration of one teaching hour.

The skills lab aims to raise awareness among children of the importance of copyright protection in modern society and the digital environment, to contribute to the development of positive attitudes and behaviours towards intellectual creation and to help develop healthy habits of Internet use, avoiding piracy and choosing legal sources of content.

- **Educational Programme for Primary Education – Copyright & Related Rights**

The HCO educational programme "Copyright and Related Rights", approved by the Institute of Educational Policy (Ministry of Education), is addressed to teachers and pupils of primary education. Using guides, videos, interactive games, comics and other rich material, the project familiarizes students and teachers with basic concepts of copyright protection. The aim of the project is to raise awareness among pupils about the importance of copyright in modern society and its role as a key factor in promoting creativity and culture. The activities listed in the educational programme are divided into two groups: a) activities for grades A, B, C, D and b) activities for grades E, F and D.

- **Higher Education – Universities**

This initiative was also extended to higher education on the grounds of a Memorandum of Understanding that was signed with the Law School of Athens.

In this regard, post – graduate students are closely engaged in copyright law by conducting special research and studies on the topics selected by the experts of the HCO in accordance with current concerns and developments in this field¹⁶.

In addition, on 11.12.2024 students of the postgraduate department of Panteion University visited the HCO offices in the framework of the course "Contemporary Socio-Political Phenomena and Human Rights".

¹⁶ <https://opi.gr/en/news/5520/>

The students were informed by the experts of the HCO of the basic concepts of copyright law, of the role of EDPPI and its work on copyright enforcement on the internet, as well as of the multiple responsibilities of the HCO¹⁷.

- **IP in Education Network**

The HCO since 2015 is a member of the pan-European Intellectual Property (IP) In Education network. The IP in Education network is an initiative of the European Union Intellectual Property Office (EUIPO) and aims to bring together experts from the Ministries of Education of the EU Member States and representatives of national Intellectual Property (IP) offices in order to develop a common approach to IP in education. The networks' meeting take place twice annually.

- **Seminars - School Visits**

In addition to the above, each year the HCO organizes several training seminars for teachers, and educational visits to schools of primary and secondary education all over Greece. The seminars and school visits take place through physical presence or online. The HCO, in the context of its seminars and school visits, systematically distributes updated information material (handbooks for students and teachers, comics, cards, stickers, posters) to teachers and students.

D. Newsletter

The HCO publishes a monthly newsletter, which includes news from the field of copyright and the broader field of intellectual property, news from European and international organizations and the Ministry of Culture, as well as the actions of the HCO. The newsletter is posted on the HCO's official websites, on its social media accounts, and is also sent via emails.

Find it on the HCO profile on [LinkedIn](#)

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¹⁷ <https://opi.gr/en/news/5590/>