



Hellenic Football Federation  
Mr. Evangelos Grammenos  
President

4 December 2020

### **Greek sports law**

Dear President,

We refer to your letters of 30 September and 27 October 2020 on the new Greek sports law (the "Law") as adopted by the Hellenic Parliament on 17 September 2020.

Following an analysis of the Law, we would like to highlight three specific issues which, if enforced, may contravene the Hellenic Football Federation's (HFF) statutory obligation as a FIFA and UEFA member association to run its affairs independently and with no undue influence from third parties (cf. art. 14, par. 1, let. i and art. 19, par. 1 of the *FIFA Statutes* and art. 7<sup>bis</sup>, par. 2 of the *UEFA Statutes*), and one additional item worth considering to guarantee the effectiveness of the fight against match-fixing in Greece.

#### **i. Sports recognition and register of clubs and related legal consequences**

According to the Law, Greek clubs are now obliged to request a special sports recognition ("Recognition") from the Ministry of Sport. The Recognition is a prerequisite to be registered with the new special register of sports clubs ("Register"). Clubs without Recognition and which, as a consequence, are not listed in the Register, will not be allowed to (i) participate in the competitive sporting activities of their respective federation, (ii) access sports facilities belonging to public and private legal entities and (iii) take part in the general assembly of their respective regional association.

In addition, the Law provides that the General Secretariat for Sports is responsible for ratifying the list of clubs entitled to participate and vote in the relevant sports federations' general assemblies based on the Register. If clubs without the Recognition and the pertinent Registry entry participate in an electoral general assembly, the Ministry of Culture and Sports is allowed to nullify the results thereof. Finally, the Law stipulates that members of an executive committee who allow clubs without Recognition to vote in a general assembly of a sports association or a natural person belonging to such club to be a candidate in an election, automatically need to forfeit their office.

While we acknowledge that there are legitimate reasons for the Greek government to establish reasonable and objective criteria for sports organisations to be eligible to receive government support and public funding, such as ensuring minimum good governance standards across all sports, those criteria should not infringe upon the obligations of the HFF to manage its affairs, including the decision which club can participate in its competitions and the determination who has the right to participate in its general assembly, independently.

#### II. HFF Executive Committee

The Law stipulates that representatives of the Panhellenic Association of Paid Players (PSAP), the Greek Association of Football Referees (ODPE) and the Greek Association of Football Coaches (OPPE) have the right to attend the meetings of the HFF Executive Committee, without the right to vote.

The right to attend meetings of the HFF Executive Committee is only and exclusively granted to the members listed under art. 33 par. 1 of the HFF Statutes. While the HFF Executive Committee may decide to invite third parties to its meetings on the basis of art. 34 par. 5 of the HFF Statutes, the participation of third parties should not be imposed from outside, e.g. through the Law. As recommended in the FIFA/UEFA holistic study, steps should be taken to ensure that major football stakeholders are represented in a balanced and adequate manner in the HFF Executive Committee – also taking into account the importance of gender equality in football. However, any such changes to the HFF Statutes must ultimately be approved by the HFF Congress.

Furthermore, the Law introduces term and age limits for the members of the HFF Executive Committee. However, the Law does not stipulate whether or not these apply retroactively. While term limits are a well-established good governance principle, and as such are recommended by FIFA and UEFA, the Law should stipulate that they do not apply retroactively.

#### III. Coaching Convention

The Law expressly regulates the recognition of coaching diplomas and related issues. This undermines UEFA's Coaching Convention which has been signed by the HFF. It is therefore imperative that the part of the Law pertaining to the Coaching Convention does not apply to football and an exception for the UEFA Coaching Convention be introduced in the Law.

#### IV. National platform

Finally, the Law also provides for the establishment of a national platform to coordinate and share information in relation to the fight against the manipulation of sports competitions in accordance with the Macolin Convention of the Council of Europe. While we commend the Greek government on this step, we note that the platform does not include the HFF, which is a key stakeholder. As stipulated in the FIFA/UEFA holistic study, the integrity officers of all relevant national sports organisations, including the HFF, should be involved in the national platform.

As an immediate next step, we would welcome the opportunity to discuss the issues contained in the present letter with the relevant experts of the HFF directly. Given the direct impact that the new law already seems to have on the organisation of the upcoming elections of the regional football associations, in particular in relation to the registration of clubs, we would appreciate if the joint meeting could be organised at your earliest convenience. Following this consultations process, we would propose to bring the issues of mutual concern to the attention of the Ministry of Culture and Sports with a view to aligning the Law with the obligations of HFF as a member association of FIFA and UEFA.

Our administrations will contact you with regard to the proposed joint meeting. In the meantime, we remain at your disposal should you need any further clarification.

Yours sincerely,

FIFA

UEFA

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Deputy Secretary General

Kevin Lamour  
Deputy General Secretary