



September 17, 2021

Ms. Sophie Moonen

Unit A.1– Antitrust Case Support and Policy

Directorate-General for Competition

Per email: COMP-VBER-REVIEW@ec.europa.eu

**Ref. HT.6179 STAKEHOLDER COMMENTS ON PUBLISHED DRAFTS OF
THE REVISED VERTICAL BLOCK EXEMPTION REGULATION AND
VERTICAL GUIDELINES**

Dear Mrs Moonen,

The Antitrust Committee of the International Bar Association welcomes the opportunity to participate in the public consultation on the European Commission's published revised drafts of the Vertical Block Exemption Regulation (VBER) and Guidelines on Vertical Agreements (VGL). Both have proven valuable tools in the assessment of vertical agreements, helping to reduce compliance costs for business. The Antitrust Committee commends the Commission on its ongoing work in ensuring that the VBER and VGL continue to fulfil that purpose.

In that regard, we take great pleasure in enclosing a submission that has been prepared by members of the Unilateral Conduct Working Group of the Antitrust Committee of the International Bar Association. In particular, the submission has been prepared by Joanna Goyder (Freshfields Bruckhaus Deringer), Zoltán Marosi (Oppenheim), Nikolaos Peristerakis (Linklaters), Katrin Schallenberg (Clifford Chance) with Working Group Co-chairs Petra Linsmeier (Gleiss Lutz) and Chris Charter (Cliffe Dekker Hofmeyr).

The Co-chairs and representatives of the Working Group would be delighted to discuss the enclosed submission in more detail with the representatives of the European Commission. Please don't hesitate to contact us if you believe that would be useful.

Yours sincerely,



Daniel G. Swanson
Co-Chair Antitrust Committee



Thomas Janssens
Co-Chair Antitrust Committee