



Delivering a **Sustainable European Post**

2019-2024

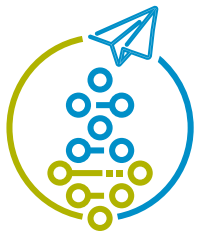
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**The manifesto
of the European
Postal industry
setting out its
priorities and
goals for the new
regulatory term**





Delivery is part of our DNA

PostEurop Members are **committed to offering a sustainable, efficient and innovative postal service** across the EU and beyond to support a stronger and competitive EU economy.

We are investing in the development of alternative services, innovative new features and the promotion of efficient delivery of postal items in order to meet evolving social, environmental and economic challenges. By providing sustainable employment and reducing our ecological footprint we are confident we can create solutions that meet our customer needs both today and in the future.

PostEurop Members want to collaborate with European policy makers and all stakeholders in the 2019-24 legislative period and drive progress across **three priority areas**:

Facilitating the Single Market

- Universal service should remain the starting point for legislation on postal services – offering flexibility and both economic and financial sustainability
- Good collaboration among the different European Commission Directorates General is key to coherent policy making – and will deliver legal certainty

Promoting Digital Europe

- There is no need for further regulation of the parcel delivery market
- Data Protection rules should be interpreted in a harmonised way throughout the EU – the Posts are a trusted partner and derogations to GDPR are justified
- More flexible implementation of the Customs changes for 2021 – a coherent approach, simplified to aid implementation

Supporting Sustainability

- Count on postal operators to contribute to the Sustainable Development Goals – including resource efficiency, procurement and waste management and air quality



Facilitating the single market

PostEurop Members are **an engine of economic growth in the single market**. They promote social inclusion by **connecting** different regions, consumers and producers, institutions and citizens. The Posts are trusted across Europe and are **an essential factor for the EU economy** – from rural areas through to sub-urban and urban areas.



We operate in all **28 EU countries**



Manage **258 million** delivery points



Account for **1 percent** of the EU's entire GDP

Since the single market for postal services was fully opened to competition in 2013, PostEurop Members have driven significant efficiencies throughout the sector. They have **fulfilled their universal service mission and delivered a high-quality offering across the EU** with innovative solutions that meet the needs of individuals, companies and all postal users.

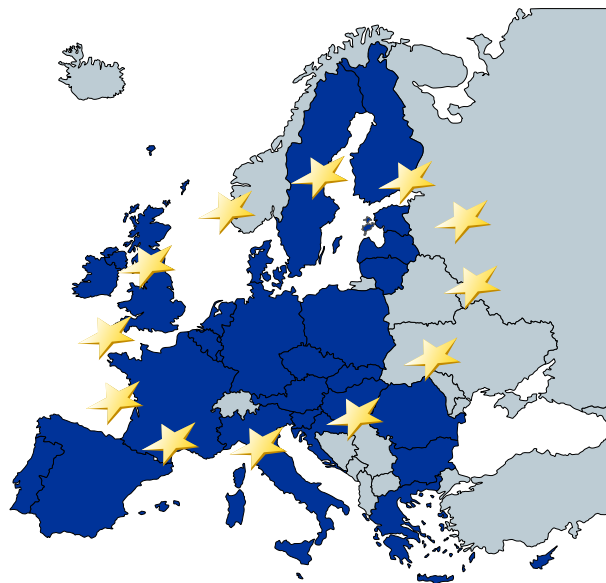
Universal Service should remain the starting point for legislation on postal services

Universal Service lies at the core of the postal legislative framework and PostEurop Members believe it should remain the focus of legislation. There is **no need for further sector-specific regulation**. There is other legislation to regulate issues which impact the postal sector - including employment, customs, taxation, consumer rights, data protection, platforms and competition rules.

Universal service should be based on user needs and national market developments. National practices and demands are a strong influence on European postal markets and these specific **circumstances can only be fully addressed through greater subsidiarity**.

PostEurop Members **call for a flexible regulatory framework**. There is no 'one-size-fits-all' universal service obligation (USO) and providers need the ability to introduce innovative delivery solutions and provide services adapted to changing customer needs.

PostEurop Members operate in a fragile ecosystem with ongoing structural decline in letters and fierce competition in parcels. Policy makers should **carefully balance the encouragement of competition with the sustainability of the USO**. A declining market is less attractive to new players. With universal service providers already weakened by the decline in the letter market, promoting competition will not create a level playing field and would be at the expense of the universal service providers and the sustainability of the service.



The USO should respect the principle of economic sustainability, how the universal service is funded is important. Where USO revenues do not or cannot cover the cost of the service, public resources should refund the universal service provider.

Coherent policy making to create legal certainty

We need strong coordination among the European Commission Directorates General to ensure legal consistency between EU regulation.

PostEurop Members are impacted simultaneously by EU policy across a host of areas including Customs, Aviation Security, VAT, Public Procurement, Trade, Communications Networks, Content and Technology, Labour and Consumer regulation, and Competition Rules. New legislative proposals in these fields should be made with due consideration to the consequences and interactions with other EU legislation.



Promoting Digital Europe

Postal operators are a **cornerstone** of the fast-growing e-commerce industry and a **crucial pillar** of the EU's Digital Single Market. The **EU acknowledged our sector's contribution** in its recent study¹ which stated *"dynamic growth in cross-border e-commerce was mainly facilitated by (...) the investments of parcel carriers"* as the supply of domestic and cross-border delivery services has broadly improved over the past decade.



Employ
2 million
people



Handle **60 billion**
items
across Europe
per year



Collect from
720,000 street
postboxes

E-commerce unlocks the potential for retailers, consumers and the whole EU economy. PostEurop Members are **enhancing the integration of their local logistics, developing more flexible and visible cross-border parcel delivery services** and improving customer tools and tracking services.

Most web-shops are **SMEs** and PostEurop Members have launched initiatives providing **customised services to support their success** and even extend their businesses across national borders.

As e-commerce expands so does the **growing efficiency** of postal operators, alongside emerging innovative solutions to meet user needs, **makes parcel services increasingly affordable.**

There is no need for further regulation of the parcel delivery market

E-commerce delivery does not need further regulation. It works well as it is, and **we should rely on market forces to provide the best solution.** In line with the principle that regulatory intervention is only justified in situations of identifiable market failure, and since no market failure has been determined, there is no justification for further European regulation of the cross-border parcel delivery market. **More regulation would have an adverse impact on reactivity and innovation.**

The parcel delivery sector is **extremely competitive with high pressure on prices and a constant drive for innovation.** The rise of e-commerce and cross-border shopping has been made possible due to the significant involvement of delivery operators. **PostEurop Members invested widely to seize the opportunity:** increasing processing capabilities, developing up-to-date IT systems and offering customers new services and innovative solutions.

Data protection rules should be interpreted in a harmonised way

We take data protection extremely seriously. Europe's Posts have been **trusted with the**



safe and secure transfer of information for centuries. We collect, process, transmit and store large amounts of data on the sender, the receiver and the postal items themselves – including electronic data. This data is sent to destination countries – including non-EU markets.

Our members generally handle data to **comply with legal requirements** such as customs clearance and security needs; for **operational efficiency** – eg sorting, transportation and optimising delivery rounds; or to offer **customer-oriented services**, like keeping people informed of their deliveries and facilitating timely communications.

Data protection rules - whether general, like the General Data Protection Regulation (GDPR), or specific to the electronic communication sector - have a **significant impact on PostEurop Members. National Data Protection Authorities understand and interpret them differently**, which presents our members with challenges in interpreting and implementing the new EU data requirements.

Today's cross-border postal services can **only be assured if EEA postal operators can rely on derogations set out under Article 49 of the GDPR.** The aims of both the GDPR and PostEurop Members may be better served if our sector is



able to develop sector-specific safeguards – such as a **Code of Conduct**, **Certification** mechanism, and standard **data protection and contractual clauses**.

Flexible implementation of the Customs changes for 2021

Several pieces of customs and taxation legislation entering into force in **2021 will imply deep changes for postal operators**. They will contribute to the **strengthening of the EU internal market and postal operators are mobilising significant resources** at both European and national level in order to manage their successful implementation.

The Universal Postal Union (UPU) is implementing an ambitious “Electronic Advance Data Roadmap” to generalise the global exchange of electronic messages on item data between posts. It has recently changed its regulations and as of 1 January 2021, ITMATT² messages will be compulsory for all items containing goods. It is also developing capacity-building programmes for the global postal community – especially in developing countries.

PostEurop Members are also fully mobilised. Comprehensive IT programmes have been launched and technical discussions are taking place with the European Commission to define implementing provisions compatible with the non-integrated postal business model.

To ensure success in these efforts, **PostEurop Members urge the European Commission to:**

- Pay particular **attention to the global coherence** of the different projects;
- **Clarify the link between the Union Customs Code provisions making electronic data exchanges compulsory and the General Data Protection Regulation** that tends to limit these data exchanges. And share the clarification with national data protection authorities;
- Provide **clarity on the IT system availability** at EU and Member State level;
- Explore the **possibility of additional customs simplifications** that would make implementation simpler – particularly in relation to duties and tax collection.



52 Postal Operators



49 countries and territories around Europe



Representing European Postal Operators **since 1993**



Supporting sustainability

PostEurop Members are **committed to environmental sustainability** – including delivering the UN Sustainable Development Goals.

We met our commitment to reduce industry CO2 emissions by 20% six years ahead of schedule. Our CEOs signed up to the 2020 commitment in 2008 and we achieved it by 2014 thanks to the **Environmental Measurement and Monitoring System (EMMS)** set up with the support of industry partner, International Post Corporation (IPC).

The programme scope is now broadened to include outsourced transport and our aim is to deliver a **20% carbon emissions reduction per letter mail and per parcel by 2025**, from a 2013 baseline year.

Since 2008 the EMMS programme: has saved 15 million tonnes of carbon emissions³; reduced emissions by 29.7%; participants have saved €1.7 billion in fuel and electricity costs. We need a 1.8% improvement to reach our 2020 carbon management proficiency target.

With the adoption of the Paris Agreement and UN Sustainability Goals (SDGs) in 2015, IPC supported PostEurop Members and postal operators from other regions in conducting stakeholder research to identify which of the **UN SDGs are most relevant for the global postal industry**. They are:



Based on the sub-targets associated with the overall Goals, our industry will **focus on five UN SDG-related priority areas to contribute to building a better world**.



³ Find more information under: <https://www.ipc.be/sector-data/sustainability/overview>

POST EUROPE

PostEurop is the trade association that has been representing European public postal operators since 1993. It has fifty-two members in forty-nine countries and territories and is an officially recognised Restricted Union of the Universal Postal Union (UPU). The members of PostEurop are designated by the Governments of their countries as operators responsible for fulfilling the obligations derived from the UPU Acts and their obligations as universal service providers under the terms of the EU Postal Services Directive (Directive 97/67/EC) as well as under their national postal laws.

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