

Public Consultation on cross-border parcel delivery

Fields marked with * are mandatory.

Before filling in the questionnaire, if you have not yet done so, please read the information in the presentation page of this public consultation.

Registration - Information about the respondent

*Please enter your full name OR the name of the organisation /company / institution you represent if you are responding on its behalf:

European Express Association

*Please enter your e-mail address:

info@euroexpress.org

*Please indicate your main country(ies) of residence or activity:

- | | | |
|---|---|---|
| <input type="checkbox"/> Austria | <input checked="" type="checkbox"/> Belgium | <input type="checkbox"/> Bulgaria |
| <input type="checkbox"/> Croatia | <input type="checkbox"/> Cyprus | <input type="checkbox"/> Czech Republic |
| <input type="checkbox"/> Denmark | <input type="checkbox"/> Estonia | <input type="checkbox"/> Finland |
| <input type="checkbox"/> France | <input type="checkbox"/> Germany | <input type="checkbox"/> Greece |
| <input type="checkbox"/> Hungary | <input type="checkbox"/> Ireland | <input type="checkbox"/> Italy |
| <input type="checkbox"/> Latvia | <input type="checkbox"/> Lithuania | <input type="checkbox"/> Luxemburg |
| <input type="checkbox"/> Malta | <input type="checkbox"/> Netherlands | <input type="checkbox"/> Poland |
| <input type="checkbox"/> Portugal | <input type="checkbox"/> Romania | <input type="checkbox"/> Slovakia |
| <input type="checkbox"/> Slovenia | <input type="checkbox"/> Spain | <input type="checkbox"/> Sweden |
| <input type="checkbox"/> United Kingdom | <input type="checkbox"/> Iceland | <input type="checkbox"/> Lichtenstein |
| <input type="checkbox"/> Norway | <input type="checkbox"/> Switzerland | <input type="checkbox"/> Other |

Please specify in which other countries you operate, if any

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- Yes
 No

Please fill-in your register ID number in the European Transparency Register:

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*Are you answering the questionnaire as a ...

- Retailer
 Consumer / Individual person
 Delivery operator
 Public or representative organisation or institution (e.g. National Authority/Industry or Consumer Association/NGO/Research Institute/Trade Union/etc.)

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Due to the possible sensitivity of some information, responses to some questions (Q2, 4, 15, 16, 17, 18, 19b, 21a) will be treated as confidential. In addition, any respondent can request non publication of their contribution.

IV - Questions to the public or representative organisation or institution

"Affordable, high-quality cross-border delivery services can build consumer trust in cross-border online sales. Stakeholders complain about a lack of transparency, the excessive costs of small shipments and the lack of inter-operability between the different operators typically involved in a cross-border shipment and the resulting lack of convenience for the final consumer.

A self-regulation exercise by industry will report to the Commission in June 2015. This exercise is concentrated on quality and investment aspects like "track and trace" and speedy delivery of parcels but does not cover the price dimension. The Commission will assess action taken by industry and launch complementary measures to improve price transparency for European deliveries and enhanced regulatory oversight of the cross-border parcel markets to ensure effective competition". (Digital Single Market Communication, 2015)

Q1 - Do you agree there is an issue with both affordability and regulatory oversight of the cross-border parcel delivery market?

- Yes
 No

Q1a - Please explain your views.

1000 character(s) maximum

Delivery markets, incl. express, are highly competitive, with prices set by the market. There is no justification of enhancing regulatory oversight which would only increase costs without benefits. Postal regulation should rather be decreased.

Real challenges are:

- Complex rules for processing packets to/from non-EU/EEA countries - delay delivery and add costs for the consumer. The EEA favours a single window for submission of customs information and centralized clearance.
- Increasing requirements of data on parcels for entry declarations - it defeat the purpose of EU customs procedures simplification.
- Fragmentation of road transport policies across Europe - e.g. road charging, cabotage, driving/resting periods' rules and administrative requirements can conflict with the free movement of goods principle and create inefficiencies.
- Fragmentation in the postal regulatory landscape - different regimes and procedures for delivery services create complexity for operators.

Q2 – What regulatory response, if any, would you consider useful to address the current issues and how could it be addressed? Please explain your views.

2000 character(s) maximum

The EEA does not believe that increased regulatory oversight is required for the parcel delivery sector.

However, a uniform interpretation and implementation of existing rules on the below issues would favour a smoother movement of goods across Europe, reducing costs while increasing efficiency as well as contributing to the good functioning of the internal market:

- Road transport policies across Europe see substantial differences between Member States in, for example, road charging systems, cabotage rules, driving and resting periods as well as in administrative requirements that can conflict with the free movement of goods principle. This fragmentation increases inefficiencies as well as costs.
- The postal regulatory landscape is highly fragmented with a diversity of regulatory regimes, procedures and conditions in which to provide delivery services. As a result, in several EU countries, the express sector faces more regulation than prior to the liberalisation of the postal market, despite the fact that express operators have never been part of the traditional mail market.
- There are significant challenges to the express industry when processing packets to/from non-EU/EEA countries that delay delivery, add costs for the consumer, and add complexity for the companies. The EEA favors movements to have a single window for submission of customs information and centralized clearance.
- Requests for increasing amounts of data on parcels for entry declarations defeat the intended purpose of simplification of EU customs procedures, and often do not fit their intended purpose of increasing ability to perform a risk analysis.

Q3 - We would appreciate if you would share with us any extra information you may find useful concerning your views on European cross-border delivery. Do you want to upload a document?

- Yes
 No

You reached the end of the questionnaire. Thank you for your contribution!

Useful links

Transparency Register (<http://ec.europa.eu/transparencyregister/public/homePage.do>)

Background Documents

Green Paper on parcel delivery (/eusurvey/files/625f2f16-2f1d-470d-ac45-9d93e21947bb)

Roadmap on parcel delivery (/eusurvey/files/05c2eddd-0b81-4d74-bae8-facf33405092)

Contact

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