

November 2025

Contribution to Call for Evidence on the EU Delivery Act

Executive Summary

The European Express Association (EEA) welcomes the European Commission's initiative to modernize the EU postal regulatory framework. We support the Commission's objective to ensure a sustainable, innovative, and competitive delivery sector that continues to serve consumers and businesses across the EU effectively.

As the association representing the world's largest logistics and delivery companies, we recognize the importance of a well-functioning regulatory environment that ensures a financially sustainable universal service provision as well as open and competitive markets. The EU delivery market has evolved substantially since the adoption of the Postal Services Directive. Today, parcel delivery is highly competitive, dynamic, and driven by innovation, while letter mail continues to decline due to digitalization. Future regulation should reflect these realities.

The EEA urges policymakers to focus on regulatory adaptation rather than expansion. The new framework should;

- safeguard universal postal services where needed,
- ensure a level playing field between all operators,
- simplify administrative requirements, and
- avoid overlaps with existing EU legislation governing transport, e-commerce, digital markets, and consumer protection.

Context and Market Developments

Over the past two decades, EU postal and delivery services have undergone a structural transformation. Letter mail volumes have decreased significantly, threatening the financial sustainability of the Universal Service Obligation (USO). Parcel volumes, fueled by the growth of e-commerce, have expanded dramatically and are now delivered through a broad range of providers (postal, private, and hybrid operators). The result is a divergent market characterized by a shrinking, regulated letter segment and a thriving, competitive parcel market.

At the ERGP Stakeholder Forum, in October 2025, regulators, operators, and consumers agreed that the revised EU postal regulatory framework must promote a resilient, competitive, and innovation-friendly single market for delivery services. The EEA fully supports this direction. The Commission's

Call for Evidence identifies legitimate policy goals, such as safeguarding universal access, ensuring fair competition, and simplifying compliance. However, these objectives must be achieved through targeted, proportionate, and market-neutral measures.

EEA Views and Recommendations

Universal Service Obligation (USO)

The EEA agrees that EU Member States need greater flexibility to adapt USO requirements to changing demand and economic conditions. We believe that the USO should remain focused on essential letter services and not be extended to parcels, where competition already ensures quality and innovation. In addition, sufficient funding for the USO must be ensured, this should be transparent, direct, and based on properly calculated net costs, avoiding compensation funds that distort competition.

Level Playing Field and Market Competition

The revised EU postal regulatory framework should reinforce equal treatment between public and private operators and the competitive parcel delivery market must not be constrained by regulatory burdens designed for the universal service. National Regulating Authorities (NRAs) should ensure non-discriminatory access to services and fair competition while avoiding overlapping mandates with competition or consumer protection authorities. The EEA also supports the Commission's goal to clarify the role of online platforms involved in delivery logistics to ensure transparency, but this should not result in new, sector-specific obligations that distort the competitive landscape.

Regulatory Simplification and Burden Reduction

The EEA welcomes the Commission's goal to streamline data collection, reporting, and notification requirements. Current obligations under the EU Postal Services Directive and the EU Cross-Border Parcel Delivery Regulation should be consolidated where possible to reduce compliance costs and enhance efficiency and future regulatory reporting should rely on existing mechanisms and ensure proportionality, especially for operators that already provide transparent, auditable information to multiple EU and national authorities.

The EEA expresses the hope that the contribution to the operating costs of NRAs be based on principles of genuine transparency, proportionality, and reasonableness, and advocates for the introduction of a maximum cap on such contributions.

Consumer Protection and E-commerce

The EU already has a robust legal framework protecting consumers and traders in digital markets, including the Consumer Rights Directive, Digital Services Act, and Digital Markets Act. The revised EU postal regulatory framework should not duplicate these rules. Consumer redress, data privacy, and product transparency are best addressed under existing horizontal legislation. In parcel delivery, competition and technology have already led to enhanced transparency, tracking, and choice, meeting consumers' evolving expectations without new regulatory intervention.

E-commerce continues to fuel Europe's economic growth by opening new, convenient channels for consumers and allowing businesses of all sizes to reach new markets. As consumer demand for online shopping grows, the volume of low-value direct-to-consumer (B2C) consignments has also created complications around customs oversight, product safety, and fair competition. In this context, we appreciate the Commission's plan to rely on the revised EU postal regulatory framework as an

The European Express Association · Boulevard du Régent 35, 1000 Brussels, T. (+32) 471 97 28 88,

E: info@expresseurope.org; W: www.euroexpress.org

additional policy tool to better monitor the flow of B2C goods within the EU single market.

Sustainability, Digitalization, and Innovation

Sustainability and digital transformation are driving progress across all transport and logistics sectors. The postal and delivery industry is already investing heavily in green fleets, renewable energy, reusable packaging, and digital efficiency tools. The EEA believes that environmental objectives should continue to be addressed through horizontal EU policies (e.g. Green Deal, transport and energy legislation) rather than through postal-specific rules. NRAs currently lack experience and competence in environmental regulation. Expanding their remit would increase complexity without improving outcomes. The revised EU postal regulatory framework should instead incentivize innovation by establishing a level playing field for all market players and reforming legal measures which inhibit interoperability of tracking systems and support for digital logistics networks.

Conclusions and Key Messages

The EEA calls on EU policymakers to ensure that the revised EU postal regulatory framework :

- Adapts the regulatory framework to new market realities, recognizing the competitiveness of the parcel segment and the need for flexibility in the letter mail USO.
- Safeguards a level playing field through fair, technology-neutral, and competition-based rules.
- Simplifies administrative requirements and avoids duplication with other EU legislation.
- Ensure financially sustainable funding for the USO. Promotes innovation and sustainability through coordination with horizontal EU policies, not through sector-specific mandates.

EU postal and delivery services have demonstrated remarkable resilience and adaptability. With the right regulatory balance, it can continue to empower European consumers, connect SMEs to global markets, and support the EU's digital and green transition. We stand ready to work constructively with the European Commission, the ERGP, and national authorities to design a modern, coherent, and future-proof regulatory framework that benefits all market participants and end users.

About the European Express Association

The European Express Association (EEA) represents the interests of the express industry in Europe. The express industry provides door-to-door transport and delivery of next-day or time-definite shipments, throughout Europe and the world. According to a 2020 Oxford Economics study on the impact of the express industry on the EU economy, the European express industry directly supported 330,000 jobs and an estimated 1.1 million indirect jobs in the EU in 2018, while generating €24 billion in tax revenues for EU Member States' governments that same year. EEA's EU Transparency Register number is 1894704851- 83.