



Position of the Chamber of Digital Economy on modernising the EU Postal and Delivery Framework

We suggest taking the following issues into consideration to ensure that the forthcoming EU Delivery Act and any related revision of the Postal Services Directive deliver a balanced, future-proof framework. The objective is to preserve universal access to essential delivery services while promoting competition, innovation and transparency across the Single Market.

1. Universal Service Obligation (USO)

Need to ensure provision of the service and cost-effectiveness

Many designated operators report that current USO obligations are no longer financially viable given the sustained decline in letter volumes. At the same time, the lack of a predictable and transparent framework weakens national logistics networks and limits access in peripheral regions.

The system should evolve towards greater flexibility and transparency, ensuring that the universal service remains available but is delivered in a cost-efficient way.

In our opinion, this should be achieved by allowing different models of USO provision, including the participation of several operators where this improves efficiency and resilience.

A *minimum universal service basket* should be defined and adapted to national conditions, focusing on essential services. Member States should be able to adapt the scope of USO to their specific circumstances, for example, in terms of the frequency of delivery.

Additionally, full transparency of the net-cost calculation is required, including assumptions and source data, to prevent hidden cross-subsidisation or market distortion.

Moreover, regulations should permit adjustment of requirements such as daily delivery frequency where demand and cost evidence justify it.

2. Cross-Border Operations

Compliance and transaction identification

E-commerce shipments arriving from outside the EU are often mis-declared or insufficiently documented. This limits the effectiveness of customs, VAT and product-safety controls and creates an uneven playing field for EU traders.

To improve traceability and compliance, better coordination between customs, postal and regulatory authorities is needed. We recommend actions such as creating a uniform reporting system for operators bringing non-EU shipments to the EU, linked over time to the EU Customs Data Hub.

In addition, existing regulatory frameworks can be used and shipment reporting could be connected to IOSS VAT identifiers and sender or platform data.



We also recommend facilitating structured data exchange between customs, NRAs and the European Commission to strengthen fraud detection.

It should be required to report the country of origin of the goods included in shipments, even when items are re-routed within the EU before delivery to the purchaser.

Information such as shipment volumes, entry points and unit prices should be included to support market monitoring.

3. Network Access and Logistics

For competition fair and predictable access to postal and logistics networks is essential. In many Member States, NRAs lack clear authority to define markets or impose access obligations.

NRAs should be granted explicit powers to define relevant markets and set proportionate access obligations.

The publication of reference offers and access terms to core infrastructure should also be required.

We also recommend enabling wholesale resale (“virtual postal operator”) models to promote service diversity.

It is essential to ensure that access principles are applied consistently across borders and Member States.

4. Regulatory Environment

A level playing field

The current split between “postal” and “non-postal” operators encourages regulatory arbitrage and uneven obligations. Regulation should focus on the nature of the service, not the corporate label of the provider.

Therefore we propose to apply the same rules to comparable services, irrespective of operator type.

It is also crucial to simplify licensing and reporting regimes to avoid unnecessary duplication and the framework technology-neutral, encouraging innovation and competition on equal terms.

5. Quality Monitoring

When we talk about delivery services, transparency on service quality is a precondition for consumer trust and informed regulatory oversight.

Therefore, we suggest to require operators to publish data on:

-



- delivery timeliness;
- complaint handling times;
- share of upheld complaints by category.

Additionally, NRAs should be encouraged to benchmark these indicators and identify systemic issues.

The above requirements should be applied to all operators offering comparable delivery services.

Conclusion

A modern postal and delivery framework should be **flexible**, **transparent** and **neutral** across business models.

- Framework should, in particular,
- ensure a sustainable and competitively neutral USO
- facilitate accurate and consistent cross-border data exchange;
- empower NRAs to maintain fair access; and
- base regulatory obligations on the service provided, not the provider's legacy status.

Taken together, these adjustments would help maintain universal access, protect consumers and sustain a dynamic, competitive delivery ecosystem across the EU.

poświadczenie złożenia podpisów i pieczęci elektronicznych

Certyfikat dla dokumentu o Autenti ID: fdf0e7a3-b8e3-4ebf-a25f-f6e6c3f16ec2
utworzonego: 2025-11-14 12:18 (GMT+01:00)

Dokument przekazany do podpisu przez Izba Gospodarki Elektronicznej biuro@eizba.pl, został zabezpieczony pieczęcią elektroniczną Autenti przed wprowadzeniem nieautoryzowanych zmian.



2025-11-14 12:18 (GMT+01:00)

Patrycja Staniszevska

patrycja.staniszevska@eizba.pl

Izba Gospodarki Elektronicznej

NIP: 7010391922 | Prezes Zarządu



**Podpis elektroniczny
zabezpieczony pieczęcią Autenti**

Uwierzytelnienie: e-mail

Powód: Podpisanie dokumentu

Adres IP: 2a00:f41:8070:fc4c:50eff4da:8c2:d7af

2025-11-14 12:25 (GMT+01:00)

Autentyczność oraz integralność podpisanego dokumentu przed wprowadzeniem nieautoryzowanych zmian została zabezpieczona pieczęcią elektroniczną Autenti.



2025-11-14 12:25 (GMT+01:00)

Niniejszy dokument stanowi poświadczenie wykonania usługi zaufania, w tym złożenia podpisów elektronicznych, zgodnie z zasadami opisanymi w Polityce.

Osoby podpisujące dokument złożyły podpisy elektroniczne zgodnie z zasadami opisanymi w Polityce Usług Zaufania Autenti dla podpisów elektronicznych Autenti oraz obsługi podpisywania dokumentów (dostępnej na: <https://autenti.com/pl/regulaminy>) oraz oświadczyły, że znają i akceptują treść podpisywanego dokumentu a także potwierdziły poprawność i prawdziwość danych służących do złożenia podpisu elektronicznego.

W ramach składania podpisów elektronicznych przeprowadzono uwierzytelnienie podpisujących.

Usługa została wykonana zgodnie z Rozporządzeniem Parlamentu Europejskiego i Rady (UE) nr 910/2014 z dnia 23 lipca 2014 r. w sprawie identyfikacji elektronicznej i usług zaufania w odniesieniu do transakcji elektronicznych na rynku wewnętrznym oraz uchylające dyrektywę 1999/93/WE (Rozporządzenie eIDAS).

Karta podpisów stanowi poświadczenie Autenti w zakresie realizacji poszczególnych usług zaufania, zgodnie z zasadami ich świadczenia oraz definicjami zawartymi w Polityce.