

Dan SJÖBLOM  
ERGP incoming Chair 2024  
European Commission  
DG GROW  
Avenue des Nerviens 105  
1040 Etterbeek  
Belgium

Brussels, 15 March 2022

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Dear Mr Dan Sjöblom,

In response to the [call of 1 February 2024](#), please find attached the PostEurop's input to the ERGP Work Programme 2024.

We are at your disposal for further questions.

Best regards,



Ms Elena FERNÁNDEZ  
Chairwoman



Botond SZEBENY  
Secretary General

In copy to:

Ms Agnieszka SKONIECZNA, DG GROW, Head of Investment Conditions and Public Services Unit

Ms Christelle DEFAYE-GENESTE, La Poste, Chair of PostEurop European Union Affairs Committee

## PostEurop's input to the ERGP Work Programme 2024

PostEurop welcomes the [call for input regarding ERGP Work Programme 2024](#). This is the opportunity to make a contribution to ERGP's work and to bring out the main issues to tackle in the postal sector. 2022 was a turbulent year for the postal sector which volumes are negatively impacted by the worldwide macroeconomic and geopolitical developments, resulting in record-high inflation and decreasing consumer trust. Despite these turbulent times, we believe that the main suggestions and input we delivered to last year's ERGP Work Programme are still very valid given the current challenges.

We therefore want to take this opportunity to briefly reiterate our main points and refer for further background to [last year's input to the ERGP Work Programme 2023](#):

- PostEurop believes ERGP should refocus its priorities for this new term and bring the issue of the sustainability of the provision of the universal service to the core of its agenda, in line with its mission according to the applicable regulatory framework.
- ERGP should look at the emerging business models and assess how to ensure a level playing field vis-à-vis new market players.
- We support a regulatory framework that leaves space for subsidiarity. Member States should continue to be able to adjust their national regulatory framework, including universal service obligations, pursuant to the principle of subsidiarity. There is no “one-size-fits-all” universal service obligation and providers need the ability and flexibility to introduce innovative delivery solutions and provide services adapted to changing customer needs.
- 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.
- There is no justification for promoting competition through sector-specific regulation. 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. The parcel delivery sector is extremely competitive with high pressure on prices and a constant drive for innovation.
- PostEurop Members are committed to environmental sustainability - and fully aligned with the UN Sustainable Development Goals on resource efficiency, procurement and waste management and air quality among others. As operators are continuously adapting their business models in order to further reduce their environmental footprint, we do believe **it could be mutually beneficial to organise a meeting in 2023 where the sector can present its expertise and their developments and challenges in making our businesses more sustainable**. We believe that a dialogue between business experts and the ERGP on this topic could be mutually beneficial and we are at your disposal if you may wish to organise such an event.