

Contribution to the Public Consultation on the Draft ERGP Medium-Term Strategy 2026–2028



PostEurop[•]

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ABOUT POSTEUROP

POSTEUROP is the association which represents European postal operators since 1993 and is officially recognised as a Restricted Union of the [Universal Postal Union \(UPU\)](#).

It is committed to supporting and developing a sustainable and competitive European postal communication market accessible to all citizens and ensuring a modern and affordable universal service.

Its Members employ **1.6 million people** and deliver billions of items annually to over **295 million homes** and **48 million companies** across Europe.

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INTRODUCTION

PostEurop, the association of European public postal operators, welcomes the opportunity to contribute to the ERGP's Medium-Term Strategy 2026–2028. Building on our previous inputs to the ERGP Work Programmes for 2024 and 2025 and to the ERGP Report Regarding the Future Regulatory Postal Framework, we underline the following challenges and priorities.

Key challenges and emerging trends to prioritise (and possible overlooked issues)

- **Universal Service at the core:** The USO remains essential for social and economic cohesion. Its value endures if aligned with user needs, cost realities and market evolution. The USO should thus remain central to the revision of the revised regulatory framework under a new EU Delivery Act.
- **Flexibility for Member States:** Member States need discretion to adapt delivery frequency, quality standards, access points and place of delivery in line with declining volumes, user preferences, and geographic/social conditions. A rigid “one-size-fits-all” EU approach would risk undermining the sustainable provision of USO.
- **Financial sustainability of the USO:** Affordable universal services require a reliable compensation framework and recognition of rising operational costs. This aspect is often underplayed in ERGP reports.
- **Competition and unfair practices:** Risks from vertically integrated e-commerce platforms with strong market power must be acknowledged. However, extending postal regulation to widen its scope or introducing ex-ante SMP regimes is not justified; existing EU competition law, DMA and DSA provide the right instruments to address potential issues. As regards the suggestion for strengthened network access obligations, it could have adverse effects and ultimately, further increase the net cost for universal service providers. Concerning infrastructure sharing, contractual freedom to reach such agreements should be kept, provided they comply with competition law.
- **Cross-border monitoring:** Current CBPR data collection is disproportionate and of limited user benefit. Additional NRA tools are unnecessary as cross-border parcel markets are already competitive.
- **User rights:** The current framework, combined with horizontal EU consumer legislation, sufficiently protects recipients. Any changes must be justified and avoid duplication, double compensation risks, and additional bureaucracy. Besides, new delivery locations (lockers, PUDOs, etc.) complement, rather than replace, traditional delivery locations; they increase rather than reduce users' delivery options, improving convenience of deliveries. Therefore, their development should not be hampered by regulation.
- **Vulnerable users:** Preserving the universal character of postal services ensures inclusion. The definition of vulnerable users should remain at national level, reflecting local realities.
- **Horizontal issues (environment, labour, AI, Cybersecurity):** Environmental sustainability, working conditions, AI governance and cybersecurity should remain addressed in horizontal EU legislation (CSRD, CSDDD, AI Act, NIS2 Directive). No evidence supports sector-specific rules in these areas, as these frameworks already apply horizontally to postal operators and subject them to

significant obligations; adding postal-specific requirements would contradict the EU drive to reduce administrative and regulatory burdens.

- **Digitalization and innovation:** Use of state-of-the-art technologies in operational procedures and innovation in products and services can bring opportunities for increased efficiency. However, the assumption that digitalization and innovation “lowers expenses” is not so straightforward, as important financial investments are needed for posts to implement innovative IT solutions, including AI, automation, big data. The regulatory environment should not restrict innovation nor mandate the adoption of specific IT and digital innovations; postal operators should keep their freedom to decide what investments are technically and economically feasible in their national and business environment to support the competitiveness of the sector going forward. Besides, the future regulatory framework should remain focused on delivery of physical items, excluding digital or electronic communications which are already regulated in separate legislation.
 - **Monitoring of global e-commerce flows:** The ERGP suggests monitoring the evolution of global e-commerce flows (through ETOEs, direct injection, or customs data). However, such activities would exceed the ERGP’s mandate and risk duplicating the work of other authorities, such as customs authorities, the UPU, and competition authorities. Additionally, they would create extra administrative burdens, which runs counter to the EU’s priorities of simplification and regulatory reduction, without providing clear benefits for users.
- ## Regulatory areas for ERGP focus (2026–2028)
- PostEurop recommends ERGP to prioritise the following regulatory areas within the next strategy period:
- **Safeguarding the USO:** Adopt flexible rules ensuring accessibility and long-term financial sustainability, supported by effective compensation mechanisms.
 - **Flexibility and subsidiarity:** Empower Member States to tailor USO scope, delivery frequency, quality standards and place of delivery to their own circumstances.
 - **Proportional and streamlined regulation:** Avoid duplicative reporting and administrative burdens; reduce red tape in line with EU competitiveness goals.
 - **Competition oversight:** Monitor parcel and e-commerce markets applying existing competition, DMA and DSA rules rather than introducing sector-specific ex-ante tools.
 - **Cross-border simplification:** Review CBPR obligations to reduce unnecessary data collection and ensure proportional transparency.
 - **Balanced consumer protection:** Guarantee clarity and fairness in complaints and redress, without overregulation.
 - **Support for environmental sustainability and innovation:** Promote investment in decarbonization and digital transformation, rather than imposing additional reporting obligations.

CONCLUSION

PostEurop encourages ERGP to frame its Mid-Term Strategy around **flexibility, subsidiarity, financial sustainability and proportionality**, while avoiding unnecessary regulatory expansion. A balanced and adaptable framework will allow universal postal services to remain robust, inclusive and resilient, while enabling operators to innovate, compete and invest in environmentally cleaner and digital technologies.

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