

Brussels, 14 April 2026

PostEurop position as feedback to the revised Taxonomy Delegated Acts

PostEurop welcomes the European Commission initiative to review the EU taxonomy climate delegated act to update and simplify the technical screening criteria. Its feedback to the draft delegated act focuses on the Climate one. This position is based on the practical experience of PostEurop members in the implementation of the technical screening criteria.

- **Creation of a dedicated postal activity**

In order to make reporting easier and closer to its operational realities, PostEurop, requests the creation of a new activity for the postal sector in the form of a combination of existing activities 6.4, 6.5, and 6.6, within a single activity 6.X. This activity wouldn't replace the mentioned activities, but it would come in addition to them. This new activity would be defined as postal, courier and express services based on the combined use of at least two modes of transport. This would allow postal operators and companies with comparable delivery activities to assess the alignment of their revenue/CAPEX (and of their fleet) as a whole and avoid artificially dividing the evaluation of alignment it into different silos, as they are currently required to do.

- **Recognition of alternative fuelled vehicles as aligned for activity 6.6**

For activity 6.6, PostEurop asks for the reassessment of the technical screening criteria which in praxis only allows electric or hydrogen heavy-duty vehicles to be considered as taxonomy-aligned; this reassessment should enable to also include trucks that run on sustainable alternative fuels (namely HVO, Bio-CNG, Bio-LNG). Indeed, for linehaul transport at the moment as well as in the next years, there are no large-scale technologically and economically feasible electric or hydrogen solutions available on the market. For hydrogen in particular, the operational reality shows that its adoption in the coming years faces far greater challenges than what had been anticipated when the first delegated act on the Taxonomy was adopted. In comparison sustainable alternative fuels offer several advantages with a range of vehicles which is mature and diversified. The taxonomy regulation should therefore recognize these fuels as being part of the decarbonisation solution and foster investments in these fuels.

- **Deletion of Pollution prevention and control DNSH on tyres for activities 6.5 and 6.6**

For both activities 6.5 and 6.6, PostEurop proposes excluding the PPC DNSH on tyres for the following reasons. EU labels are unavailable for tyres in many countries outside EU. Local standards use different criteria and cannot easily be mapped. Additionally, the EPREL database considers all tyre label information. It currently lacks a functionality to determine the two highest populated classes of fuel efficiency in combination with the two highest population class of rolling noise via the available filter options. Therefore, the determination has to be done manually for every potential tyre designation (combination of size parameters, season, load-capacity index etc.) which causes huge efforts. Finally, the application of external rolling noise criteria to electric vehicles is paradoxical, given that these vehicles are inherently quieter and are nonetheless required to be equipped with Acoustic Vehicle Alerting Systems (AVAS).

- **Simplification of DNSH Requirement for investment in Solar Panel and in Charging infrastructure for electric vehicles**

To be aligned, investments in charging stations and solar panels must comply with the criteria of activities 7.4 and 7.6 respectively for installation expenses, and with the criteria of activities 3.20 and 3.1 respectively (which include compliance with Appendix C) for the cost of the actual equipment¹. We would recommend to either remove the need to comply with Appendix C or to drastically simplify this appendix for its application for solar panels and charging stations, as we notice that the manufacturers of such equipment find it extremely difficult to certify compliance with Appendix C as it stands, resulting in investments in solar panel installations and electric vehicle charging stations that are not Taxonomy-aligned.

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.

¹ As indicated by FAQ nr. 61 of Commission Notice C/2025/1373 on the interpretation and implementation of certain legal provisions of the EU Taxonomy Environmental Delegated Act, the EU Taxonomy Climate Delegated Act and the EU Taxonomy Disclosures Delegated Act