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MARKET STRUCTURE AND COMPETITIVE DYNAMICS IN EU E-COMMERCE PARCEL DELIVERY

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Copenhagen Economics

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EXECUTIVE SUMMARY

The European Commission is reviewing the EU regulatory framework for postal and delivery services, with a view to potentially introducing a new EU Delivery Act. As part of this review, the Commission considers whether regulation should cover e-commerce parcel delivery services, reflecting concerns about whether parcel delivery markets operate under conditions of effective competition.

To inform this policy discussion, PostEurop members have commissioned Copenhagen Economics to assess the level of competition in the EU e-commerce parcel delivery markets. We assess whether market outcomes indicate any systemic competition problems, focusing on: (i) market structure, including the number of operators and barriers to entry; (ii) firm conduct, including pricing, entry, and innovation; and (iii) market performance, including prices, quality, and service availability for consumers.

Key findings

Overall, we find no evidence of structural competition problems in the EU e-commerce parcel delivery markets. Across structure, conduct, and performance, the market indicates characteristics consistent with a competitive sector.

In terms of structure, several features point to competitive conditions in the EU e-commerce parcel delivery markets. E-merchants act as the buyers in the market, where they can have strong bargaining powers towards the delivery operators due to the importance of their volumes for the operators. The market comprises multiple operators with diverse business models, leading to differentiated services serving different customer needs. Market shares in parcel markets (37–50 per cent for the main operator) are more dispersed than in letter markets (82–94 per cent), indicating stronger rivalry. Although some operators retain relatively strong positions, countervailing factors such as entry, expansion, and buyer power must also be taken into account. Legal and structural conditions also generally point to contestability: we observe no binding legal barriers, interoperable infrastructure, relatively low switching costs, and sustained growth in e-commerce parcel delivery supply and demand.

In terms of conduct, observed firm behaviour generally aligns with what we would expect in a competitive market. First, relatively moderate profitability suggests that competitive pressure may limit supracompetitive margins, with USP's EBITs typically ranging from 2.5 to 9.0 per cent and averaging 5.5 per cent in 2025. Second, price differences of domestic and cross-border services appear to largely reflect cost differences. Third, entry and expansion remain active, with new operators able to capture market share, whereas incumbents respond to entry through investment, partnerships, and service improvements. Fourth, firms compete on non-price dimensions, improving service quality and investing in innovation. And last, horizontal competition concerns identified in recent case law appear to be case-specific rather than systemic, with existing *ex post* competition law enforcement adequate to address them.

In terms of performance, available and new evidence suggests that outcomes for consumers are broadly consistent with effective competition. First, online shoppers benefit from a range of accessible delivery options, including home delivery, parcel lockers, and pick-up/drop-off points, available in both urban and rural areas. Second, while end-consumers delivery prices do not directly inform what e-merchants pay for delivery, we find that the end-consumers delivery prices appear affordable, by constituting around 0.9 per cent of annual expenditure for frequent shoppers, with high levels of consumer satisfaction and limited

differences across delivery types and geographies. Third, service quality is high, with reliable and timely delivery supported by strong consumer satisfaction across key dimensions.

Policy considerations

Due to the dynamic nature of postal and delivery markets, careful consideration is required of whether regulatory remedies are needed and, if so, what remedies would be appropriate. In order to reduce the risk of regulatory failure, any regulatory intervention should be based on a clear theory of harm and evidence of market failure. Without this, there is a high risk of regulatory failure where regulatory intervention harms market dynamics and causes unfavourable outcomes. In particular, the European Commission should demonstrate that existing regulation is necessary to sustain effective competition in today's e-commerce parcel delivery market; if such evidence is lacking, the default should be to rely on competition law rather than sector-specific rules.

We find that there is effective competition in the EU e-commerce parcel delivery market without any structural market failures. Thus, there is no indication that sector-specific *ex ante* regulation is needed from a competition perspective. Where concerns arise, existing competition law provides effective tools to address potential anti-competitive practices.

As a result, a new EU Delivery Act should refrain from imposing sector-specific regulation on the e-commerce parcel delivery market. This allows market force to deliver high value-outcome for consumers while avoiding the risk of regulatory failure. It also implies that the postal universal service obligation (USO) should be narrow and focus on essential services, which the market is not providing. Further, including e-commerce parcel delivery in the USO would risk creating an uneven level playing field between universal service providers and other parcel delivery providers, as players providing similar services would be subject to different regulations.

1 INTRODUCTION AND METHODOLOGY

In 2025, the European Commission (EC) launched a review of the EU regulatory framework for postal and delivery services, which consists of the Postal Services Directive (PSD) and the Cross-border Parcel Regulation (CBPR).[1] The review, ongoing at the time of our study, is expected to result in a new EU Delivery Act that will unify and modernise the existing framework.[2]

As part of its review, the EC is assessing whether the postal regulatory framework should extend to the broader delivery of goods, including e-commerce parcel delivery services.[3] This debate takes place against the background of rapid, e-commerce-driven growth in parcel volumes,[4] a structural decline in letter volumes and growing costs of providing the universal service,[5] shifts in the competitive landscape,[6] and increased attention from national regulators to the competitiveness of the parcel delivery markets.[7]

Currently, the EU e-commerce parcel delivery market largely operates outside the core of traditional postal service regulation. However, three main regulatory instruments affect different parts of the parcel market in the EU:

- The Postal Services Directive (PSD) sets minimum requirements for postal services in each Member State and explicitly covers single-piece parcels. It does not, however, impose minimum requirements on bulk or commercial courier, express, and parcel (CEP) services. Member States implement the PSD through national postal legislation, defining the scope of the universal service obligation (USO). In practice, most Member States focus on letter mail and single-piece parcels, while only a few extend the USO to bulk parcels. Even where bulk parcels are not included, the USO can indirectly influence conditions in the bulk parcel segment through requirements on adjacent services, such as single-piece parcels.

- Regulation (EU) 2018/644 on cross-border parcel delivery aims to enhance transparency and regulatory oversight in the EU parcel delivery markets. It requires parcel operators to submit tariff and operational data to national regulatory authorities but does not directly intervene in or reshape market structure.

- The Universal Postal Union (UPU) Convention is a binding international treaty that establishes the global legal framework for the exchange of international mail, including single-piece and bulk letter and parcel items handled by designated postal operators. It does not, however, apply to courier and logistics companies operating outside the UPU system.

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1 See European Commission (2025) *Commission seeks public feedback on postal deliveries*, Link.
2 See European Commission (2025) *Call for evidence for an impact assessment*, available for download at Link.
3 The EC describes Policy Option 3 as: "*Merging the Directive and Regulation into one legal act, this option would fully revise the scope of the EU postal framework to focus on the delivery of goods, without excluding letter mail, and guarantee access to efficient and affordable delivery services across the EU, while ensuring financially sustainable conditions.*", see European Commission (2025) *Call for evidence for an impact assessment*, available for download at Link.
4 See European Commission (2021) *Report from the Commission on the application and implementation of Regulation (EU) 2018/644 on cross-border parcel delivery services*, p.3, Link. See also Ecommerce Europe (2025*) Commission prepares the ground for revising the EU's postal sector*, Link.
5 See, e.g. European Commission (2021) *Report on the application of the Postal Services Directive*, p.3, p.5. Link.
6 See European Commission (2021) *Report from the Commission on the application and implementation of Regulation (EU) 2018/644 on cross-border parcel delivery services*, p.4, Link. See also Copenhagen Economics (2022) *Main developments in the postal sector (2017-2021)*, Chapter 3.3, Link.
7 One of the three strategic pillars of the European Regulators Group for Postal Services' (ERGP) 2023-2025 work plan is the "*Promotion of a competitive single EU postal market in the context of rising e-commerce deliveries*", see ERGP (2023) *ERGP 2023 Direction and Priorities*, p.7, Link.

However, the EC appears concerned about the level and quality of competition in EU parcel delivery markets. This is reflected in its public consultation, where stakeholders are asked, among other things, whether national and cross-border parcel delivery markets operate under conditions of fair competition.[8] In this context, fair competition is understood as a market environment in which firms compete on the merits of their services, operate on a level playing field, and are subject to effective competitive pressure.[9] It therefore remains an open question whether the new EU Delivery Act should include *ex ante* regulation in e-commerce parcel delivery markets.

Ex-ante regulatory intervention aimed at specific policy outcomes is only warranted where there is a clear market failure. In the absence of such failures, competitive markets generally deliver the efficient level of goods and services, i.e. the amount that best matches consumers' needs and preferences given scarce resources. Market failures related to the exercise of market power are already addressed through a well-developed body of EU competition law, which provides for deep harmonisation and strong enforcement powers.

In some circumstances, however, *ex post* competition law may be considered too slow or too narrow to address problems stemming from entrenched market power, for example in markets with persistently high entry barriers and limited competitive constraints. In such cases, any proposal to introduce sector-specific *ex ante* rules as an additional layer on top of competition law must be supported by robust evidence and a clear justification.

By contrast, introducing *ex ante* regulation without such justification creates a serious risk of regulatory failure, where intervention does more harm than good. In dynamic markets such as e-commerce parcel delivery, poorly targeted or rigid *ex ante* rules can distort market incentives, entrench inflexible business models, and weaken competitive pressure, thereby dampening innovation and ultimately worsening outcomes for consumers and businesses.[10]

Any regulatory change should therefore rest on a clear theory of harm and be supported by robust evidence of the limits of existing competition tools. To determine the appropriate scope of regulation, the key question is therefore: ***Does competition in the EU e-commerce parcel delivery market(s) work well, or is there evidence of structural problems that warrant further ex ante regulation***?

In competition cases and industry studies, parcel delivery services in the EU are frequently discussed within a broader courier, express and parcel (CEP) framework, which is distinguished from letter post and general B2B freight logistics. Within the CEP market, authorities and regulators often recognise multiple dimensions and sub-segments, such as domestic versus cross-border services, standard versus express delivery, lighter versus heavier parcels, home versus out-of-home delivery, and platform-integrated versus stand-alone delivery solutions.

In this report, we do not undertake a full market-definition exercise. Instead, we focus on the segment of **e-commerce parcels.** These are understood as parcels sent in bulk by e-merchants, including platforms, to end-customers as part of an online retail interaction (B2X, including B2C). In this study, we refer to this segment as the e-commerce segment (the "market"), without formally defining the market.

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8 The EC's questionnaire asks: *"Do you think that the postal delivery sector of the EU operates in conditions of fair competition (i.e. a market environment where businesses compete on a level playing field, based on the merits of their services, and subject to competitive pressure from the others)?"* Respondents are asked to answer this question separately "*For national parcel deliveries*", "*For cross-border parcel deliveries*", "*For national letter mail*" and "*For cross-border letter mail*", questionnaire previously accessible via European Commission (2026) *About this consultation*, Link.

9 Ibid.

10 See, e.g. European Centre for International Political Economy (2020) *Economic Cost of Ex ante Regulations*, Link; or with a focus on digital markets, see Business at OECD (2021) *Ex-Ante Regulation and Competition in Digital Markets – Notes by BIAC*, Link.

1.1 Previous assessments of the EU e-commerce parcel delivery services indicate competitive conditions

A review of earlier assessments shows that most studies, including those by the EC, characterise the CEP market as broadly competitive, while a smaller set highlights specific, targeted competition concerns.

Several assessments conclude that competition in the EU CEP market is generally effective. For example, the EC described the parcel delivery segment as "*highly competitive*" in its 2021 evaluation of the PSD.[11] Similarly, a 2019 study for the EC on the development of cross-border e-commerce through parcel delivery found that the landscape for cross-border parcel delivery services is competitive.[12] In addition, a 2021 survey of national regulators reports that competition along the parcel and express delivery value chain is typically moderate to intense, both for domestic and international services.[13]

When assessing competitive conditions in specific countries for the purpose of granting procurement exemptions, the EC concluded that domestic and international parcel and courier segments in several Member States are directly exposed to competition, see Table 1.

Table 1
EC assessments of parcel delivery services in the EU countries in the last ten years mostly found competitive markets

COUNTRY	YEAR	MARKET SEGMENT	EC CONCLUSION
Estonia	2025	Domestic standard and express parcel delivery services	Directly exposed to competition
		International standard parcel delivery services (inbound, outbound)	Directly exposed to competition
		Maxi letters and extra small parcels	Directly exposed to competition
Slovakia	2024	Domestic parcel delivery services	Directly exposed to competition
		International standard parcel delivery services	Directly exposed to competition
		International express parcel delivery services	Directly exposed to competition
		Domestic courier services	Directly exposed to competition
Lithuania	2023	Domestic express parcel delivery services	Directly exposed to competition
		International express parcel delivery services	Directly exposed to competition
Denmark	2020	Domestic B2C parcel delivery services	Directly exposed to competition
		International B2C parcel delivery services	Cannot be concluded if it is directly exposed to competition.
Croatia	2019	Domestic express parcel delivery ser vices	Directly exposed to competition
		International express parcel delivery ser vices	Directly exposed to competition
Poland	2016	Services of clearance, sorting, transport, and delivery of courier items	Directly exposed to competition

Note: The EC can grant an exemption from certain EU public-tender rules for utilities (like water, energy, transport and postal services) when it is shown that these activities already face effective competition. To do this, it has to assess how competitive the market is in practice. The EC first defines the relevant product and geographic markets and then assesses whether the market segment is directly exposed to competition, taking into account factors such as the number of providers, the market shares of the main players, and barriers to entry. In this way, there is no single quantitative formula, but the assessment relies on qualitative criteria and empirical evidence.
Source: See exemption decisions by the EC here: Exempt markets, Link.

11 European Commission (2021) *Report on the application of the Postal Services Directive*, p.9, Link.
12 WIK (2019) D*evelopment of Cross-border E-Commerce through Parcel Delivery*, p. XVIII, Link.
13 Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Figures 48 and 55, Link.

We also note that there have been some studies that point to specific areas where competition concerns could arise. For example, the EC has highlighted structural issues in cross-border parcel delivery—such as high barriers to entry and limited price transparency—which may weaken competitive pressure and contribute to higher prices.[14] In addition, concerns have been raised about potential distortions of the level playing field by vertically integrated operators.[15] However, such concerns typically stem from market power in upstream platform markets, rather than from a lack of competition in parcel delivery itself. Overall, these issues are case-specific and do not, in themselves, indicate a general lack of rivalry in e-commerce parcel delivery.

To supplement the EC's public consultation, PostEurop has engaged Copenhagen Economics to provide an independent, up-to-date economic assessment of competition in domestic and cross-border e-commerce parcel delivery markets in the EU.[16] The purpose of this study is to contribute relevant market evidence to the policy discussion by assessing whether any observed market outcomes point to systemic market failures that would justify sector-specific *ex ante* regulation.

1.2 Methodology

To evaluate the competitiveness of the EU e-commerce parcel delivery market, we apply a structured competition assessment based on three dimensions:

- **Market structure:** Assesses the environment in which firms compete, as this determines the scope for competition by influencing how easily firms can enter, expand, and challenge existing operators. We assess, for example, the number of firms, market concentration, product differentiation, and barriers to entry.
- **Firm conduct**: Assesses how firms behave strategically in the market and whether they exercise market power or are constrained by competitive pressures. We assess, for example, pricing and entry behaviour, investments in quality and innovation, and responses to rivals' actions.
- **Market performance:** Assesses the outcomes delivered by the market for consumers of delivery services. We assess, for example, the range of services available to online shoppers as well as their prices and service quality.

These dimensions correspond to the core elements of the Structure–Conduct–Performance (SCP) framework in the economic literature.[17] Assessing the evidence across the three elements allows us to form a holistic view of the level of competition in the market.[18] Based on this, we consider the policy implications for the EU postal regulation of the e-commerce parcel delivery market.

Our analysis draws on several sources. These include desk research of market studies, relevant case law, case studies, and academic literature, as well as Eurostat data. Further, we surveyed PostEurop members, see appendix A. Finally, to draw on the most recent market data, we carried out a mystery shopping exercise in collaboration with Tembi. The mystery shopping data records the delivery conditions shown to consumers when shopping on domestic e-commerce websites. The data covers 19 countries and includes information on available delivery operators, delivery prices, deliver speed etc., see appendix B.

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14 European Commission (2016) *Proposal for a regulation of the European Parliament and of the Council on cross-border parcel delivery services*, Link. We note that the EC's assessment was primarily focused on single-piece cross-border prices due to confidentiality of bulk prices.

15 ERGP (2025) *ERGP PL I (25) 4, ERGP Report on outline of the future Regulatory Postal Framework*, p. 5, Link; and European Commission (2024) *Prospective study on the future of the postal sector – Final report*, p. 209, Link.

16 Our study covers EU Member States and Norway. Throughout the report, 'EU' refers to this group. It uses selected country examples to illustrate key arguments but does not provide a full country-by-country assessment.

17 Industrial organisation literature has long identified market structure, firm conduct and market performance as the key dimensions for assessing competition in a given market, see for example Bain, J. S. (1959). *Industrial Organization*. Wiley. We consider these dimensions both individually and jointly, without assuming a causal relationship.

18 This study focuses on assessing horizontal competition in e-commerce parcel delivery markets. As such, it does not assess the role that e-merchants may play in influencing market outcomes available to online shoppers.

2 MARKET STRUCTURE

This chapter examines the market structure of the EU e-commerce parcel delivery market. It provides the structural basis for our later assessment of firms' conduct and market performance within the Structure–Conduct–Performance (SCP) framework.

We assess whether the observed market structure is consistent with a competitive market. In such a market, no single operator can materially influence prices, several operators operate without significant market power, and barriers to entry and expansion are low.[19] We therefore look for evidence on the number and relative size of operators, the presence of dominant or legacy operators, and structural impediments to entry or growth.

The chapter is structured as follows. First, we show that e-merchants act as powerful buyers in parcel delivery, with heterogeneous but often strong bargaining power vis-à-vis delivery operators. Second, we document that multiple operators with different business models compete in domestic and cross-border delivery, with more distributed parcel market shares and substantial out-of-home capacity held by non-universal service providers (non-USPs). Third, we assess legal and structural conditions for entry, expansion, and switching and find no legal barriers, supportive interoperability, low switching costs, and growing e-commerce demand—all consistent with competitive market structures.

2.1 E-merchants act as buyers with significant bargaining power

We find that the buyer side of the e-commerce parcel delivery market is fragmented and heterogeneous, but that e-merchants as a group have strong bargaining power. The structure of demand therefore plays a central role for market outcomes, as delivery operators compete to win and retain contracts with e-merchants. This rests on four elements.

First, e-merchants act as the direct buyers of parcel delivery services, since they select delivery operators, negotiate contracts, and pay for the service. Final consumers, in contrast, do not negotiate with operators and do not choose contract terms or prices, but their expectations still shape what e-merchants buy. E-merchants translate these expectations into concrete service specifications when they negotiate with operators, for example by asking for next-day delivery, specific delivery time windows, tracking, or convenient return options.

Second, the buyer side consists of a large and growing number of e-merchants, so the demand is highly fragmented across the customers that operators serve. At the same time, these buyers differ materially in size, business model, and shipping patterns, which creates a heterogeneous demand structure. Large e-merchants, including major online platforms and large omnichannel retailers, ship high and predictable volumes across many destinations and often operate in several Member States, treating parcel delivery as a strategic input. Small and medium-sized enterprises also rely on parcel delivery, but they ship much lower and more fragmented volumes and often operate only at the national or regional level in narrower product niches.

Third, e-merchants and delivery operators typically contract through individually negotiated agreements. These contracts define prices, service levels, performance targets, and operational details, such as collection times, sorting arrangements, and procedures for loss or damage. Operators also use tariffs, discounts, and surcharges to reflect the characteristics of the traffic that each buyer brings, including parcel size, weight profile, and geographical coverage, so that two e-merchants that ship a similar number of parcels can still face different effective prices if their shipment profiles and contractual setups differ.

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[19] Mankiw, N.G. (1998) *Principles of Microeconomics*, Link.

Fourth, e-merchants usually possess strong bargaining power vis-à-vis delivery operators, mainly because they can commit high and predictable volumes. Large e-merchants can use this position to negotiate lower unit prices, more favourable rebates, and tailored service conditions, including dedicated support and customised interfaces. By contrast, SMEs have limited bargaining power when they negotiate alone, as they bring small, less predictable volumes and therefore face more standardised tariffs, higher prices per parcel, and less influence over service levels and contract terms. However, SMEs can to some extent improve their position by using consolidators or logistics platforms that aggregate demand and grant access to more favourable delivery conditions, see below.

2.2 There are multiple delivery operators

We find that the number and relative strength of players in the EU e-commerce parcel delivery market are consistent with a competitive market, for three main reasons:

First, the EU e-commerce parcel delivery segment is characterised by a wide range of business models, each targeting different customer needs and parts of the value chain. This variety is typical of a competitive market where firms differentiate their services rather than relying on a single dominant model:

- National postal operators rely on nationwide last-mile networks and universal service infrastructure. They offer both letter and parcel delivery, benefit from extensive domestic coverage and high reliability, and use international postal arrangements to offer cross-border services.

- Pan-European operators such as DHL, DPD, UPS, GLS, and FedEx offer time(day)-definite domestic and cross-border services across the full logistics value chain. They run integrated multi-country networks, control long-haul transport and customs processes.

- Regional and local operators focus on specific geographic areas or logistics segments. They often combine transport and parcel solutions and maintain cross-border capabilities within neighbouring countries.

- Former closed-network operators such as Colis Privé, Relais Colis, and Hermes specialise in cost-efficient, high-volume B2C parcel delivery, typically using asset-light last-mile models and partnership-based cross-border arrangements.

- Vertically integrated companies such as Allegro, Amazon, and Vinted are reducing their dependence on third-party operators by integrating fulfilment, warehousing, sorting, and last-mile delivery for both domestic and cross-border markets, while in some cases offering logistics services to third-party sellers on their platforms.

- Consolidators aggregate volumes from many smaller senders and operators, bundle parcels, optimise routings, and negotiate access to multiple networks, allowing SMEs to offer cross-border delivery at competitive prices without building their own infrastructure. While representing a competitive enabler for SMEs, consolidators may not be uniformly developed in all Member States, especially in markets with lower volumes.

These different business models imply variation in service levels, tracking options, and geographical coverage, giving e-merchants a broad menu of delivery solutions. Survey and market evidence suggest that e-merchants are generally well informed about available operators and consider national, pan-European, and regional players when selecting delivery partners.[20]

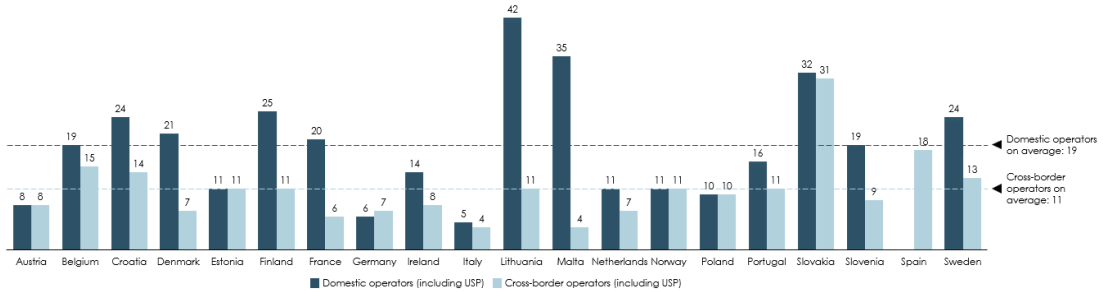
[20] Copenhagen Economics (2016) *Principles of e-commerce delivery prices*, p.20, Link; Copenhagen Economics (2013) *E-commerce and delivery*, p.119, Link.

Second, the EU e-commerce parcel delivery segment consists of multiple operators. This is consistent with a competitive market, where rival firms limit each other's market power.

From the consumer's perspective, the number of delivery operators effectively available depends on the options chosen by the e-merchants.[21] At checkout, consumers are on average presented with 1.4 delivery operators when shopping online. This indicates that many web shops offer a limited set of operators per transaction, even though more operators are active in the market.

From the market-structure perspective, the underlying number of operators is significantly higher. Based on data reported by national postal operators, EU countries have on average 19 domestic and 11 cross-border parcel delivery operators, see Figure 1.

Figure 1
Number of operators active in domestic and cross-border parcel delivery
Number of operators



Note: Bulgaria and domestic operators in Spain are not displayed here, reporting significantly higher numbers. Questions in RFI: *Number of domestic operators in 2025 (or the latest available year); Number of non-USP cross-border operators in 2025 (or the latest available year)*. Note, we add the USP in the reported number of cross-border operators.
Source: RFI to PostEurop members.

When looking across multiple web shops in each country, the effective choice set becomes even clearer. Checkout data from the mystery shopping exercise with Tembi show that, across domestic e-commerce sites, an average of nine distinct delivery operators are displayed per country, see Table 2 below and Appendix B for further details. This typically includes the national postal operator and several private carriers[22], confirming that e-merchants draw on a broad pool of competing delivery operators rather than relying on a single provider.

[21] Muhthar, N., Jaafar, H. S., & Nasir, S. (2022). Factors influencing e-retailer choice of courier service provider: A conceptual paper. *International Journal of Academic Research in Business and Social Sciences*, *12*(11), 2383–2394, Link

[22] The operators are not necessarily all registered or physically established in the country concerned. In some cases, they include foreign operators, which do not have a last-mile delivery network, but provide delivery services to the merchants through access agreements with domestic operators.

Table 2
Delivery operators displayed at checkout on domestic e-commerce sites

COUNTRY	#	OPERATORS
ES	12	Correos, CorreosExpress, CTT, DHL, GLS, Inpost, MBE, MRW, Nacex, Seur, Tipsa, UPS
GR	9	ACS, Boxnow, Courier Center, DHL, Easy Mail, Elta Courier, Geniki Taxydromiki, SLM, Speedex
LV	9	DHL, DPD, FedEx, Latvijas Pasts, Lietuvos Pastas, Omniva, Smartposti, UPS, Venipak
HU	8	DPD, ExpressOne, Foxpost, GLS, Magyar Posta, Omniva, Packeta, Sameday
IT	8	DHL, DPD, FedEx, GLS, Inpost, MBE, Poste Italiane, UPS
PL	8	DHL, DPD, FedEx, GLS, Inpost, Orlen, Polish Post, UPS
SE	8	bring, Budbee, DB Schenker, DHL, Early Bird, Instabox, Postnord, UPS
SK	8	DPD, Geis, GLS, Packeta, PPL, Slovenska Posta, SPS, UPS
BE	7	bpost, DHL, DPD, GLS, Mondial Relay, PostNL, UPS
DK	7	bring, Danske Fragtmaend, DAO, DHL, GLS, Postnord, UPS
DE	6	Deutsche Post/DHL, DPD, GLS, Hermes, UPS
HR	6	Boxnow, DPD, GLS, Hrvatska Posta, MBE, Overseas express
NO	6	bring, DHL, Helthjem, Instabox, Portbuddy, Postnord
RO	6	Cargus, DPD, Fan Courier, GLS, Posta Romana, Sameday
EE	5	DPD, Lietuvos Pastas, Omniva, Smartposti, Venipak
FI	5	DB Schenker, DHL, Matkahuolto, Posti, Postnord
LT	5	DPD, Lietuvos Pastas, Omniva, Smartposti, Venipak
NL	5	DHL, DPD, GLS, PostNL, UPS
BG	4	Boxnow, DPD, Econt, Sameday
IS	3	Dropp, Eimskip, Iceland Post
SI	3	DPD, GLS, Posta Slovenije

Note: The list may not be exhaustive. To eliminate outliers, we implement a threshold of one per cent of visibility at checkouts. Operators are ordered alphabetically, not according to market share or visibility.
Source: Mystery shopping exercise by Tembi in 2026.

Available evidence indicates that rural areas can also be served by multiple parcel operators. For example, a comparison of delivery operators active in rural areas in Sweden, Finland, and Norway suggests that at least three operators are present in each of these countries, regardless of whether bulk parcel delivery is part of the USO.[23] However, this finding is based on a limited set of Nordic countries and may not be representative of conditions in all EU Member States.

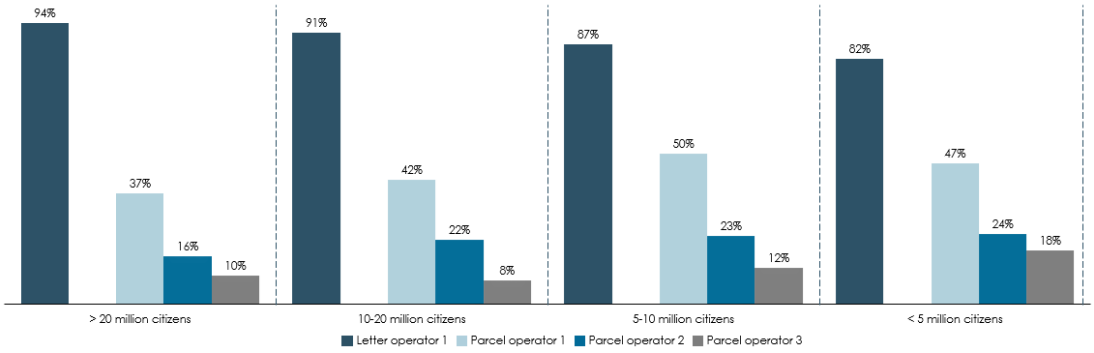
Third, market share patterns in parcels are more distributed than in letter markets. In most countries, the main letter operator often holds above 80 per cent share, whereas the largest parcel operator's share is typically in the range of 37–50 per cent. The second and third parcel operators combined account for 26–42 per cent of volumes, implying a more balanced market structure and rivalry among several sizeable players, see Figure 2.

At the same time, the largest parcel operator in many countries still holds a strong position. High market shares can signal market power, but they are not determinative on their own. Countervailing factors such

[23] Copenhagen Economics (2024) *E-Commerce Parcel Delivery, the Unwanted Guest at the USO Table? An Empirical Study Covering Ten Markets in Europe*, Link.

as potential entry and expansion, buyer power from large e-commerce platforms and marketplaces, and multi-homing by merchants can significantly limit the ability of any single operator to raise prices or degrade quality.[24] For this reason, the structural evidence in terms of market shares is complemented in the following chapters with evidence on firms' conduct and market performance.

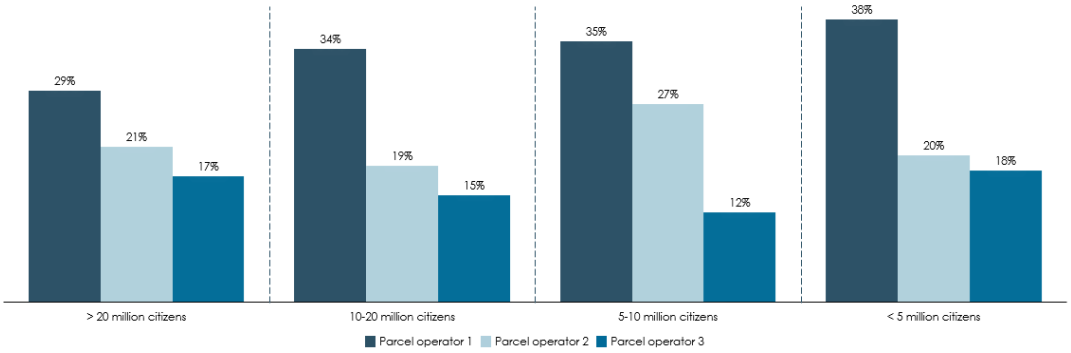
Figure 2
Shares in the domestic letter market and last-mile delivery grouped by population size
Share



Note: Data from 16 countries. Question in RFI: *Please indicate market shares for players active in domestic last-mile parcel delivery in your country (B2X, including both express and standard delivery services)*.
Source: RFI to PostEurop members. Letter market share based on Copenhagen Economics (2022) Main Developments Study 2017 – 2021, Link, Wik-consult (2023), Link, Bundesnetzagentur (2025), Link.

A similar pattern emerges in cross-border parcel delivery, where market shares are spread across several sizeable operators rather than concentrated in a single firm, see Figure 3. The average market share of the largest cross-border operator is lower than that of the largest domestic operator. This indicates that the largest domestic operator faces stronger competitive pressure in cross-border markets.

Figure 3
Shares in cross-border last-mile delivery grouped by population size
Share

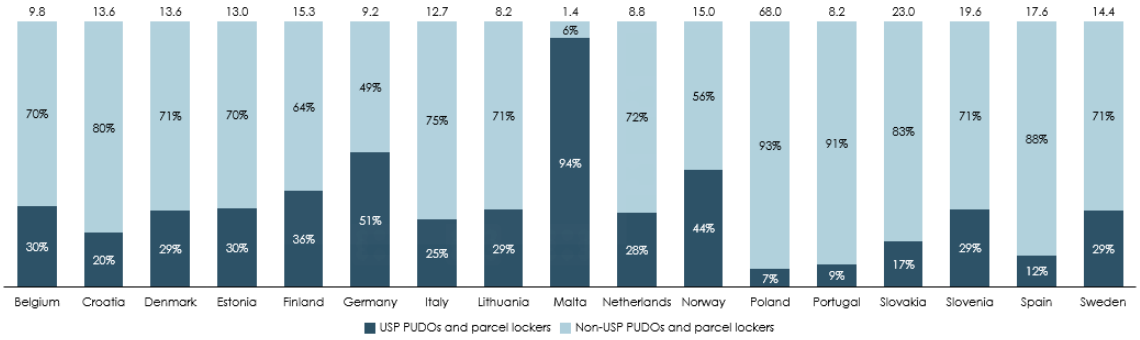


Note: Data from 14 countries. Question in RFI: *Please indicate market shares for players active in cross-border delivery in your country (B2X, including both express and standard delivery services)*.
Source: RFI to PostEurop members.

[24] Tirole, J. (2015). Market failures and public policy. *American Economic Review*, *105*(6), 1665-1682, Link.

Beyond traditional volume- or revenue-based shares, competition analysis often considers capacity-based indicators, because they capture firms' ability to expand output if market conditions change. When several operators hold substantial capacity, such as network coverage or available delivery points, rivals can more easily scale up and respond to price increases or quality reductions by the incumbent operator. In parcel delivery, out-of-home (OOH) delivery points—parcel shops and lockers—constitute a key capacity input, as dense OOH network is crucial for attractive, low-cost last-mile delivery. Across the EU countries, non-USPs collectively hold a substantial share of OOH delivery capacity and in many cases, operate more parcel shops and lockers than the USP, see Figure 4. This indicates that they are well placed to constrain the incumbent's behaviour.

Figure 4
Share of OOH delivery points operated by USP and non-USPs
OOH delivery points per 10,000 inhabitants



Note: PUDO: pick-up and drop-off. Only countries that provided information on USP and non-USP networks are included. USPs often run a network of traditional post offices, which also function as an OOH delivery option. Based on questions in RFI: *Average number of PUDOs operated by USPs, total or per 10,000 inhabitants; Average number of PUDOs operated by non-USPs, total or per 10,000 in-habitants; Average number of parcel lockers operated by USPs, total or per 10,000 in-habitants; Average number of parcel lockers operated by non-USPs, total or per 10,000 inhabitants.*
Source: RFI to PostEurop members.

2.3 Entry barriers are low

Entry barriers in EU e-commerce parcel delivery appear low, which is consistent with a competitive market structure because it allows new firms to enter and expand. In addition to the absence of legal barriers to entry[25], the way the market is organised supports effective entry and competitive pressure.

First, e-merchants face low switching costs between operators. Parcel delivery services are largely standardised, and e-merchants typically contract at a non-exclusive basis, which enables them to multi-source or reallocate volumes across operators.[26] As a result, they can credibly shift traffic in response to changes in prices or service quality, strengthening competitive constraints and limiting customer captivity.

Second, continued market growth is likely to attract new entrants and intensify competition. E-commerce in the EU is expected to keep growing strongly over the coming decade, with compound

25 Copenhagen Economics (2019) *Additional EU mail & parcel regulation: what evidence to look for?*, Link
26 European Commission (2021) *Report from the Commission to the European Parliament, the Council and the European Economics and Social Committee on the application and implementation of Regulation (EU) 2018/644 on cross-border parcel delivery services*, Link.

annual growth rates of 7.9 to 12.7 per cent.[27] This creates room for additional operators to enter and scale. Smaller players can initially focus on local or regional markets, build scale as volumes increase, and subsequently expand into new geographic areas of service segments. We explore the different business models further in the conduct chapter, see chapter 0.

Third, entrants can target specific stages of the value chain rather than replicating end-to-end networks from the outset. Although delivery networks exhibit economies of scale, the value chain is open and interconnected, allowing new operators to specialise in particular segments and gradually expand. This interoperability is supported by standardisation efforts such as those of the Universal Postal Union (UPU) for designated operators and the European Committee for Standardization (CEN), which provide common standards for track-and-trace, VAT compliance, customs procedures, electronic data interchange, and harmonised barcodes. These standards reduce frictions and make it easier for new and smaller operators to plug into existing networks. [28]

[27] See for example Mordor Intelligence (2026*) Europe e-commerce market size & share analysis*, Link and Market Research Future (2026) *Europe E Commerce Market*, Link.

[28] ERGP (2021) *ERGP report on harmonised measures related to standardized cross border delivery services*, Link.

3 FIRM CONDUCT

This chapter sets out our assessment of firms' **conduct** in the EU e-commerce parcel delivery. It builds directly on the preceding analysis of market structure and examines how operators behave within that environment, both individually and in their strategic interactions.

In a competitive market, firms' conduct should reflect competitive constraints and limited scope to exercise market power. We would expect price-cost margins to be low or moderate and entry and expansion to occur actively in response to profit opportunities.[29] Firms would compete on the merits through quality improvements and innovation[30] rather than relying on legacy offerings to remain attractive to their customers' changing needs. We would expect limited evidence of anti-competitive behaviour and active competition law enforcement to address any arising issues.

The chapter is structured as follows. First, we discuss pricing and find moderate margins in the EU e-commerce parcel delivery reflecting underlying cost differences. Second, we observe active entry dynamics and incumbent responses to competitive pressure. Third, our assessment of quality and innovation shows that operators compete through ongoing improvements and differentiation. Finally, the limited number of competition cases suggests no systemic competition concerns.

3.1 Moderate price-cost margins and cost-based pricing indicate competitive market conditions

We find moderate price-cost margins in the EU e-commerce parcel delivery sector when considering bulk and single-piece parcels jointly. This indicates that rivalry and ease of entry prevent firms from sustaining supracompetitive prices above the costs of provision. Differences in domestic and cross-border bulk parcel prices are likely to reflect underlying cost differences rather than the extraction of non-competitive rents in the cross-border delivery market.

First, operators' margins for parcel delivery services are in line with regulated margins in the postal sector. To assess competitiveness in the EU e-commerce parcel delivery, we would ideally analyse bulk parcel margins separately. However, prices for bulk parcels are typically based on individually negotiated contracts with the sender, and the price margins are highly confidential. We, therefore, examine EBIT margins for operators' overall parcel business as a proxy.[31] Overall, profitability in the EU parcel delivery segment is positive but moderate, with operating margins typically ranging from 2.5 to 9.0 per cent and averaging 5.5 per cent in 2025, see Figure 5.

Looking specifically at the mark-ups on domestic and cross-border parcel delivery, we find that mark-ups are broadly similar, or only slightly higher than, EBIT margins. Survey data from 2022 on cost mark-ups show that, for domestic bulk and single-piece delivery, the average mark-up over costs is 3.6 per cent for USPs and 14.4 per cent for non-USP operators. For cross-border delivery, the corresponding averages are 7.8 per cent for USPs and 14.6 per cent for non-USPs.[32]

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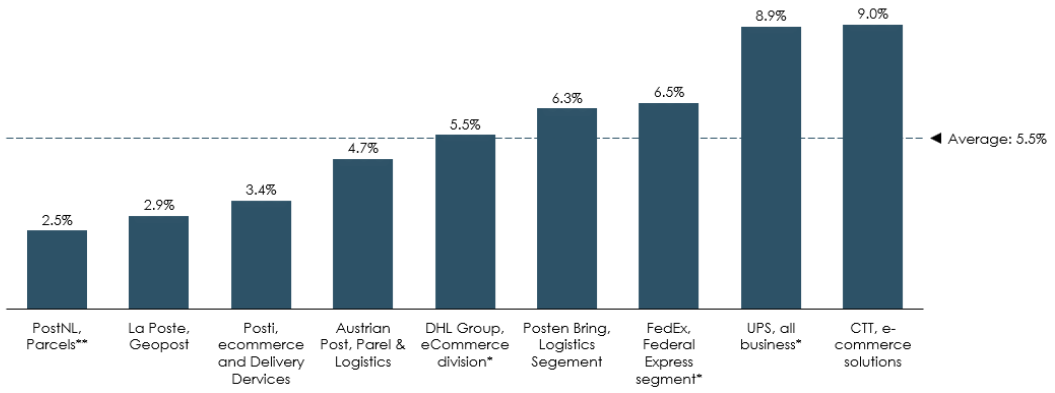
29 Mankiw, N.G. (1998) *Principles of Microeconomics*, Link.

30 Tirole, J. (1988) *The theory of industrial organization*, MIT press, Link.

31 The scope of operators' parcel business differs across companies and can include services beyond parcel, such as logistic services. However, this measure provides the best available and most comparable proxy for profitability for the parcel segment.

32 Copenhagen Economics (2022) *Main Developments Study 2017-2021*, p.337, Link. Note that averages are based on responses by seven USPs and 15 non-USPs across nine countries.

Figure 5
EBIT margins in EU parcel delivery averaged around 5.5 per cent in 2025
EBIT margin in per cent



Note: We select e-commerce delivery operators active in the EU and Norway based on the availability of separate data on the profitability of their parcel segment. (*) Includes all global parcel activity. (**) Normalised EBIT margin.
Source: Operators' 2025 annual reports.

Assessing whether product margins are high or low is inherently context-specific and requires an appropriate benchmark. A useful reference point in this case are regulated margins for USO products. For example, in Germany, the Bundesnetzagentur set the allowed profit rate for all price cap regulated products at around 6.5 per cent over the past ten years. The new German *Postgesetz* of 2024 even allows for this profit rate to be increased by 2.5 per cent[33] to a total of up to 9 per cent for some products.[34] This provides a regulatory benchmark for what is considered an acceptable return in the sector. At the same time, operators, industry stakeholders, and researchers frequently describe parcel margins as "*limited*",[35] "*very low*",[36] or "*thin*",[37] suggesting that they are not widely perceived as excessive.

Second, operators' margins are under pressure. In recent years, market conditions indicate that parcel delivery operators' price-cost margins are increasingly squeezed from both sides. On the cost side, operators face significant upward pressure from wage inflation and higher transport-related expenses, e.g. for fuel.[38] On the price side, we understand that at least four factors put downward pressure on prices:

- *Intense competition from rival delivery operators,* as reported by operators in negotiations with e-merchants;[39]

33 See § 44 PostG (German Postal Act)
34 The profit rate is based on a corrected average of the return on sales plus a statutory additional profit, see Bundesnetzagentur (2024) *Bundesnetzagentur sets scope for postage rate increases*, Link.
35 See results from workshops with parcel operators, WIK (2019) *Development of Cross-border E-Commerce through Parcel Delivery*, p. 193, Link.
36 Statement by the UNI Europa Post & Logistics representative interviewed for European Labour Authority (2025) *Key challenges in tackling undeclared work in the Courier, Express, and Parcel Delivery sector*, p. 8, Link.
37 See, for example, Verified Market Research (accessed February 2026) *Courier, Express and Parcel (CEP) Market Size And Forecast*, Link.
38 See for example European Labour Authority, Link; nShift, Link; MordorIntelligence, Link; LogisticsBusiness, Link.
39 Operators report to be constrained by "*price pressure driven by fierce competition in the delivery market [when negotiating rates with e-merchants]", see* results from workshops with parcel carriers, WIK (2019) *Development of Cross-border E-Commerce through Parcel Delivery*, p. 193, Link. See also Verified Market Research (2026) *Courier, Express and Parcel (CEP) Market Size And Forecast*, Link.

- *Strong buyer power among e-commerce retailers*. Increasing concentration in the e-commerce retail market allows large platforms to secure significant discounts, while smaller e-merchants account for a declining share of volumes;[40]
- *The growth of consolidators for e-commerce parcels*, both domestic and cross-border, increases price pressure and buyer power further by bundling volumes from smaller e-merchants and granting them access to larger discounts;[41]
- *Overcapacity in the delivery market* as a result of insourcing by large platforms, combined with investments and continuous entry.[42]

Third, higher prices for bulk cross-border parcels reflect structurally higher costs. The higher costs for bulk cross-border delivery reflect structural factors such as longer transport distances, including air transport, more complex logistics and coordination across operators, and additional handling, customs, administrative requirements and in particular lower volumes.[43] These factors reduce economies of scale and increase transport and processing costs.

Since the full liberalisation of the EU postal markets, price differences between domestic and cross-border parcel delivery have attracted significant regulatory and policy attention. In 2021, public cross-border single-piece parcel prices charged by USPs were two to nine times higher than domestic prices.[44] For non-USPs, the ratio was between two and 30.[45] These single-piece price differentials raised concerns that competition in cross-border parcel delivery may not function effectively, potentially undermining the free movement of goods in the internal market.

A similar concern can exist for cross-border e-commerce parcels. However, we find that price differences for domestic and cross-border bulk (e-commerce) parcels largely reflect higher cross-border costs. On average, USPs report that cross-border *prices* are around 3.3 times higher and *costs* around 3.4 times higher than domestic levels, see Figure 6. There is, however, variation across USPs, where the bulk cross-border *prices* are 1 to 5 times higher than domestic prices, while unit *costs* are 1 to 8 times higher.[46] It should be noted that for countries without land connections to major EU markets, which rely on air or sea transport corridors for sending cross-border parcels, the multiplier may be structurally higher.

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40 Copenhagen Economics drawing on consultations with market participants. Already in 2022, we found that e-merchants sending in bulk can benefit from discounts of up 60 to 70 per cent compared to single piece prices, see Copenhagen Economics (2022) *Main Developments Study 2017-2021*, p. 356, Link. For a theoretical approach to this, see Borsenberger, C. et al. (2016) *Differentiated pricing of delivery services in the e-commerce sector*, in Crew, M. & Brennan, T.J. (eds.), *The Future of the Postal Sector in a Digital World*, pp.191–211.

41 Copenhagen Economics drawing on consultations with market participants. We also discuss consolidators in chapter 2 above.

42 See, for example, Kearny (2023) *European parcel market: from fortune to hardship*, Link; We discuss insourcing by large platforms and other forms of entry, as well as investments, in the following sub-chapters.

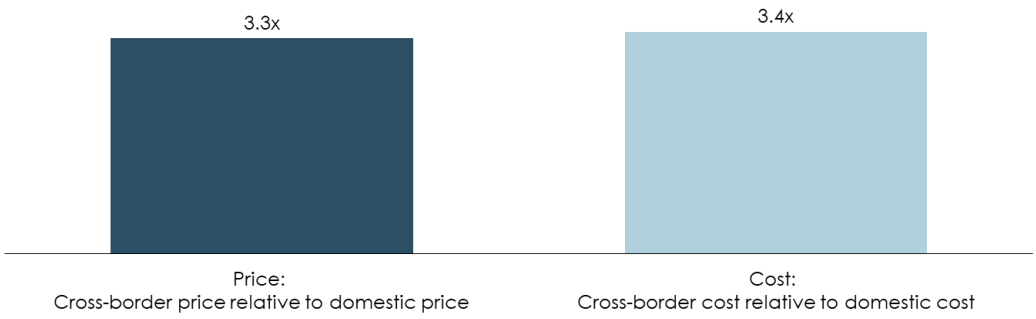
43 Based on RFI to PostEurop members.

44 See European Commission (2021) *Report on the application and implementation of Regulation (EU) 2018/644 on cross-border parcel delivery services*, p. 10, Link.

45 Ibid.

46 Copenhagen Economics based on RFI to PostEurop members.

Figure 6
Higher cross-border bulk parcel prices closely track higher underlying costs
Price and cost levels of cross-border bulk parcel delivery shown as multiples of domestic bulk parcel delivery



Note: Unweighted average of 7 countries. Question in RFI: *For comparable bulk parcel products, how many times higher is the average cross-border price compared to the average domestic price?; For comparable bulk parcel products, how many times higher is the average cross-border unit cost compared to the average domestic unit cost?*
Source: RFI to PostEurop members.

3.2 Active entry and incumbent responses reflect competitive market dynamics

We find that the limited entry barriers identified in chapter 2 are materialised in practice through active entry and incumbent responses in the EU e-commerce parcel delivery sector, which promotes effective competition.

First, new operators have entered the market in recent years and have been able to attract a meaningful customer base. While the market is characterised by both entry and exit, the overall increase in the number of operators indicates that entry has outweighed exit, pointing to sustained market entry. In 2025, the average number of parcel delivery operators in an EU country increased by 27 per cent in domestic delivery and 23 per cent in cross-border delivery since 2015, reaching 19 and 11 respectively, see Figure 7.

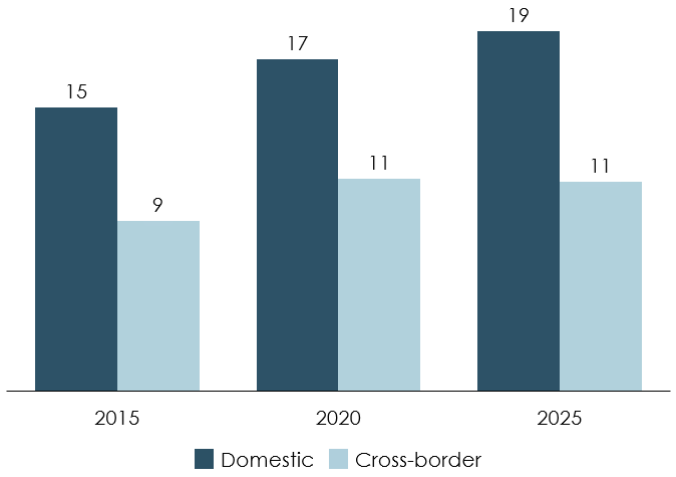
To enable entry, new operators have pursued differentiated strategies [47]. Based on information from PostEurop members, observed entry strategies include specialisation in specific segments of the value chain and international expansion:

- *Specialisation in specific segments of the value chain*: By focusing on discrete stages or even specific geographic areas, entrants reduce capital requirements and operational complexity relative to nationwide end-to-end operators.[48] Examples include operators like Instabee, Packeta Slovakia, Porterbuddy or Paack focused exclusively on last-mile delivery, e.g. via a locker-led OOH network or flexible, low-cost home delivery. We also observe the emergence of digital intermediaries, e.g. consolidator platforms like Sendcloud and Myparcel, which specialise in pooling small senders' volumes and brokering access to parcel operators.
- *Vertical integration from a separate upstream market*: Firms active in e-commerce retail or online marketplaces become active downstream in the distinct parcel delivery market, leveraging existing customer relationships and volumes to reduce scale and customer acquisition barriers. Examples include e-merchants Amazon Logistics, Allegro, VintedGO and bol.com extending into parcel delivery.

47 See for example Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Chapter 3.3, Link.
48 We note that, rather than constituting cream-skimming that undermines long-run market sustainability, this type of entry has resulted in dynamic rivalry. Incumbents have responded with targeted optimisation of discrete operational stages, for example through greater sorting automation or expansion of their parcel and out-of-home networks. We discuss this in the next chapter.

- *Entry from adjacent but separate markets*: Firms active in related distribution markets extend their activities into the distinct e-commerce parcel delivery market, exploiting economies of scope. Examples include newspaper distributors like Early Bird or Helthjem, or logistics companies like DSV adding parcel delivery to their service portfolio. Further, international integrators with logistics experience like GLS and DPD are expanding into delivery of domestic e-commerce parcels.
- *International expansion*: Operators leverage existing know-how, technology, and financial scale from their domestic operations to enter new geographic parcel markets at lower incremental cost. For example, InPost has expanded from Poland into the UK, France, Italy, and Spain while Colis Privé has entered Belgium from France and SmartPosti has expanded across the Baltics. Operators also pursue acquisition-led entry strategies. For instance, Spanish Correos acquired Rangel Expresso in Portugal.

Figure 7
Entry is driving up the number of domestic and cross-border parcel delivery operators
Average number of parcel delivery operators in an EU country



Note: Includes data from 19 countries for domestic and 20 countries for cross-border. Not all countries report figures for all years. Cross-border delivery operator includes USP. Figures for Bulgaria and domestic operators in Spain are excluded, as their values deviate from the average, potentially due to differences in licensing and registration across countries. Questions in RFI: *Number of domestic operators in 2015, 2020, 2025 (or the latest available year); Number of non-USP cross-border operators in 2015, 2020, 2025 (or the latest available year).* Note, we add the USP in the reported number of cross-border operators.
Source: RFI to PostEurop members.

Although entry does not always lead to sustained presence, a number of entrants have remained in the market, indicating a degree of contestability in the parcel delivery market. Case evidence shows that alternative operators can scale rapidly and compete effectively with incumbents:[49]

- Instabee's sub-companies have been active since 2015 and have gained up to a 15 per cent share of the domestic parcel delivery market in Sweden by 2024.[50] Further, the company has also expanded its operations to Finland, Denmark, the Netherlands, Norway, and Belgium.[51]
- InPost entered the Polish parcel delivery market in 2006 and rapidly built a network of parcel lockers, accounting for around 35 to 40 per cent of the Polish CEP market.[52]
- Amazon Logistics entered Germany in 2015 and Belgium in 2021 and has gained market shares of 15 to 25 and 5 to 10 per cent, respectively.[53]

49 Other examples include Helthjem, Packeta Slovakia or Ontime, based on RFI to PostEurop members.
50 PTS (2025) *The Swedish Parcel Market*, Link.
51 See Instabee (2026) *About us*, Link.
52 See InPost (2019) *InPost success story*, Link and based on RFI to PostEurop members.
53 See Bundedsnetzagentur (2025) *Parcels Market Report*, Link and based on RFI to PostEurop members.

3.3 Active non-price competition driven by quality enhancement and innovation

We find that parcel operators compete not only on price, but also on service quality and innovation in response to evolving customer demands. As e-commerce expands, online shoppers have become increasingly demanding with respect to parcel delivery solutions.[54] Apart from price, delivery attributes such as predictability, reliability, convenience, and speed play an increasingly important role in purchase decisions.[55] E-merchants, therefore, tend to seek access to delivery operators whose services align closely with these preferences, motivating competition on quality and innovation.

Our survey evidence is consistent with these drivers of quality and innovation. In responses to our questionnaire to PostEurop members, 71 per cent of operators cited changing consumer preferences as a key driver of service improvements, 62 per cent pointed to e-merchant requirements, and 43 per cent highlighted overall competitive pressure to maintain high service levels.[56]

Consistent with these stated drivers, we observe a wide range of initiatives through which parcel delivery operators upgrade and differentiate their service offerings in practice.

First, many parcel delivery operators are improving the quality of their services constantly to meet online shoppers', and thus e-merchants', demand for predictability, reliability, convenience, and speed. In the absence of harmonised empirical measures of operators' *efforts to improve quality*, we present examples which should be interpreted as examples rather than an exhaustive list, see Table 3. We discuss the resulting *levels of quality* in terms of online shopper satisfaction in the performance chapter, see chapter 4.

Second, parcel delivery operators are innovating and investing in their infrastructure and service offerings. According to operators, key motivations for these decisions include (i) upgrading infrastructure to accommodate rising parcel volumes, and (ii) maintaining an attractive and competitive offering for online shoppers and e-merchants.[57] Alternative motivations may include cost efficiency, risk management, and longer-term strategic positioning. In practice, investment decisions are typically commercially driven and may therefore concentrate on the most attractive segments, such as urban areas. Given that the EU postal regulation aims to ensure territorial cohesion, this raises the potential risk of an investment gap. However, based on the market outcomes observed for the EU online shoppers, as discussed in chapter 4, we do not find evidence that this constitutes a widespread issue across the EU.

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54 See Copenhagen Economics (2016) *Principles of e-commerce delivery prices*, Link.

55 See, for example, DS Smith (2025) *Last-mile Delivery: the Future Unpacked*, p. 12, Link; Sendcloud (2021) *2021/2022 E-commerce Delivery Compass*, Link; Copenhagen Economics (2016) *Principles of e-commerce delivery prices*, Table 2, Link. The *IPC Cross-border E-commerce Shopper Survey 2025* found that cross-border online shoppers' main reason for choosing a specific parcel carrier was reliability, followed by speed, trust in the operator, good tracking, convenient locations, and good value for money. When asked what national postal operators would need to improve for online shoppers to use them more for cross-border e-commerce deliveries in the future, the main factors mentioned were speed, convenient locations, real-time tracking, convenient delivery times, convenient opening hours of PUDO points, and the option to change the delivery location.

56 RFI to PostEurop members. Includes answers from 21 countries.

57 Parcel carriers stated in workshops that one of their main challenges was "*to meet the prevailing market rates and service standards while at the same time to* ***invest in capacity and innovations to tackle the growing number of deliveries and more and more demanding quality requirements of e-retailers and online shoppers***." [emphasis added], see WIK (2019) D*evelopment of Cross-border E-Commerce through Parcel Delivery*, p. 193, Link.

Table 3
Examples of service quality improvements to meet online shopper delivery demands

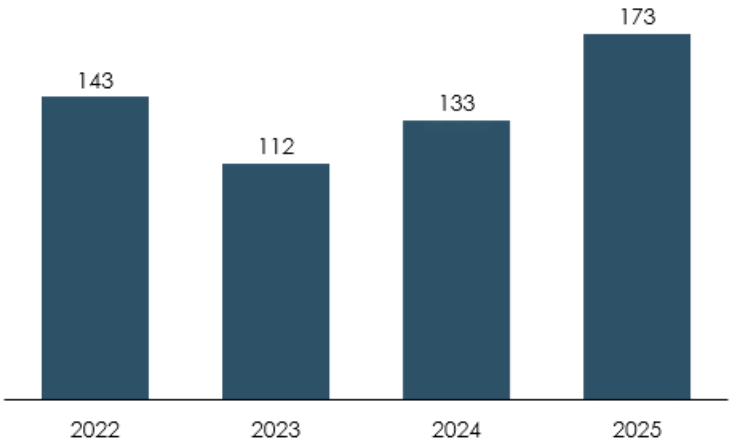
ONLINE SHOPPERS' DEMANDS	OPERATORS' RESPONSE	ILLUSTRATIVE EXAMPLES
Predictability	Operators have introduced services that allow online shoppers to receive narrow delivery windows and redirect parcels to alternative dates or addresses.	• Offering narrower and transparent delivery windows and the option to control timing and location[58] • Often facilitated by modernised consumer touchpoints such as apps[59]
Reliability	Operators have enhanced transparency and reduced delivery uncertainty through real-time tracking and monitoring tools.	• Improving track and trace features i.e. via own app including cross-border [60] • Improving complaint handling and faster compensation procedures[61]
Convenience	Operators have expanded delivery windows and service point networks.	• Longer opening hours[62] • Adding Sunday delivery[63] • Larger service point network, including expanding the network of out-of-home delivery options, such as PUDOs and parcel lockers[64] • Developing convenient products[65]
Speed	Operators have streamlined their operations and extended pick-up times for e-merchants, enabling next-day delivery even for orders placed later in the evening.	• Later parcel pick-up and cut-off times for e-merchants and selected senders[66]

Note: Question in RFI: *Example of improved quality in terms of predictability, reliability, convenience, speed or other. This can include, e.g., narrower and transparent delivery windows, enhanced track-and-trace features, larger delivery point networks, longer opening hours, or later parcel pick-up from merchants.*
Source: RFI to PostEurop members, see footnotes.

Regarding infrastructure upgrades, operators may invest to expand capacity, improve operational efficiency, and reduce unit costs. This includes modernising existing facilities and constructing new sorting and delivery centres.[67] Providers' investment activity is supported by responses from PostEurop members to our RFI, which show an upward pattern in average annual investment across the EU, see Figure 8. These figures should, however, be interpreted with caution, as the investments can cover both parcel and letter activities. Moreover, the average can be influenced by a few operators making particularly large investments or by lumpiness in investment cycles, as major projects do not occur every year.

58 FR, IE, HR, NL, and PL. Similarly, DHL offers the on-demand delivery tool, see Link.
59 ES, PT, SE, and SI.
60 DK, ES, FI, FR, IT, LT, MT, PT, SE, and SK. Similarly, GLS offers Parcel tracking, see Link.
61 IT.
62 FR, IE, and SK.
63 For example Austrian Post (Link) and Chronopost (Link).
64 BE, DE, ES, FR, HR, LT, PL, PT, SE, SI, and SK.
65 For example, bpost developed locker to locker products.
66 FR, IE, and PL.
67 For example, based on RFI to PostEurop members the following USPs indicated investments in their facilities, sorting and transport automation and capacities: AT, BE, DE, DK, EE, ES, FI, HR, IE, IT, LT, MT, NO, PL, PT, SE, SI and SK. Similarly, for example, DPD has invested in a new sorting centre, see DPD (2023) *DPD is building the Adriatic HUB – a new sorting center for Croatia and Slovenia*, Link.

Figure 8
Reported investments by the EU USPs show an upward trend
Average investment by a USP in million EUR



Note: Includes data from 13 countries in 2022 to 2024 and 10 countries in 2025. Question in RFI: *What has been the annual investment in: 2022, 2023, 2024, 2025*. The numbers are based on simple unweighted average across countries
Source: RFI to PostEurop members.

Regarding innovation and investment aimed at maintaining an attractive offer for online shoppers and e-merchants, we observe operators pursuing several strategies, including:[68]

- investing in new delivery methods and expanding delivery networks to enhance online shopper convenience and align with preferences;[69]
- upgrading IT infrastructure and developing mobile and web applications to improve tracking, transparency, and user experience;[70]
- designing tailored services for e-merchants, including solutions targeted at specific segments such as SMEs;[71]
- investing in artificial intelligence to optimise routing and operations, thereby improving efficiency and reducing costs.[72]

EU regulators monitoring the parcel delivery market recognise that competition takes place, in part, through quality improvements and innovation:

- ERGP: "*Parcel volumes are growing as consumers buy more and more online, generating more orders for parcel delivery. This has made an impact on the competition among postal operators, who may seek to improve their networks such as extending capacity to provide parcel delivery services, implementing and optimizing of tracking systems, introducing new delivery options,*

68 RFI to PostEurop members.
69 BE, DE, ES, FR, HR, LT, PL, PT, SE, SI, and SK. Further, e.g., bpost developed label free parcels. Multiple operators also invest in greener delivery, e.g. in DK, ES, IT, and SE.
70 DK, ES, FI, IE, NO, PL, SE, SI, and SK. Further, e.g., PostNord Sweden allows parcel recipients to verify their identity through their mobile ID in its app, removing the need to present physical identification at collection and enabling third parties to collect parcels more easily on their behalf, see FREJA (2021) *Freja as Physical ID at PostNord*, Link.
71 BG, IT, LT, MT, and SK. For example, Bulgarian Post developed an e-package service aimed at delivering e-commerce shipments, Slovakian Post and Lithuanian Post enable integrations with e-merchants and MaltaPost offers an eSeller online platform for B2B customers. Similarly, FedEx, UPS, DHL, and GLS have developed e-commerce fulfilment services for online shops and in particular for SMEs, see Copenhagen Economics (2022) *Main Developments Study 2017-2021*, p. 201, Link.
72 DE, NO, and SI. In Slovenia and Germany, AI is contributing to improved customer service and in Norway machine learning is used to estimate arrival times of parcels and parcel locker locations.

especially through parcel lockers and pick-up points, and investing in new infrastructure aimed at volumes derived from e-commerce."[73]

- AGCOM: "*The development of e-commerce has led to greater competition and the emergence of a receiver-oriented business model, as well as new ways of network management (e.g. joint parcel and letter delivery, flexible delivery), in particular, in the delivery phase (e.g. parcel lockers).*"[74]

Third, entry creates further innovation pressure, where operators are being inspired from each other. New entrants introduce innovative business models that meet consumer expectations, as explained above. We observe in various instances that existing parcel operators respond strategically, e.g. by (i) developing similar delivery models or services in-house, (ii) collaborating with entrants to access innovative capabilities or technologies, or (iii) acquiring entrants to internalise new capabilities rather than building them internally,[75] see Box 1. This dynamic response indicates that entry creates effective competitive pressure and stimulates innovation by existing operators. Overall, PostEurop members report that entry is a significant driver of innovation and service quality improvements.[76]

Box 1 Examples of existing operators' responses to innovations

- **Match the new offering by developing similar delivery models or services in-house**. For example, after entrant InPost developed the first parcel locker network in Poland, various other operators, including the USP Poczta Polska, followed by investing in their own parcel locker network.[77]
- **Collaborate with entrants to access innovative capabilities or technologies**. For example, both Slovak Post and DPD CZ are collaborating with parcel locker operator AlzaBoxes.[78] Similarly, rather than building its own parcel locker network, UPS has partnered with open locker networks such as Quadient[79] and FedEx is entering into commercialisation agreements with InPost to access its locker network.[80]
- **Acquire entrants to gain new capabilities** rather than develop it in-house, since developing capabilities internally can take time and may delay the competitive response. For example, La Poste/GeoPost acquired Stuart, a platform-based last-mile delivery operator,[81] and Austrian Post acquired a 70% stake in euShipments.com, a Bulgarian e-commerce logistics scale-up offering integrated cross-border fulfilment and delivery services.[82]

73 ERGP (2019), *Report on the development of postal networks*, Link.
74 AGCOM (2019) *In Consultazione Pubblica Il Documento Sull'analisi Del Mercato Dei Servizi Di Consegna Dei Pacchi*.
75 Typically, this represents vertical integration and capability upgrading rather than horizontal consolidation in the parcel delivery market. It does not qualify as a killer acquisition, as the acquirer is not dominant in parcel delivery and the innovation remains on the market post-acquisition.
76 Based on RFI to PostEurop members.
77 See InPost (2019) *InPost success story*, Link; Parcel and postal technology international (2020) *Poczta Polska embraces PUDOs to win in the last mile*, Link.
78 See IPC (2025) *Slovak Post expands its network of self-service devices with AlzaBoxes*, Link; GeoPost (2022), *DPD CZ expands its network of lockers by 1000 AlzaBoxes*, Link.
79 See, for example, Quadient (2023) *Quadient's Open Parcel Locker Network Selected as Partner for UPS Access Point Expansion in the UK*, Link; Trans.info (2023) *300 Quadient lockers added to UPS France's pickup point network*, Link.
80 Reuters (2026) *FedEx, Advent-led consortium to buy parcel locker firm InPost in $9.2 billion deal*, Link.
81 See Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Box 15, Link.
82 euShipments.com (2025) *Austrian Post acquires a majority stake in euShipments.com*, Link.

3.4 *Ex post* competition regulation intervenes where needed and appears adequate to address concerns

Past and ongoing competition-law enforcement in the EU e-commerce parcel delivery market does not indicate a sector-wide market failure due to a lack of competition or of shortcomings in the current competition-law framework. Rather, the types of competition concerns identified by competition authorities can be, and are, adequately addressed through targeted interventions using the existing competition law enforcement tools.

First, national competition authorities and the EC actively use their *ex post* enforcement powers where needed, although this occurs in relatively few cases. In recent years, we are aware of a limited number of competition cases regarding the parcel and e-commerce market. Based on the input from PostEurop members, we find that there have been 19 domestic cases and 15 EU competition cases from 2020-2025 related to the parcel or bulk parcel delivery market, excluding state aid cases. The existing cases show that firms can, in specific instances, restrict rivalry through pricing and trade conditions or coordination rather than competing on the merits. Examples of such behavior, based on our research and input from PostEurop members, includes anti-competitive rebates[83] and cartels.[84] Competition authorities already have the powers and analytical tools to intervene, and existing competition cases show that they use these tools in practice.

In addition, national and EU merger control further protects the competitive process by preventing concentrations that would significantly impede effective competition in e-commerce parcel delivery markets. This tool has been actively applied in a number of cases in recent years.[85]

We note that there have been a few cases related to competition concerns on the platform side of the e-commerce markets. However, these competition concerns are related to vertical competition issues resulting from vertical integrated e-commerce platforms who have their own delivery network.[86] These cases are, therefore, not directly linked to horizontal competition concerns in the delivery market.

Second, the observed enforcement patterns suggest that competition concerns are targeted and case-specific rather than systemic. Investigations focus on individual firms, as in many other sectors, and address discrete instances of alleged abuse or coordination rather than market-wide features. A limited number of cases is therefore consistent with effective underlying competition, with enforcement addressing outlier behaviour rather than signalling pervasive failure. The tools available to competition authorities, i.e. targeted interventions, are suitable to address case-specific competition concerns and, where appropriate, impose remedies. To our knowledge, no EU country has launched a sector-wide competition investigation into e-commerce parcel delivery markets based on concerns about the overall competitive process.

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83 For example, French Competition Authority (2020) *Décision 20-D-06 du 02 avril 2020 relative à des pratiques mises en œuvre dans le secteur de la livraison de colis*, Link.

84 For example, Concurrences (2018) *The Spanish Competition Authority fines 10 parcel delivery service providedrs for customer allocation cartel*, Link; French Competition Authority (2015) *Décision 15-D-19 du 15 décembre 2015 relative à des pratiques mises en œuvre dans les secteurs de la messagerie et de la messagerie express*, Link.

85 Recent examples include a joint venture of Deutsche Post and CTT assessed by the EC (2026, case M.11942, Link); national acquisition of Cargus by Sameday (2026, Link); joint control of DHL and Evri assessed by the EC (2025, M.12026, Link); acquisition of Staci by bpost (2024, M.11558, Link); joint venture of Deutsche Post and Poste Italiane assessed by the EC (2023, case M.11334, Link); Swedish national merger of Budbee and Instabox (2022, Dnr 627/2022, Link); Italian national acquisition (2020, C-12333, Link).

86 Examples includes i) Italian Competition Authority (AGCM) case A528 – "FBA Amazon", decision no. 29925 of 30 November 2021, Link and ii) Poland's competition authority UOKiK s investigating whether Allegro favours its own logistics services (including deliveries) over competing providers, Link

4 MARKET PERFORMANCE

This chapter sets out our assessment of market **performance** in the EU e-commerce parcel delivery. It examines how the combination of structural conditions and firms' conduct translates into outcomes that matter for online shoppers. Within the SCP framework, performance provides the ultimate benchmark for judging whether competition is effective, with particular attention to the profitability, availability, affordability, and quality of e-commerce delivery services.

In a competitive market, performance would match consumers' effective demand and firms' supply. We would expect consumers' willingness to pay and ability to buy to match firms' willingness and ability to supply. [87] Hence, high consumer satisfaction would result from strong market performance along channels of delivery options, prices, and quality. In delivery markets, however, such performance may vary geographically, so that outcomes in rural areas can differ systematically from those in urban areas even within the same Member State.

Moreover, in a competitive market, we would expect modest margins, as competitive pressures constrain firms' ability to price above costs, driving profits towards normal returns over time. As already demonstrated in Chapter 3.1, we find that EBIT margins for the parcel segment across different parcel operators are within the same rate as what is considered a reasonable margin by the regulator in Germany. We, therefore, conclude that operators' margins are consistent with a competitive market.

In this chapter, we assess service-level performance indicators for both domestic and cross-border parcel deliveries. From the perspective of online shoppers, however, this distinction may not always be salient, as cross-border e-commerce is often integrated seamlessly into online platforms. Even though the evidence is somewhat dated, earlier survey results suggesting that many consumers (40 per cent) do not realise when they are buying from a foreign seller supporting the view that cross-border delivery is frequently perceived as part of a unified e-commerce experience rather than a distinct service.[88]

The chapter is structured as follows. First, we assess delivery options in urban and rural areas, concluding that online shoppers benefit from a wide range of accessible and comparable delivery services across geographies. Second, we analyse delivery prices in urban and rural areas and find that prices are generally low, affordable, and largely uniform between regions. Third, we evaluate the quality of e-commerce parcel delivery in urban and rural areas, showing high service quality and strong online shopper satisfaction across key dimensions.

4.1 There are multiple delivery options in urban and rural areas

Online shoppers across the EU have access to a wide range of delivery options in both urban and rural areas, indicating strong availability of parcel delivery services. As discussed in chapter 2, the EU e-commerce parcel delivery markets are characterised by the presence of multiple operators, which supports the availability of different delivery services. To assess availability, we examine the range of delivery modes and the accessibility of delivery locations. Across these dimensions, the evidence points to broadly comparable service levels across geographies.

First, online shoppers can choose among a range of delivery service options, including delivery location and delivery speed, indicating a high degree of service variety. The availability of multiple delivery options allows consumers to select services based on price, speed, and convenience, which is a key dimension of market performance.

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87 Mankiw, N.G. (1998) *Principles of Microeconomics*, Link.
88 European Commission (2015) *Obstacles to the Digital Single Market*, Link.

In terms of place of delivery, online shoppers can choose between home delivery, parcel lockers, and pick-up and drop-off (PUDO) services across all 21 analysed countries included in the mystery shopping exercise, see Table 4.

Table 4
EU online shoppers can choose home delivery, parcel locker, and PUDO services

	IT	PL	NL	ES	DK	RO	HU	SE	FI	NO	SK	BE	GR	BG	EE	LT	SI	LV	HR	IS	SK
Home delivery	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Parcel locker	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
PUDO	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x

Note: Many markets offer cash on delivery, which is available in 13 out of the 21 countries analysed.
Source: Mystery shopping exercise by Tembi in 2026.

In terms of delivery speed, online shoppers can choose between alternative delivery speeds beyond standard delivery. Based on answers provided by PostEurop members, evening delivery is available in 16 out of 20 markets, while express delivery is offered in 18 out of 20, see Table 5. This indicates that differentiated delivery speeds are available in the majority of analysed markets.

Table 5
USPs offer evening and express delivery

	AT	BE	BG	HR	DK[1]	EE	FI	FR	DE	IT	IE	LT	MT	NL	NO	PL	PT	SK	SL	ES	SE
Evening delivery	x	x				x	x	x		x	x	x	x	x	x	x[2]	x		x	x	x
Express delivery	x	x	x	x		x[3]	x	x	x	x	x	x	x	x	x	x	x	x	x[4]	x	x

Note: 1) In Denmark, the answer is from PordNord Denmark, the previously designated universal service provider. 2) Applies only to courier services. 3) In capital cities. 4) In Ljubljana. Question in RFI to indicate Yes/ No: *Parcel delivery options offered: Evening delivery, Express delivery.*
Source: RFI to PostEurop members.

Moreover, we find that the different delivery options are also to some extent provided in rural areas. Data from 2020 covering eight EU countries shows that rural consumers also had access to both home and OOH delivery. However, the options for evening and express delivery is less common in rural areas, see Figure 9.

Figure 9
Delivery options available to e-commerce shoppers in rural areas

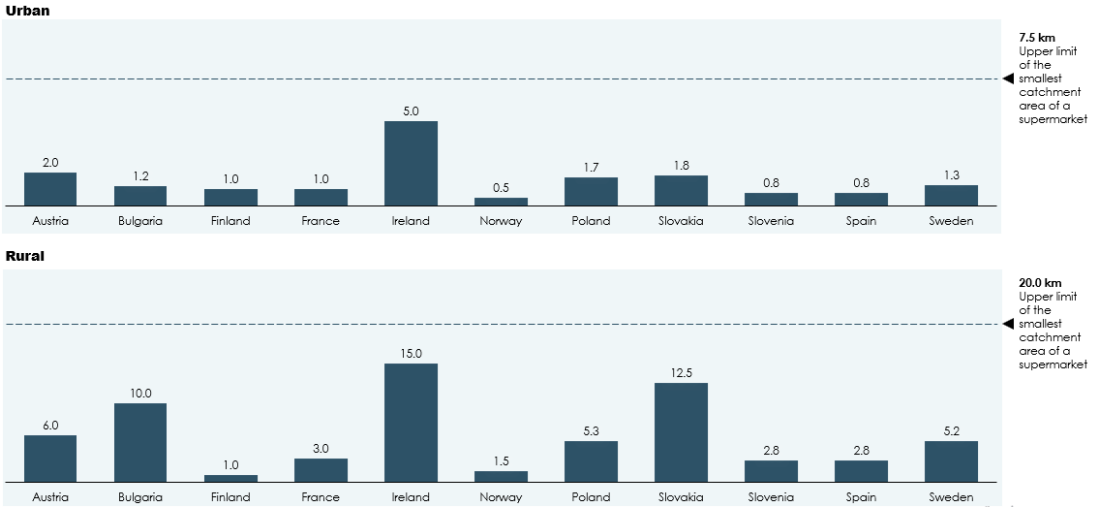
	BE	BG	DE	GR	FR	PL	PT	SE	NO	FI
Home delivery	x	x	x	x	x	x	x	x	x	x
Out-of-home delivery	x	x	x		x	x	x	x	x	x
Evening delivery						x			x	
Express delivery	x				x			x	x	x

Note: These delivery options are also available in urban areas in each country.
Source: Copenhagen Economics (2024) *E-Commerce Parcel Delivery, the Unwanted Guest at the USO Table? An Empirical Study Covering Ten Markets in Europe*, Link.

Second, OOH delivery options are accessible across both urban and rural areas, indicating no systematic geographic access gap. Data provided by PostEurop members for 2025 show that the distance to USPs' pick-up points falls within typical supermarket catchment areas in both urban and rural areas. In urban areas, travel distance to USPs' pick-up points ranges from 0.5 km in Norway to 5.0 km in Ireland, which is below typical supermarket catchment areas of around 7.5 km. In rural areas, distances are longer but remain within the range of supermarket catchment areas, see Figure 10.

These distances represent an upper bound, as they reflect only the networks of universal service providers. As discussed in chapter 2, non-USP operators also operate parcel locker and PUDO networks, often extending overall coverage. Consistent with this, cross-border survey data show that 31 per cent of online shoppers travel less than 300 metres to collect their parcels.[89] For comparison, the average distance to the nearest supermarket in the Netherlands was 0.9 km in 2025.[90]

Figure 10
Online shoppers in rural and urban areas have access to pick-up points
Km to USP's nearest pick-up points



Note: Question in RFI: *Excluding home delivery, what is the average travel distance of your end-customers to pick-up and return locations in urban areas, in rural areas.* The pick-up points can include all types of OOH delivery options, including parcel lockers, PUDOs, post offices.

Distance is rounded. Bulk parcel is part of the USO in Portugal. Sweden removed parcel delivery from the obligation in 2025, with exemptions for vulnerable groups.[91] Croatia, Estonia, Germany, Lithuania, and the Netherlands did not provide the average but the maximum distance. Among these countries, the maximum distance in urban and rural areas reported is up to 5km, which is lower than the limit of the urban and rural supermarket catchment areas. A catchment area refers to the geographic area from which a store attracts most of its customers and is widely used in supermarket merger assessments.[92] This provides a relevant benchmark, as consumers regularly travel to supermarkets, and parcel points are often located nearby, particularly in rural areas. Evidence from EU supermarket merger cases shows that the smallest catchment areas are typically 5 to 7.5 km in urban areas and 10 to 20 km in rural areas.[93] While 7.5 km may appear relatively long in an urban context, the data do not indicate any country where e-commerce shoppers must travel beyond these benchmarks to collect or return parcels.

Source: RFI to PostEurop members.

4.2 Delivery prices vary across options and markets

From an economic perspective, the most relevant prices for assessing competition in parcel delivery are the prices that e-merchants actually pay to delivery operators. These are typically not observable, as they are set through bilateral negotiations, differ across merchants depending on volumes and service characteristics, and are generally treated as commercially confidential.

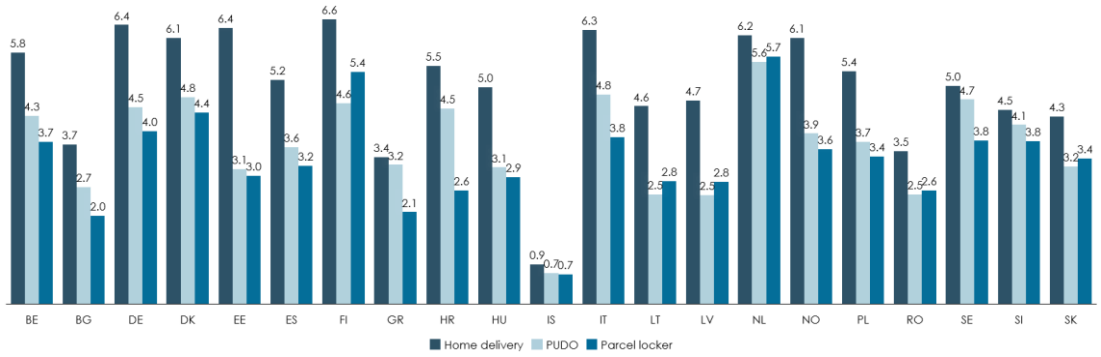
89 IPC (2026) *Cross-border e-commerce shopper survey 2025.*
90 Statline (2026) *Proximity to facilities; distances by car, regional*, Link.
91 Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Link, PTS (2025) *Swedish Postal Market 2025*, Link.
92 See Oxera (2020) *Catchment if you can: a practical guide to local competition analysis*, Link.
93 See FCCA (2015) *KKV/1575/14.00.10/2015* Link, Germany (2015) *b2-96/14*, Link, UK (2014) *ME/6466-14*, Link, Norway (2015) *2014/0373-417*, Link, Poland (2018) *DKK1-421.23.2018.JBG*, Link.

Consumer-facing delivery prices at checkout cannot, therefore, be used to draw direct conclusions about the competitiveness of the delivery market. While delivery costs may be partially passed through to consumers, the extent of pass-through is uncertain and depends on factors such as the intensity of retail competition, merchants' pricing strategies, and the use of cross-subsidisation (for example, free shipping thresholds or bundling delivery into product prices). E-merchants may choose to absorb delivery costs to remain competitive or, conversely, apply mark-ups as part of their overall pricing strategy. As a result, consumer delivery prices may diverge significantly from the underlying prices paid to operators and do not provide a reliable one-to-one indicator of operator tariffs or market competitiveness.

However, consumer prices remain useful for assessing delivery outcomes from the end-user perspective. They provide a direct measure of the affordability of delivery services for online shoppers, which is a key concern for policymakers. In the following, we therefore focus on the prices consumers pay for delivery at checkout.

First, domestic delivery prices for consumers at checkout vary by delivery method. Home delivery is typically more expensive than delivery to PUDO points and parcel lockers. On average, home delivery prices are set, including cases of free delivery, at around 5 EUR, compared to 3.7 EUR for PUDO and 3.3 EUR for parcel lockers, although there are notable differences across countries, see Figure 11.

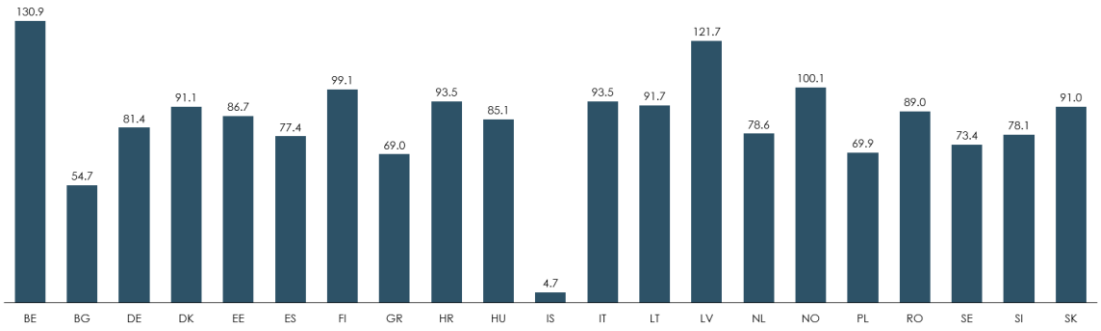
Figure 11
Domestic parcel delivery prices at checkout depend on the mode of delivery
EUR



Note: Including cases of free delivery.
Source: Mystery shopping exercise by Tembi in 2026.

Second, delivery pricing is often structured around free delivery offers and minimum basket thresholds. Across countries, e-merchants commonly offer free delivery once a minimum basket value is met. For domestic delivery, on average, 24 per cent of e-merchants across the analysed countries offer at least one free delivery option, see Figure 12. The average threshold varies across countries, with Belgium having the highest at 130 EUR and Iceland the lowest at 4.7 EUR.

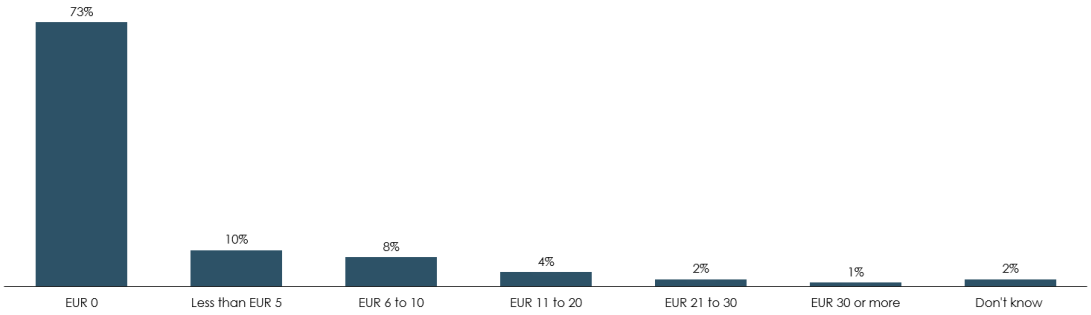
Figure 12
Average free delivery threshold for consumers on e-merchants' websites
EUR



Source: Mystery shopping exercise by Tembi in 2026.

Free-delivery is especially frequent for cross-border deliveries, where 73% of online consumers benefited from free delivery. This reflects retailers offering free shipping, promotion, free delivery due to high volumes, or free delivery due to loyalty programmes. This pricing structure implies that delivery costs are often bundled with the product value rather than charged as a standalone fee. As a result, a significant share of online shoppers faces no explicit delivery prices at checkout, particularly for cross-border purchases. For consumers that paid for delivery, 10 per cent paid less than 5 EUR, and 8 per cent paid between 6-10 EUR, see Figure 13. As result, an online consumer paid on average 2.4 EUR per cross-border delivery.[94]

Figure 13
Reported delivery price paid by shoppers for cross-border deliveries
Per cent



Note: The 73 per cent share of zero delivery price reflects consumers benefiting from retailer offers, promotions, free delivery thresholds, or loyalty programmes.
Source: IPC (2026) *Cross-border e-commerce shopper survey 2025*

Third, delivery prices represent a small share of consumer expenditure, which indicates affordability. We find that two out of three online shoppers spend less than 5 EUR per month on delivery[95], i.e. shoppers who shop online once every two weeks or less, see Figure 14. For frequent shoppers (multiple times per week), their monthly expenditure is around 19 EUR, which corresponds to less than 0.9 per cent

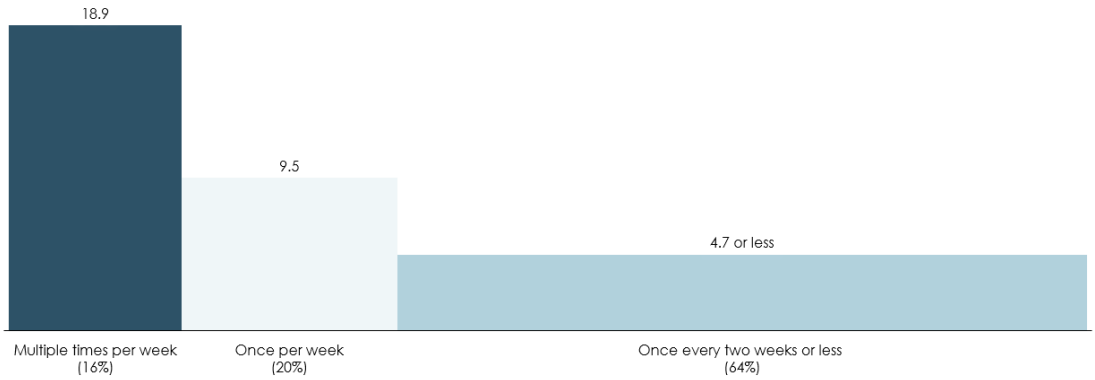
94 To estimate the average delivery price, we use the mid-point in the intervals for the price of delivery, e.g. we assume a price of 8 EUR for consumers that indicated a delivery price of 6 to 10 EUR.
95 The expenditure is based on the number of deliveries per month times the average delivery price. We apply the weighted average delivery price for cross-border deliveries as it represents actual transactions. The frequency of online shopping is based on IPC (2026) *Cross-border e-commerce shopper survey 2025,* which captures all online shopping ecommerce transactions, including both domestic and cross-border deliveries.

of annual expenditure. This is significantly lower than other cost groups, such as transport that accounts for 10 per cent of total annual expenditure, while non-durable goods account for 24 per cent.[96] Moreover, the expenditure on e-commerce deliveries is comparable to postal services in the UK in 2016/17, which was deemed to be affordable by Ofcom.[97]

Further, the affordability of e-commerce deliveries can also be assessed in relation to the value of online purchases. On average, delivery prices correspond to roughly 5–9 per cent of the value of the products ordered. This follows from an average cross-border delivery price of 2.4 EUR and the most common order-value range of 25–49 EUR, which accounts for 28 per cent of cross-border orders.[98]

Finally, consumers are satisfied with delivery prices. Overall, 87 per cent of cross-border online shoppers report being (very) satisfied with delivery prices, while only 4 per cent report dissatisfaction.[99]

Figure 14
Monthly expenditure on delivery by purchasing frequency
EUR

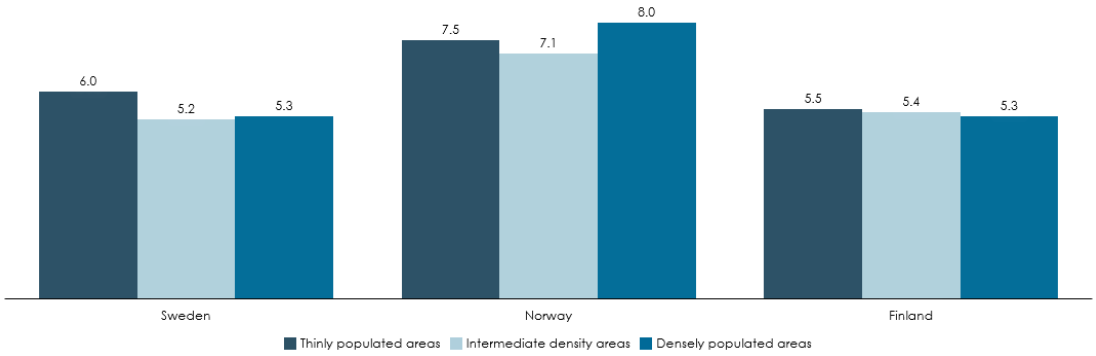


Note: Based on the weighted average delivery price of 2.4 EUR estimated using IPC (2026*) Cross-border e-commerce shopper survey 2025*. Consumers who order online once every two weeks spend 4.7 EUR per month on delivery. Those who order less frequently spend less.
Source: IPC (2026) *Cross-border e-commerce shopper survey 2025*. Expenditure data: DBnomics, Link

Lastly, delivery prices are broadly similar across urban and rural areas. A mystery shopping experiment in Sweden, Norway, and Finland shows that delivery prices are largely identical across geographies, with the maximum observed difference below 0.90 EUR and below 5 per cent in all cases, see Figure 15. From a competition perspective, this outcome is important. Uniform pricing suggests that delivery operators do not charge higher prices on rural online shoppers, who may have fewer alternatives. If such higher prices were present, e-merchants could pass these higher costs on to online shoppers in rural areas. While this evidence is based on a limited set of Nordic countries, and pricing patterns may differ in other markets, it suggests that geographic price differences are limited in the analysed cases.

96 Nominal expenditure per inhabitant in the Euro area amounts to 28,546 EUR per year for actual individual consumption. Nominal expenditure per inhabitant for transport amounts to 2,857 EUR and non-durable goods to 6,947 EUR in 2024, see DBnomics, Link.
97 Ofcom (2019) Review of the Second Class Safeguard Caps 2019, pp. 51-52, Link.
98 IPC (2026) *Cross-border e-commerce shopper survey 2025.*
99 IPC (2026) *Cross-border e-commerce shopper survey 2025.*

Figure 15
Average delivery prices in rural, intermediate, and urban areas are similar within Sweden, Norway, and Finland
EUR



Note: The delivery price refers to the delivery price stated by the e-merchant as part of the total item price presented to the online shopper. Thinly populated area: More than 50 per cent of the population living in rural grid cells. Intermediate density areas: Less than 50 per cent of the population living in rural grid cells; and less than 50 per cent live in a high-density cluster. Densely populated areas: At least 50 per cent living in high-density clusters.
Source: Copenhagen Economics (2024) *E-Commerce Parcel Delivery, the Unwanted Guest at the USO Table? An Empirical Study Covering Ten Markets in Europe*, Link.

4.3 Parcel delivery service quality is similar across urban and rural areas

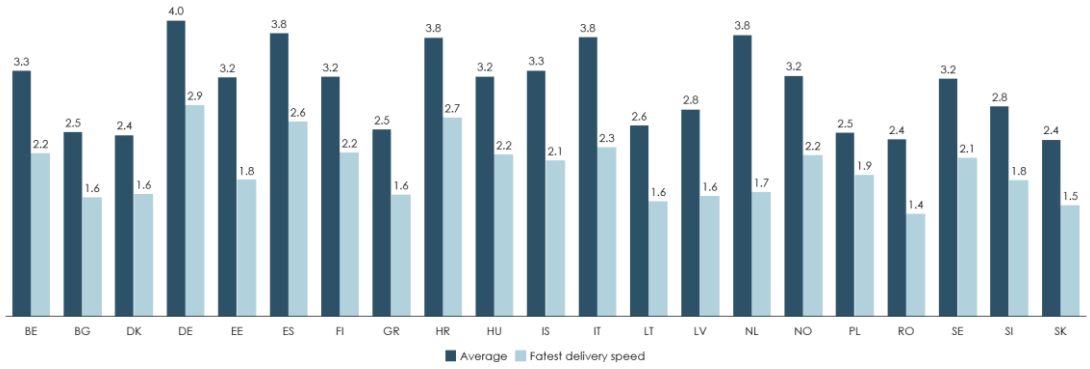
We find that parcel delivery services across the EU are characterised by short delivery times, high consumer satisfaction, and limited differences between urban and rural areas. This pattern is consistent with the competitive dynamics described in chapter 2, where multiple operators compete on service quality and differentiation. To assess quality from the consumer perspective, we examine both operational performance and user experience. Across key indicators, including delivery speed, reliability, and customer satisfaction, the evidence indicates consistently strong performance and no systematic differences between urban and rural areas.

First, the delivery speeds that e-merchants promise to online shoppers are broadly consistent across countries. We assess operational quality based on average and fastest delivery speeds observed at checkout, which reflect the delivery times that e-merchants present to consumers rather than the end-to-end transit time from handover to the operator. When shopping online, e-merchants typically present consumers with delivery intervals (for example, 2–4 days). In the following, we assess both the average delivery speed, which reflect the midpoint of these intervals, and the fastest delivery speed, which reflects the minimum delivery time offered.

Across the analysed countries, average promised delivery times for domestic e-commerce parcel delivery range from around 2.4 to 4.0 days based on the mystery shopping exercise. Fastest delivery options are available within shorter timeframes, typically between approximately 1.4 and 2.9 days, see Figure 16. While delivery times vary across countries, most observations cluster around three days for average delivery and around two days for the fastest available option. In comparison, the promised delivery speed is within the range of USO targets for non-priority letters and single-piece parcels. Across EU countries, USO single-piece parcel targets typically require delivery within D+1 to D+4, while non-priority letters typically range from D+2 to D+5. [100]

[100] Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Link.

Figure 16
Average and fastest promised delivery speeds by e-merchants for domestic delivery
Days

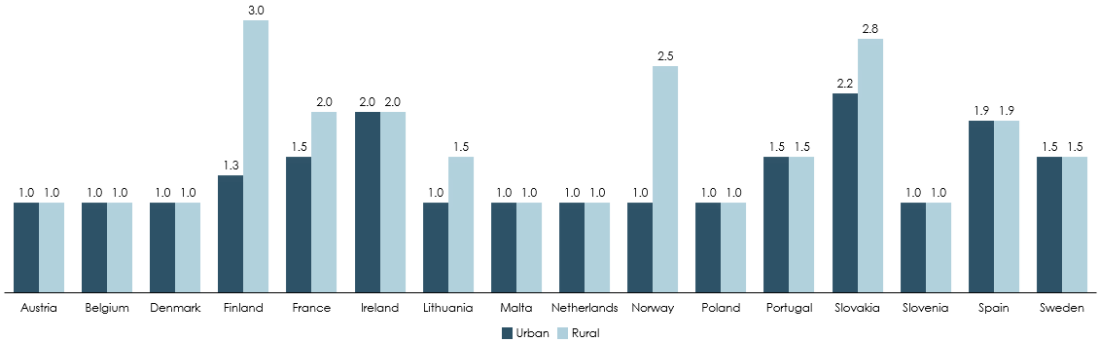


Note: The figure shows the promised delivery speed e-merchant present online consumers with at the check-out stage. This delivery speed differs from the actual delivery speed of operators, which is only measured from the time when the parcel is handed over from the e-merchant to the operator. Average delivery represents the midpoint of intervals, while the fastest delivery speed is the minimum delivery speeds displayed in the web shop. Data reflects average across websites within each country.
Source: Mystery shopping exercise by Tembi in 2026.

The actual delivery speed achieved by operators is faster than the delivery times presented to consumers at checkout. Survey data from PostEurop members indicate that the average actual delivery speed is typically around one day. This suggests that operators' real-world performance exceeds the delivery promises that e-merchants display to online shoppers.

Moreover, we find that the actual delivery speed tends to be similar across urban and rural areas. In 10 out of 16 countries, delivery speed is the same in urban and rural areas. In the remaining countries, differences are generally limited to less than one weekday, with larger differences observed only in Finland and Norway, where longer transport distances can affect delivery times, see Figure 17. In addition, some countries with identical delivery speeds between urban and rural areas do not include B2C parcel delivery in the USO. Taken together, this suggests that delivery speed levels in rural areas for bulk parcels are primarily driven by market dynamics rather than regulatory requirements.

Figure 17
USP standard delivery speed for bulk parcels in rural and urban areas
Days



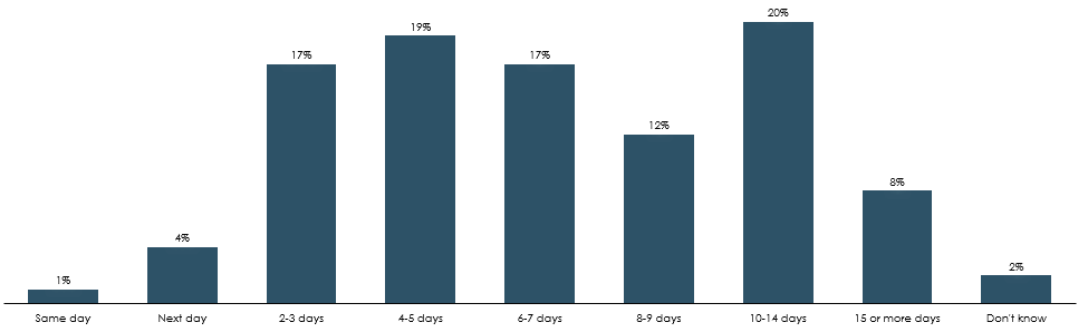
Note: Question in RFI: *For comparable bulk parcel products (e.g. when choosing standard delivery), what is the average delivery time in urban areas, in rural areas.*

Bulk parcel is part of the USO in Malta and Portugal. Sweden removed parcel delivery from the USP's obligation in 2025, with exemptions for vulnerable groups, see Copenhagen Economics (2022) *Main Developments Study 2017-2021*, Link; PTS (2025) *Swedish Postal Market 2025*, Link. Finland: average delivery speed in urban areas is 1 day for PUDO and parcel locker delivery and 1-2 days for home delivery. France: average delivery speed is 1-2 days in urban areas and 1-3 days in rural areas. Norway: average delivery speed in rural areas is 2-5 days for remaining households, with very limited population in the higher end of the bracket.

Source: RFI to PostEurop members.

For cross-border online shoppers, delivery times are generally longer than for domestic deliveries. Based on survey data,[101] more than half of cross-border orders are delivered within 2–7 days, with 17 per cent delivered in 2–3 days, 19 per cent in 4–5 days, and 17 per cent in 6–7 days, see Figure 18. A smaller share of deliveries takes longer, with 12 per cent delivered in 8–9 days and 20 per cent in 10–14 days. We note that more than 65 per cent of these cross-border deliveries originates from China and the USA, which can explain the longer delivery times for cross-border item.[102] Thus, the actual cross-border delivery times for items within the EU can be significantly lower.

Figure 18
Cross-border delivery speed from across the world to EU countries
Share



Source: IPC (2026) *Cross-border e-commerce shopper survey 2025*.

101 IPC (2026) *Cross-border e-commerce shopper survey 2025*.
102 51 per cent of the purchased cross-border items in the past 12 months was from China and 15 per cent from the USA, IPC (2026) *Cross-border e-commerce shopper survey 2025, p. 7*.

Second, user experience indicators show high satisfaction and limited issues across key service dimensions. We assess user experience based on complaint rates, customer satisfaction, and post-purchase services such as tracking, returns, and compensation.

In terms of complaints and satisfaction, the complaints have generally declined over time, while satisfaction has increased. Among USPs, 47 per cent report a decrease and 37 per cent a stable number of complaints since 2020.[103] Over the same period, 47 per cent report increased customer satisfaction and 47 per cent stable satisfaction levels, see Table 6. Consistent with this, only 9 per cent of cross-border online shoppers report experiencing an issue with delivery.[104] Over the same period, the parcel volumes have increased. This demonstrates that the increase in volumes has not deteriorated the service quality.

Table 6
Customer satisfaction and complaints development since 2020

OUTCOME	INCREASED SUBSTANTIALLY	INCREASED SLIGHTLY	REMAINED STABLE	DECREASED SLIGHTLY	DECREASED SUBSTANTIALLY
Number of complaints	0%	16%	37%	26%	21%
Customer satisfaction	26%	21%	47%	5%	0%

Note: Number of complaints and customer satisfaction are based on 19 RFI answers. Questions in RFI: *Has the number of complaints per 10,0000 deliveries changed since 2020?; How has overall customer satisfaction evolved since 2020?*
Source: RFI to PostEurop members.

Complaint handling and compensation mechanisms are widely available and associated with high satisfaction. Among cross-border online shoppers who reported an issue, 65 per cent are satisfied or very satisfied with complaint handling.[105]

In terms of post-purchase services, satisfaction is high, particularly for parcel tracking and returns. Overall, 82 per cent of cross-border online shoppers use parcel tracking, and among these users, 90 per cent report being at least satisfied. Satisfaction with returns is also high, with 74 per cent of users reporting that they are satisfied or very satisfied. [106]

[103] Due to data availability, we use USPs as proxy for consumer satisfaction. However, there are multiple players offering parcel delivery in the EU parcel market and consumer satisfaction might vary across parcel delivery operators, see for example Management Site (2026) *De pakketmarkt is kapot*, Link or Parcel and post international (2025) *Last-mile delivery costs rise for 84% of businesses in UK and Europe, DS Smith reports*, Link.
[104] IPC (2026) *Cross-border e-commerce shopper survey 2025.*
[105] IPC (2026) *Cross-border e-commerce shopper survey 2025.*
[106] IPC (2026) *Cross-border e-commerce shopper survey 2025.*

5 IMPLICATIONS FOR EU POSTAL REGULATION

In this study, we assess the competitiveness of the EU e-commerce parcel delivery market. **Our analysis indicates that the market is competitive and finds no systematic evidence of competition-related market failures**. E-merchants can choose among multiple delivery operators and options when serving online shoppers (structure). At the same time, we find indications that delivery operators compete on price, quality, and innovation (conduct), while online shoppers across the EU benefit from broad service availability and affordable delivery options (performance). Our overall assessment of competitiveness is broadly consistent with earlier evaluations by the EC and national regulators, see chapter 1.1.

Taken together, the evidence points to effective competition in the e-commerce parcel delivery market. On this basis, **there does not appear to be a case for introducing sector-specific *ex ante* regulation of e-commerce parcel delivery**. Should the EC nevertheless wish to maintain or develop sector-specific rules in this area, this would warrant a careful demonstration that such intervention is necessary to address a clearly defined market failure that cannot be adequately handled within the existing policy and competition law toolkit.

Where competition concerns arise, general competition law provides effective tools to investigate and remedy anti-competitive practices, including abuse of dominance or anti-competitive agreements. This is especially important in a growing market, where competition supports investment and innovation to the benefit of the consumers.

Extending the postal USO to e-commerce parcels appears unjustified, given that the market already provides these services effectively across the EU. We find that the market already provides a wide range of e-commerce parcel delivery services available to EU citizens at prices and quality generally perceived as satisfactory by online shoppers. Extending the postal USO framework to include e-commerce parcels to ensure their availability would therefore appear unjustified and would add limited benefits compared to what the market is already providing.[107] In contrast, introducing *ex ante* regulation through the inclusion of e-commerce parcels in the USO could create competitive distortions, i.e. lead to regulatory failure.

The risk of regulatory failure is especially high if the USO covers both e-commerce parcels and letters under a unified regulatory framework because the two markets exhibit very different dynamics. The parcel sector is characterised by diverse and evolving business models and continuous innovation. In contrast, the letter market is declining and subject to regulation designed to safeguard a universal service. Applying this mail-oriented framework to e-commerce parcels could blunt competitive pressures, weaken incentives to invest and innovate, and ultimately reduce competition in the parcel delivery sector.[108]

An alternative to introducing *ex ante* regulation is to allow the current framework to evolve without new sector-specific rules, thereby helping to keep regulation proportionate, effective, and responsive to market developments in the national markets. To remain credible, **this approach needs to be accompanied by sufficient regulatory flexibility**, so that Member States can monitor market developments and adjust their national frameworks to country-specific circumstances where warranted. Any future EU-level initiative, including a possible EU Delivery Act, should therefore prioritise clearly identified, EU-wide structural market failures, rather than prescribing detailed, one-size-fits-all rules for a sector that, on current evidence, appears broadly competitive.

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[107] Including parcel delivery services in the USO would also require assessing how delivery of goods relates to the EU's economic and social cohesion and whether it qualifies as an essential instrument of communication and trade, in line with how the PSD defines the role of postal services. This falls outside the scope of our study.

[108] Copenhagen Economics (2020) *Principles of EU postal regulation and implications for the future*, Link.

A APPENDIX: RFI QUESTIONNAIRE TO POSTEUROP MEMBERS

Copenhagen Economics has been engaged by PostEurop to conduct a study on the competitiveness of the delivery market for e-commerce in Europe.

This Request for Information (RFI) seeks input on key data from PostEurop's members to support the study and gather evidence on:

- **Market structure**, i.e. the characteristics of the market, including the number and size distribution of firms, product differentiation, and entry barriers.
- **Market conduct**, i.e. the behaviour of firms, including pricing strategies, contractual arrangements, investment decisions, and competitive interactions.
- **Market performance**, i.e. the outcomes observed in the market, including prices, quality of service, innovation, efficiency, and consumer welfare.

As we begin the project, we kindly request any available data you may have on the following topics.

Market Structure

Number of postal operators
Our most recent data from 2021 shows that EU Member States had, on average, 14 domestic parcel delivery operators in 2021. In cross-border delivery, the number of non-USP operators ranges from three operators to more than 15 operators.

We would like to request data for 2025 (or the latest available year), for:

1. Number of operators in your country
   1.1. Number of domestic operators in 2015, 2020, 2025
   2015
   [Please indicate number]
   2020
   [Please indicate number]
   2025
   [Please indicate number]
   1.2. Number of non-USP cross-border operators in 2015, 2020, 2025
   2015
   [Please indicate number]
   2020
   [Please indicate number]
   2025
   [Please indicate number]

Market shares
Our most recent data from 2021 shows that the USPs' market share in the CEP market was 38 per cent on average across EU Member States, with large variations across Member States. For USPs' market share in the letter market, the average is 85 per cent on average across EU Member States.

We would like to request data for 2025 (or the latest available year), for:

2. Market shares in the last-mile delivery market in your country
   2.1. What are the market shares of the Top 5 to Top 10 operators active in the last-mile parcel delivery? Note, do not specify the names of the operators.
   [Please indicate in Table 7]
   2.2. What is the market share of the remaining smaller players active in the last-mile parcel delivery market?
   [Please indicate share]

Table 7
Please indicate market shares for players active in domestic last-mile parcel delivery in your country (B2X, including both express and standard delivery services)

OPERATOR ORDERED BY MARKET SHARE	MARKET SHARE
1	[Please indicate market share]
2	[Please indicate market share]
3	[Please indicate market share]
4	[Please indicate market share]
5	[Please indicate market share]
6	[Please indicate market share]
7	[Please indicate market share]
8	[Please indicate market share]
9	[Please indicate market share]
10	[Please indicate market share]

Note: Do not specify the operators' names.

3. Market shares in domestic and cross-border parcel delivery in your country
   3.1. What are the market shares of the Top 5 to Top 10 operators active in domestic and cross-border parcel delivery? Note, do not specify the names of the operators.
   [Please indicate in Table 8]
   3.2. What are the market shares of the remaining smaller players active in the domestic and cross-border parcel delivery market?
   [Please indicate share]

Table 8
Please indicate market shares for players active in cross-border delivery in your country (B2X, including both express and standard delivery services)

OPERATOR ORDERED BY MARKET SHARE	MARKET SHARE
1	[Please indicate market share]
2	[Please indicate market share]
3	[Please indicate market share]
4	[Please indicate market share]
5	[Please indicate market share]
6	[Please indicate market share]
7	[Please indicate market share]
8	[Please indicate market share]
9	[Please indicate market share]
10	[Please indicate market share]

Note: Do not specify the operators' names. B2X refers to businesses sending to a receiver which is either a business or a consumer

Delivery options

Our most recent data from 2021 shows that EU Member States had, on average, 6.5 PUDOs per 10.000 inhabitants and 1.3 parcel lockers per 10,000 inhabitants across European Member States in 2021.

Further, we have no data on delivery speed differentiation between operators.

We would like to request data for 2025 (or the latest available year), for:

4. Number of PUDOs[109] and parcel lockers
   - 4.1. Average number of PUDOs operated by USPs, total or per 10,000 inhabitants
     [Please indicate number]
   - 4.2. Average number of PUDOs operated by non-USPs, total or per 10,000 inhabitants
     [Please indicate number]
   - 4.3. Average number of parcel lockers operated by USPs, total or per 10,000 inhabitants
     [Please indicate number]
   - 4.4. Average number of parcel lockers operated by non-USPs, total or per 10,000 inhabitants
     [Please indicate number]

[109] PUDOS refers to Pick-up/drop-off points with over-the-counter service, such as post offices and post-in-shops.

Market Conduct

Price-cost margins
Our most recent data from 2024 shows that European USPs have an average company-wide EBIT margin of around 4 per cent. For parcel price-cost margins, our latest available data from 2021 shows that the average USP EBIT markup over costs is 3.6 per cent for domestic parcel deliveries and 7.8 per cent for international parcel deliveries.

We would like to request information for the 2021-2025 period, for:

5. Price-cost margins
   [Please indicate in per cent; Data points 7.3, 7.4 and 7.5 will only be reported at an aggregated average level]

EBIT MARGIN	2021	2022	2023	2024	2025
7.1 Company-wide	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]
7.2 Postal business (letters & parcels)	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]
7.3 Parcel (USO & non-USO)	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]
7.4 Bulk parcel	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]	[Please indicate in per cent]

Price differential between domestic and cross-border parcels
Public data on single-piece parcels indicate that cross-border parcel prices are between two and nine times higher than domestic parcel prices (2021 data; more recent data are available). Information on bulk parcel prices is not available.

To enable us to assess whether price differentials between domestic and cross-border **bulk** parcels reflect underlying cost differences, we would like to request information for 2025 (or the latest available year):

6. Bulk parcel price and cost differentials
   6.1. Prices: For comparable **bulk** parcel products, how many times higher is the average cross-border **price** compared to the average domestic price?
   [Please indicate as a multiple, e.g. 2x, 3x, 4x]
   6.2. Costs: For comparable **bulk** parcel products, how many times higher is the average cross-border unit **cost** compared to the average domestic unit cost?
   [Please indicate as a multiple, e.g. 2x, 3x, 4x]
   6.3. What factors explain differences in margin levels between cross-border and domestic bulk parcels
   [Please indicate in no more than 20 words]

Entry by new players and response by existing players
New parcel delivery providers are entering the e-commerce delivery market with targeted strategies to overcome entry barriers. For example, they may focus on a specific part of the value chain, expand

internationally, or leverage capabilities from adjacent markets such as newspaper delivery. In several EU countries, these entrants have gained a meaningful customer base.

Further, we observe that existing players respond to entry using different strategies, such as:
(i) develop similar delivery models or services in-house;
(ii) collaborate with entrants to access innovative capabilities or technologies;
(iii) acquire entrants to internalise new capabilities rather than build them internally.

We would like to request information for the period 2015-2025:

7. Entry strategies and market impact of new parcel delivery providers
   7.1. What types of entry strategies and business models by new parcel delivery providers have you observed in your market?
   [For each strategy, please briefly describe the main approach and name the entrant concerned in no more than 20 words]
   7.2. Provide an example of a parcel delivery entrant that has rapidly gained market share in your market
   [Please indicate the year of entry, and its current approximate market share]

8. Response to entry
   8.1. Example where your company, in response to entry, adjusted its offering either using one of the strategies named above or otherwise.
   [Please describe in no more than 20 words]

Quality and innovation
We observe that parcel delivery providers continuously improve service quality, innovate, and invest to meet demanding and evolving consumer preferences in the e-commerce segment. Previous studies conducted by Copenhagen Economics provide examples of such developments up to 2021.

To complement this evidence, we request information for the period 2020–2025:

9. Quality improvements
   9.1. Main motivation to improve the quality of parcel delivery services, e.g. merchant requirements, consumer complaints.
   [Please describe in no more than 20 words]
   9.2. Example of improved quality in terms of predictability, reliability, convenience, speed or other. This can include, e.g., narrower and transparent delivery windows, enhanced track-and-trace features, larger delivery point networks, longer opening hours, or later parcel pick-up from merchants.
   [Please describe in no more than 20 words]

10. Innovation and investment
   10.1. Example of infrastructure investment to expand capacity or improve operational efficiency.
   [Please describe in no more than 20 words]
   10.2. What has been the annual investment in:
   2022
   [Please indicate number]
   2023
   [Please indicate number]
   2024

[Please indicate number]
2025
[Please indicate number]

10.3. Example of innovation or investment to maintain an attractive offer for e-shoppers and merchants, e.g. development of innovative delivery methods or investment in AI.
[Please describe in no more than 20 words]

Anti-competitive conduct
Our most recent data from the 2013-2017 period shows 13 EU-level competition cases and 26 national competition cases in the letter and parcel segment, including mergers, access cases, cartels, abuse of dominance, discriminatory, excessive or predatory pricing, rebates, and zonal pricing. More recent consolidated information on competition cases specifically in the (bulk) parcel segment is not available.

To complement this evidence, we request information for the period 2020–2025:

11. Number of competition cases
    11.1. How competition investigations initiated by the relevant national[110] between 2020 and 2025 concerned the parcel or bulk parcel delivery market?
    [Please provide the number and relevant case references]
    11.2. How many **EU** competition cases[111] between 2020 and 2025 concerned the parcel or bulk parcel delivery market?
    [Please provide the number and relevant case references]

Market performance

Delivery options for online shoppers
Our most recent data from 2020 and 2022 show variation in delivery options across ten European countries analysed. In four countries, consumers can choose between home delivery, pick-up point delivery, and express delivery. In three countries, the choice is limited to home and pick-up point delivery. In one country, consumers can choose between home delivery, pick-up point delivery, and evening delivery. In one country, consumers are only offered home delivery. Finally, in one country, all four options are available: home delivery, pick-up point delivery, evening delivery, and express delivery.

We would like to request data for 2025 (or the latest available year), for:

12. Parcel delivery options offered
    12.1. Home delivery
    [Please indicate Yes/No, elaborate if needed]
    12.2. PUDO
    [Please indicate Yes/No, elaborate if needed]
    12.3. Parcel locker
    [Please indicate Yes/No, elaborate if needed]
    12.4. Evening delivery
    [Please indicate Yes/No, elaborate if needed]
    12.5. Express delivery
    [Please indicate Yes/No, elaborate if needed]

[110] Please do not include state aid cases.
[111] Please do not include state aid cases.

Distance to pick-up and return parcels for consumers
Our most recent data from 2020 and 2022 shows that average distance for customers to pick-up and return parcels is below 2km in urban and below 13km in rural areas, excluding home delivery.

We would like to request data for 2025 (or the latest available year), for:

13. Excluding home delivery, what is the average travel distance of your end-customers to pick-up and return locations
    13.1. In **urban** areas
    [Please indicate number in km]
    13.2. In **rural** areas
    [Please indicate number in km]

Delivery speed
Our most recent data from 2020 and 2022 show that average delivery speed varies more across countries than between urban and rural areas within the same country. Across countries, delivery times range from one day to 5.7 days. By contrast, the urban–rural gap within a country is no more than 0.7 days.

We would like to request data for 2025 (or the latest available year), for:

14. For comparable bulk parcel products (e.g. when choosing standard delivery), what is the average delivery time
    14.1. In **urban** areas
    [Please indicate number in days]
    14.2. In **rural** areas
    [Please indicate number in days]

Customer satisfaction
We observe mixed developments for customer satisfaction.

We would like to request data for 2025 (or the latest available year), for:

15. Development of complaints over time
    15.1. Has the number of complaints per 10,0000 deliveries changed since 2020?
    [Please indicate from (1) Decreased substantially to (5) Increased substantially, with (3) indicating remained stable]
    15.2. Are there examples of consumers receiving compensation or other types of remedies for?
    [Yes/No, if yes, please elaborate in max 20 words]

16. Development of satisfaction indicators
    16.1. How has overall customer satisfaction evolved since 2020?
    [Please indicate from (1) Decreased substantially to (5) Increased substantially, with (3) indicating remained stable]
    16.2. Based on your latest available data, which service dimension(s) receive the highest and lowest levels of customer satisfaction (e.g. delivery speed, parcel tracking, delivery cost, complaint handling, returns, etc.)?
    [Please describe in no more than 20 words]

B APPENDIX: TEMBI DATA

To collect information about the delivery options that e-merchants present their consumers with, we have engaged Tembi, which conducts large-scale monitoring of e-commerce websites across different countries. We asked Tembi to conduct a mystery shopping exercise to collect information about the delivery options at the checkout stage. Below, we describe the method in more detail and the obtained data.

Method

To capture checkout data, Tembi simulates a real customer journey on each web shop. First, it selects a random product for the basket. The product is typically selected from the front page and includes a mix of small, medium, and large items. While the data does not contain information about the weight of the item, we find that the products are likely to present items that are shipped as a standard parcel. This is based on the average value of the randomly selected products, which suggests that most items are small, see Table 9.

Table 9
Median price of the randomly selected products

COUNTRY	MEDIAN PRODUCT VALUE, EUR
BE	29.95
BG	19.11
CH	38.15
DE	29.00
DK	32.37
EE	17.96
ES	25.00
FI	28.50
GB	30.15
GR	21.00
HR	23.00
HU	2.52
IS	18.13
IT	30.00
LT	20.22
LV	23.00
NL	29.95
NO	30.69
PL	10.90
RO	14.25
SE	27.14
SI	20.00
SK	16.30

Note: Values for countries using currencies other than the euro have been converted to euro in the table above.
Source: Mystery shopping exercise by Tembi in 2026.

Second, once the product has been selected, Tembi proceeds to the checkout stage, where Tembi collects information about which delivery providers are presented, whether they are explicitly branded, the order in which they appear, the delivery method type, price, and estimated delivery time (where available), as well as other relevant service labels shown during the checkout flow.

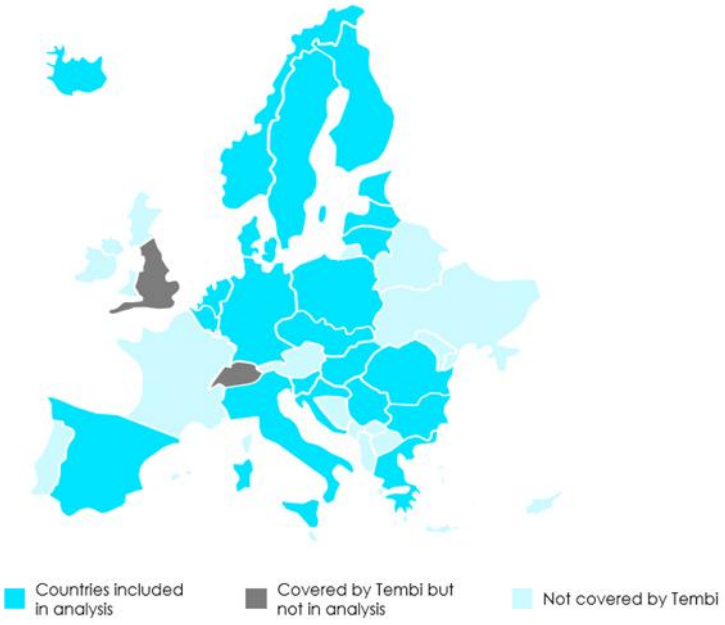
To ensure data quality, extreme outliers are removed in cases where the randomly selected product results in highly unrepresentative delivery conditions, for example, unusually large or atypical items such as garden playhouses that lead to abnormal delivery prices or delivery times.

Data

Tembi covered 23 countries in its analysis. In our analysis, we use the data for 21 countries, see Figure 19. For this study, only web shops that could be matched to an organisation number were included, resulting in a sample of 593,358 web shops across the selected markets. The sample comprises active B2C web shops across a broad range of retail categories. Non-transactional sites, inactive domains, and marketplace environments are excluded.

The data was collected from mid-February to early March 2026. This process is conducted on a biweekly basis. Using this approach, checkout data was successfully collected for 436,136 web shops, corresponding to approximately 73 per cent of the included web shop base.

Figure 19
Countries covered by the mystery shopping exercise



Source: Copenhagen Economics