

# CCIA Europe Response to the European Commission's Call for Evidence

## Driving a competitive European market for delivery services

November 2025

This paper sets out the feedback of the Computer & Communications Industry Association (CCIA Europe) to the European Commission's call for evidence on the new EU Delivery Act and the broader reform of EU postal rules. CCIA Europe acknowledges the Commission's efforts to address the postal sector's transformation and the financial pressures stemming from the Universal Service Obligation (USO).

The Association, however, warns against unintended consequences stemming from an extensive revision of the EU postal framework. Putting all business models into a single basket risks creating regulatory overlap and legal uncertainty, particularly for the diverse and evolving delivery ecosystem that operates under the various legal frameworks introduced in recent years, some of which are still being implemented by Member States.

### I. Ensuring a competitive delivery sector

*The high standards set for delivery services, enjoyed by European consumers and companies alike, are the direct result of competition and innovation driven by diverse business models. This system must be safeguarded, rejecting any one-size-fits-all approach.*

#### Recommendations:

1. Recognise the diversity of business models in the delivery market
2. Avoid blanket requirements for different business models

### II. Refraining from proposing overlaps with existing laws

*Europe's delivery ecosystem is already governed by a robust, modern legal framework. Future investments and innovation by companies demand consistent legal certainty – not new, conflicting legal layers. Safeguarding innovation and high-quality services through a predictable framework should be at the core of the Commission's efforts.*

#### Recommendations:

3. Acknowledge and uphold the existing legal and regulatory framework
4. Maintain and advance ongoing regulatory simplification efforts

## Introduction

The Computer & Communications Industry Association (CCIA Europe) is pleased to provide feedback to the European Commission's call for evidence on the upcoming EU Delivery Act and its broader reform of EU postal rules. CCIA Europe acknowledges the Commission's plans to address the postal sector's structural transformation and the financial pressures stemming from the Universal Service Obligation (USO).

However, the Association cautions against the potential unintended consequences of a comprehensive revision of the EU's postal framework, because the delivery sector is far from homogeneous. Indeed, it consists of a wide variety of business models and operational realities. Any approach that treats all these models as one would risk misrepresenting the market – conflating the traditional postal sector with the highly competitive, innovative, and distinct delivery solutions that have brought significant competition and consumer choice to the European market.

Non-traditional postal and delivery services also already operate under a wide range of comprehensive and modern legal frameworks – many of which are still in the process of being implemented or enforced by Member States<sup>1</sup>. Imposing additional requirements on them would risk creating significant regulatory overlap, legal uncertainty, and conflicting obligations.

For these reasons, CCIA Europe firmly opposes any broader review or expansion of the Delivery Act's scope and urges the Commission to address postal-specific issues separately, rather than applying uniform requirements across all operators in the European delivery sector.

## I. Ensuring a competitive delivery sector

*The high standards set for delivery services, enjoyed by European consumers and companies alike, are the direct result of competition and innovation driven by diverse business models. This system must be safeguarded, rejecting any one-size-fits-all approach.*

### 1. Recognise the diversity of business models in the delivery market

The European delivery market is one of the highest-performing and most competitive sectors of the EU economy. According to the European Commission's call for evidence, the possibility of a full revision of the Postal Services Directive (PSD)<sup>2</sup> and the Cross-Border Parcel Delivery Services (CBPDS) Regulation<sup>3</sup> is being considered, among other options.

<sup>1</sup> For example, as of 13 November, 8 countries (Italy, Greece, Sweden, Germany, Croatia, Cyprus, Finland, and Germany) still need to fully transpose the EU Accessibility Act into national law.

<sup>2</sup> Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service, available [here](#).

<sup>3</sup> Regulation (EU) 2018/644 of the European Parliament and of the Council of 18 April 2018 on cross-border parcel delivery services, available [here](#).

CCIA Europe warns of the unintended consequences this might have. **The European delivery market is not a monolithic entity. Instead, it is composed of different business models and services.** The business model of legacy postal services is fundamentally different from that of innovative businesses that have arisen in recent years – such as online marketplaces, third-party logistics, couriers, or food delivery services.

Some of these services, especially food delivery services, often do not meet the defining criteria for the postal sector as outlined in the PSD and the CBPDS Regulation. First and foremost, they are private commercial entities, not public services, and therefore cannot and do not wish to be subject to the Universal Service Obligation (USO). Secondly, many of these operators do not clear, sort, transport, or deliver postal items, nor do they always engage in cross-border delivery activities.

In fact, many business models that would be caught under an extended scope are purely hyperlocal, making cross-border postal rules entirely irrelevant to their operations.

In some cases, online marketplaces rely on postal operators, both traditional incumbents and more dynamic international players, to deliver parcels and products to consumers, especially in rural areas. These platforms may not directly own or manage warehouses, logistics networks, or transport operations. While it is not for CCIA Europe to comment on the financial sustainability of national postal incumbents, it is worth noting that certain players active in the delivery sector have injected much-needed competition into traditionally monopolistic markets. This competition has driven innovation, improved customer experience, and reduced prices for consumers across Europe. Indeed, some delivery companies do compete directly with postal services, and raise the bar of the quality of service in doing so, but they only represent one part of a much broader and dynamic sector.

Similarly, it is also crucial to underline that online marketplaces have been instrumental in enabling European SMEs and entrepreneurs to access new markets, increase exports, and compete globally – not as delivery operators, but as digital platforms facilitating commerce. Subjecting them to obligations intended for postal operators would threaten these economic benefits, without advancing the Commission's policy objectives.

## 2. Avoid blanket requirements for different business models

The variety of the European delivery market requires a tailored approach for a potential revision of the EU postal regulatory framework. Blanket extensions of the scope would be detrimental to the competitiveness of the sector, while not addressing the market failures of the legacy postal sector.

When considering its potential options, the European Commission must recognise that a one-size-fits-all approach would risk distorting a highly diverse and innovative market. Any revision, therefore, should take into account the specific characteristics, competitive dynamics, and consumer expectations associated with each type of delivery service.

**Applying postal-style regulation to non-postal operators would hinder innovation, limit consumer choice, and increase compliance costs** for companies that already operate under robust consumer protection and transparency rules.

CCIA Europe recognises the importance of ensuring that the Universal Service Obligation remains sustainable and affordable. However, regulating innovative market players who are not postal operators – or who in many cases are their primary competitors – would not address the underlying challenges. Legislation should aim to raise the overall standard and efficiency of postal services, not worsen it.

Instead of broadening the scope of postal regulations to non-postal businesses, the Commission should focus on the nature of the problem at hand, which requires a separate, postal-specific solution. Addressing the problem and ensuring a level playing field, without imposing disproportionate obligations on services that do not share the same public service remit or market structure as traditional postal operators, should be at the core of any solution.

## II. Refraining from proposing overlaps with existing laws

*Europe's delivery ecosystem is already governed by a robust, modern legal framework. Future investments and innovation by companies demand consistent legal certainty – not new, conflicting legal layers. Safeguarding innovation and high-quality services through a predictable framework should be at the core of the Commission's efforts.*

### 3. Acknowledge and uphold the existing legal and regulatory framework

A study by the European Parliament Research Service from April 2024<sup>4</sup> estimated that the first von der Leyen Commission proposed 526 legislative initiatives. This just goes to show how the Commission's previous mandate was already characterised by a high volume of new regulations and legislative activity.

**Indeed, this also means that the EU already has a comprehensive toolbox that tackles the problems identified in the call for evidence**, with certain measures still pending transposition into national legislation:

- EU State Aid rules, including those for Services of General Economic Interest (SGEI)<sup>5</sup>, ensure that Universal Service Obligation (USO) providers are compensated proportionally and that such support does not constitute illegal state aid or distort competition (problem 1 of the call for evidence).
- The Platform-to-Business (P2B) Regulation<sup>6</sup> establishes principles of fairness and transparency for online intermediation service providers (problem 3 of the call for evidence).

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<sup>4</sup> European Parliament Research Service, 'The six policy priorities of the von der Leyen Commission: An end-of-term assessment,' April 2024, available [here](#).

<sup>5</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: A Quality Framework For Services Of General Interest In Europe, available [here](#).

<sup>6</sup> Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services, available [here](#).

- The European Accessibility Act (EAA)<sup>7</sup> sets common accessibility standards and requirements, ensuring that all products and services, including delivery services, are usable by everyone, including persons with disabilities and older people (problems 2 and 4 of the call for evidence).
- The General Product Safety Regulation (GPSR)<sup>8</sup> and the Product Liability Directive (PLD)<sup>9</sup> guarantee that all consumer products placed on the EU market are safe, establishing clear obligations for economic operators and redress mechanisms for consumers (problem 2 of the call for evidence).
- The Consumer Rights Directive (CRD)<sup>10</sup> and the Unfair Consumer Practices Directive (UCPD)<sup>11</sup> provide a strong consumer protection framework – ensuring rights such as clear pre-contractual information, including delivery terms, and the right of withdrawal from distance contracts (problems 2 and 4 of the call for evidence).
- The Platform Workers Directive (PWD)<sup>12</sup> regulates the working conditions of platform workers while supporting the sustainable growth of Europe’s digital economy (problem 3 of the call for evidence).
- The Digital Services Act (DSA)<sup>13</sup>, in full application since February 2024, applies to all online intermediaries – including online marketplaces – ensuring traceability, accountability, and trust in the digital ecosystem (problems 2 and 4 of the call for evidence).
- The Geo-Blocking Regulation<sup>14</sup> prohibits unjustified geo-blocking, guaranteeing that EU consumers can access and purchase goods online from other Member States

<sup>7</sup> Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services, available [here](#).

<sup>8</sup> Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023 on general product safety, amending Regulation (EU) No 1025/2012 of the European Parliament and of the Council and Directive (EU) 2020/1828 of the European Parliament and the Council, and repealing Directive 2001/95/EC of the European Parliament and of the Council and Council Directive 87/357/EEC, available [here](#).

<sup>9</sup> Directive (EU) 2024/2853 of the European Parliament and of the Council of 23 October 2024 on liability for defective products and repealing Council Directive 85/374/EEC, available [here](#).

<sup>10</sup> Directive 2011/83/EU of the European Parliament and of the Council of 25 October 2011 on consumer rights, amending Council Directive 93/13/EEC and Directive 1999/44/EC of the European Parliament and of the Council and repealing Council Directive 85/577/EEC and Directive 97/7/EC of the European Parliament and of the Council, available [here](#).

<sup>11</sup> Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directive 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council (Unfair Commercial Practices Directive), available [here](#).

<sup>12</sup> Directive (EU) 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work, available [here](#).

<sup>13</sup> Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), available [here](#).

<sup>14</sup> Regulation (EU) 2018/302 of the European Parliament and of the Council of 28 February 2018 on addressing unjustified geo-blocking and other forms of discrimination based on customers’ nationality, place of residence or place of establishment within the internal market and amending Regulations (EC) No 2006/2004 and (EU) 2017/2394 and Directive 2009/22/EC, available [here](#).

and receive them wherever delivery is offered, or collect them locally (problem 4 of the call for evidence).

Legal fragmentation and overlaps risk potentially worsening the current market situation regarding several aspects of deliveries, such as complaint handling. For example, under the current Postal Services Directive, Member States are required to address and settle complaints “promptly”<sup>15</sup>. This vague terminology has allowed Member States to adopt a wide and differing range of definitions and timelines for resolution. Instead of this ambiguity, harmonised implementation should be prioritised to ensure that all such complaints receive fair and swift resolution.

#### 4. Maintain and advance ongoing regulatory simplification efforts

In the broader context of the European Commission’s ongoing simplification efforts – which CCIA Europe fully supports – the Association questions the need for a radical overhaul of the EU postal framework’s scope. A comprehensive revision aimed solely at expanding its scope to non-postal operators would constitute yet another legislative initiative, further complicating an already extremely dense EU regulatory environment.

Moreover, several legislative instruments identified in the previous section – including the European Accessibility Act, Product Liability Directive and the Platform Workers Directive – have yet to be fully transposed into national law and properly enforced.

As this comprehensive body of regulation for the digital sector is still in its nascent stages of implementation, or even transposition, immediately deviating from it or layering upon legislation that has not yet taken full effect would be counterproductive. This approach would not only increase uncertainty for businesses (hindering their ability to innovate and deliver value to European consumers and companies) but would also fundamentally clash with the core ambitions of the EU simplification agenda by impacting a variety of businesses across diverse sectors and policy areas.

Instead, the European **Commission should acknowledge the effectiveness and continued relevance of the existing framework, allowing recently adopted legislation to take full effect**. It is only after a thorough assessment of the overall impact and coherence of all recent relevant legislation in a few years that new measures may ultimately be considered. Doing that prematurely risks undermining legal clarity.

## Conclusion

The forthcoming EU Delivery Act presents the Commission with a clear choice: either pursue a targeted, surgical reform of the legacy postal sector only affecting these incumbent services, or risk introducing massive legal uncertainty by attempting to regulate the entire digital delivery ecosystem with postal rules.

CCIA Europe strongly urges the European Commission to reject any broad overhaul of the EU postal framework, or any other one-size-fits-all approach for that matter. Because the

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<sup>15</sup> Article 19 of Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service, available [here](#).

market reality is crystal clear: the high standards and consumer benefits of delivery services are the result of competition and diverse business models, not the rigid public service remit of traditional postal operators.

The core problems identified by the Commission – consumer protection, labour standards, and traceability – are all already covered by modern, dedicated pieces of EU legislation. Introducing additional requirements would create direct and immediate conflicts.

To truly strengthen the Single Market and safeguard its competitiveness, the focus must shift from proposing new regulation to finalising, enforcing, simplifying, and ensuring overall coherence within the existing legal framework. This is the only path to predictable growth that will truly deliver for all European businesses, both large and small.

## About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

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