



The European Regulators Group for Postal Services (ERGP)

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24 January 2019

Dear ERGP

Developments in the postal sector and implications for regulation.

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

The Consumer Council has specific statutory duties in relation to postal services in Northern Ireland. This includes considering consumer complaints, carrying out research and educating and informing consumers on postal matters.

The Consumer Council has reviewed with interest the ERGP report on Developments in the postal sector and implications for regulation. We note the report raises a number of strategically important policy considerations for the postal sector and regulation in the postal market. We provide some general comments below and highlight The Consumer Council's research which is relevant to many key areas discussed in the ERGP report.

The Consumer Council would ask that ERGP puts consumers at the centre of any changes to the regulatory framework.

Reliance on traditional forms of mail is decreasing in favour of faster alternatives such as telephone and online communication. However, vulnerable consumers continue to place significant importance on using a postal service as a means of communication.

The Consumer Council recently published a [report](#) which looks at the experiences and

attitudes of vulnerable consumers and businesses to the postal service in Northern Ireland. This offers a useful insight into how consumers and businesses view the universal postal service and why it is important that any redesign of the EU regulatory framework must fully meet their needs.

Additionally, Northern Ireland holds a unique position in both the UK and Europe which means The Consumer Council is in a position to offer an important understanding about the key challenges on cross border postal services. Northern Ireland does not share a land border with the other UK nations, yet it is the only part of the UK to share a land border with the Republic of Ireland. The Consumer Council's Border Post [report](#) outlines key findings from the cross-border postal study which include:

- Consumer and business use of cross border mail;
- How consumers and businesses feel about value for money;
- Consumer trust and complaints; and
- Parcel delivery innovations

While there is competition and significant growth in the parcel market, consumers in Northern Ireland still experience significant detriment in this unregulated part of the postal market. Consumers who shop online are frequently charged extra for parcel services because they live in Northern Ireland. Despite the ongoing growth in the parcel market, competition has not addressed this problem. Parcel surcharging based on geographic location within the UK is a long standing issue which needs addressed and any redesign of EU framework can look at how to do this.

Parcel surcharging is not the only issue in the parcel market. In the C2X part of the market, consumer awareness of alternative operators is low. This reduces consumer choice, limits the benefits of competition and means consumers may be paying more than is necessary.

If you wish to discuss any aspect of this letter or The Consumer Council's research please contact me on 028 9025 1637.

Yours sincerely

Kellin McCloskey

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