



ERGP Report on the outcome of the public consultation on the

ERGP Draft Medium Term Strategy 2023-2025



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1. Background

On the 1st of July 2022, the ERGP Plenary I Meeting took place, approving, among others, the ERGP draft Medium Term Strategy 2023-2025 for public consultation, aiming to increase transparency and receiving valuable feedback from all interested parties through the public consultation.

This report summarizes the stakeholders' contributions and how their views have been considered in the MTS 2023-2025, presenting ERGP's responses to each contribution.

The public consultation was open from the 8th of July until the 8th of October 2022. Responses were received from the Hellenic Authority of Communication Security and Privacy (ADAE), the Trade association of European USP's (PostEurop) and the European Consumers Centre Network (ECC Net). None of the contributions received is confidential. Therefore, ERGP also publishes all individual contributions on its website.

2. Contributions received during public consultation

2.1 ADAE

ADAE's contribution to the public consultation (MTS 2023-2025) put the emphasis on contributing to the reinforcement of issues such as harmonisation of data privacy, confidentiality and security, especially in a context of digital transition, where the handling of parcels by postal operators is increasing significantly. Without prejudice to the division into three strategic pillars, ADAE expressly suggests or sees as a priority that the consumer is at the centre of the aforementioned confidentiality and security, and this does not mean neglecting other objectives to be achieved, such as environmental sustainability, among others. NRAs have a responsibility in this regard.

ERGP Response

In order to include the security and confidentiality issues highlighted by ADAE, we consider the possibility to include in paragraph 3 in page 11 the following text: "*... while preserving the security and confidentiality in the context of new technologies within the margins that its competence structure allows*".

2.2 PostEurop

PostEurop believes the existing EU framework already grants a sufficient oversight and there is no reasonable need for strengthening NRAs' powers on these subjects, nor to codify additional monitoring competences on environmental and digital matters within the EU postal regulatory framework. NRAs' competences and their scope of intervention should remain defined at national level according to the principle of subsidiarity.

PostEurop stresses also, that parcel delivery does not need further sector-specific regulation and there is not a need to extend rules in the Postal Service Directive relating to parcels under the USO.

There is no "one-size-fits-all" universal service obligation and operators need the ability and flexibility to introduce innovative delivery solutions and provide services adapted to changing customer needs.

ERGP Response:

ERGP welcomes PostEurop's participation to the public consultation and considers that the specific nature of the comments is more appropriate to be addressed, if needed, by the specific work of ERGP in the working groups, in order not to prejudge the circumstances.

Therefore, there is no need to introduce any modification in the current wording of the MTS 2023-2025.

2.3 ECC Net

The document presented by ECC Net brings together all the issues identified in consumer cases on the issues of compensation for loss or damages and tax questions. The ECC Net also considers this information as valuable to consider during the harmonised implementation of the Regulation 2018/644 in 2023.

ERGP Response:

ERGP considers the input from ECC Net very valuable, although in this case ERGP deems that the input and comments do not directly affect the drafting of the MTS 2023-2025, and therefore no changes need to be implemented in the final version of the MTS. It neither affects the implementation of the Regulation 2018/644 on cross-border parcel delivery services, as the Regulation does not deal with these issues, but is about better regulatory oversight and transparency by collecting certain data, as well as the assessment of prices for US products.