

**Statement of DHL Express Norway to the Proposal for a Regulation of the European Parliament and of the Council on cross-border parcel delivery services**

On 25 May 2016 the European Commission published its proposal for a Regulation of the European Parliament and of the Council on cross-border parcel delivery services in the context of the Digital Single Market strategy. DHL Express Norway appreciates the opportunity to share its comments on the new legislative proposal:

We welcome the efforts made by the European institutions to stimulate the growth of intra-European e-commerce driven trade by addressing the current patchwork of legislation in a range of policy areas that are related to the Digital Society. This is a positive development as many of the causes of the slow development of Europe's e-commerce market are related to issues such as geo-blocking, exclusive distribution contracts, VAT requirements and a lack of international payment systems. They represent obstacles to the growth of cross-border e-commerce and are not directly related to delivery services.

European parcel delivery markets are highly competitive which has resulted in clear benefits for shippers, high quality of service and competitive prices for both cross-border and domestic delivery services. Delivery operators have strongly invested in both the capacity of the delivery infrastructure and innovative delivery solutions.

Against this background, the proposal raises concerns that it will create additional administrative burdens. As an express delivery operator DHL Express Norway is affected by the proposal's provision for all delivery operators to provide data to the National Regulatory Authorities (NRAs), consisting of domestic and cross-border number of parcels, turnover and number of employees. We are convinced that this measure which intends to contribute to a better oversight of market developments needs to be kept simple and consistent. It should be sufficient to provide data related to domestic and cross-border volumes to identify the share and growth of cross-border parcel flows compared to national flows.

A standardised template for data collection would be preferable, allowing for effective comparison across the different EU markets. In addition and very importantly, we would also require clear guarantees that individual company data provided by express delivery operators will be treated with confidentiality, given the highly competitive nature of the sector. Also should new reporting requirements not come in addition but should replace requirements existing today in individual Member States.

The proposal should avoid overregulation of the competitive parcel delivery market through the introduction of additional "red tape". The European parcel delivery markets need less and not additional regulation. Following the better regulation guidelines of the Commission the overarching principles of subsidiarity and proportionality should be respected, regulatory interventions should be applied only where necessary and in a way not going beyond what is needed to resolve the problem.

Kind regards



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