



The Consumer Voice in Europe

# Public consultation on cross-border parcel delivery

**BEUC response**

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## **Public consultation on cross-border parcel delivery: "Initiative to enhance the affordability, quality and convenience of cross-border parcel delivery"**

### **Introduction - consumer concerns in parcel delivery**

BEUC, the European Consumer Organisation, welcomes the European Commission's consultation on cross-border parcel delivery as a follow up of the Green Paper 'An integrated parcel delivery market for the growth of e-commerce in the EU' of 29 November 2012 and the Digital Single Market strategy published on 06 May of this year.

Efficient delivery is a fundamental element for a Single Market which works for both businesses and consumers. It is also critical to the development of e-commerce in the EU.

Existing data shows that consumers are willing to buy online, a fact also demonstrated by consistent growth in the sector<sup>1</sup>; however our members' evidence confirms significant consumer detriment due to problems with parcel delivery.

In our response to the 2012 Green Paper<sup>2</sup> we highlighted the main problems consumers face in the delivery market and provided substantial evidence from our members.

To summarise, the main consumer concerns are related to:

- Unsatisfactory delivery times;
- A lack of transparency/information on the service, for example the gap of information when the carriers do not dispose tracking systems when the parcel leaves the country of origin;
- A lack of information at the beginning of the purchase about the goods' delivery cost (VAT, customs costs, extra costs not indicated, etc.);
- Items damaged during the delivery process and lack of clarity concerning liability for loss or damage;
- Theft;
- Lack of pick up/collection services;
- Lack of return procedures;
- High prices for cross-border delivery.

BEUC has limited its answers to the questions addressed in section IV (Questions to the public or representative organisation or institution).

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<sup>1</sup> According to the 7<sup>th</sup> Edition of the Consumer Market Scoreboard (May 2012) more than four out of ten EU consumers (43 %) have purchased goods and services over the Internet in the past year. This represents an increase of 3 percentage points compared to 2010. Since 2004 the proportion of Internet shoppers has risen by 23 percentage points from 20 %.

<sup>2</sup> <http://www.beuc.eu/publications/2013-00196-01-e.pdf>

**Q1** - Do you agree there is an issue with both affordability and regulatory oversight of the cross-border parcel delivery market?

Pricing in cross-border deliveries is indeed a source of consumer concern. For example, our Italian member Altroconsumo compared delivery charges for goods bought online both domestically and cross-border in a mystery shopping exercise<sup>3</sup>. The results showed the price of delivery is often so high that shopping abroad is not a real advantage for consumers, even if the price of the good is cheaper abroad.

However, affordability is not the only problem. Our members also reported consumer problems in relation to quality of service. Particularly in high delivery seasons like Christmas consumers are confronted with delays and inconvenient delivery times. Thus, alternative means such as pick-up and drop-off points should be encouraged as well as the use of technologies to inform consumers more efficiently about delivery times.

Additionally, there is the problem of lack of consumer trust when it comes to return policies and complaint handling if the product gets damaged after the consumer has sent the product back to the seller.

**Q2** - What regulatory response, if any, would you consider useful to address the current issues and how could it be addressed? Please explain your views.

BEUC considers that there is a need to improve price transparency, particularly around the costs of cross-border deliveries between e-retailers and postal operators and the possibility for regulators to monitor the delivery market. In this regard, it would be advisable to develop a monitoring scheme for prices in cross-border deliveries in the frame of the obligations of NRAs under the Postal Directive as amended by Directive 2008/6/EC. This could be achieved by imposing a reporting obligation on NRAs to inform the European Commission about the level of prices in different countries for domestic and cross-border deliveries.

As part of the transparency dimension, it is essential that the rules on pre-contractual information of prices of the Consumer Rights Directive are enforced to prevent consumers being surprised by hidden delivery charges. Additionally, we support the European Commission's recommendation to publish quality of service information so consumers are able to compare the performance of different postal operators. This information could include speed of delivery, geographic coverage, delays and guarantees for damaged or lost items.

Finally, improving of the complaint handling is essential to guarantee consumer thrust in ecommerce. Particularly, retailers and postal operators should be encouraged to endorse alternative dispute resolution schemes and to inform consumers, in accordance with the rules of the Consumer Rights Directive, about the possibility to apply to an ADR body or the ORD platform in case they encounter problems during and after the purchasing process.

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<sup>3</sup> <http://www.altroconsumo.it/hi-tech/nc/articoli/inchiesta-acquistare-online-sui-siti-esteri>

## **Annex: selected articles from BEUC members**

### **Belgium**

Test-Achats, "les achats en ligne", Budget & Droits 222, June 2012,  
<http://www.test-achats.be/hightech/nc/guide/achats-sur-internet-n1379503/>

### **Denmark**

Taenk, "Beware of duty and VAT on e-commerce, SKAT's guide online shopping",  
<http://taenk.dk/gode-raad/tema/gode-raad-om-e-handel/pas-paa-told-og-moms-ved-e-handel>.

### **France**

UFC Que Choisir, "Achat internet : Arnaque au transporteur", April 2012,  
<http://www.quechoisir.org/commerce/methode-de-vente-abus/actualite-achat-sur-internet-arnaque-au-transporteur>

### **Germany**

Stiftung Warentest, "Onlineshops für Schuhe und Kleidung: Hier klappt der Einkauf", November 2011, <https://www.test.de/Onlineshops-fuer-Schuhe-und-Kleidung-Hier-klappt-der-Einkauf-4293638-0/>

### **Ireland**

CAI, "Buying Online", October 2011, <http://thecai.ie/your-rights/your-rights/online/>

### **UK**

Citizens Advice, "Measuring Consumer Awareness of delivery rights", March 2015,

[https://www.citizensadvice.org.uk/global/migrated\\_documents/corporate/online-delivery-rights-report-final-230315--2-.pdf](https://www.citizensadvice.org.uk/global/migrated_documents/corporate/online-delivery-rights-report-final-230315--2-.pdf)

Which? campaign: "Dodgy deliveries"  
<http://www.which.co.uk/campaigns/dodgy-deliveries/>

Which? survey, "Delivery problems rife when buying online", November 2012,  
<http://www.which.co.uk/news/2012/11/delivery-problems-rife-when-buying-online--302882/>