

The European Confederation of Independent Trade Unions (CESI) is a confederation of more than 40 national and European trade union organisations from over 20 European countries, with a total of more than 5 million individual members. Founded in 1990, CESI advocates improved employment conditions for workers in Europe and a strong social dimension in the EU. Most of CESI's affiliates are employed in the different fields of the European, national, regional and local public services and administrative bodies. In the area of postal services, CESI is a recognised sectoral European social partner. CESI's internal members' committee ('trade council') on telecoms and postal services, bringing together its various telecoms and postal member unions, informs the confederation's policy advocacy and work in the European social dialogue in the sector.

As part of the evaluation and possible revision of the EU Postal Directive in 2019/20 and beyond, CESI's Trade Council 'Post & Telecoms' looked into developments since the first directive on postal services in 1997 up to the most recent amendments in 2008. Members of the trade council criticise the role of the directive which has contributed towards the liberalisation of the sector, worsening the quality of delivery services and the working conditions for those employed in the sector.

Postal communication in Europe is still highly valued in spite of a –constant but generally moderate– decline in quantities dispatched. For example, Deutsche Post AG (DP AG), tasked with the universal postal service in Germany, delivered 7.7 billion fully-paid letters in 2018 – excluding mailshots and catalogues. A decade earlier, 400 million more were delivered, but this only points to a drop of around 5.5 per cent. This not overly pessimistic state of play corresponds to employee numbers and working conditions in this former state company. Developments have been similar with regards to other large postal companies in Europe. Great discrepancies can be witnessed only in those countries in which the state changed the postal service massively, charging very high prices or going so far as to effectively abolish letters as a form of communication between citizens and administrative offices (example: Denmark).

What can be observed is that the former state postal companies are among the largest sectoral employers, and also appear to offer the most attractive and sustainable jobs.

In spite of the progress of digitisation and the new means of communication with which it is associated, the traditional letter remains indispensable, for it is easy to handle and offers (legal) security. Moreover, the traditional letter is advantageous due to its fastness, with letters reaching their recipient as soon as the next day, the very high density and quality of the postal infrastructure, as well as the comparatively cheap price of sending a letter.

In some EU states, and particularly in rural areas, the postal services remain the determinant means of communication for many people, and are hence crucial for social cohesion. A worse provision or under-provision of postal services in rural areas would not serve to attract new businesses and likely lead to an exodus of small and medium-sized enterprises (SMEs) to areas with a better postal service. Regions that are already at a disadvantage should not be further discriminated against. All postal services should be accessible to all and be subject to the same conditions.

In light of increasing digitisation, it should also be taken into account that digitisation is not or cannot be rolled out at the same speed in all countries. Rural areas will always be worse off than urban areas. The network speeds vary between regions, and across the EU there continues to be substantial differences in the provision of high-performance infrastructure. Here, too, the degree of acceptance amongst citizens for differences should not be underestimated. Moreover, not every citizen is prepared to use only electronic media for communication purposes, particularly when important documents need to be sent. Citizens wish to rely on the safety and reliability of services.

In sum:

- Postal communication plays and will continue to play a decisive role for a functioning state, for the supply of a key service for citizens and for safeguarding employment – not only because of increasing dangers related to data security during electronic information exchanges, but also due to demographic change, which has been leading to an ageing population.
- Well-functioning postal communication is also of great significance for the attraction and retention of regional small and medium-sized enterprises.
- Citizens are right to expect affordable and regular postal and parcel shipping and delivery. Adequate working conditions and salaries are prerequisites for such high quality service. Special rules for cross-border parcel deliveries are required to enable uniform conditions for access to the postal networks. These must ensure that quality working conditions are created and are not endangered by dumping prices.

The European Commission's initiative on a European Green Deal, as well as similar initiatives in single member states, is worth to be supported also in relation to the postal sector. It would be highly useful to establish tangible results also in the field of logistics of delivery services. The spirit of the green deal should also be reflected in EU postal regulation.

Universal postal services are indispensable for the function of the state, for social inclusion as well as for economic and territorial cohesion, and it must therefore remain subject to the same conditions for all natural and legal persons resident in the same territory.

The European Commission must take these above considerations into account when it comes to, possibly, adapting the postal services directive. As a consequence, the following is required for quality employment in a functioning postal sector:

- European legislators should make a clear commitment to the **continued existence of an EU postal directive** and advocate, in the case of a revision, for its further development. The central objective must be the maintenance/establishment of a balance between competition, consumer needs, a functioning and economically viable universal service as well as the maintenance of decent employment in the postal and parcel sector. Wage dumping, undue discrimination and the exploitation of workers must be precluded.
- Offering a universal postal service must be conditional upon the **provision of a minimal postal infrastructure and the continued achievement of an ambitious minimum level of quality service.**
- The service must, as a matter of principle, be provided at least **five working days per week.** However, in so doing, suitable measures must guarantee that the national provider of universal postal services is not discriminated against vis-a-vis competing companies due to the task entrusted to him.
- Given that the employment situation in the postal and parcel service sector often leads to marked social distortions and violations of the laws and rules, appropriate national-level frameworks must be created to counter this undesirable development. In so doing, minimum wage payments, for example, as well as the respect for applicable driving and rest times must be subject to **permanent and transparent controls carried out by the competent national authorities.** The legislator should intervene, should the rules not be adhered to.
- The legislator should encourage work in the sector within the EU to be part of a **collective agreement.** It is only through involving the social partners in all EU member states that minimum standards and acceptable wages can be guaranteed and any exploitation and old age poverty precluded.
- The member states' national legislation needs to introduce **subcontractor liability** in the post and parcel industry. Should a service partner (subcontractor) of a postal service provide violate the law, it should also be possible to hold the postal service provider accountable.

- The spirit of the **European Green Deal** and a **social Europe** should feed into a revised EU postal directive. In the interest of environmental protection, a stronger promotion of state subsidies for alternative engines and innovative models within the framework of letter and parcel delivery is of urgent importance. The postal operators should have to agree on making postal deliveries with a shared, low-emission fleet of vehicles. To this end, the distribution of letters and parcels could be subject to **licensing**. Delivery licences could ensure the respect for environmental protection as well as, beyond, the obligation to provide social insurance as well as further non-environmental criteria. In the framework of binding licences, all companies that provide services relating to the delivery of letters and parcels should be obliged to report to the national regulatory authorities in a standardised manner:
 1. **Social data:** number of employees, nature of contractual agreements, staff fluctuation, pay gaps;
 2. **Social standards**, including employment standards;
 3. **Environmental standards**.

When placing a shipping order, customers should be allowed to decide whether a letter/parcel should only be sent via those logistics providers which adhere to minimum standards, even if the customer ends up paying a higher amount.

- As work becomes increasingly digital and online-based, the **protection of the personal data** of employees and their private lives is more important than ever before. In the framework of the EU postal directive, but also beyond this in the context of the EU general data protection regulation (GDPR), employees and staff must be protected from inadequate surveillance and control by digital technology potentially deployed by employers. Digital systems purely for the purposes of monitoring staff and employees should be rejected.
- The significance of **occupational health and safety** for employees in the postal and parcel sector should deserve special attention. National legislative framework must be created to help all employees have a realistic chance of good health until retirement age.
- National legislation should require the set up framework conditions according to which those people employed by the postal and parcel services who find their work endangered due to the progress of digitisation, have the right to ongoing **continued and further training, upskilling re-training**. To this end, there is also a need for an **inclusion of the social partners in the discussions on the strategic (re-)direction of companies** that may become necessary in the course of digitisation and as a consequence of the training and further education to be planned, for example by aiming for new business areas. The employer should thus be encouraged to boost their due role to take care of the employees. Company restructuring at the general public's expense (social welfare, employment) should be precluded.