

**COMMENTS TO THE COMMUNICATION FROM THE COMMISSION
ON THE FUTURE OF EUROPEAN TRANSPORT POLICY**

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I. EXECUTIVE SUMMARY

Deutsche Post DHL is the world's leading mail and logistics services Group. Our climate protection program **GoGreen** has made us the first logistics sector company to set a concrete carbon efficiency goal, which is to achieve a 30% improvement in its CO₂ efficiency by the year 2020. This means implementing measures in each and every division, such as fleet optimization for both aircraft and ground vehicles, and expanding our range of carbon-neutral, climate-friendly GoGreen products and services.

Transport and logistics services have significantly changed in the last decade. For instance, logistics companies are assembling vehicle parts and items for the electronics and food industries and increasingly with their own IT systems fully integrated with those of their customers. In just a few years, the next generation of the Internet will lead to completely new business models and industrial processes. Not only will completely new global players emerge, but transport and logistics companies will also be able to provide all or part of more complex production, delivery and service processes.

Logistics is far more than just goods transport, warehousing and special process solutions. It provides a vital “backbone” function in supporting macro-economic processes and the operation of markets, critical infrastructures and distribution to both business and consumers. **In 2008 the logistics sector was the biggest sector in the EU economy generating €950 billion revenues** (cf. *'The Top 100 of Logistics 2008/2009'* by Klaus and Kille, ed. DVV Media Group).

The competitiveness of European industry is dependent on efficient transport and logistics services. Today European logistics service providers are global market leaders, which help European companies to stay competitive in global markets.

Therefore, we welcome the Commission's initiative to engage into a large public consultation before setting the European Transport Policy for the next decade.

Deutsche Post DHL uses all modes of transport and mainly runs intermodal operations. In this respect, we share the views of the Commission that *“immediate priorities” should be “a better integration of the different modes of transport as a way to improve the overall efficiency of the system and the acceleration of the development and deployment of innovative technologies”* (cf. point 38 of the Communication on a sustainable future for transport, COM(2009) 279, hereafter “the Communication”).

We agree that the future European Transport Policy should be based on the following pillars:

- complete the Internal Market and foster competition for all transport modes,
- maintain, deploy and integrate modal networks,
- promote new technology to accelerate transition to a low-carbon society,
- secure open standards and interoperability,
- ensure effective and coordinated actions within the EU to avoid new internal trade barriers,
- have the voice of Europe to be heard more prominently on the international scene,
- educate, inform and involve the society about the challenges of mobility.

As recognized by the Action Plan for freight logistics of 2007, **reducing administrative, regulatory and operational complexity should also be a priority in order to secure a more efficient transport.** Furthermore, a **complete prior impact assessment** based on sound market and industry understanding and reliable data should guarantee the efficiency of the measures to be undertaken.

To suitably address the challenges of transport, there is a need to have a better integrated European Transport Policy, not only between the transport modes but also on the entire value chain of transport and logistics services with all relevant actors of the industry and of the European Commission.

II. THE EUROPEAN TRANSPORT POLICY'S AGENDA 2000-2010: HALF WAY THROUGH

Since 2000, the EU has launched several initiatives in all modes of transport in order to make transport more safe, secure, sustainable and efficient. Taking into account the reality of transport market and infrastructures, the mid-term revision of the White Paper in 2006 lead to the recognition that European Transport Policy should achieve **“co-modality”**. Using all modes of transport depending on the needs of its customers, Deutsche Post DHL welcomes the recognition that each mode of transport is necessary for the supply chain. Each mode of transport should individually be made more efficient, competitive, secure, safe and sustainable and interconnections between different modes of transport should be run as efficiently and smoothly as possible.

In 2007, Deutsche Post DHL welcomed the Commission's **Action Plan for Logistics** (COM (2007)606), **which recognized for the first time the importance of this sector, which goes beyond the sum of the benefits of each mode of transport.** In its Communication on freight transport logistics (COM(2006)336) the Commission stated that *“logistics measures are indispensable for maintaining and increasing European competitiveness and prosperity in line with the renewed Lisbon agenda on growth and jobs”*. In order to achieve that, a logistics perspective should have been integrated into the European transport policy. As stated in the Communication, *“logistics considerations should be an underlying factor in decision-making”*.

However, some of the main EU's policies took a very long time to be implemented, other failed to deliver all the expected benefits or did not match the industry's needs.

In particular, the **lack of a truly harmonized Internal Market for all modes of transport** is hampering a seamless and more environmentally-friendly cross-border transport flow, which at the end cost time, money and energy. The current restrictions for road cabotage prevent industry from fully tackling the problem of 30% of trucks running empty. Despite full market opening in 2007, the rail freight market fails to deliver satisfactory reliability for cross-border services preventing a larger use of rail freight. In air transport, any delays in creating a Single European Sky II (SES II) would prevent savings of up to 12% of CO2 emissions. Furthermore, the Trans-European Transport network (TEN-T) programme faces technical and financial difficulties to realize the interconnection of the national transport infrastructures to create a genuine trans-European network (e.g. the implementation of the European Rail Traffic Management System was unnecessarily delayed).

The Marco Polo programme could have stimulated the shift of more volume of freight from road to sea, rail and inland waterways if the criteria for eligibility would have reflected more the real needs of the business. Significant modal shift does not only depend on financial incentives. The transport mode needs to satisfy customers' requirements for quality, service reliability and security as well.

We shared the Commission's view that external costs of transport should be tackled by applying a policy based on the **"balanced approach" principle**, i.e. introducing gradually, if required, technological progress (e.g. cleaner vehicles), operational measures (e.g. eco-driving), infrastructure improvements (e.g. rail freight dedicated framework, intermodal hubs and efficient traffic management systems) and economic instruments.

As a matter of principle, the prerequisite to establish any fair, transparent, proportionate and easy mechanism for the internalization of the external costs of road transport is to have a thorough understanding of the road transport sector. Unfortunately, the Proposal to revise the Directive 1999/62 on the charging of heavy goods vehicles for the use of certain infrastructures (COM(2008)147) was based on false assumptions regarding the business models of road freight transport of today. For instance, road transport patterns are commanded by customer's and regulatory demands that make a shift to cheapest time zone unrealistic. In addition, shifting to rail often has no economic sense due to short distance of transportation – average distance of 109 km for road freight transport in Europe (source: Eurostat doc 66/2008) -, or is impossible due to poor service quality and/or missing rail and intermodal infrastructures. By obliging only goods vehicles to pay for congestion costs, the Proposal is also inefficient and discriminatory since passenger cars are also major contributors to road congestion (cf. 2006 study of the Transport Research Center (AVV) – Dutch Ministry of Transport). The external cost charges, as proposed by the Commission, will therefore not lead to the desired positive effects on both, the environment and congestion in Europe.

After 9/11, additional **transport security measures** were adopted. However, some of them did not meet the **risk-based and cost-effective** principles advocated by the Commission. They create unnecessary barriers to free flow of trade within the Internal Market. For instance, the proposal for a Regulation on enhancing supply chain security (COM(2006)79) was pre-mature and would not have helped to provide the public or the industry with effective measures against terrorism.

At the international level, the profile of the EU is raising, which leads the Commission to conduct successfully the re-negotiations of the bilateral air transport agreements. However, the EU still fails to speak with one voice at intergovernmental organizations.

In general, the European Transport Policy conducted in the last decade could have been more efficient if **better coordination would have been achieved between the different Directorate Generals of the Commission where activities impact directly or indirectly transport and logistics business**. For instance, insufficient cooperation between DG TAXUD and DG TREN on security matters threaten to have some inconsistencies in the transport security framework and duplication of certifications.

III. TRENDS IN TRANSPORT AND LOGISTICS TODAY AND TOMORROW

1. The logistics sector is already today the backbone of the European economic growth and competitiveness

As acknowledged by the Commission, “*transport is an essential component of the European economy*” and transport policies “*promoted the competitiveness of the European industry*” (cf. point 7 of the Communication).

Logistics service providers like Deutsche Post DHL play an important role in European competitiveness:

- by contributing to an open market and growing employment opportunities,
- by lowering logistics and thereby final product cost,
- by enabling customers to grow in foreign markets,
- by increasing the speed and responsiveness of supply chains, and
- by connecting manufacturer and customer in a direct and quick supply chain.

The current economy relies increasingly on an extended and more tailored supply chain. There is a need of professional logistics operators able to provide global coverage with proven and robust systems and processes and able to use more functional and flexible technology enhancing the supply chain’s transparency.

The supply chain design plays a critical role for efficiency and sustainability. While the logistics sector is partly responsible of the climate change, it can also be part of the solution: today Deutsche Post DHL is in a position to improve the efficiency of their own carbon footprint, and that of their customers up to 30% by optimizing supply chains and the energy balance of warehouses as well as modernizing corporate processes with the aid of digital technologies (such as the use of RFID, Track & Trace and Intelligent Transport Systems).

2. Trends and challenges in logistics

Deutsche Post DHL generally agrees with the Commission’s analysis stating that the transport and logistics sectors would have to face ageing of the population, migration, urbanization, environment protection and scarcity of fossil fuels in the next decade(s) (cf. points 19 to 37 of the Communication).

A study of June 2009 conducted by Deutsche Post DHL¹ shows that the logistics industry will be challenged by the following macro-economic and industry trends:

- **Globalization** is expected to continue despite some signs of increased protectionism;
- Increased risks due to infrastructure bottlenecks, security regulations and increased length of supply chains leading to '**regionalization**' of supply chains;
- Ongoing recession expected to increase tendency to consider **outsourcing** in the mid-term as companies strive to reduce cost and focus on their core competency (especially for SMEs);
- **Digitization of the supply chain** will be achieved by emerging technology standards and information/item flow linkage creating new opportunities, the "Internet of the Things" will become a reality;
- **Supplier consolidation** (especially: ocean carriers and port operators);
- Global demand destruction due to the economic slowdown has led to a record fall in crude oil prices; However, **high oil prices and oil scarcity** will remain a challenge in the medium term; it will conduct to develop resilience in operating model to deal with high oil prices (i.e. by improving utilization of networks and of modes and improving fuel-efficiency);
- **Urbanization** will continue and would demand innovative urban logistics solutions;
- **Sustainability** will continue to remain a key element of the supply chain; there will be a strong pressure (and opportunity) to redefine low-value supply chains/modal mix and to optimize efficiency/capacity utilization, innovation will play a key role in combating climate change.

In order to address these challenges the logistics industry will require more and more well educated logistics managers and ICT engineers. It will rely less on blue collar employees. However, today university level education programmes focused on logistics are not widespread.

These changes will create "**new**" **customers for logistics companies** with new needs, expectations and behaviors. In particular, digitization will transform customer's expectations and behavior all over the world: the focus will be on individualization, transparency, simplicity, availability and reliability of the service. Customers will demand transparent information on ecological footprints. Eco-friendliness and sustainable transport will determine purchasing behavior to an increasing degree but price will limit ethical purchasing decision especially in difficult economic period.

A recent study of A.T. KEARNEY found an **increase of transportation and logistics costs** (cf. 6th European ELA & A.T. KEARNEY Logistics Study, July 2009).

¹ "Delivering Tomorrow – Customer needs in 2020 and beyond – A Global Delphi Study"; 500 experts evaluate 60-80 given visionary theses and qualitative statements about future developments in logistics

Transportation costs represent the largest cost block for logistics. They have diminished by nearly 50% between 1987 and 1998 mainly due to the liberalization of freight services but between 2003 and 2008 these costs climbed up again by 35%. This turnaround has been triggered by globalization which entails greater transportation distances and a sharp upturn in increasingly high-priced sea freight. Road tolls and fuel costs have also contributed to this development. After many years of decline, logistics costs are getting up again Europe-wide. **In the five years from 2003 to 2008, logistics costs increased by 20%. A further increase of the same range is expected up to 2013**

In view of the pressing upcoming challenges to be faced by the transport and logistics sector, the future European Transport Policy should play a central role to provide the suitable framework enabling the industry to address the new economic and social demands.

IV. POLICY RECOMMENDATIONS

1. Prior and complete impact and risk assessment based on sound market and industry understanding and reliable data

In accordance to the “**Better Regulation**” principle a **thorough impact assessment** is required before adopting any initiative.

In this respect, the **specificities of freight transport** should be considered with as much attention as those of passenger transport. For instance, in the past regarding the impact assessment for including aviation in the EU Emission Trading System, the external consultants appointed by the Commission refused to have a detailed exchange of views with the cargo and express companies. Therefore, throughout the following legislative process it remained a constant problem to avoid discriminatory provisions for air cargo.

Any impact assessment needs to incorporate a horizontal view. A “silo approach” for transport and environment policy proposals can lead to inefficient, complex and discriminatory rule-making. A key industry like logistics warrants such a horizontal approach.

Regarding the internalization of the external costs, the scopes and system’s boundaries of measuring external costs for each mode of transport should be based on identical criteria and principles and equally applied to passenger and cargo transport. External costs caused by existing bottlenecks in infrastructures, by the lack of efficient traffic management systems or by regulatory restrictions applied to transport services should not be taken into consideration. Furthermore, the impact assessment must take into account:

- **all measures already in place for reducing the external costs concerned** (e.g. fuel taxes, tolls, VAT, road tax) in order to avoid transport operators to pay twice for the same external costs,
- **the negative effects of transport on the environment but also its positive effects for the European economy and society in its whole**, in terms of competitiveness, sustainability and jobs
- **all possible alternative EU policies and regulations to tackle external costs of road transport** (e.g. completion of the Internal Market for freight transport services, full liberalization of road cabotage, efficient road traffic management

systems, rail freight dedicated network, cleaner fuel and vehicles, eco-driving, fiscal incentives for cleanest vehicles, noise barriers,...), and

- **consistent assumptions and data to establish a formula ensuring accurate cost calculation** (e.g. the formula provided by the Proposal to calculate noise costs is only based on noise data from Germany but must be applied for all EU Member States, this is highly questionable since noise costs depend very much on the local conditions and the landscape).

Furthermore, the consultants and organisations used to carry out the assessment should include full appreciation of the current and future impacts on the entire value chain of transport and logistics services, in order to guarantee the quality of impact assessments.

Regarding the **security measures imposed on the transport sector**, there should be no adoption of any new security regulation prior comprehensive impact and risk assessment in close cooperation with the industry. A balance must be drawn between security procedures and the free flow of trade. It is necessary to examine the impact of the security measures already imposed on aviation, airports and ports before adding new provisions, especially regarding the supply chain. In this respect, the self-regulatory security schemes of individual companies should also be taken into account. **As regards terrorist threats, freight transport should be distinguished from passenger transport. A balance between anti-terrorist policy requirements and flexible time-sensitive logistics operations must be found.** If not, unnecessary new security measures at the European and at national levels will make logistics operations more difficult, create delays and will, at the end, harm European competitiveness. **Higher national security measures** above EU harmonized measures should only be possible when there is a justified heightened threat at a country level and they should be **directly financed by the State concerned**.

2. Completion of the internal market for transport services is a prerequisite for an efficient and sustainable logistics sector for today and tomorrow

We believe that the completion of the EU Internal Market for all modes of transport is the key to cope with the future expected growth of logistics services!

We, therefore, strongly supports that “*further promoting market opening and fostering competition*” should be a priority for the future European Transport Policy (cf. points 80 to 83 of the Communication).

In this respect, the following measures should be, in particular, completed without delay:

Road:

- Full liberalization of cabotage operations
- Better implementation of the working and resting time and better use of the tachograph
- Better and harmonized enforcement of working and resting time

Rail:

- Implementation of the 1st railway package
- Implementation of the ERTMS

- Cross-border corridors (TEN-T)

Maritime (cf. point 68 of the Communication):

- Implementation of the actions of the Action plan to establish a European maritime transport space without barriers
- Expand operations of the Motorways of the Sea

Inland Waterways:

- Implementation of the NAIADS programme for inland waterway transport

Aviation :

- Completion of the European aviation area:
Although Community airlines face no limitations flying on intra-European routes, the same cannot be said for routes to third countries outside the territory of the European Union. Flights utilizing 5th or 7th freedom rights out of Member States to third countries (e.g. route: Frankfurt – Amsterdam – Shanghai) are still governed by old and restrictive bilateral agreements between EU countries that often date back to the 1960s. Since the implementation of the European Common Aviation Area there has been no basis nor incentive to update these old bilaterals. The result, however, is that it is easier for a US based airline to fly from another Member State to a third countries than for an EU based carrier. A regulation should render all existing bilaterals between EU Member States obsolete and automatically grant full 5th and 7th freedom rights to all EU carriers from all EU member states. This would complete the European aviation area and ensure that European carriers at least enjoy a level playing field in Europe.
- Implementation of the Single European Sky II as soon as possible to achieve its potential environment benefits
- Secure that the conditions provided for aviation in the EU Emission Trading System remain well balanced, non-discriminatory, workable and efficient. Moreover, in order to ensure a general level playing field it is important that ICAO is tasked to develop a global framework for dealing with aviation emission.
- Measures regarding gaseous emissions other than CO₂ should only be proposed provided there is sufficient scientific evidence and after a thorough impact assessment
- Concerning noise, it is imperative that ICAO's balanced approach to noise is applied at all Community airports by consistently implementing the existing Community legislation.

3. Implementation of the action plan on freight logistics without delay

The Communication appropriately takes over key measures of the Action Plan for freight logistics like the full integration and interoperability of the individual parts of the transport system, as well as the interconnection between the different (modal) networks (cf. point 63 of the Communication) and the creation of “green corridors” (point 64 of the Communication) that are not yet been implemented.

The logistics sector cannot wait any longer for having the Action Plan for freight logistics implemented, in particular:

Short-term actions:

- **Creation of rail freight priority corridors** enabling a more efficient use of rail infrastructure for freight trains;
- **Allowing cross-border operation of European Modular Systems** (the recent study done for the Commission and trials in Denmark, Sweden, Norway and The Netherlands have all shown the benefits for business, the environment and society);
- Implementation of the Action Plan for urban mobility creating a framework to exchange best practices on urban logistics between local authorities and promoting dialogue between local authorities and logistics companies; increase the funding for freight solutions in the CIVITAS programme (cf. point 88 of the Communication);
- Harmonization and simplification of the liability regime according to the Montreal Convention's principles (i.e. clear and unbreakable limits) provided that the EU liability regime is accepted globally;
- Implementation of key performance indicators to measure port performance in terms of time and costs saved;
- Promote use of inland depots with feeder services to less congested ports (called "out-ports") to bypass congested depots (This would increase usage of barge and allows that goods are removed from ports more rapidly, requires fewer kilometers by trucks to reach the final destination of the goods and, at the end, improves logistics efficiency);

Medium-long term actions:

- Simplification of administrative compliance via a **one administrative stop-shop based on IT system for administrative procedures (including e-customs clearance) in all modes** (the e-custom initiative of the DG TAXUD should be integrated into the "e-freight" initiative of DG TREN);
- **Investment plan creating a network of intermodal terminals** integrating, where possible, rail, road, inland waterways, maritime and air services (cf. point 63 of the Communication);
- **Ensure fair competition, transparency and reliability of loading and unloading services at intermodal platforms;**
- **Single and digital transport document for cross-border and intermodal transport;**
- **"e-Freight" and Intelligent Transport Systems (ITS):** EU and national investment plans should be adopted and implemented in a coordinated manner in order to allow an electronic flow of information along the physical flow of goods;

- Need of efficient ports offering intermodal solutions (inland waterways, road, rail), rapid transshipment services from sea to land, reliable and affordable services, transparency of charges and taxes, screening facilities if required.

4. Supplementary measures to support the logistics and transport sectors

The Communication identified positive actions like common methodologies and cost-benefit ratios for selecting infrastructure projects (cf. point 65 of the Communication), optimal use of existing facilities (cf. point 66 of the Communication) and increasing R&D expenditures for technologies which are not yet mature for market application (cf. point 76 of the Communication).

The following actions should satisfactorily complement those measures identified by the Commission:

Short term measures

- **Financial incentives** (e.g. credits with low interest rate or subsidies) at the EU and/or at the national levels for applications, technologies and solutions enabling a reduction of energy consumption but costing more than the conventional solution/technology. Regarding the ground fleet, this should be allowed for **investment in EURO V vehicles, aerodynamics features, ITS devices, electric and hybrid trucks**, etc... Similar programmes should also cover **Real Estate solutions** (lightings, photovoltaic roof etc...). One prerequisite for these financial incentives could be the implementation of an **energy consumption monitoring system**, so that the CO2 reduction and energy saving can be tracked. This system should be based on ISO standards or industry certifications programmes.

Combining the financial incentives with an energy monitoring system would help to calculate energy consumption and CO2 emission on the entire supply chain.

New fuel and vehicle technologies are efficient to reduce external costs of road transport for instance:

- optimization of vehicle fuel consumption enabled a decrease of CO2 emission of 33% from 1991 and 2004,
- nowadays 13 trucks are no louder than a single one in 1980,
- EURO V trucks exhaust more than 95% less air pollutants compared to 1990 levels

(cf:

http://vda.de/en/publikationen/publikationen_downloads/detail.php?id=498).

- **EU or national plan to reimburse professional consulting advisory on greening initiatives** (which are also cost reduction initiatives, e.g. energy, waste and water consumption reduction in office buildings and warehouses).
- **Key actions for securing a wide and successful implementation of the AEO programme:** extension of the AEO Status to all goods under the control of an AEO accredited operator, more trade facilitation benefits to AEO operators and clarification of the AEO accreditation process;

- Develop easy to understand **information material** (general tips and information with short text in several languages and self-explanatory pictures) on basic rules and demands regarding **security of loading**, to be distributed to EU and non-EU drivers at the borders and by police (cf. point 84 of the Communication);
- Promote **construction of parking and rest areas** on highways and major routes for HGVs;
- Secure road and rail crossing (cf. point 41 of the Communication);
- **Open standards for transport technologies** to avoid technological barriers and extra costs (cf. point 88 of the Communication);
- **Ensure interoperability** for global ICT logistics applications across transport modes (cf. points 69 and 88 of the Communication);
- **Facilitating integration of warehousing services with transport services along the supply chain** by removing administrative, fiscal and infrastructure bottlenecks;

Medium-long term measures:

- Development of an **environmental benchmarking system** for trucks like the EURO-norms, but based on consumption of diesel per tone/kilometer produced.
- **Mutual recognition agreements on customs and security programmes between the EU and third- countries** and entry into force as soon as possible.
- Review and align conditions of operations between inland waterways and maritime transport;
- Promote EU standard for carbon accounting/reporting and development of harmonized data sources for transport companies and shippers;
- Develop a Train Control System based on data communications between the Radio Block Centre and the trains (so-called ERTMS level 2) to reduce the distance between the signals and thus enabling a more efficient use of the railways tracks;
- Promote an international signalling system for rail transport (cf. point 92 of the Communication).

5. Enhanced cooperation between the Commission services

Although a separate logistics unit has been set up, **DG Transport and Energy** very often continues to conduct policy from a modal approach which often overlooks the function of logistics. **Future European transport policy should be cross-modal and take into account the entire supply chain from the producers and manufacturers to the end customers.**

Furthermore, **DG Enterprise and Industry** should contribute when it comes to major decisions affecting the logistics sector given that these decisions indirectly impact

European industry. Logistics industry issues should be regarded from a services point of view as well as from an industrial policy approach.

DG Internal Market and Services should be committed together with **DG Transport and Energy** to complete the Internal Market for all modes of transport. The upcoming internal market monitoring and review for services could be one useful tool to achieve a better understanding of the internal market issues of the logistics services industry and its impact on retail.

An objective dialogue between the logistics sector and **DG Environment** factoring in requirements and realities of the logistics industry should be established. The logistics industry would like to see DG Environment as an ally, certainly if EU legislation hampers optimisation of logistics services and prevents environmental efficiencies from being achieved.

Increased coordination between the different Directorate Generals of the Commission has the potential to significantly improve policy that impacts directly or indirectly on the transport and logistics sector.

In order to enhance understanding of the logistics sector and achieve the adoption of a suitable regulatory framework, **key strategic directions need to be aired at a wider level with discussions between the industry concerned and, at the very least, the Commissioners for Transport, Industry, the Internal Market, the Environment and possibly Trade, plus the President.** The relevant industries include not only the logistics groups but also suppliers and customers of logistics services.

We, therefore, support the creation of a **high-level stakeholders' group for logistics with broad-based industry representation**, in which the major issues of logistics can be discussed thoroughly. In parallel, a logistics think tank within the European Parliament should be created, in which topics can be discussed across party and committee lines. **This should help the Commission to succeed in implementing its new approach that “keeps transport users and workers, with their needs and rights, at the centre of policy making”** (cf. point 38 of the Communication).

Deutsche Post DHL believes that the future European Transport Policy could create the required momentum to facilitate logistics operations today and to secure more efficient and sustainable supply chains tomorrow. We are ready to support the European Commission to succeed in this challenging task.

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