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**President:**  
Joe Hansen  
UFCW, USA and Canada

**General Secretary:**  
Philip J. Jennings

Mr Charlie McCreevy  
Commissioner for Internal Markets and  
Services  
European Commission  
B-1049 Brussels  
Belgium

Nyon, 5 December 2008

### Implementation of the Third Postal Directive

Dear Mr McCreevy,

UNI Post and Logistics Global Union has concerns about some of the implementation processes for the Third Postal Directive. Our concerns relate to how inclusive the implementation processes are and to how the requirement that the social aspects of the opening up of the postal market are being taken into consideration.

In clause 16 of the new Directive it says;

*This Directive is without prejudice to the competence of Member States to regulate employment conditions in the postal services sector, which should not, however, lead to unfair competition. Social considerations should be taken into due account when preparing the opening up of the postal market.*

In our view this aspect has not yet been dealt with in a satisfactory manner. Indeed we are concerned that the Commission has been making statements about how the actions of some member states has been a barrier to entry for alternative postal operators, notably Germany and the Netherlands, in respect of minimum wages for postal workers. While there are differing views on our part about the validity of this argument by the Commission, it does indeed highlight to us that there urgently needs to be discussion and clarification on a number of social considerations.

Recently UNI Post & Logistics held a workshop for our affiliated unions and to which a representative of DG Internal Markets attended. His attendance was extremely valuable to our members and to the exchange of information we were able to achieve. However the discussions at this workshop raised many concerns from our affiliates about the almost lack of discussions on the social considerations of the implementation and how they are having difficulty in getting this issue satisfactorily dealt with both by their governments and local regulators.

It is UNI Post & Logistics view that as the DG Internal Markets has constituted working groups to look at different aspects of the Directive, such as the Universal Service Obligation, and is proposing to have some more, that one such working group should be investigating how the social considerations of the implementation of the directive



can be dealt with. Therefore we would urge you to give very serious consideration into constituting a social issues working group.

UNI Post & Logistics is also very much interested in the work that the working group on the Universal Service Obligation has been doing and would if possible like to make a contribution to that group. Our view is that the final decisions on how the universal service will be funded and structured could have a significant affect on our members employment and as such would like to ensure that we have had an appropriate input into this group.

We look forward hearing your views on our suggestion that one of the proposed working groups on the implementation of the third postal directive deal with the social considerations and to how we can make a contribution to other working groups.

Yours sincerely

A handwritten signature in black ink that reads 'Neil Anderson'. The signature is written in a cursive style with a long horizontal flourish at the end.

Neil Anderson  
Head of UNI Post & Logistics

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