

Report on the state of the postal market in 2020

Warsaw, May 2021



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Report on the state of the postal market in 2020 was drawn up in accordance with Article 43(6) of the Act of 23 November 2012 – the Postal Law¹, hereinafter referred to as the ‘Act’ or the ‘Postal Law’, on the basis of the data received from postal operators in accordance with Article 43(1) and (2) of the Act.

The aforementioned provisions obliged the postal operators to submit to the President of the Office for Electronic Communications, hereinafter referred to as the ‘President of the UKE’, reports on postal activities in 2020 with the use of the reporting templates laid down by the Regulation of the Minister of Administration and Digitisation².

The report on postal activities for 2020 was submitted by 139 postal operators (out of 291 registered postal operators), including Poczta Polska and 138 alternative operators.

The report was used to correct the data concerning 2019, as stated in the reports on postal activities submitted after the publication entitled ‘The Report on the state of the postal market in 2019’ and the amendments to the submitted reports on postal activities. Therefore, part of the data on the number of active postal operators, the volume of services, revenue and percentage shares have changed in comparison with the previous Report of the President of the UKE. The aforementioned changes do not significantly impact the picture of the postal market described in the 2019 Report.

Subsequent parts of the Report present the legal basis, the entities operating on the postal market, depict the development of the postal market during 2020, and deliver a comparative analysis for the years 2018-2020.

Unless otherwise specified, the figures are expressed in millions of units or in millions PLN. Any differences in the sum total and shares result from the applied rounding rules.

¹ Uniform text: Journal of Laws of 2020, item 1041.

² The Regulation of the Minister of Administration and Digitisation on the template form for submitting the report on postal activities to the President of the Office of Electronic Communications (Journal of Laws of 2013, item 1489).



1

Introduction

Following the development of digital technologies, the Polish market for postal services has been undergoing lasting structural changes for several years now, including the shrinking importance of traditional postal services, compensated by the dynamic growth of consignments containing goods. In recent years, this has driven a consistent increase in the value of the Polish postal market, which has been growing at a faster pace than the entire Polish economy.

In 2020, nearly all areas of the socio-economic life were affected by the COVID-19 pandemic that hit Poland in March by causing significant changes in social behaviour, including consumer behaviour.

The state of the epidemic enforced a shift of the economic activity to the digital space. That had a significant impact on the e-commerce sector that experienced a swift and steep growth upon the introduced lockdown, irrespective of its continuous impressive development in Poland over a number of years³.

That triggered an abrupt increase in the total value of the postal market in Poland. The e-commerce sector is the main driver of the segment of courier items that has the main influence on the value of the market. During the same year 2020, the Polish postal market recorded a record value jump year on year since the market liberalization in 2013. It amounted to just over PLN 1.4 billion, which inflated the total value of the Polish postal market to PLN 11.7 billion. This also translated into an unprecedented growth pace of 14.1%, which particularly contrasts the 2.7% decline in GDP due to the pandemic crisis in 2020.

³ As depicted in Figure 8.

Simultaneously, the segment of courier items strengthened its primacy, which made the greatest contribution to increasing the total revenue value of the postal operators on the market, while generating 58.8% of the market value.

As in the preceding year, the increase in the market value was accompanied by a slight decline in the total volume of postal services. In 2020, the total volume of postal services amounted to 1.88 billion units, which means a year-on-year decrease by 0.5%.

The most important role on the market was played by Poczta Polska S.A. (hereinafter referred to as 'Poczta Polska'), acting as the designated operator in 2020, which carried out 1,265.4 million services (67.4% of the total volume) in domestic and international trade, while generating PLN 5,330.9 million revenue (45.6% of the total revenue). If compared with the preceding year, the volume of the operator's services shrank by 13.8%, with the value of revenue falling by 4.4%.

During 2020, alternative operators carried out a total of 611.2 million services (32.6% of total volume) in total domestic and international trade, which translated into PLN 6,355.5 million revenue (54.4% of total revenue). If compared with the preceding year, the volume of the alternative operators' services increased by 46.4%, with the value of revenue increasing by 36.1%.

The greatest volume of services was still created by letter services, with 1,054.7 million units being delivered in 2020, which however means a decrease by 15.4% against 2019, and generated PLN 3,542.9 million revenue (lower by 6.2%).

On the other hand, a total of 666.9 million units of courier items and traditional postal parcels were delivered during the analysed year (an increase by 43.1%), which generated PLN 7,322.9 million revenue (29.5% more). This means that the year 2020 marked another consecutive year of increasing revenue in such services, which was also influenced by a significant acceleration in the development of e-commerce due to the pandemic, and thus of the postal market, in particular the segment of courier items.

As in the preceding year, 21 new postal operators were registered in 2020. By the end of the year, there were 291 operators in the register (283 in 2019), of which 139 actively operated postal services (146 in 2019).

The operators report that a total of 93,429 people were employed in the postal sector, which marks an increase by 464 posts compared to the preceding year.

In 2020, postal services were provided in 27,904 postal outlets, including 7,627 outlets of the designated operator and 20,277 outlets of the alternative operators. Postal service machines were used for the provision of postal services, with 11 thousand being already in operation in 2020.

2 Characteristics of the postal services market



2.1

Legal bases governing the functioning of the market for postal services

2.1.1 Domestic law

The following legal acts constituted the legal basis for the functioning of the market for postal services in Poland in 2020:

- the Act – the Postal Law⁴ and the implementing acts thereto,
- the Act of 16 July 2004 – the Telecommunication Law⁵, hereinafter referred to as the ‘Telecommunication Law’.

The Postal Law divided the market for postal services into several main segments: courier items, universal services, services falling within the scope of universal services and other postal services.

In 2020, the Postal Law was amended by the Act of 16 April 2020 on specific support instruments upon the spread of the SARS-CoV-2 virus⁶. The amendment introduced new provisions on amending the manner, rules and mode for delivering a registered consignment and a courier delivery, etc.

On 1 January 2020, the provisions implemented by the Act of 31 July 2019 on amending certain acts to reduce the regulatory burdens⁷ entered into force (to implement the declarations specified in the Strategy for Responsible Development to decrease the bureaucratic burdens and to simplify the provisions), while enabling the President of the UKE to remove entries from the register of postal operators in case a postal operator

does not fulfil the information obligation specified in Article 43 par. 1 (the report on postal activities) or par. 5a (the declaration on not carrying out postal activities) during a period of two subsequent years.

2.1.2 European law

The most important acts regulating the postal market in the European Union in 2020 were:

- Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service (the so-called First Postal Directive)⁸,
- Directive 2002/39/EC of the European Parliament and of the Council of 10 June 2002 amending Directive 97/67/EC with regard to the further opening to competition of Community postal services (the so-called Second Postal Directive⁹),

⁴ The Act – the Postal Law implemented the provisions of Directive 2008/6/EC of the European Parliament and of the Council of 20 February 2008 amending Directive 97/67/EC with regard to the full accomplishment of the internal market of Community postal services (O. J. of the EU L 52, 27.02.2008, p. 3, as amended) and defined the rules for the functioning of the postal market after its opening to competition.

⁵ Uniform text: Journal of Laws of 2021, item 576.

⁶ Journal of Laws of 2020, item 695.

⁷ Journal of Laws of 2019, item 1495.

⁸ O. J. of the EU L 15, 21.01.1998, p. 14, as amended.

⁹ O. J. of the EU L 176, 05.07.2002, p. 21.

- Directive 2008/6/EC of the European Parliament and of the Council of 20 February 2008 amending Directive 97/67/EC with regard to the full accomplishment of the internal market of Community postal services (the so-called Third Postal Directive)¹⁰,
- Regulation (EU) 2018/644 of the European Parliament and of the Council of 18 April 2018 on cross-border parcel delivery services¹¹.

2.1.3 International law on the postal market

The functioning of the market for postal services is also regulated by the legal acts of the Universal Postal Union¹². The basic document is the Universal Postal Convention¹³, establishing common rules applicable to the international postal service.

The tasks related to postal activities, as defined for the postal managers or postal administrations by international legal provisions, are performed by the designated postal operator. This is of particular importance for the obligation to render universal services, as Article 3(1) and (2) and Article 12 of the Universal Postal Convention specify a broader range of basic (universal) services compared to the one specified in Article 45(1) of the Postal Law.

2.2 Participants of the market for postal services

2.2.1 Regulatory authority

The President of the UKE is the central body of the government administration. Its competences are defined by the Telecommunication Law and the Postal Law. They cover regulatory, control, mediation and inspiration tasks in the area of the postal and telecommunication market.

The President of the UKE cooperates with multiple organizations dealing with the postal market at domestic, European and international level. The most important international groups include: the European Commission (EC), the European Regulators Group for Postal Services (ERGP), the European Committee for Postal Regulation (CERP) and the Universal Postal Union (UPU).

¹⁰ O. J. of the EU L 52, 27.02.2008, p. 3.

¹¹ O.J. L 112, 02.05.2018, pp. 19-28

¹² Universal Postal Union (UPU).

¹³ Journal of Laws of 2015, item 1522.

2.2.2 Postal operators

There were 291 entities in the register of postal operators in 2020 (as of 31 December 2020). Of the registered postal operators, the report was submitted by: Poczta Polska and 138 other postal operators.

2.2.2.1 Operator designated for rendering universal services

By decision of the President of the UKE¹⁴, Poczta Polska is the operator designated for rendering universal services in the years 2016-2025.

The designated operator is obliged to render universal services within the entire territory of the country in a uniform manner and under comparable conditions.

2.2.2.1.1 Scope of the postal activities of the designated operator

During 2020, the postal activities of the designated operator involved in particular:

- universal postal services in domestic and international trade: unregistered letter services, registered letter services (including registered letters and letters with a declared value), consignments to the blind, postal parcels with a weight of up to 20 kg (including those with a declared value) and M bags,
- services falling within the scope of universal services in domestic

- and international trade: letter services (including unregistered, registered and with a declared value) from mass senders, postal parcels, EMS and others,
- courier items in domestic trade, including: Pocztex, Consignment,
- courier items in international trade, including: Paczka Ukraina+,
- other postal services in domestic trade, including marketing consignments, commercial consignments, unaddressed forms, postal transfers, consignments with a weight of more than 10 kg and others,
- other postal services in international trade: Direct Entry and IDM consignments, postal foreign transfers, Business Parcel and other.

2.2.2.2 Alternative postal operators

In accordance with the Postal Law, the postal activity is a regulated activity in the meaning of the Act of 6 March 2018 – the Entrepreneurs' Law¹⁵, and requires entry in the register of postal operators (ROP).

During 2020, the President of the UKE received:

- 26 applications for entering in the ROP, of which 21 applications were accepted, 4 applications were left unconsidered (as the application was not corrected), while one application was received in 2020, but the entry was made in 2021,

¹⁴ Decision of 30 June 2015.

¹⁵ Uniform text: Journal of Laws 2021, item 162.

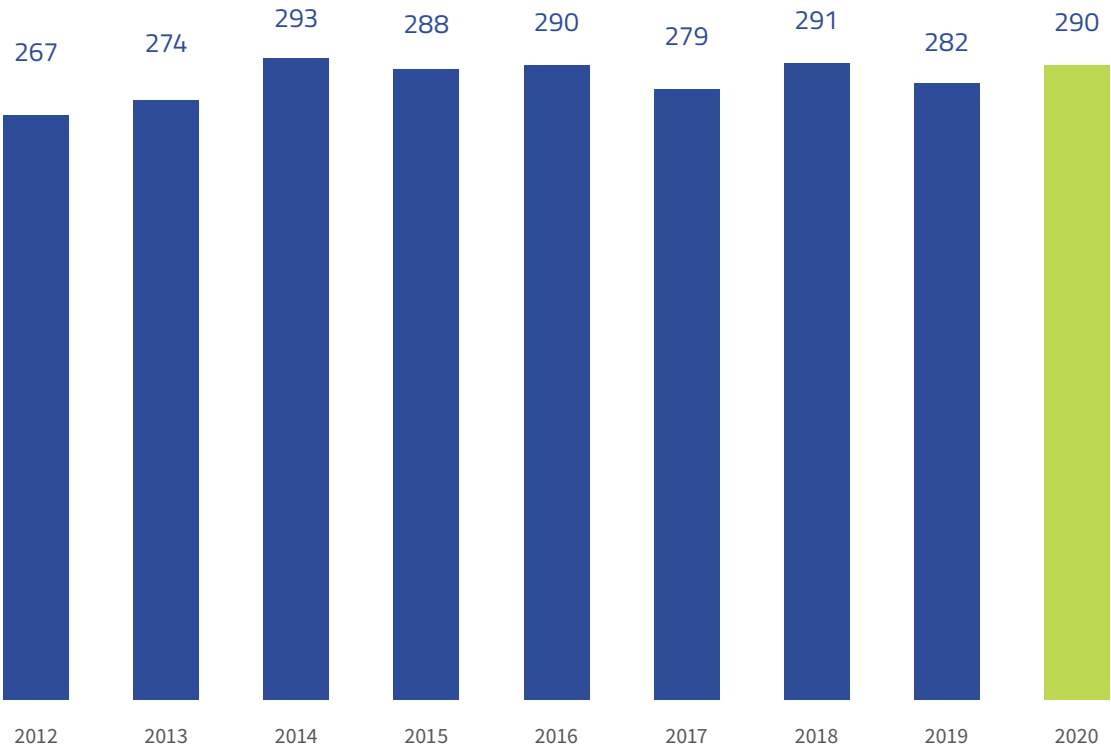
- 10 applications for removing from the ROP, while one application was received in 2020, but the removal was made in 2021,
- 4 applications for suspending the postal activities,
- 19 applications for amending the data in the application for entering in the ROP.

Four (4) entities were removed from the ROP ex officio, as it was established that they had abandoned the postal activities on a permanent basis (they had been removed

from the Central Registration and Information on Business or the National Court Register at an earlier time). As of 31 December 2020, there were 291 entities in the register of postal operators, including Poczta Polska and 290 operators not rendering universal services.

A gradual increase in the number of alternative operators was recorded over the years 2012-2014. The number of registered entities remained stable in the following years.

Figure 1
Number of registered alternative postal operators in the years 2012-2020 (as of 31 December).



Source: UKE on the basis of the ROP.

Not all of the registered operators start postal activities at all. The greatest number of active entities was recorded in the Mazowieckie

Voivodeship (62). The remaining voivodeships did not have more than 12 operators.

Table 1

Number of registered and active alternative postal operators in different voivodeships in 2020.

Voivodeship	Number of operators registered*	Number of operators active	Usage degree of the entries
Lower Silesia	19	8	42.1%
Kuyavia-Pomerania	5	1	20.0%
Lublin	5	1	20.0%
Lubusz	7	5	71.4%
Łódź	14	5	35.7%
Lesser Poland	21	12	57.1%
Masovia	122	62	50.8%
Opole	5	4	80.0%
Subcarpathia	21	5	23.8%
Podlaskie	8	4	50.0%
Pomerania	21	5	23.8%
Silesia	25	11	44.0%
Świętokrzyskie	4	2	50.0%
Varmia and Masuria	1	1	100.0%
Greater Poland	20	9	45.0%
West Pomerania	5	3	60.0%
TOTAL	303	138	45.5%

Source: UKE

* The number of registered operators also includes 13 operators that were removed from the ROP in 2020.

In the postal sector, the economic activities are carried out by the alternative postal operators in different organizational and legal forms, with the majority of them being companies with limited liability and economic activities of natural persons. During 2020, the following organizational and legal forms were used by 138 active alternative operators:

- company with limited liability
– 62 operators,
- economic activity of a natural person
– 56 operators,

- joint-stock company – 4 operators,
- other form (civil partnership, registered partnership, limited partnership, cooperative, foundation) – 16 operators.

Contrary to Poczta Polska which is obliged to render services in domestic and international trade, the alternative operators may render their services within the country, abroad or on an international basis or only on a local basis (within a voivodeship, powiat, one locality or a district of the former).

Table 2

Areas of operation of the alternative postal operators in the years 2018-2020.

Area of operation	Number of alternative postal operators		
	2018	2019	2020
Domestic	37	32	26
Domestic and international	44	44	46
Only international	8	9	9
Local, including:	61	60	57
within a voivodeship	21	22	21
within a city, powiat or a different area	40	38	36

Source: UKE

2.2.2.2.1 Scope of the postal activities carried out by the alternative operators

During 2020, the alternative postal operators were active in three segments of the market for postal services: courier items, services falling within the scope of universal services and other postal services.

The number of alternative postal operators in different segments of the market for postal services is depicted below.

Analysis of the segments in which the alternative postal operators operate shows that 125 of them rendered services only in one segment during 2020 (80 operators reported that they rendered only courier delivery services, while 37 operators rendered services falling within the scope of universal services). There was only 1 alternative operator that operated in all three segments of the market for postal services.

These statistics indicate that there were 88 alternative operators in the segment of courier items, 47 operators in the segment of services falling within the scope of universal services, while 17 alternative operators were active in the segment of other postal services during 2020.

Table 3

Segments of operation of the alternative postal operators in the years 2018-2020.

Segments of the market for postal services (in 2020)			Number of alternative postal operators		
Courier items	Services falling within the scope of universal services	Other postal services	2018	2019	2020
			84	78	80
			37	41	37
			13	10	8
			6	6	4
			3	5	5
			4	4	3
			3	1	1
			150	145	138

Source: UKE

3 Analysis of the Polish market for postal services in 2020



3.1

Value of the Polish market for postal services in 2020

By the end of 2020, the Polish market for postal services reached a value of PLN 11,686.4 million. This means that compared to the preceding year total revenue in the postal services of the operators operating on the Polish market increased by PLN 1,444.1 million, which translates into an annual growth rate of 14.1%. The year 2020 was the fourth consecutive year when the value of the market for postal services increased at a higher pace than the Polish economy.

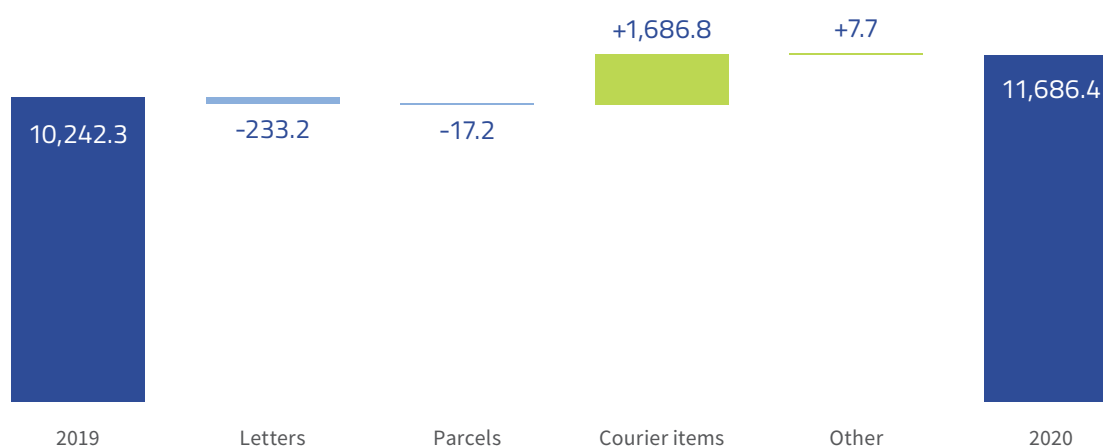
The most important growth factor was the swift increase in the revenue from courier items, stimulated by the constantly increasing volumes of consignments containing goods purchased by consumers in e-commerce transactions.

The year 2020 marked a decline in the revenue in two main product categories, including letters by 6.2% and postal parcels by 3.6%, whereby the volume of the latter increased by 19.1% during the same period, while letters recorded a slight decrease by 15.4%.

Figure 2 depicts the impacts of the developments in different categories of revenue on the total value of the postal market in the years 2019-2020.

Figure 2

Key drivers of the value of the postal market in 2020 (in PLN million).



Source: UKE

Table 4 summarizes the value, share and growth pace of the revenue in the years 2018-2020 by main types of postal services.

Table 4

Revenue from different postal services in the years 2018-2020.

	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Letters	3,600.3	38.1%	3,776.1	36.9%	3,542.9	30.3%	4.9%	-6.2%
Postal parcels	442.8	4.7%	472.1	4.6%	454.9	3.9%	6.6%	-3.6%
Courier items	4,644.9	49.2%	5,181.1	50.6%	6,867.9	58.8%	11.5%	32.6%
Other services	758.8	8.0%	813.0	7.9%	820.7	7.0%	7.1%	0.9%
TOTAL	9,446.7	100.0%	10,242.3	100.0%	11,686.4	100.0%	8.4%	14.1%

Source: UKE

In 2020, the segment of courier items additionally strengthened its primacy as a segment with the greatest share in the total value of the Polish market for postal services. This is consistent with general market developments¹⁶. As pointed out on multiple occasions, courier items – irrespective of their higher price – are the preferable form for delivering goods by the e-commerce sector due to the fact that they are easier to post and deliver, may be traced and take less time than the traditional postal services.

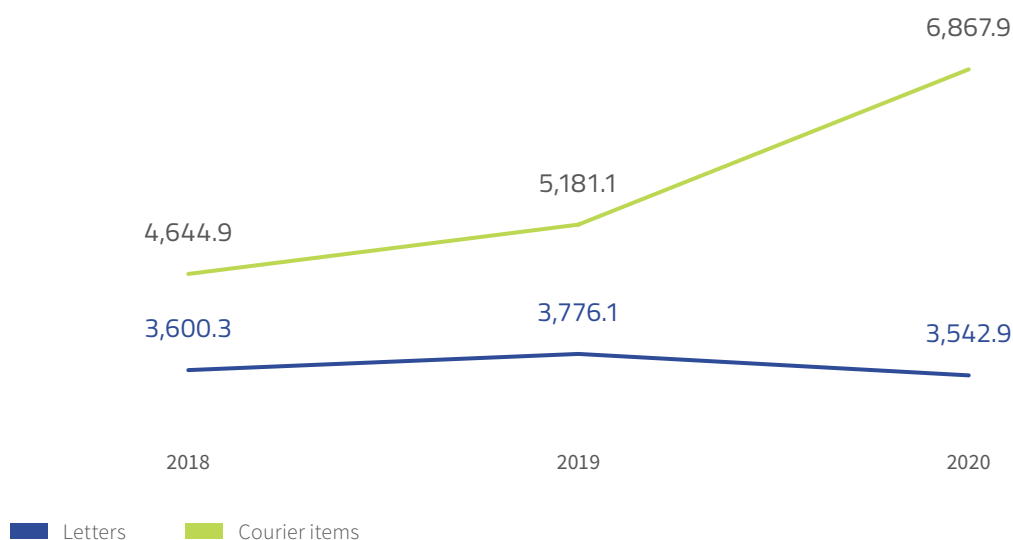
The development of the e-commerce sector and, in consequence, of the segment of courier items was additionally fuelled by the restrictions and limitations caused by the COVID-19 pandemic.

The analysis of mutual relationships between the revenue developments in the two most important market groups during 2020 makes it noticeable that the trends are of a contrary nature due to the diversified revenue dynamics.

¹⁶ The European Regulators Group for Postal Services Report on Core Indicators for Monitoring the European Postal Market 2020.

Figure 3

Developments in the revenue from letters and courier items in the years 2018-2020.



Source: UKE

A vast majority of the value of the Polish postal market is generated by the revenue of the operators in domestic trade, but international trade has also had a significant share in its value for several years now, while consistently maintaining the level of approx. 15-20%.

Table 5 summarizes the value, share and growth pace of the revenue in the years 2018-2020 by domestic and international trade.

Table 5

Revenue from all postal services by domestic and international trade in the years 2018-2020.

	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Domestic	7,599.5	80.4%	8,535.5	83.3%	9,836.9	84.2%	12.3%	15.2%
International	1,847.2	19.6%	1,706.8	16.7%	1,849.5	15.8%	-7.6%	8.4%
TOTAL	9,446.7	100.0%	10,242.3	100.0%	11,686.4	100.0%	8.4%	14.1%

Source: UKE

The highest growth pace of the courier items strengthened the dominating impact of the segment in 2020 in relative terms.

Table 6 summarizes the value, share and growth pace of the revenue in the years 2018-2020 by segment of the postal market.

Table 6

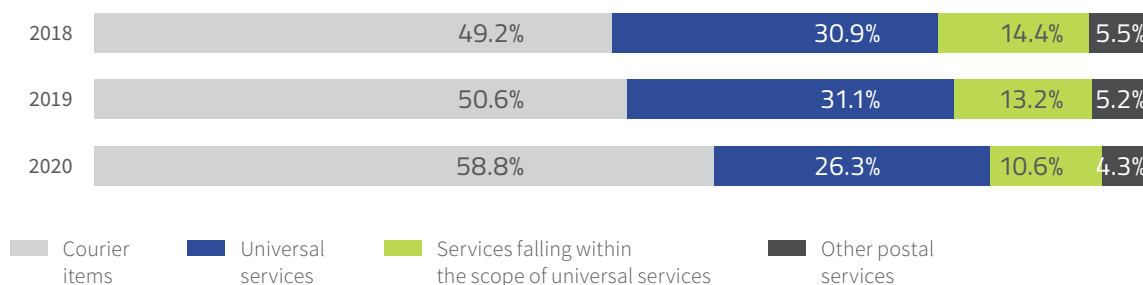
Revenue from all postal services by segment of the postal market in the years 2018-2020.

	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Courier items	4,644.9	49.2%	5,181.1	50.6%	6,867.9	58.8%	11.5%	32.6%
Universal services	2,920.4	30.9%	3,181.5	31.1%	3,072.2	26.3%	8.9%	-3.4%
Services falling within the scope of universal services	1,361.6	14.4%	1,347.0	13.2%	1,238.9	10.6%	-1.1%	-8.0%
Other postal services	519.8	5.5%	532.6	5.2%	507.3	4.3%	2.5%	-4.8%
TOTAL	9,446.7	100.0%	10,242.3	100.0%	11,686.4	100.0%	8.4%	14.1%

Source: UKE

Figure 4

Value of the market for postal services in the years 2018-2020 by segment in relative terms.



Source: UKE

3.2

Volumes of postal services in 2020

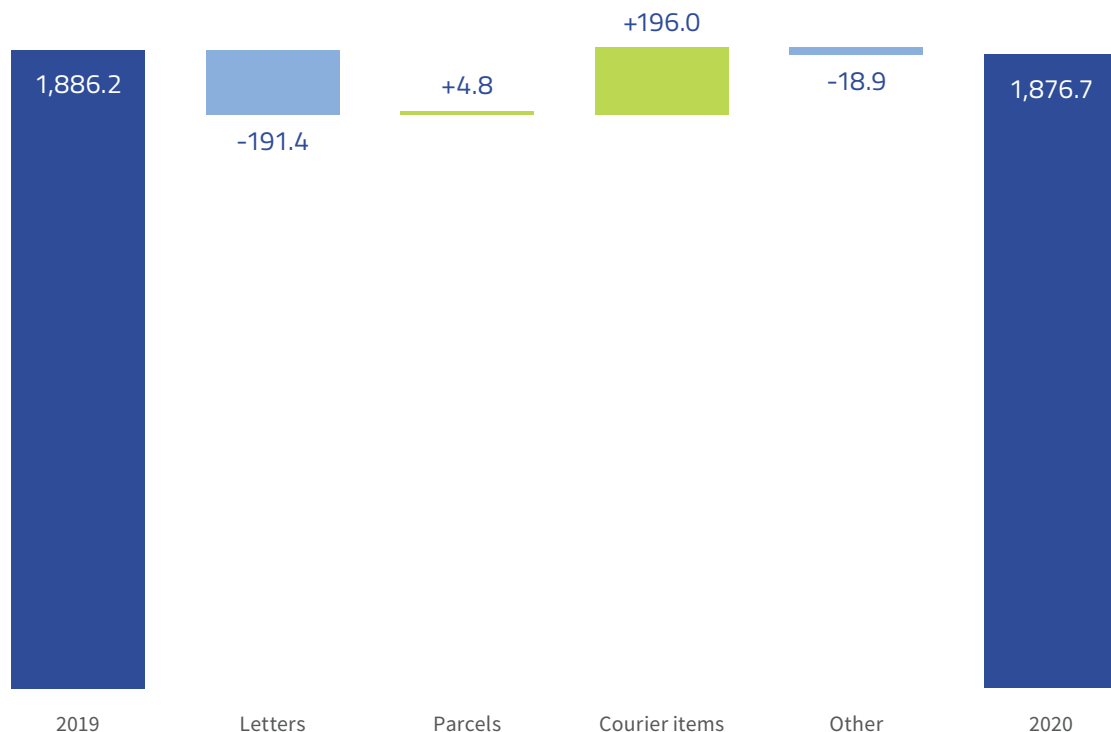
During 2020, the postal operators delivered a total of 1,876.7 million units of services, which implies a decrease by 9.5 million units, i.e. by 0.5%, if compared to 2019. This year the decrease in the volume of letters was not

compensated by the increasing volumes of other categories of services, which reflected in the continued decrease in the volume of postal services, as recorded since 2019.

Figure 5 depicts the impacts of the volumes of different postal services on the total volume of services in the years 2019-2020.

Figure 5

Key drivers of the volume of postal services in 2020 (in millions of units).



Source: UKE

Table 7 summarizes the value, share and growth pace of the volumes generated by the postal operators in the years 2018-2020.

Table 7

Volumes of different postal services in the years 2018-2020.

	Volume (in million units) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Letters	1,372.2	71.2%	1,246.1	66.2%	1,054.7	56.2%	-9.2%	-15.4%
Postal parcels	23.0	1.2%	25.2	1.3%	30.0	1.6%	9.4%	19.1%
Courier items	368.8	19.2%	440.9	23.3%	636.9	33.9%	19.5%	44.5%
Other services	162.2	8.4%	174.0	9.2%	155.1	8.3%	7.3%	-10.9%
TOTAL	1,926.3	100.0%	1,886.2	100.0%	1,876.7	100.0%	-2.1%	-0.5%

Source: UKE

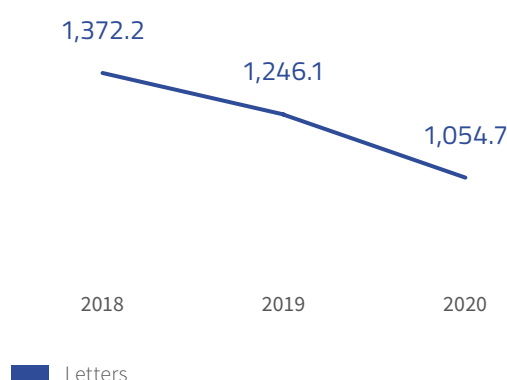
Figures 6 and 7 illustrate the developments in the volumes of basic types of consignments: letters, postal parcels and courier items.

A decreasing trend in the volume of letters has been noticeable for several years now¹⁷. The trend was also evident in 2020, which was additionally strengthened by the lockdown-related restrictions, including the limited opening hours of the postal outlets and the decreased socio-economic activity.

In 2020, the volume of courier items increased by 44.5% year on year, which implies that a very strong trend from previous years does continue.

Figure 6

Developments in the volume of letters in general in the years 2018-2020 (in millions of units).

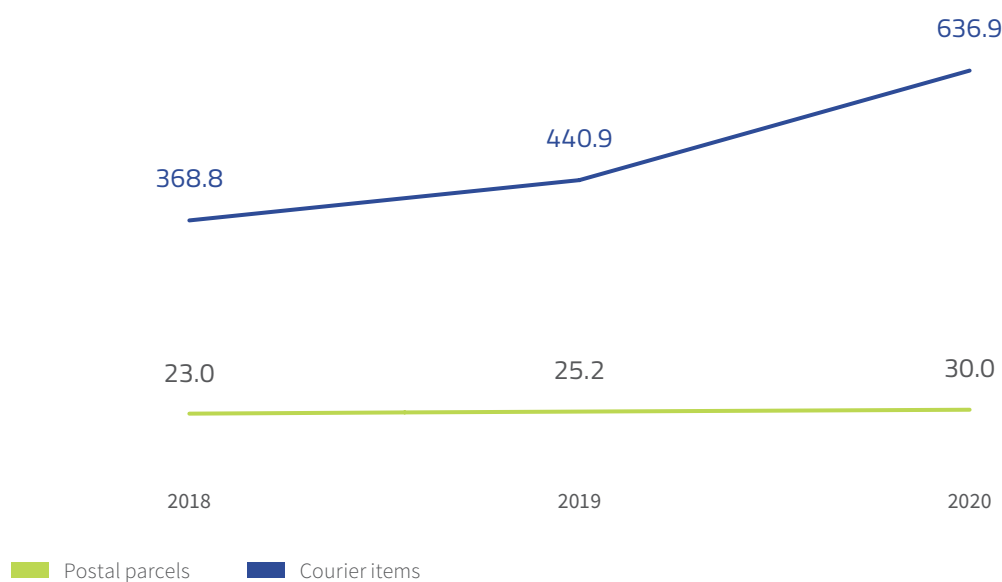


Source: UKE

¹⁷ Report on the state of the postal market in 2018 and Report on the state of the postal market in 2019.

Figure 7

Developments in the volume of courier items and postal parcels in general in the years 2018-2020 (in millions of units).



Source: UKE

In 2020, the volume of traditional postal parcels remained on a stable level for a consecutive year, while marking a slight increase against the preceding year. Contrary to the preceding year, the number of other postal services decreased, which may be attributed to the decreasing volume of both completed postal transfers and marketing consignments.

The so-called posting indicator is a relative measure of the volume of postal services per one resident of a country. In 2020, the indicator had a value of 49 units of postal services per 1 resident a year.

Table 8

Number of units of postal services per 1 resident of Poland in the years 2018-2020.

	Years		
	2018	2019	2020
Volume of postal services in (in million units)	1,926.3	1,886.1	1,876.7
Number of postal services per 1 resident	50.1	49.1	49.0

Source: UKE (the number of the population at the end of each year provided by the Central Statistical Office of Poland).

3.3 Courier items

The segment of courier items of the Polish market for postal services has gradually been increasing the volume of delivered consignments due to the swift development of e-commerce. This resulted in an annual increase by as many as ten millions of units or so, which drove an increase in the revenue of the operators of courier items by even several hundreds of millions PLN.

In 2020, the pandemic made the Polish e-commerce market register a record high increase in ten years or so (by approx. 26% Y/Y according to the analyses), while reaching a value of approx. PLN 80 billion. Online commerce has strongly benefited from the restrictions imposed to curb the spread of the pandemic. Shops and commercial platforms recorded significant increases in sales, while many chains of stationary shops decided to launch their own e-shops¹⁸. As a result, the segment of courier items experienced an unprecedented growth.

During 2020, this market segment increased its revenue by as much as PLN 1,686.8 million compared to 2019. Such a rise reflected in a growth pace of nearly 33%, while the volume of delivered consignments increased by 196 million units compared to 2019, by the growth pace of 44.5%.

In 2020, courier items accounted for 33.9% of the entire volume of postal services on the market, and for as much as 58.8% of its value.

The Poland e-commerce market is believed to still possess a significant potential to grow further.

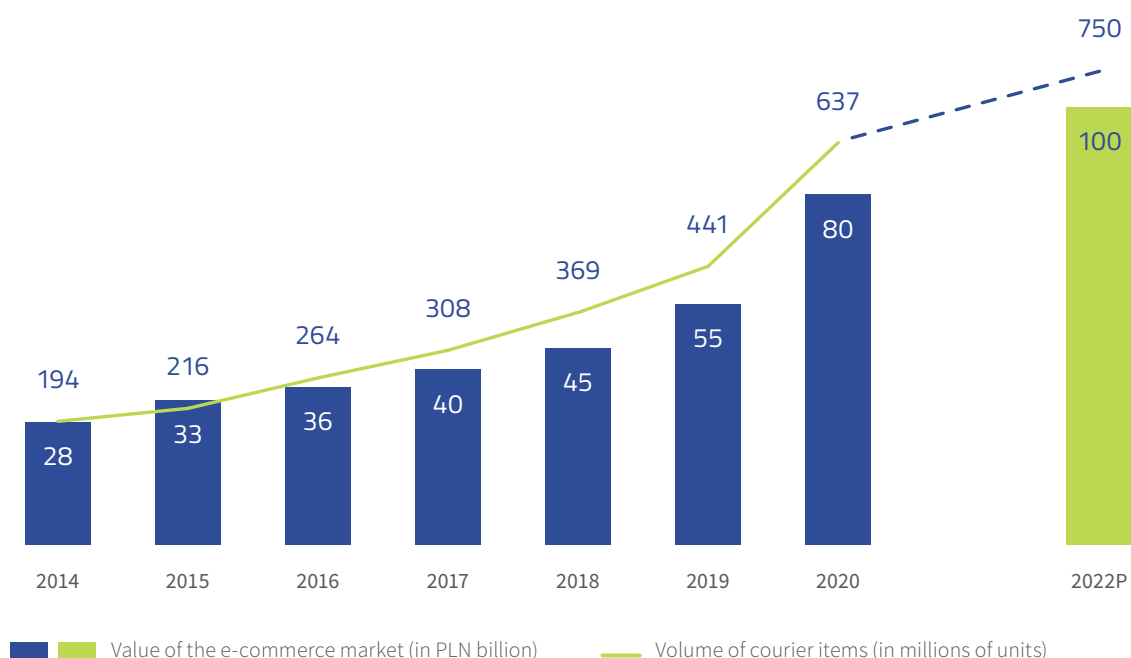
It is highly probable that the growth trends will continue after the pandemic. The number of Poles shopping by e-suppliers has gradually been growing for years now. As specified in the report entitled 'E-commerce in Poland in 2020. Gemius for e-Commerce Poland', as many as 73% of the Internet users shop online. This result is better than the previous edition of the survey by as much as 11 pp. This may be attributed to the pandemic and the restrictions in the socio-economic life which encouraged many people to shop through the Internet. What is more, the analysts predict that the e-commerce market will continue a two-digit growth in the upcoming years, which will also create adequate perspectives for the development of the segment of courier items of the postal market.

Figure 8 illustrates the relationship between the total volume of courier items and the increase in the estimated value of the Polish e-commerce market. As shown in the figure, the relationship is explicitly linear, which demonstrates that the segment possesses the potential to grow further.

If the growth forecasts for the value of the Polish e-commerce market realize, the volume of courier items may increase to even 750 million courier items in the upcoming years.

¹⁸ www.pmrmarketexperts.com/rekordowy-wzrost-rynku-e-commerce-w-2020-roku-spowodowany-epidemia-covid-19/

Figure 8

Volume of courier items and value of the Polish e-commerce market¹⁹.

Source: UKE

In 2020, there were 89 postal operators, including Poczta Polska, operating in the segment of courier items. In terms of the number of active operators, this is the largest segment of the market for postal services and an area that has experienced the highest increase of competition as a result.

Although the operators of courier services have benefited from the swiftly increasing demand for their services in recent years, the decreasing level of unemployment and the salary pressure resulted in a noticeable increase in the operational costs of the courier services on the Polish market. The operators struggle to achieve a high profitability, even the large ones or those being highly efficient in operational terms.

The unceasing competition between the operators to gain new clients, increase the

volume of services and revenue, triggered a price pressure in this segment of the market. In recent years, this has become evident in the growth pace of the volume of consignments exceeding the growth paces of their revenue. As a result, the average revenue from a courier delivery kept falling down. The situation did not change in 2020 even by the increasing demand for courier services which can however be attributed to the development of the e-commerce market as a result of the pandemic-related lockdown. This implies that the segment of courier items is highly competitive in Poland.

¹⁹ The growth forecast for the value of the e-commerce market after 2020 were prepared on the basis of the report by PwC Poland 'The development perspectives of e-commerce in Poland in the years 2021-2026'. The growth forecast for the number of courier deliveries was calculated in proportion to the 95% growth pace in the value of the e-commerce market in the years 2020-2022.

Table 9 illustrates the average revenue per one courier delivery in the years 2018-2020.

From the analysis of the aforementioned data it results that in 2020 the seven (7) largest operators of courier items in terms of volume and revenue possessed a share of 96.6% in the total volume and a share of 93.9% in the total revenue in this segment of the market. As in the preceding years, generating annual revenue in the amount of approx. PLN 100 million was a precondition to become one of the largest operators of courier items in 2020.

Table 9

Average revenue per one courier delivery in the years 2018-2020 (in PLN net for 1 unit).

	Years		
	2018	2019	2020
Average revenue per 1 courier delivery	12.59	11.75	10.78

Source: UKE

Table 10

Leading postal operators in the segment of courier items in 2020.

Volume				Revenue			
No	Name of the operator	Domestic trade	International trade	No	Name of the operator	Domestic trade	International trade
1	InPost sp. z o.o.			1	InPost sp. z o.o.		
2	DPD Polska sp. z o.o.			2	DPD Polska sp. z o.o.		
3	Poczta Polska S.A.			3	GLS Poland sp. z o.o.		
4	GLS Poland sp. z o.o.			4	UPS Polska sp. z o.o.		
5	InPost Paczkomaty sp. z o.o.			5	Poczta Polska S.A.		
6	UPS Polska sp. z o.o.			6	Fedex Express Poland sp. z o.o.		
7	FedEx Express Poland sp. z o.o.			7	InPost Paczkomaty sp. z o.o.		

Source: UKE

3.3.1 Volumes of and revenue from the courier items in 2020

During 2020, postal operators carried out a total of 636.9 million courier items in domestic and international trade, which translated into PLN 6,867.9 million revenue. If compared with 2019, the volume of such services increased by 44.5%, while their revenue by 32.6%.

The segment of courier items remains a segment in which the revenue from international trade determine the total value of the segment to the greatest extent. In 2020, this share amounted to 17.8% of the total revenue.

Table 11

Courier items in domestic and international trade in the years 2018-2020
(by volume).

	Volume (in million units) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Domestic	345.3	93.6%	415.5	94.3%	604.9	95.0%	20.3%	45.6%
International. including:	23.6	6.4%	25.3	5.8%	31.9	5.0%	7.6%	26.0%
outgoing	15.2	4.1%	16.1	3.7%	20.0	3.1%	6.4%	24.0%
incoming	8.4	2.3%	9.2	2.1%	11.9	1.9%	9.6%	29.5%
TOTAL	368.8	100.0%	440.9	100.0%	636.9	100.0%	19.5%	44.5%

Source: UKE

Table 12

Courier items in domestic and international trade in the years 2018-2020 (by revenue).

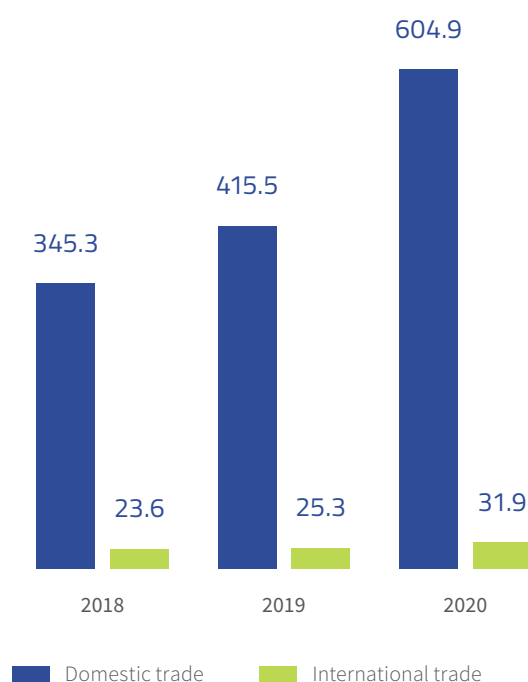
	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Domestic	3,590.5	77.3%	4,218.3	81.4%	5,644.2	82.2%	17.5%	33.8%
International, including:	1,054.4	22.7%	962.8	18.6%	1,223.7	17.8%	-8.8%	27.1%
outgoing	775.1	16.7%	804.3	15.5%	933.0	13.6%	3.6%	16.1%
incoming	279.2	6.0%	158.6	3.1%	290.7	4.2%	-43.4%	83.3%
TOTAL	4,644.9	100.0%	5,181.1	100.0%	6,867.9	100.0%	11.5%	32.6%

Source: UKE

In the years 2018-2020, the market for courier items in domestic trade recorded a gradual increase both in terms of volume and revenue. As far as international trade is concerned, it was the number of deliveries which increased. A relatively significant increase in the revenue (by 27.1%) in 2020 was preceded by a short-term slight decrease in 2019.

Figure 9

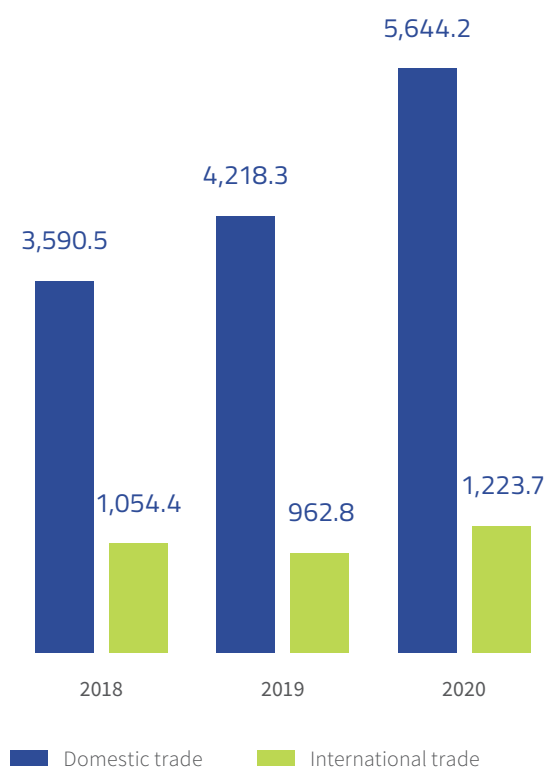
Courier items in domestic and international trade in the years 2018-2020 by volume (in millions of units).



Source: UKE

Figure 10

Courier items in domestic and international trade in the years 2018-2020 by revenue (in PLN million).



Source: UKE

As explained above, both the increased volume and revenue from courier items had been driven by a swifter development of the e-commerce sectors in the preceding years, which significantly accelerated during the COVID-19 pandemic.

3.3.2 Complaints concerning courier items

During 2020, the users of courier items submitted complaints concerning a total of 953,830 units of services, which means that, comparing with the total value of rendered services, nearly 15 out of 10,000 units of services were subject to a complaint (more than 23 in 2019). The main reason for the complains was caused by the delays against the guaranteed delivery time. The operators accepted 30.6% of the submitted complaints (50.3% in 2019).



Table 13

Submitted complaints concerning courier items and the result of their examination in 2020.

Reason of the complaint	Result of the examination:	Accepted	Rejected	In progress	Total	Percentage share (in %)
	Loss of the consignment	50,416	112,553	3,278	166,247	17.4%
	Partial loss of the consignment's content	6,769	16,549	1,252	24,570	2.6%
	Damaged consignment	62,979	103,874	9,805	176,658	18.5%
	Delay against the guaranteed delivery time	133,919	284,657	4,306	422,882	44.3%
	Incorrectly completed acknowledgment of receipt form ²⁰	2,206	220	154	2,580	0.3%
	Return of a consignment after deadline	339	813	15	1,167	0.1%
	Return of a consignment due to the incorrectly specified reason	4,056	14,633	0	18,689	2.0%
	Others	31,225	109,248	564	141,037	14.8%
	TOTAL	291,909	642,547	19,374	953,830	100.0%

Source: UKE

²⁰ Acknowledgement of receipt of a consignment.

3.4 Universal services

In 2020, the universal services²¹ included the following types of services in domestic and international trade:

1. accepting, sorting, transport and delivery of:
 - a) letters, including registered letters and letters with a declared value, with a weight of up to 2000g and with the following dimension to tolerance of 2 mm:

- a maximum of 900 mm, being the sum of the length, width and height, whereby the largest dimension must not exceed 600 mm, and for letters sent in a roll – 1040 mm, being the sum of the length and doubled diameter, whereby the largest dimension must not exceed 900 mm,
- a minimum of 170 mm for letters sent in a roll , being the sum of the length and doubled diameter, whereby the largest dimension must not smaller than 100 mm,
- the minimum address page – 90x140 mm,

²¹ Article 45 of the Postal Law.

- b) consignments to the blind,
 - c) postal parcel, including those with a declared value, with a weight of up to 10,000 g and the dimensions of up to 1500 mm each, whereby the sum of the length and the largest perimeter measured in the opposite direction to the length must not exceed 3000 mm;
2. sorting, transport and delivery of postal parcels from foreign countries, with a weight of up to 20,000 g and the dimensions mentioned in point 1 letter c).

In accordance with the Universal Postal Convention, universal services also include postal parcels with a weight of up to 20 kg, if posted to a foreign country, and M bags.

Under current law, the catalogue of universal services does not cover: postal transfer, marketing consignments and the services mentioned in Article 45(1) of the Act, if rendered for the mass senders.

Article 46(2) of the Postal Law lays down that universal services should be rendered: in a uniform manner, under comparable conditions, by ensuring that postal outlets and outgoing mail boxes are available across the entire country according to the existing needs, by fulfilling the time flow indicators for postal consignments, at affordable prices, with a frequency such that the outgoing mail boxes are emptied at least once and postal

consignments are delivered at least every working day, not less than 5 days a week, excluding statutory holidays, in a manner ensuring that the sender may receive the acknowledgment of receipt of a registered consignment.

Poczta Polska is the only operator rendering universal services.

3.4.1

Volume of universal services in 2020

During 2020, Poczta Polska completed 485.9 million units of universal services, which translated into PLN 3,072.2 million revenue. The percentage of services in domestic trade amounted to 87.1%, and 12.9% in international trade. A gradual, but modest increase in the volume of universal services took place in the years 2017-2019. The services then significantly decreased in volume in 2020 in comparison with the preceding year, both in domestic and international trade. The volume decreased by 14.2% and 25.2% respectively. The share of universal services in the total postal services amounted to 25.9% in terms of volume and to 26.3% in terms of revenue.

Table 14

Universal services in domestic and international trade in the years 2018-2020 (by volume).

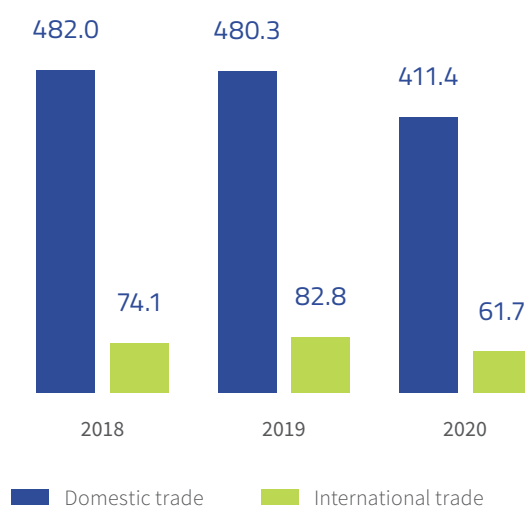
	Volume (in million units) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Letters	556.1	98.4%	563.1	97.6%	473.1	97.4%	1.3%	-16.0%
Postal parcels	9.2	1.6%	13.9	2.4%	12.8	2.6%	50.6%	-7.6%
TOTAL	565.3	100.0%	577.0	100.0%	485.9	100.0%	2.1%	-15.8%

Source: UKE

As in the preceding years, letters were the largest part of the segment of universal services in 2020, with a share of 97.4% of the total volume. The share in the volume of postal parcels amounted to 2.6%.

Figure 11

Letters in the segment of universal services in domestic and international trade in the years 2018-2020 by volume (in millions of units).



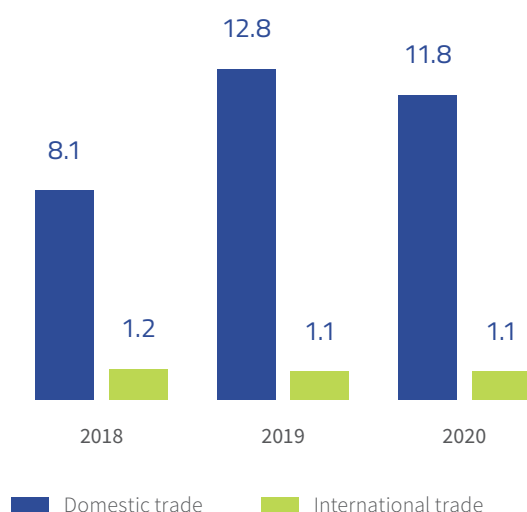
Source: UKE

The data on the volume of letters in the segment of universal services – both in domestic and international trade – in the years 2018-2020 demonstrate that the year 2020 brought a sharp decrease in the volume of such services – by 14.3% and 25.5% accordingly, in comparison with 2019.

The analysis of the volume of postal parcels in the segment of universal services in domestic trade in the years 2018-2020 demonstrates that the sharp increase in 2019 was followed by a stabilization. In international trade, the volume of parcels remained stable in 2020, following the trend recorded in the preceding years.

Figure 12

Postal parcels in the segment of universal services in domestic and international trade in the years 2018-2020 by volume (in millions of units).



Source: UKE

3.4.2 Complaints concerning universal services

During 2020, the users of universal services submitted complaints concerning a total of 181,724 units of services, which means that nearly 3 out of 10,000 units of services were subject to a complaint in proportion to the total volume of rendered services (slightly more than 3 in 2019). The loss of the consignment was the main reason of the complaints. The designated operator accepted 22.0% of the submitted complaints (31.0% in 2019).

Table 15

Submitted complaints concerning universal services and the result of their examination in 2020.

Reason of the complaint	Result of the examination:	Accepted	Rejected	In progress	Total	Percentage share (in %)
	Loss of the consignment	22,050	64,075	14,943	101,068	55.6%
	Partial loss of the consignment's content	174	526	110	810	0.4%
	Damaged consignment	249	1,670	278	2,197	1.2%
	Damaged consignment	2,499	8,833	263	11,595	6.4%
	Incorrectly completed acknowledgment of receipt form ²²	4,460	3,849	361	8,670	4.8%
	Others ²³	10,564	40,880	5,940	57,384	31.6%
	TOTAL	39,996	119,833	21,895	181,724	100.0%

Source: UKE

²² Acknowledgement of receipt of a registered consignment.

²³ Return of a registered consignment after deadline, return of a registered consignment due to the incorrectly specified reason and others.

3.5 Services falling within the scope of universal services

The segment of services falling within the scope of universal services²⁴ includes letters and postal parcels having the same type, weight and dimensions as specified for the universal services, however not rendered by the designated operator in the framework of its obligation to render universal services.

The services falling within the scope of universal services also include the services rendered for mass senders (i.e. those posting more than 100 thousand shipments a year). This is the reason why Poczta Polska generates revenue in this market segment as well.

This segment is marked by mass contractual volumes for the negotiation of which the negotiation strength of the contracting parties is of particular importance. This reflects in an effective price pressure, which causes that the segment accounts for only 10.6% of the value of the entire market although it generates as much as 31.7% of the entire volume of postal services.

In 2020, there were 48 postal operators, including Poczta Polska, actively operating in the segment of services falling within the scope of universal services.

²⁴ Article 3 point 30 of the Postal Law.

The segment of services falling within the scope of universal services still remains highly concentrated. The three largest operators active in the segment of services falling within the scope of universal services had a share of 98.8% in revenue and 99.5% in the volume in 2020.

Table 16 lists the largest operators in the segment and specifies the outreach of their services.

Table 16

Leading postal operators in the segment of services falling within the scope of universal services in domestic and international trade in terms of volume and revenue in 2020.

Volume				
No	Name of the operator	Domestic trade letters	Domestic trade Postal parcels	International trade
1	Poczta Polska S.A.			
2	Speedmail sp. z o.o.			
3	RUCH S.A.			
Revenue				
No	Name of the operator	Domestic trade letters	Domestic trade postal parcels	International trade
1	Poczta Polska S.A.			
2	RUCH S.A.			
3	Speedmail sp. z o.o.			

Source: UKE

3.5.1 Volumes of and revenue from the services falling within the scope of universal services in 2020

In 2020, postal operators carried out a total of 595.3 million units of services falling within the scope of universal services in domestic and international trade, which translated into

PLN 1,238.9 million revenue. If compared with 2019, the volume of such services decreased by 13.7%, while their revenue by 8.0%.

The greatest volume of services was delivered in domestic trade. International trade is relatively insignificant for the services falling within the scope of universal services. As in the preceding year, letters were the most important service in this segment in 2020, with a share of 97.2% of the total volume.

Table 17

Services falling within the scope of universal services in the years 2018-2020 (by volume).

	Volume (in million units) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Letters	812.1	98.4%	679.4	98.5%	578.8	97.2%	-16.3%	-14.8%
Postal parcels	13.0	1.6%	10.6	1.5%	16.5	2.8%	-18.3%	55.0%
TOTAL	825.1	100.0%	690.0	100.0%	595.3	100.0%	-16.4%	-13.7%

Source: UKE

Table 18

Services falling within the scope of universal services in the years 2018-2020 (by revenue).

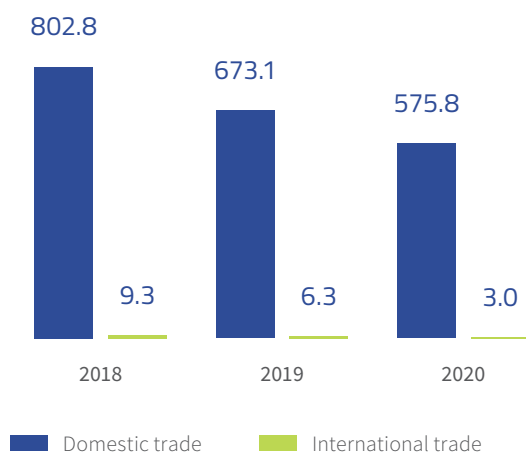
	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Letters	1,129.3	82.9%	1,134.3	84.2%	1,035.4	83.6%	0.4%	-8.7%
Postal parcels	162.8	12.0%	137.0	10.2%	151.7	12.2%	-15.8%	10.8%
Others ²⁵	69.5	5.1%	75.7	5.6%	51.8	4.2%	8.9%	-31.6%
TOTAL	1,361.6	100.0%	1,347.0	100.0%	1,238.9	100.0%	-1.1%	-8.0%

Source: UKE

²⁵ Acknowledgement of receipt of a registered consignment.

Figure 13

Letters in the segment of services falling within the scope of universal services in domestic and international trade in the years 2018-2020 by volume (in millions of units).



Source: UKE

Figure 15

Postal parcels in the segment of services falling within the scope of universal services in domestic and international trade in the years 2018-2020 by volume (in millions of units).



Source: UKE

Figure 14

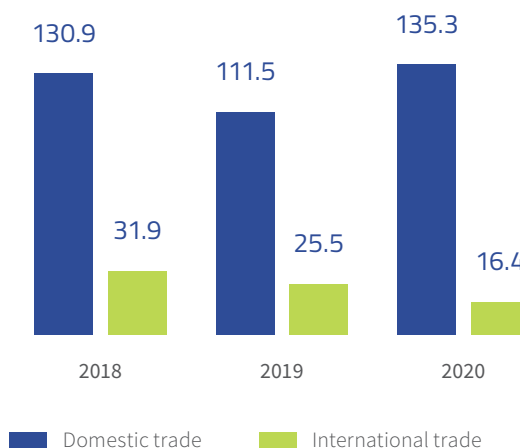
Letters in the segment of services falling within the scope of universal services in domestic and international trade in the years 2018-2020 by revenue (in PLN million).



Source: UKE

Figure 16

Postal parcels in the segment of services falling within the scope of universal services in domestic and international trade in the years 2018-2020 by revenue (in PLN million).



Source: UKE

In the years 2018-2020, the segment of services falling within the scope of universal services recorded a decrease in the revenue and volume of posted letters both in domestic and international trade. The only exception was that revenue from such services slightly increased on the domestic market in 2019, which was probably driven by higher prices.

In the years 2018-2020, both the volume and the revenue from postal parcels decreased on the international market in the aforementioned segment. On the other hand, the domestic market noticeably expanded during 2020 contrary to the declining trend in the preceding years, which the experts attribute to the state of the pandemic in our country, shifting the consumers' activity towards Internet shops.

3.5.2 Complaints concerning services falling within the scope of universal services

During 2020, the users of services falling within the scope of universal services submitted a total of 146,635 complaints, which means that over 2 out of 10,000 units of services were subject to a complaint in proportion to the total volume of rendered services (more than 4 in 2019). The loss of the consignment was the main reason of the complaints. The operators accepted 46.5% of the submitted complaints (50.0% in 2019).

Table 19

Submitted complaints concerning services falling within the scope of universal services and the result of their examination in 2020.

Reason of the complaint	Result of the examination:	Accepted	Rejected	In progress	Total	Percentage share (in %)
	Loss of the consignment	21,895	26,272	2,425	50,592	34.5%
	Partial loss of the consignment's content	140	156	28	324	0.2%
	Damaged consignment	864	1,761	147	2,772	1.9%
	Delay against the guaranteed delivery time	6 174	9,617	403	16,194	11.0%
	Incorrectly completed acknowledgment of receipt form ²⁶	11,899	9,457	628	21,984	15.0%
	Return of a registered consignment after deadline	8,416	901	38	9,355	6.4%
	Return of a registered consignment due to the incorrectly specified reason	659	402	16	1,077	0.7%
	Others	18,066	25,338	933	44,337	30.2%
	TOTAL	68,113	73,904	4,618	146,635	100.0%

Source: UKE

²⁶ Acknowledgement of receipt of a registered consignment.

3.6

Other postal services

The segment of other postal services includes letters and postal parcels that do not meet the definition of the consignments falling under the segment of universal services and the segment of services falling within the scope of universal services. Other postal services also include postal transfers, marketing consignments, unaddressed forms and postal consignment shipped with the use of the means of electronic communication (the so-called hybrid consignments), which took the form of a letter at the stage of accepting, transporting or delivering an information notification.

In 2020, the revenue of this segment accounted for 4.3% of the value of the entire postal market, while the corresponding volume accounted for 8.4% of the volume of the entire market.

A specific service in this segment consists of the distribution of unaddressed forms that requires an entry in the register of postal operators. The service is rendered in huge volumes (1.4 billion units in 2020), while generating marginal revenue of PLN 0.08 billion.

To prevent the distortion of data and as assumed for the purposes of this Report, the volume of unaddressed forms was excluded from the measures of the segment and from the entire volume of the postal markets, as in the preceding years.

The further analysis of the segment of other postal services was performed by excluding the unaddressed forms.

In 2020, there were 18 postal operators, including Poczta Polska, operating in the segment of other postal services.

Poczta Polska is continuously the largest operator in this segment of the market, generating 95.7% of its revenue and 94.2% of its volume of services.

3.6.1

Volume and revenue from other postal services in 2020

During 2020, the volume of other postal services amounted to 158.5 million units, which translated into PLN 507.3 million revenue. If compared with 2019, the volume of such services decreased by 11.1%, while their revenue by 4.8%.

Table 20

Other postal services in the years 2018-2020 (by volume).

	Volume (in million units) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Marketing consignments	116.8	69.9%	130.4	72.2%	113.4	71.5%	11.7%	-13.1%
Postal transfers	45.4	27.2%	43.6	24.1%	41.7	26.3%	-4.0%	-4.3%
Others ²⁷	4.8	2.9%	4.3	3.7%	3.4	2.1%	-11.8%	-20.5%
TOTAL	167.0	100.0%	178.3	100.0%	158.5	100.0%	6.7%	-11.1%

Source: UKE

²⁷ Letters, postal parcels, postal consignments shipped with the use of the means of electronic communication.

Table 21

Other postal services in the years 2018-2020 (by revenue).

	Revenue (in PLN million) and relative share (in %)						Percentage change (%)	
	2018	%	2019	%	2020	%	2019/18	2020/19
Marketing consignments	126.5	23.2%	154.5	29.0%	148.6	29.3%	22.1%	-3.8%
Postal transfers	332.6	64.9%	324.9	61.0%	319.0	62.9%	-2.3%	-1.8%
Others ²⁸	60.6	11.8%	53.2	10.0%	39.8	7.8%	-12.2%	-25.3%
TOTAL	519.8	100.0%	532.6	100.0%	507.3	100.0%	2.5%	-4.8%

Source: UKE

²⁸ Letters, postal parcels, postal consignments shipped with the use of the means of electronic communication, acknowledgments of receipt of a registered consignment.

Tables 20 and 21 summarize the value, shares of different main services and the growth rate of the revenue and volumes of the respective services in the years 2018-2020.

As in the years 2018-2019, the year 2020 marked decreases both in the volume and the revenue from all the services in this segment of the postal market. In 2019, the only exception was related to the marketing consignments that gained in significance both in terms of their volume and revenue.

3.6.2 Complaints regarding other postal services

During 2020, the users of other postal services submitted complaints concerning a total of 9,196 units of services, which means

that nearly 1 of 10,000 units of services were subject to a complaint in proportion to the total volume of rendered services (slightly more than 1 in 2019). The loss of the consignment was the main reason of the complaints. The operators accepted 24.5% of the submitted complaints (59.6% in 2019).

Table 22

Submitted complaints concerning other postal services and the result of their examination in 2020.

Reason of the complaint	Result of the examination:	Accepted	Rejected	In progress	Total	Percentage share (in %)
	Loss of the consignment	595	539	2,540	3,674	40.0%
	Partial loss of the consignment's content	34	23	2	59	0.6%
	Damaged consignment	191	801	54	1,046	11.4%
	Delay against the guaranteed delivery time	333	524	42	899	9.8%
	Incorrectly completed acknowledgment of receipt form ²⁹	0	0	0	0	0.0%
	Return of a registered consignment after deadline and due to the incorrectly specified reason	0	0	0	0	0.0%
	Non-delivery by the operator of the amount of money indicated in the postal transfer form	277	1,996	151	2,424	26.4%
	Others	821	241	32	1,094	11.9%
	TOTAL	2,251	4,124	2,821	9,196	100.0%

Source: UKE

²⁹ Acknowledgement of receipt of a registered consignment.

4 Resources and elements of the postal infrastructure



The resources and elements of the postal infrastructure of the operators are mainly postal outlets, outgoing mail boxes and customer service machines and human resources. The designated operator also possesses post-office boxes, own outgoing mail boxes, a system of postal codes for identifying the areas of delivery and a data base of address changes for the purposes of redirecting postal consignments.

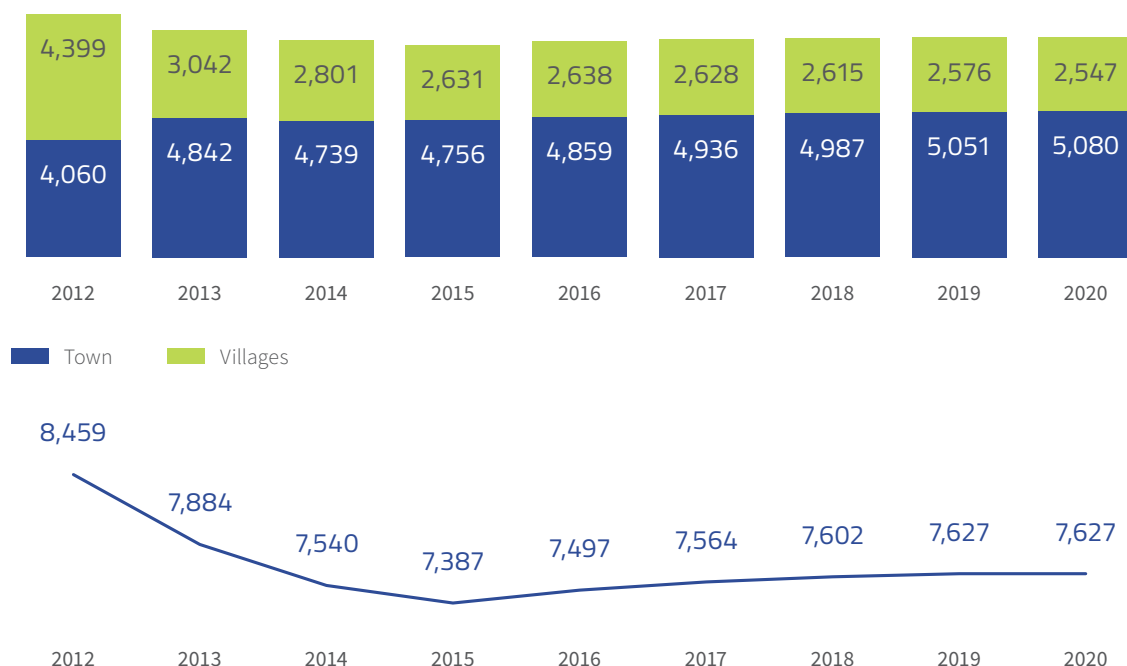
4.1 Resources and elements of the postal infrastructure of the designated postal operator

4.1.1 Postal outlets

As of 31 December 2020, Poczta Polska operated through 7,627 postal outlets of which 5,080 postal outlets were located in towns (including those located in urban municipalities and urban and rural municipalities), while 2,547 postal outlets were located in rural areas (i.e. rural municipalities). Postal agents managed 2,885 postal outlets.

Figure 17

Number of postal outlets operated by Poczta Polska in the years 2012-2020.



Source: UKE

Table 23

Fulfilment by Poczta Polska of the accessibility criterion for universal services.

Accessibility criterion in accordance with the Regulation of the Minister of Administration and Digitisation ³⁰	Degree of fulfilment as of 31.12.2020
The designated operator should launch at least one permanent postal outlet in each municipality.	Criterion fulfilled Each of 2,477 municipalities had at least one permanent postal outlet.
The designated operator should run one permanent postal outlet per 6,000 residents on average in urban and urban and rural municipalities across the entire country.	Criterion fulfilled The indicator of average accessibility of postal outlets amounted to 5,981 residents per 1 active permanent postal outlet in urban and urban and rural municipalities.
There should be at least one postal outlet of the designated operator per 85 km ² in rural municipalities across the entire country on an average basis.	Criterion fulfilled The indicator of average accessibility of postal outlets amounted to 83.93 km ² per 1 active permanent postal outlet in rural municipalities across the country.
The postal outlets of the designated operator should open every working day, excluding Saturdays, at least 5 days a week, and in case a statutory holiday falls during a week, the number may be reduced accordingly.	Criterion fulfilled The postal outlets open every working day. On statutory holidays, customers are served by the postal outlets on duty.

Source: Data provided by Poczta Polska.

³⁰ The Regulation of the Minister of Administration and Digitisation on the conditions under which the designated operator may render universal services (uniform text: Journal of Laws of 2020, item 1026).

As of 31 December 2020, Poczta Polska fulfilled the requirements concerning the location of postal outlets and the accessibility of the network of postal outlets.

4.1.2 Outgoing mail boxes and customer service machines

By the end of 2020, Poczta Polska operated 15,989 outgoing mail boxes, including

- 7,903 mail boxes in towns,
- 8,086 mail boxes in villages.

In comparison to 2019, the number of outgoing mail boxes decreased by slightly more than 1%. The number of outgoing mail boxes has been declining for several years now.

Apart from the postal outlets, consumers could also post and collect postal consignments by using the customer services machines in any place and at any time, and they could also refer to external collection points. By the end of 2020, the designated operator possessed 226 customer services machines and 8,644 external collection points (for consignment to be collected in a collection point).

4.1.3

Other elements of the postal infrastructure

By the end of 2020, Poczta Polska managed 125,545 post-office boxes and 120,264 own outgoing mail boxes. Additionally, the designated operator also possessed a system of postal codes for identifying the areas of delivery and a data base of address changes for the purposes of redirecting postal consignments. Having the aforementioned elements of the postal infrastructure, the designated operator is obliged to provide the postal operator rendering services falling within the scope of universal services with access to such elements within the scope specified in a contract on the access to elements of the postal infrastructure. On the other hand, the operators not rendering services falling within the scope of universal services are required to make available only the system of postal codes for identifying the areas of delivery and the data base of address changes for the purposes of redirecting postal consignments³¹. In 2020, Poczta Polska signed three contracts on the access to elements of the postal infrastructure. One contract was terminated in the analysed period.

4.1.4

Employment structure by Poczta Polska

In 2020, the annual average level of employment by Poczta Polska on the basis of employment contract amounted to nearly 77,256 full-time equivalent units. If compared with the preceding year, the operator decreased its employment by 1.6%.

4.2

Resources and elements of the postal infrastructure of the alternative postal operators

4.2.1

Postal outlets

By the end of 2020, the alternative postal operators ran a total of 20,277 postal outlets of which 17,162 were located in towns and 3,115 outlets in rural areas. As mentioned above, more alternative postal operators tend to concentrate their activities in towns where the demand for postal services is higher by their lower costs than in the rural areas. The vast majority of all the postal outlets of the postal operators, i.e. 18,569 postal operators, were managed by postal agents.

³¹ Article 66 of the Postal Law.

Table 24

Number of outlets reported by the alternative postal operators
(as of 31 December 2020).

Number of outlets	Number of operators in 2020
no outlet	63
1 outlet	43
from 2 to 10 outlets	18
from 11 to 100 outlets	7
from 101 to 1,000 outlets	2
more than 1,000 outlets	5
TOTAL	138

Source: UKE

The aforementioned data confirm that the largest group (nearly 76.6%) is formed by the alternative postal operators that do not possess postal outlets or possess one postal outlet. Most of them are usually seats of the natural person carrying out economic activity.

4.2.2 Other elements of the postal infrastructure

During the analysed period, none of the alternative postal operators had own outgoing mail boxes. In 2020, Poland had over 10,700 postal service machines.

4.2.3 Employment structure of the alternative postal operators

The annual average level of employment by the alternative postal operators was equal to 16,174 posts, which marks an increase by 1,693 (by 11.7%) posts in 2020, in comparison to 2019. As results from the data below, the level of employment by different postal operators was highly diversified. On the market, there were 8 operators with more than 500 employees. One-person operators formed a relatively large group (48).

Table 25

Number of employees by the alternative postal operators (as of 31 December 2020).

Level of employment	Number of operators in 2020
one-person economic activity	48
from 2 to 9 people	44
from 10 to 49 people	31
from 50 to 249 people	4
from 250 to 500 people	3
over 500 people	8
TOTAL	138

Source: UKE

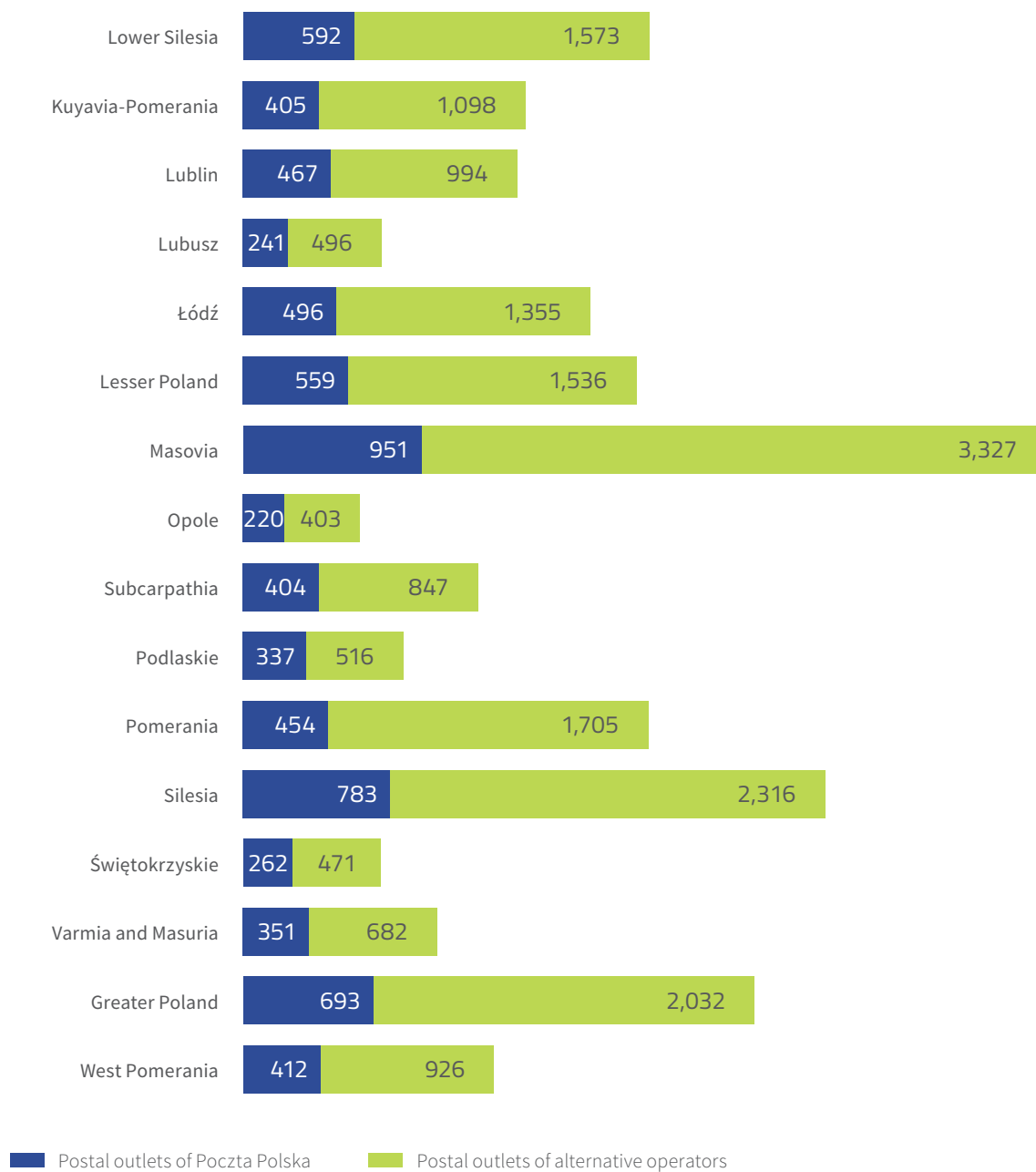
4.3 Postal outlets of the postal operators in 2020

During 2020, the postal operators rendered postal services through 27,904 postal outlets across the entire country. Own outlets of the postal operators accounted for over 23.1% of them (6,450). The remaining 76.9% of the postal operators were managed by postal agents. The designated operator had 73.5%

of the own postal outlets. The highest number of postal outlets are located in the highly urbanized voivodeships, e.g. Mazowieckie, Śląskie, Wielkopolskie and Dolnośląskie. Concerning the proportion of the postal outlets to the population of different voivodeships, the voivodeships with a higher value of GDP per capita are in a relatively better situation.

Figure 18

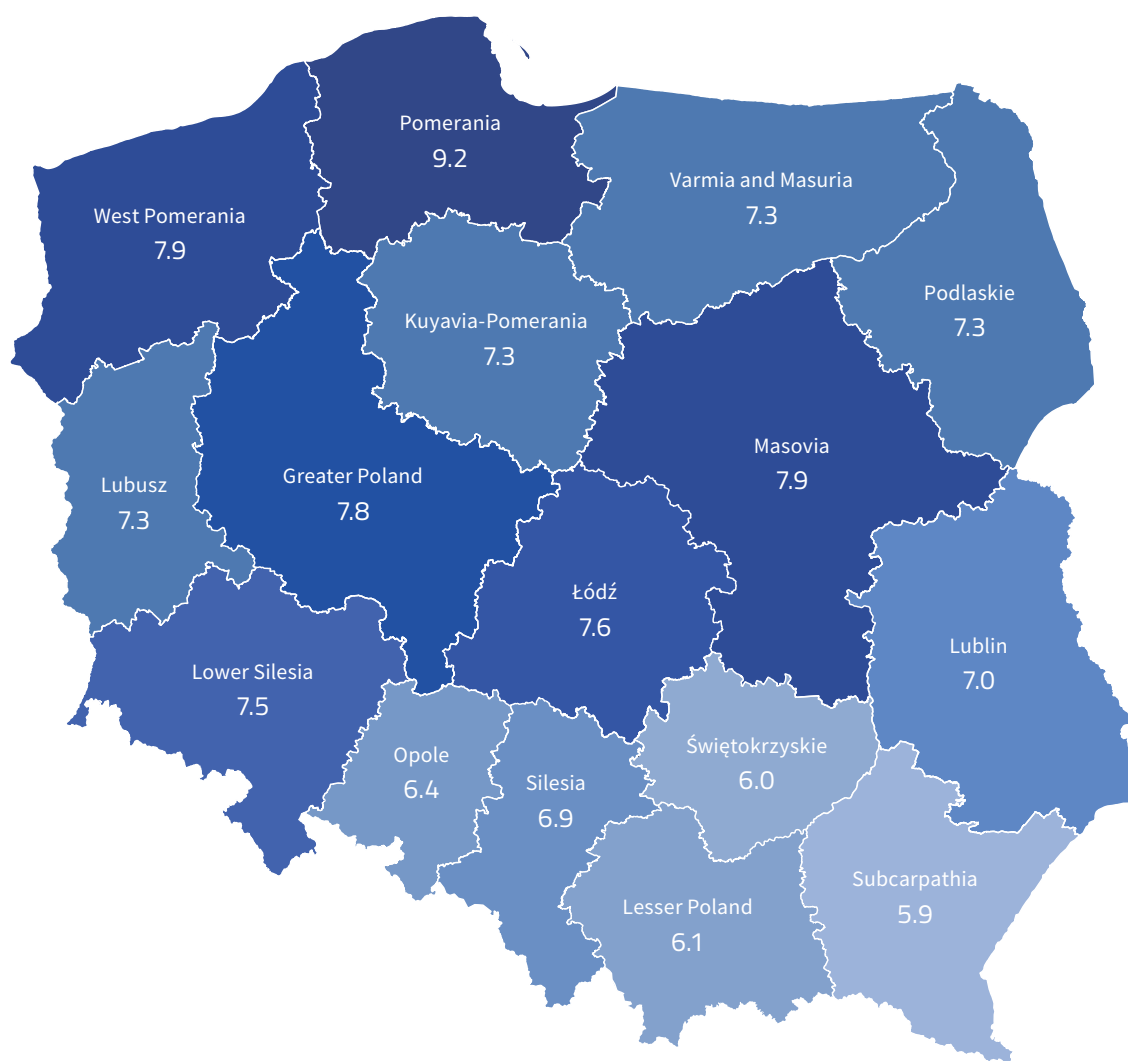
Number of postal outlets in 2020 by voivodeship.



Source: UKE

Figure 19

Number of postal outlets per 10 thousand residents in 2020 by voivodeship.



Source: UKE (the number of the population at the end of each year provided by the Central Statistical Office of Poland).



5 Conclusions

The year 2020 was marked by the pandemic and the related crisis, brought serious challenges for a number of sectors and for the entire economy that fell into recession for the first time since 1991. However, it brought a record-high increase in the volume of completed courier items and the value of revenue since the market liberalization – on the entire Polish market for postal services and in the most important segment of courier items in particular.

The postal operators efficiently and swiftly adjusted their activities to the requirements and restrictions during the pandemic, while implementing or expanding the deliveries to collection points other than the recipient's address of residence, no-contact door-to-door deliveries, no contact acknowledgment of receipt or non-contact payment by the receipt.

It is beyond any doubt that the only advantageous factor was that Poland had an extensive network of collection points before the pandemic, even compared with the more developed countries in Europe.

The Polish market for postal services has a significant potential to develop further. Following the unprecedented year 2020, the analysts forecast a further development of e-commerce, which may directly influence the demand for courier services. Despite the competition persisting on the market for courier items, the postal operators are planning further investments, in particular to expand the network of collection points. The recipients expect the shortest possible delivery times and convenient locations. Therefore, expanding the network of collection points will become one of the most important trends on the market for postal services in the upcoming years.

The aggregate data in Table 26 illustrate the developments in basic indicators of the market.

Table 26

Selected indicators of the Polish postal markets in the years 2018-2020 (excluding unaddressed forms).

	2018	2019	2020
Number of registered alternative operators	291	282	290
Number of active alternative operators	150	145	138
Volume of shipments operated by alternative operators – in billions of units	0.4	0.4	0.6
Volume of shipments operated by all operators – in billions of units	1.93	1.89	1.88
Revenue from postal services of alternative operators – in PLN billion	4.2	4.7	6.4
Revenue from postal services – in PLN billion	9.4	10.2	11.7

Source: UKE

Table 27

Postal services in different segments of the postal market in the years 2018-2020 – structure (in %) by volume and revenue (excluding unaddressed forms).

Segment	2018		2019		2020	
	Volume	Revenues	Volume	Revenues	Volume	Revenues
Courier items	19.1%	49.2%	23.4%	50.6%	33.9%	58.8%
Universal services	29.3%	30.9%	30.6%	31.1%	25.9%	26.3%
Services falling within the scope of universal services	42.8%	14.4%	36.6%	13.2%	31.7%	10.6%
Other postal services	8.7%	5.5%	9.5%	5.2%	8.4%	4.3%

Source: UKE

The Polish postal market is an important element of the Polish economy and has a high potential of further development. The COVID-19 pandemic revealed how important it is for the society. Thanks to the ability to adapt own activities to the swiftly developing conditions and to the introduction of innovative solutions, in particular for

delivering consignments, the consumers were provide with a safe and reliable access to services. Furthermore, this market generates a significant amount of revenue, guarantees the exchange of information on the internal market, and facilitates the enterprises to compete on a domestic and international basis.



6

Annex No 1. Results of the inspections of the postal activities carried out in 2020

Inspections by the operator rendering universal services

During 2020, the UKE carried out inspections by Poczta Polska being the designated operator in the following areas:

- providing the persons with disabilities with access to the universal services,
- examining complaints concerning universal services,
- adhering to the post-inspection recommendations of the President of the UKE.

Inspection of providing the persons with disabilities with access to the universal services

In accordance with Article 62 of the Postal Law, the President of the UKE is a body authorized to carry out inspections of whether the designated operator provides the persons with disabilities with access to the universal postal services. During the period from October until December 2020, the President of the UKE

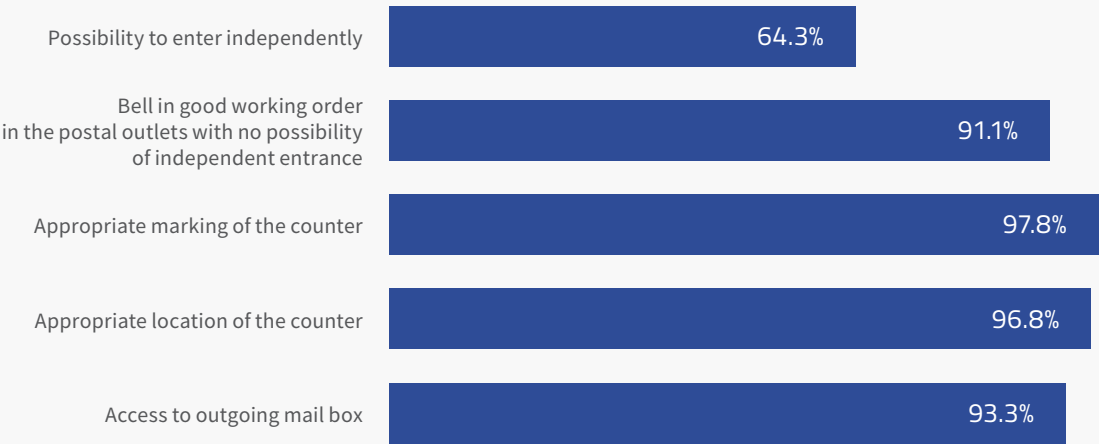
inspected 314 postal outlets as a result (259 postal outlets in towns and 55 postal outlets in villages), i.e. 4.1% of all the postal outlets of Poczta Polska that rendered postal services across the country³². Of the inspected postal outlets: 202 postal outlets had an independent entrance to the building, whereby in case there was no possibility to enter the premises independently, 102 postal outlets had a ring in good working order to call the personnel. However, the personnel of 5 postal outlets did not react to the ring, inter alia, because of servicing the customers present in the postal outlet at the same time.

It may be concluded on the basis of the inspection findings, that 299 of 314 inspected postal outlets of Poczta Polska (95.2%) could be accessed by those using wheelchair independently, or the persons with disabilities could call the personnel effectively.

³² From the annual report of the designated operator results that there were 7,627 postal outlets across the country by the end of 2019, including 5,051 postal outlets in urban areas and 2,576 postal outlets in rural areas.

Figure 20

Postal outlets with facilities for the persons with disabilities.



Source: UKE

All of the 128 inspected postal offices, which operated the delivery services, accepted consignments from persons with disabilities at their place of residents and kept a register of persons with disabilities.

The President of the UKE confirmed by inspection that most of the inspected postal outlets fulfil the requirements specified in the Postal Law. Furthermore, the gathered data confirm that the designated operator adapts its postal outlets to the needs of persons with disabilities by renovating, allocating or developing the network of postal outlets in the framework of the new visualization project.

Inspections of the procedure of examining complaints concerning universal services

The provisions of the Postal Law and the implementing provisions thereto lay down possible procedures in which the users of postal services may submit claims, the conditions and prerequisites for the responsibility of the postal operator, including the exemption circumstances, as well as the rules for granting a compensation and for calculating its amount (Articles 87-95 of the Postal Law). The main procedure in which the users of postal services may submit claims is the complaint procedure conducted by the portal operators.

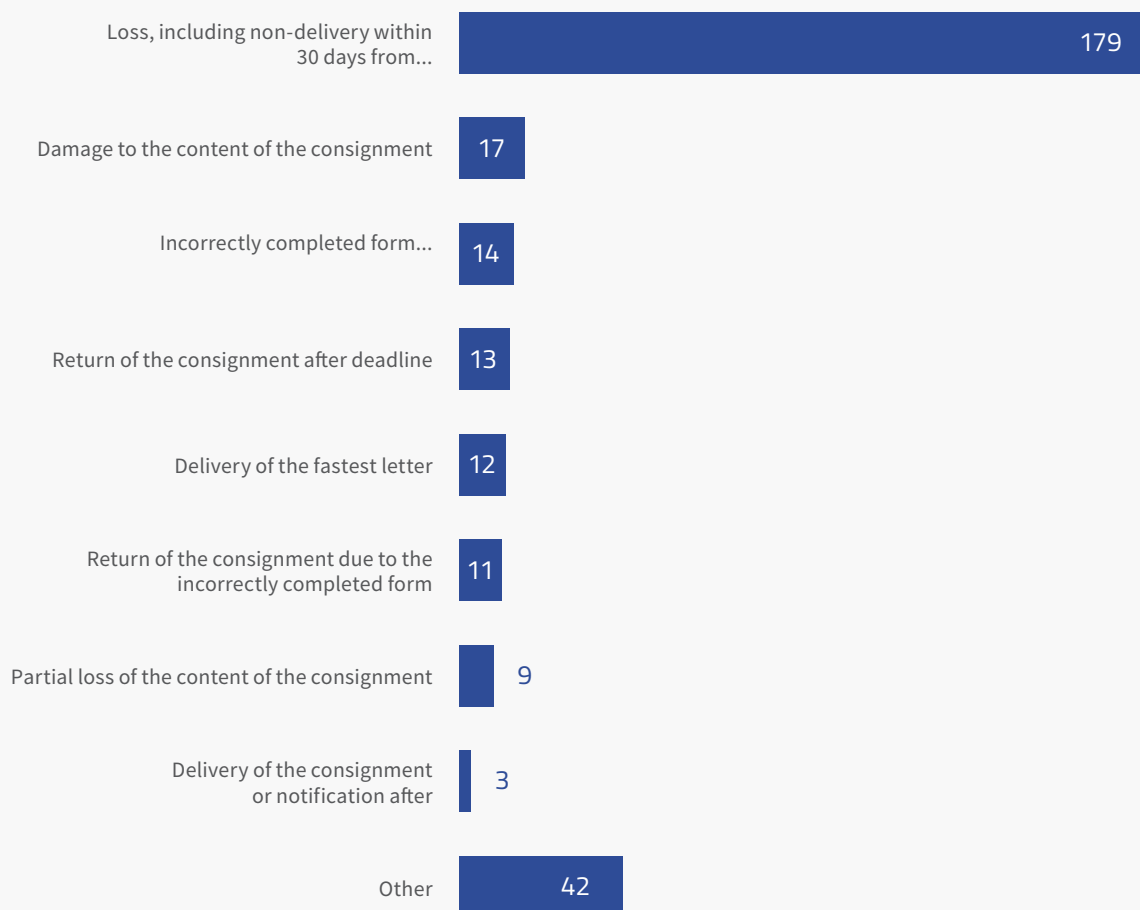
During the period from October until December 2020, the President of the UKE inspected the organizational units of Poczta Polska that are in charge of examining the incoming complaints. The inspection covered the period from 1 January until 9 December

2020. A total of 300 complaints concerning registered consignments in domestic trade were checked, including: 222 complaints concerning letters, 74 complaints concerning postal parcels and 4 complaints concerning postal parcels with a declared value. The inspection was aimed at establishing

whether Poczta Polska examines the complaints concerning registered consignments in the framework of universal postal services in accordance with valid legal provisions, and at gathering data on the completeness of the answers to the complaints and their timeliness.

Figure 21

Reasons for submitting complaints selected for inspection.

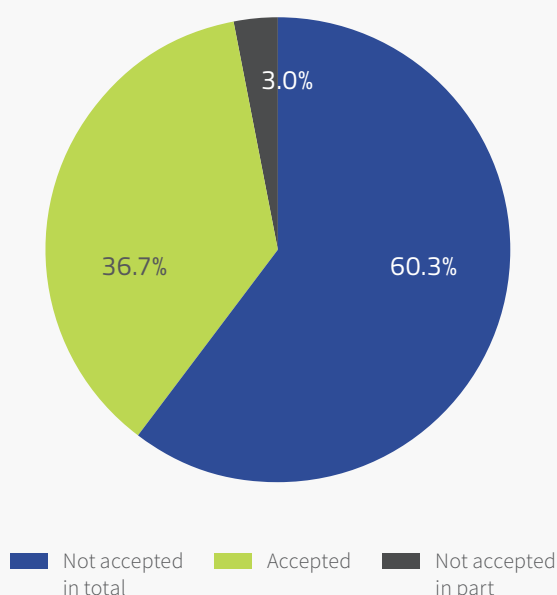


Source: UKE

From the inspection findings formulated by the President of the UKE results that nearly 40% of the inspected complaints were accepted, while 181 (60.3%) complaints were not accepted in total.

Figure 22

Result of the examination



Source: UKE

The evidence gathered during the inspection and the resulting findings make it possible to conclude that the designated operator examined the complaints concerning registered consignments in the framework of universal services in accordance with valid legal provisions, in particular the provisions of the Regulation on submitting a complaint concerning postal services³³.

Inspection of the postal operator's adhering to the post-inspection recommendations of the President of the UKE

The President of the UKE is authorized to carry out inspections to verify whether the provisions and decisions on postal activities are adhered to (Article 122(1) of the Postal Law). The inspection findings may justify further legal measures to be taken up, e.g. to issue post-inspection recommendations, as mentioned in Article 125(2) of the Postal Law.

In 2019, Poczta Polska was inspected for adhering to the legal provisions on postal activities with regard to the obligation of postal secrecy. Post-inspection recommendations in the meaning of Article 125(2) of the Postal Law were issued on the basis of the inspection findings.

In view of the above, in 2020 the President of the UKE inspected Poczta Polska to verify whether the postal operator had implemented the post-inspection recommendations issued in 2019, i.e. whether Poczta Polska adhered to the obligation of postal secrecy in the light of the issued recommendations. The inspection was carried out in the seat of Poczta Polska in Warsaw and in a selected postal outlet of the postal operator (in the Postal Office in Szydłowiec near Radom).

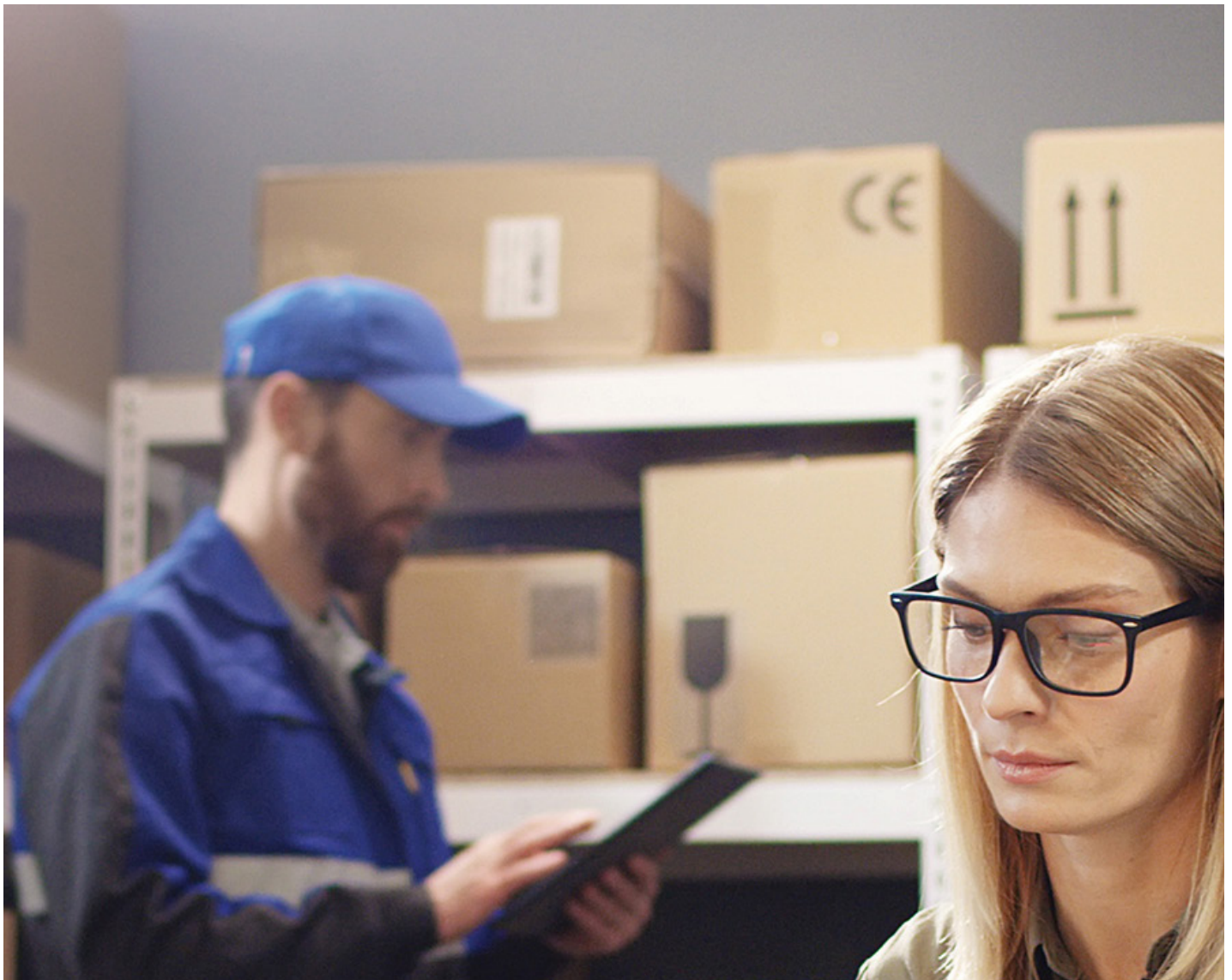
³³ The Regulation of the Minister of Administration and Digitisation of 26 November 2013 on submitting a complaint concerning postal services (uniform text: Journal of Laws of 2019, item 474).

The inspection findings made, inter alia, on the basis of the gathered evidence and completed inspection activities reveal that Poczta Polska implemented the post-inspection recommendations issued by the President of the UKE.

The inspection activities resulted in securing the interests of the users of postal services, including in providing them with access to services under equal and uniform conditions, ensuring an appropriate quality of services and ensuring compliance with applicable legal provisions, as well as in the verification of the implementation of the post-inspection recommendations of the President of the UKE.

Inspections by the alternative operators

Considering different regulatory tools, the legislator authorized the President of the UKE to carry out inspections of the economic activity to verify whether the provisions and decisions on postal activities are adhered to (Article 122(1) of the Postal Law). The applicable legal provisions lay down a pecuniary penalty, inter alia, for violating the rules for postal activities, including for violating the reporting obligation mentioned in Article 43(1) of the Postal Law in accordance Article 126(1)(2) of the Postal Law. In 2020, the President of the UKE therefore inspected the operations of the postal operator that had not submitted the report on postal activities in 2018. Furthermore, the inspection was to establish whether the postal operator carries out the postal activities, and whether it carried out such activities in 2018 and 2019. The inspection focused on the compliance with legal provisions and decisions on postal activities and on the compliance with the requirements for carrying out postal activities. It was established during the inspection that the enterprise had not carried out postal activities.



7

**Annex No 2. Reports
in accordance with
Regulation (EU)
No 2018/644**



The provisions of Regulation (EU) 2018/644 of the European Parliament and of the Council of 18 April 2018 on cross-border parcel delivery services entered into force on 22 May 2018 (hereinafter referred to as the 'Regulation').

Article 4(1) and (3) of the Regulation introduced, inter alia, an obligation to provide the national regulatory body with data on the turnover value and on the volume of parcels delivered during the preceding calendar year by 30 June each calendar year, for the Member State whether postal activities are carried out, by domestic parcels and incoming and outgoing cross-border parcels (from and from outside of the EU/EEA).by parcels delivered on the basis of a contract with the sender delivered on behalf of a different operator, the same being applicable to the employment data.

The year 2020 was the second consecutive year when the operators submitted the data on their results for 2019 by 30 June. The data were delivered by 27 postal operators.

This Annex presents aggregate data for the Polish market, including the data mentioned in Commission Implementing Regulation (EU) 2018/1263 of 20 September 2018 establishing the forms for the submission of information by parcel delivery service providers pursuant to Regulation (EU) 2018/644 of the European Parliament and of the Council.

From the analysis of the result in terms of the reporting obligation mentioned in Article 43 of the Postal Law, it should be pointed out that there is:

1. a definition discrepancy.

In accordance with recitals 16 and 24 of the preamble of the Regulation, Annex 1 thereto, and the explanations to Commission Implementing Regulation

(EU) 2018/1263, as published by the European Commission, the postal operators were obliged to consider the parcels generated in the framework of their activities related both to standard parcels and consignments of goods handled in the stream of letters in their report, whereby it was assumed that the respective parcels cover any consignments over 20 mm thick. It means that the Regulation defines parcels more broadly than the Postal Law.

2. Discrepancy in the scope of the subject matter of the reporting

In accordance with Article 4(6) of the Regulation, the reporting obligations are applicable only to those postal operators that had over the previous calendar year on average fewer than 50 persons working for it and involved in the provision of parcel delivery services, including those working for the parcel delivery service provider's subcontractors, unless the postal operator carried out its activities in more than one Member States. This means that not all postal operators had reporting obligations in accordance with the Regulation.

3. There are no consolidation mechanisms for aggregate reports.

In accordance with Commission Implementing Regulation (EU) 2018/1263, the postal operators were obliged to submit data by parcels delivered on the basis of a contract with the sender and delivered on behalf of a different operator. This means that the same parcel could be reported by several postal operators, if they were involved in its handling. However, the provisions of the Regulation did not establish any consolidation adjustment to prevent that.

The tables below summarize the 2019 reporting data for the Polish market in accordance with Regulation (EU) 2018/644.

Table 28

Number of parcels handled and annual turnover in parcel delivery services in Poland in accordance with Regulation (EU) no 2018/644 – domestic parcel delivery services.

Domestic parcel delivery services	2019
Number of parcels [in millions of units], including:	528.8
Rendered on behalf of a different operator	1.3
Rendered on the basis of a contract with the sender	527.5
Turnover value from the parcel delivery services [in PLN million], including:	5,420.1
Rendered on behalf of a different operator	4.7
Rendered on the basis of a contract with the sender	5,415.4

Source: UKE

Table 29

Number of parcels handled and annual turnover in parcel delivery services in Poland in accordance with Regulation (EU) no 2018/644 – incoming cross-border parcel delivery services (from and from outside of the EU/EEA).

Incoming cross-border parcel delivery services (from and from outside of the EU/EEA)	2019
Number of parcels [in millions of units], including:	47.9
Rendered on behalf of a different operator	2.3
Rendered on the basis of a contract with the sender	45.6
Shipped from the EU/EEA, including:	25.0
Rendered on behalf of a different operator	2.2
Rendered on the basis of a contract with the sender	22.8
Shipped from outside of the EU/EEA, including:	23.0
Rendered on behalf of a different operator	0.2
Rendered on the basis of a contract with the sender	22.8
Turnover value from the parcel delivery services [in PLN million], including:	664.3
Rendered on behalf of a different operator	26.2
Rendered on the basis of a contract with the sender	638.2
Shipped from the EU/EEA, including:	339.4
Rendered on behalf of a different operator	19.5
Rendered on the basis of a contract with the sender	320.0
Shipped from outside of the EU/EEA, including:	324.9
Rendered on behalf of a different operator	6.7
Rendered on the basis of a contract with the sender	318.2

Source: UKE

Table 30

Number of parcels handled and annual turnover in parcel delivery services in Poland in accordance with Regulation (EU) no 2018/644 – outgoing cross-border parcel delivery services (to and outside of the EU/EEA).

Outgoing cross-border parcels to and outside of the EU/EEA	2019
Number of parcels [in millions of units], including:	35.7
Rendered on behalf of a different operator	0.8
Rendered on the basis of a contract with the sender	34.9
Shipped to the EU/EEA, including:	32.4
Rendered on behalf of a different operator	0.8
Rendered on the basis of a contract with the sender	31.6
Shipped outside of the EU/EEA, including:	3.3
Rendered on behalf of a different operator	0.04
Rendered on the basis of a contract with the sender	3.3
Turnover value from the parcel delivery services [in PLN million], including:	1,721.6
Rendered on behalf of a different operator	22.9
Rendered on the basis of a contract with the sender	1,698.6
Shipped to the EU/EEA, including:	1,432.4
Rendered on behalf of a different operator	21.8
Rendered on the basis of a contract with the sender	1,410.6
Shipped outside of the EU/EEA, including:	289.2
Rendered on behalf of a different operator	1.2
Rendered on the basis of a contract with the sender	288.0

Source: UKE

Table 31

Employment data of the operators of parcel delivery services in 2019 in Poland in accordance with Regulation (EU) No 2018/644.

Number of people employed by the operators, including:	2019	
	30.06	31.12
On a full-time basis	72,679	72,922
On a part-time basis	12,466	13,747
Employees employed for an indefinite period	24,162	25,643
Self-employed	4,201	4,600
TOTAL	113,508	116,912

Source: UKE

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