



The voice of blind and partially sighted people in Europe

Feedback on the European Commission's evaluation of the Postal Services Directive

EBU Position Paper | March 30th, 2020

Object of the public consultation

The European Commission published on 2 March 2020 a roadmap concerning the evaluation of the Postal Services Directive (97/67/EC), which was last revised in 2008. Since then, the postal sector has undergone major changes due to digitalisation and e-commerce.

An evaluation report, planned for the 4th quarter of 2020, will assess whether the Directive is still fit for purpose and achieves its original aims. The Commission invites comments of all interested parties.

In this context, the European Blind Union (EBU) has made the following comment (online via the 'Have Your Say' portal).

Feedback

Situation

The first indent of Article 12 of the Directive states that “Member States may maintain or introduce the provision of a free postal service for the use of blind and partially sighted persons”.

So, currently, the provision for free [Cecogrammes in the Postal Services Directive is voluntary](#) (“may”). This creates insecurities, as service providers under profit pressure could retract their free service.

Recommendations

It is very important to keep the section on free postal service for the use of blind and partially sighted persons.

Moreover, it would be a welcome improvement to make the gratuity of such services a requirement (“shall”), at least for ‘cecograms’, i.e. mail or parcels containing documents or literature from or for the blind.

Related considerations

- Continuous free provision of postal services for the use of blind and partially sighted persons is paramount, as disabled persons’ organizations and specialized organisations such as libraries or schools for the blind could otherwise not sustainably cover the expenses of cecograms.
- Digital alternatives to postal services can only compensate vulnerabilities, assuming that online platforms, authentication methods and contents are accessible. This is currently not consistently the case.
- Regardless of volumes, visually impaired users will continue to rely on cecograms, as braille printing is organised centrally by non-profit entities, while the community of users is spread out across Europe.
- While audio material can increasingly be sent digitally, cecograms can be expected to increase in volume due to the EU’s ratification of the WIPO Marrakesh Treaty to Facilitate Access to Published Works for Persons Who Are Blind, Visually Impaired or Otherwise Print Disabled.
- While the frequency and speed of delivery are relevant and given the costs of braille printing, the most important is the reliability of service, i.e. that no shipments are lost. This also applies to return shipments from individual users to institutions.
- It should always be possible to get consignments shipped to someone’s home since it could be hard to find post offices or to have access to self-service machines.

About EBU

The European Blind Union (EBU) – **Interest Representative Register number 42378755934-87** – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 25 European Union member states, candidate countries and other countries in geographical Europe.

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