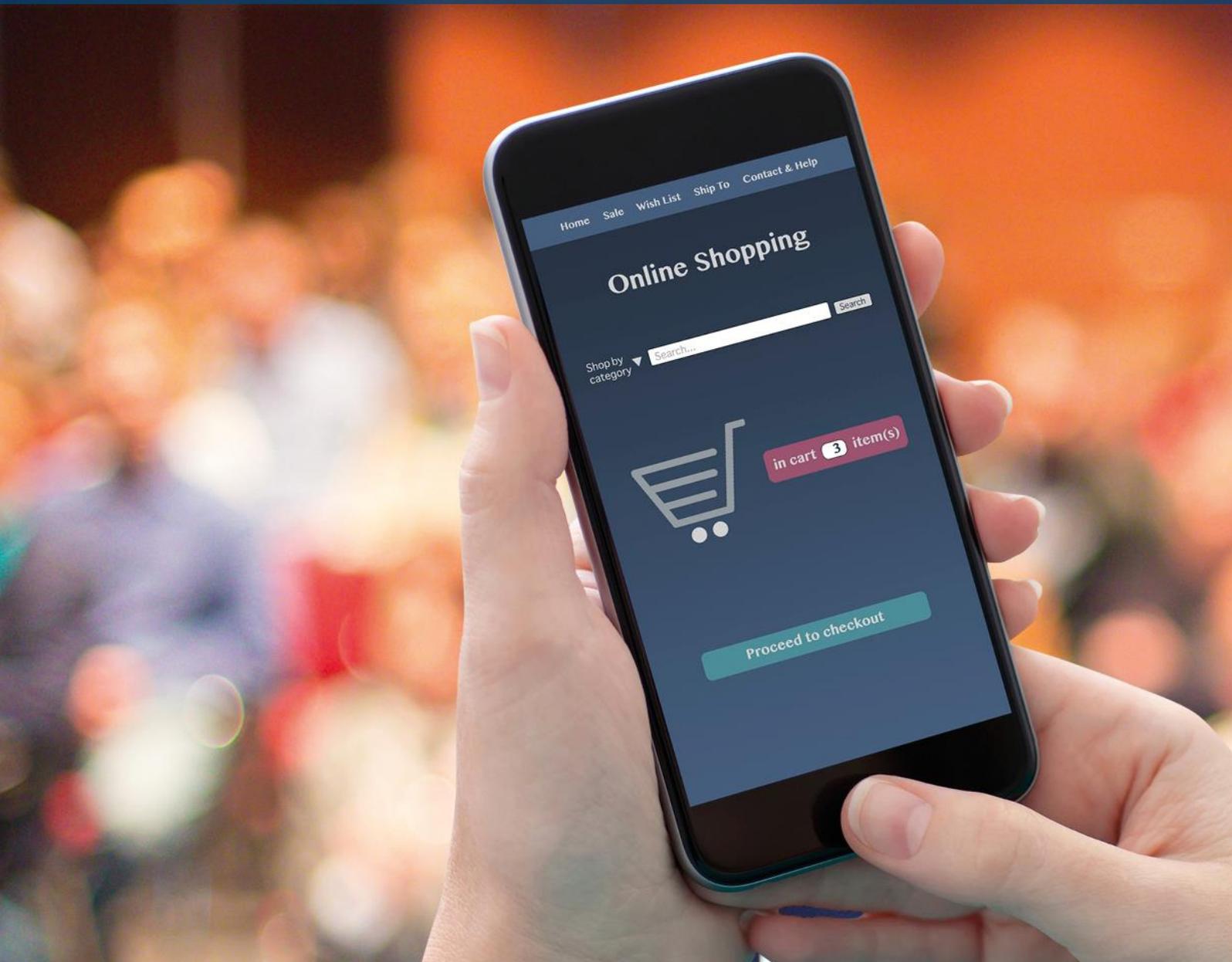


ECOMMERCE EUROPE POSITION PAPER

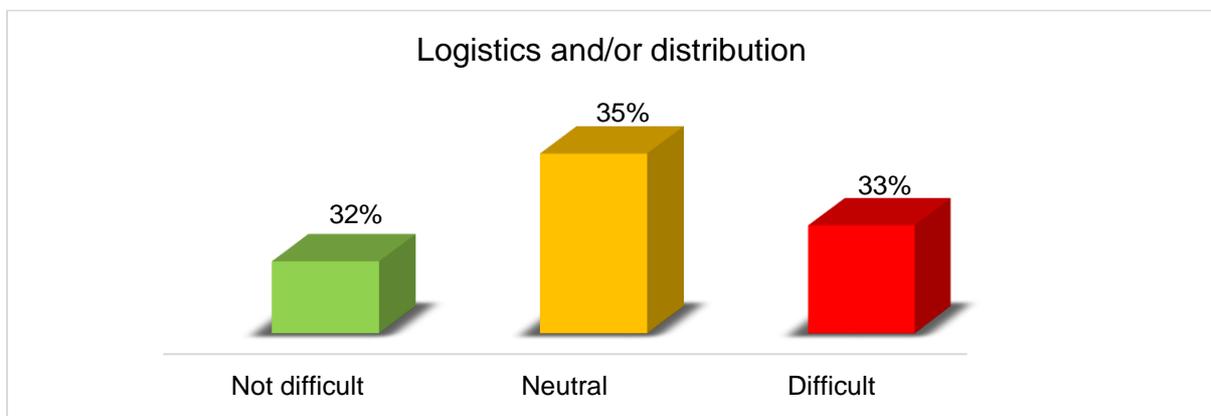
Manifesto for a better parcel delivery market in Europe

May 2017



INTRODUCTION

E-commerce is fundamentally changing postal and parcel markets. Global e-commerce streams revolutionize shopping, but the current parcel streams are ill-fitted to accommodate this. Almost one out of five EU citizens identifies cheaper delivery prices as the main improvement that would encourage more online shopping from sellers located in other EU Member States¹. Similarly, more than one third of online merchants consider higher costs of cross-border delivery compared to domestic delivery as an obstacle in online cross-border trade². Inefficient cross-border delivery is consistently in the top three of biggest barriers for online merchants to sell in another EU Member State, as Ecommerce Europe's Cross-Border E-commerce Barometer 2016³ already showed in the past: logistics and distribution represent a difficult barrier to tackle for 33% of the companies selling abroad.



Source: Cross-Border E-commerce Barometer 2016, Ecommerce Europe

Concretely, online merchants identify the following barriers which still remain:

- Lack of a global level playing field from service providers;
- Lack of standardized interface specification to exchange data and to harmonize labelling;
- Lack of information on differences in service and standards;
- In some cases, lack of track-and-trace services: leading to consumers inquiring information with merchants or consumers unjustifiably claiming a package has not arrived;
- Excessive delivery times throughout Europe: in particular, for non-express services;
- Customs and VAT administration: too complicated, rules vary greatly;
- Reverse logistics: especially problematic for small volumes.
- Lack of transparency in pricing.

¹ Eurobarometer 398

² WIK Consult, Initiatives to support the growth of e-commerce via better functioning parcel delivery systems, 31

³ <https://www.ecommerce-europe.eu/app/uploads/2016/07/Research-Report-Cross-Border-E-commerce-Barometer-2016-FINAL.pdf>

Specifically concerning track-and-trace, common practice is that European postal services relabel parcels when crossing borders, converting them from “international” into “domestic” ones. This causes a major issue because the track-and-trace service stops at the border. As a result, only approximately 2/3 of cross-border postal parcels are traceable. The remaining 1/3 lose the traceability at the border due to relabeling and a lack of cross referencing between track-and-trace systems⁴.

It is clear that digitalization is changing current delivery value chains, and this has a direct impact on costs and business models. Online commerce shifts the focus of delivery to the demands and needs of the modern consumer:

- The demand for quality leads to measurable performance and customer service being at the heart of the business model.
- The demand for speed leads to customer retention via same-day or even immediate delivery options, financed via a flat fee model.
- The demand for transparency leads beyond traceability to proactive messaging and real-time adjustments according to the preferences of the recipient.
- The demand for convenience leads to easy-to-use return solutions, scheduled drop-off and alternative delivery options, pick-up and recycling options.

All demands should be based on a data-driven service delivery industry that necessitates standardization, in order to avoid the creation of independent networks of interconnected information, which would impair the ease of access to systems that online merchants are looking for. The e-commerce sector has already internalized these principles. Now it is time for the delivery sector to adapt its business models and infrastructure as well. The distinction between “courier”, “express” and “postal” has become irrelevant, and borders have become obsolete.

⁴ These figures come from various sources, specifically from the Universal Postal Union (UPU) documents and the International Post Corporation (IPC) projects, and are only accessible for Members of the UPU's Consultative Committee and Observer of the UPU CA/POC. The Universal Postal Union, governing the world-wide postal network, and IPC, a corporation safeguarding the interests of the leading postal administrations, addressed this challenge in the last UPU cycle (2012 - 2016). Together, both developed cross-border tracking solutions, new products and services in order to respond to the changing demands, in particular in the field of e-commerce. This was matched by the European Committee for Standardization, so that technical specifications written for the few (only for those designated by the members of the UPU - 192 member states) will be accessible for the many (all senders and their service providers, based on open standards and integrated with supply chain management systems, such as GS1).

MANIFESTO FOR BETTER PARCEL DELIVERY

Larger e-commerce merchants, namely platforms, have already started developing their own delivery services because they consider those currently available too expensive and incapable of providing performant services. In Ecommerce Europe's view, this risks a scenario in which postal operators move diminishing volumes of goods, and consequently lose their most important and biggest clients. In this scenario, it is likely that such platforms would transform their own delivery services to make them accessible to third parties, for instance SMEs that would like to have their own web shop but linked with the delivery service provided by another platform.

A further part of this disruption is the use of parcel re-routing practices to get preferential prices (i.e. establishing a delivery service in China would be less expensive than doing so in a EU country), and also controlling data and technology to by-pass postal services. In an already very segmented market, where postal services are subcontracting with transport companies to dispatch parcels, larger e-commerce actors can benefit from their technology backbone to manage third party delivering networks on their own.

From Ecommerce Europe's perspective, this situation would produce damaging instability, with only larger postal operators with express delivery services surviving. Consequently, Ecommerce Europe is against this specific kind of disruption and advocates instead for a smooth transition in which postal operators reshape their business models and become fit for e-commerce. Ecommerce Europe strongly supports the creation of a sustainable, reliable and competitive parcel delivery market, without any players in dominant positions. Delivery providers need to bridge the gap to online merchants, who are their consumers. It is time the delivery market is shaped from a consumers' - not senders' - point of view. Ecommerce Europe, as the leading European e-commerce association, emerged from one of many stakeholders in the discussion and decided to take the lead in developing European and global technical and service-orientated standards, in close collaboration with all stakeholders, to overcome hurdles identified in cross-border e-commerce in the past.

- A global level playing field from service providers (in postal: modernizing terminal dues and termination fees);
- More negotiating power on prices through transparency and access;
- Open IT-standards for labelling;
- Open IT-standards for interface and database.

ECOMMERCE EUROPE'S ROLE AS A DETERMINING STAKEHOLDER

As the representative of the biggest users of parcel delivery services, Ecommerce Europe actively participates in, and chairs, several fora at the global and European level. In this way, Ecommerce Europe helps to ensure that standards being shaped at both, the global and European level, are in coherent and interoperable, so that a truly international market can be developed.

- Chairing the work on Labelling and exchange of data between e-merchant and logistic operators for cross border parcels.
- Chair of CEN/TC331 WG2: “New digital postal services”, developing
 - Requirements for electronic advanced data (EDA) in postal operations, in particular compliant to security and customs requirements
 - Requirements to connect, access, participate and further develop open global networks and systems, for postal operators and the wider postal sector players
- Chair of the Consultative Committee of the Universal Postal Union setting 5 priorities
 - Re-engineering of global e-commerce
 - Addressing standards, so that all can be reached
 - Access of the wider postal stakeholders to the global postal network
 - Open and accessible specifications and standards
 - Reform of the Universal Postal Union, responding to needs of a global community

Through its participation in all relevant institutional stakeholder groups, as well as the tabling of the e-commerce sectors' demands on the agenda (for example towards the Universal Postal Union⁵), Ecommerce Europe makes its voice clearly heard. Ecommerce Europe has taken an active role in determining how cross-border e-commerce should develop by assuming Chairmanship of several institutional committees in Europe (i.e. CEN Standardization Committee on Postal Services TC331, leading the development of CEN / Technical Specification TS17073: “Postal Services - Interfaces for cross border parcels”). Moreover, Ecommerce Europe actively contributed to the content of the current implementing decision of the European Commission on a standardization request to CEN under

⁵ With 192 member countries, the Universal Postal Union (UPU) is a special organization of the United Nations and the primary forum for cooperation between postal sector players. It sets the rules for the exchange of international postal items, makes recommendations to stimulate growth in mail, parcel and financial services volumes and improve quality of service for customers. Ecommerce Europe held a seat in the Consultative Committee of the UPU since 2016. Just after the 26th UPU Congress in Istanbul, in late 2016, Ecommerce Europe was elected by Postal Administrations and representatives of the wider postal stakeholder environment, to chair the committee in the “Istanbul Cycle” until 2020.

mandate of the EU⁶, as well as contributing to the Mid-term strategy on how to regulate the European Postal Market until 2020 of the European Regulators Group for Postal Services (ERGP).

On global level, Ecommerce Europe took the chairmanship of the Consultative Committee of the UPU, activating the third dimension of the UPU, facilitating access for the wider postal stakeholders, so that their voices can be heard, and the necessary input to further develop global postal products and services can be provided, on legal and regulatory matters, to the UPU member states and on cross-border processes to those postal operators, designated to fulfill the national obligations arising from the international treaties maintaining the global postal network.

Ecommerce Europe actively brings stakeholders together to discuss and stimulate change, in order to better cater to the online merchants' needs and to achieve more innovation and greater transparency in the logistics chain.

BREAKING DOWN BARRIERS ON ALL LEVELS

To harmonize the currently fragmented market and to diminish the distortion of the market, collaboration of all stakeholders in the sector (online merchants, delivery service providers, regulators, solution providers, customer organizations) on all levels is necessary. Open and interoperable standards should be the norm.

1. Global level: Universal Postal Union

Ecommerce Europe notes that there is a lack of a global, level playing field from service providers. In late 2016, the 26th UPU Congress in Istanbul took major decisions to further develop products and services to respond to the changing demands of senders and recipients alike, driven by an ever-growing request for reliable, speedy, efficient and global cross border delivery services. The UPU, responsible to administer the global postal network, undertook measures to tailor costs and subsidies so that they might fit current circumstances (i.e. not listing China as a developing country, leaving Europe to be flooded with cheaper parcels via Chinese post, and others currently benefitting from an outdated UPU termination fee⁷ system, granting development aid like subsidies to the disadvantage of online trade in Europe and North-America).

The exchange rates (termination fees) between postal companies are set and implemented according

⁶COMMISSION IMPLEMENTING DECISION of 1.8.2016 on a standardisation request to the European Committee of Standardisation as regards postal services and the improvement of quality of service in support of Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 (C(2016) 4876 final / M548)

⁷ Termination fees: Currently there are several remuneration systems in place at UPU level and fundamental changes are planned for the future. For letters up to 2 kg, (including commercial letter post items) the Terminal Dues systems; for parcels up to 30 kg, the Inward Land Rates System. In the last months a new termination fee system was launched globally by the UPU, their ECOMPRO system, dedicated to x-border Ecommerce (the system currently is based on new service and product descriptions and new termination fees on bi-and multilateral level). In Europe multilateral termination fee systems, like REIMS V for letters, the EPG system for parcels and lately the INTERCONNECT system for cross-border ecommerce items, add to the lack of transparency and regulatory oversight.

to international regulation (Universal Postal Union). The UPU, and the European Union following suite, addressed significant price gaps between countries (i.e. Germany-France > Hungary-France > Estonia-France). New products and services are created to better serve the need for cross-border commercial item delivery. Still, millions of parcels use indirect shipping processes due to restrictive agreements. Moreover, this impedes the capacity of postal services to operate profitably when managing large quantities of items (approximately 80% of the products are under 2kg) because the termination fee payable does not cover the costs, when the most competitive rates are applied (China to France). To increase the efficiency of global e-commerce, new technical specifications, enabling better interconnectivity between all parties involved were developed. This including CEP⁸, postal and supply chain related transport and logistics operators.

In the view of Ecommerce Europe, the recipe for successful, high quality postal services should be based on:

- Combining the approach of having costs and subsidies tailored to current reality with speedier decision-making;
- A faster response to market demands;
- An integrated approach to product development and remuneration systems;
- Connecting wider postal sector players with products and services at all levels.

The UPU was designed as a global network in which its members enjoy equal rights and privileges, and are bound to the same treaties and obligations. However, technological developments themselves can't make the UPU fit for the future if it does not remain committed to retaining this level playing field, actively promoting and supporting its model of cooperation amongst equals.

Fundamental changes were introduced at the last UPU Congress in 2016, to reflect the needs of customers ordering, sending and returning e-commerce goods and services worldwide.

By redesigning the products and services at global level in an integrated product plan over a period of 4 years until 2020, member states and operators within the UPU took notice of the changing market demands. By eradicating the existing product silos, the letter and parcel item definition, and replacing them with definitions based on content, major changes were possible. The European Union adopted the same approach in 2016 as well.

As already mentioned above, Ecommerce Europe strongly believes in a sustainable, reliable parcel delivery network, which should be fair and open to all operators, be they postal or not. An integrated ecosystem should therefore be created. The UPU took the first steps into the right direction, followed by the European Union.

Moreover, online retailers need postal operators, but the services they offer must be fit for such an

⁸ CEP: abbreviation for "Courier-, Express- and Parcel delivery operators"

increasing B2C e-commerce market.

Decisions adopted at the 26th UPU Congress in Istanbul can be instrumental to re-engineer the UPU to a partnership of equals, protecting the communication rights and integrity of its users within a secure network, for the benefit of each and every one of us - the senders and receivers. Still, alternatively, the possibility that the global postal network could disintegrate into a network in which a few major players force through bilateral and multilateral contracts, designed specifically to exclude the majority of postal services and their users from any role in shaping the network, in order to boost their own bottom line and that of their private investors, is an eminent threat. Should this happen, we all lose.

The UPU is extending its reach, facilitating operational infrastructure at marginal cost for the postal administrations designated by its member states, enabling them to exchange commercial items within a dedicated network. However, currently courier, express and postal operators not designated by the member countries of the UPU are excluded from this network.

Ecommerce Europe understood this challenge. That is the reason why Ecommerce Europe applied and was elected to become the chair of UPU's Consultative Committee⁹, so that necessary work can be done to facilitate access of the wider postal stakeholders to the global postal network, and fundamental decisions on how to further develop interconnectivity between all can be undertaken.

Having made the shift from letter post items to commercial letter and parcel post items with its Integrated Product Plan, the UPU's next step is to set out the path to a fully integrated, data-driven, highly interconnected infrastructure. The UPU will emerge as the facilitator for all its operational postal members, each responsible for its own postal territory, and connected via a single digital global postal network for cross-border item delivery.

All the technical building blocks are in place and the legal framework for the digital global postal network was agreed by its members at the 26th UPU Congress in Istanbul. Until 2020, the next UPU cycle will establish a new digital global postal network for the exchange of postal items in the coming decade, designed for our modern digital age and the world of e-commerce. Ecommerce Europe ensures that current efforts in B2B markets and in European standardization are in line with global postal network developments, when the UPU opens access to its global network to the wider postal stakeholders.

Ecommerce Europe will, therefore, be instrumental that the members of the UPU, in particular the 28 EU & 4 EFTA countries, will pave the ground for a level playing field by opening access to UPU products and services available to wider postal sector players to ensure innovation and competition in the market.

⁹ The UPU Consultative Committee is representing the third dimension to the Universal Postal Union (UPU), the wider postal stakeholders, customer representatives, unions and CEP operators not designated by UPU member states.

2. European level

Ecommerce Europe is convinced that high European delivery performance is a key driver for success for web merchants and their business models. Merchants and consumers need a Pan-European delivery system with open standards for labeling and data interfaces to carrier data, in order to create more innovation and greater transparency in the logistics chain. Additionally, more options are needed, including different offers, alternative affordable delivery options, more flexibility, more information and greater transparency from delivery service providers.

As volumes in e-commerce keep growing, raising efficiency in logistics, transport and final mile delivery becomes a question to better use limited resources. Ecommerce Europe helps promoting technical and service oriented standardization, to further utilize existing infrastructure in a better and more efficient way. This includes smart city and smart rural country side concepts, so that consolidation of items for final delivery leads to a much better use of existing resources, economics of scale and termination between carriers along the value chain, without losing their face to the customer.

In this light, Ecommerce Europe welcomed the publication of the European Commission's Proposal for a Regulation on cross-border parcel delivery services¹⁰. Ecommerce Europe believes that the original proposal had the potential to help create a level playing field for competing parcel delivery operators and thereby – ultimately – for online merchants throughout Europe. Nevertheless, given the recent legislative developments, Ecommerce Europe has specific concerns regarding the draft Regulation.

Extension of the scope to other parties (e-merchants)

Some modifications proposed in the Council's texts of the past months proposed a new recital (8a). This recital is also included in the Council document dated 5 May 2017 (8834/17) which has been sent to the Permanent Representatives Committee, who are invited to examine and confirm the Presidency compromise text and forward it to the Transport (TTE) Council in order to adopt a general approach at its meeting on 9 June. The proposed Recital 8a will enlarged the regulatory oversight to all those e-commerce retailers which are "drawing on the collaborative economy and e-commerce platforms". In the case of Germany and other European Member States, this would potentially require e-commerce companies to register or even apply for a postal license. In Ecommerce Europe's opinion, this is going far beyond what the Commission wanted to achieve and will result in another additional hurdle and administrative burden for the e-commerce industry, something that should definitely be avoided.

Focus on C2C vs B2C

Ecommerce Europe recognizes that the current cross-border parcel delivery Regulation focuses on the publicly available prices. Its focus is, therefore, on the C2C market, setting only limited additional regulatory oversight onto the B2C market. Extending the scope of the proposed cross-border parcel

¹⁰ COM(2016) 285 final

delivery Regulation into the markets up- and downstream of the postal market, including processes necessary to consolidate and further pre-sort items containing merchandise, by qualifying these activities as postal services, will lead to over-regulation and the challenge to better separate markets closely related, such as the freight and transport and logistics markets in the B2B area.

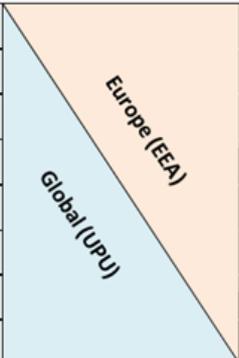
Some are treated more equally than others

Extending regulatory oversight as far as possible, while not insisting that C2C and B2C Universal Service Providers who currently dominate the market should change their pricing behavior or open their network to third parties, will further distort transparency and service affordability. In the past, USPs have been able to negotiate highly beneficial terminations fees amongst themselves. Now they will be able to even improve their position. All other parcel delivery services are required to provide full price transparency, while the USPs are still able to keep their termination fees, access conditions and administrative benefits hidden.

Lack of ambition with regards to standardization

The Proposal of the Commission lacks ambition with regards to the importance of having standards and interoperability in the parcel delivery market. However, the current mandate of the European Commission to CEN, already “amended” the scope of the proposal accordingly, by providing a consensus-based approach addressed to all stakeholders in the market. As a result, Ecommerce Europe strongly supports standardization, and is actively proposing solutions, as already mentioned. Standardization will bring new technology solutions into the market that will allow the provision of clear and transparent pricing, requiring all providers to adjust themselves in order to compete with each other.

Standardization, based on the necessary framework conditions to further implement the Digital Single Market in Europe, will allow for new delivery models, such as crowd-delivery, to develop (for example Stuart, supermarket delivery services, on demand delivery services), but also further integrate supply chain related management to better interface to services upstream in the B2B environment, leading to seamless interconnectivity into a B2B2C scheme. Ecommerce Europe is the driving force in this area, as it has demonstrated that already with its Pan-European Trustmark solution.

Challenges	Regulatory frame	Solution
Level playing field for all Carriers		USO: Postal Services; Products & Services
Data Interfaces & Item Identification		2 new Mandates & TS17073
Quality of Service, Customer Care		EN 14042
End-2-End Track and Trace		TS 15472
Delivery Time		1 new Mandate (incl. all postal items)
Interfaces: Customs & Import duties/VAT		1 new Mandate (EAD)
Returns		UPU / CEP & GS1 Standards
Tariff & Infrastructure transparency		Termination fees (New EU Parcel Reg.)

Many players are already delivering products ensuring an information-based delivery market, the quality of the service, a complaint handling system, redress mechanisms and return services. However, these players need the fundamental interoperability with online stores and among services in order to be widely available for online shops of all sizes.

Although Ecommerce Europe's approach towards regulatory oversight is positive, the fast-driven technology market will need faster corrections than those that authorities can currently provide. Therefore, interoperability and standardization are necessary for the development of an information-based delivery industry. Authorities should ensure that bigger players do not take advantage of their consolidated position, especially incumbents, and that they do not make close networks of public-private companies raising prices unreasonably due to a dominant market position. All these elements are important in crafting an environmental conscience in the e-commerce delivery industry.

Moreover, especially for SMEs, both the regulatory oversight and, in particular, the open standards will allow the development of open source data-driven services provided for SMEs on the Cloud by SaaS at affordable prices. This would allow them to compete with bigger companies' services and thereby reduce market distortion, especially because currently SMEs have no options beyond those created by these bigger companies. An interconnected network, with open labeling standards, will also allow further consolidation of delivery services, including in remote areas. The interoperability of such services will allow easy access to, and sharing of, fundamental parcel information. In Ecommerce Europe's view, these open source standards are the solution for smaller players in the market, as it has been in other areas (e-payments, server hosting, data-driven services for customer personalization, consumer trustmarks, etc.).

Ecommerce Europe is already actively shaping these standards through its work in the CEN, the European Standardization Committee. In CEN, Ecommerce Europe is working to incorporate worldwide open technical standards, originating in supply chain management and already widely used in 3rd and 4th party logistics management (such as GS1) based on existing ISO and UPU standardization.

Finally, Ecommerce Europe is concerned about leaving penalties up to national authorities and European legislators should carefully assess such a provision. In other words, Ecommerce Europe wants to avoid a situation of market distortion that could arise from differing penalties across Member States, such as companies establishing themselves in a certain Member State where the level of fines is lower compared to others.

SECTOR RESPONSIBILITY

Where the delivery sector has a responsibility to bring its business models up to speed, the e-commerce sector has a responsibility to ensure its business model is sustainable for the generations to come. Sustainable solutions can thereby enhance efficiency in the supply chain. Merchants combining volumes

can increase performance and decrease their ecological footprint. Efficient packaging can save distribution space and diminish waste streams. Consolidation of items to optimize available transport and logistics infrastructure in a collaborative way, upstream to final delivery, will help to utilize available capacities, currently not fully used. Online merchants are already developing sustainable solutions for the last mile to decrease the pressure on inner cities. It is important that the e-commerce sector takes up its role in stimulating these initiatives and in helping create a more sustainable delivery value chain. Ecommerce Europe is an important facilitator in this process, providing the platform to design and foster sustainable, integrated e-logistics solutions.

ANNEX: DIGITAL EVOLUTION OF GLOBAL POSTAL NETWORK

The postal market is already defining how to reshape itself and be fit for digital commerce, even though online merchants have not really noticed any improvement so far, except for more developed countries (i.e. France, Nordic countries). Thanks to its active, leading role in the UPU Consultative Committee, Ecommerce Europe gathered the building blocks of this digital transformation of the new global postal network:

1. Instead of overlapping products and services, there will be a single category of “postal items” from 0 - 31,5 KG.
2. Instead of differentiating by weight into letters (up to 2 KG) or parcels (up to 31,5 KG), differentiation will be based on content: “documents” vs. “goods”. The implementation will be supported by a 2 phased implementation plan to be implemented at UPU’s “Istanbul cycle” following the 26th UPU Congress 2016, until 2020.
3. Instead of the current distorting termination fees which are not fit for today’s market conditions, there will be new products, services and related pricing, set by the postal administrations, and starting with a new regime of bilateral and multilateral agreements (not monitored by the International Bureau as set out in Art. 8 of the UPU convention).
4. Quality of Service-related governance, based on pre-set events and leading to the monitoring of shipments containing goods on an item basis, will be implemented and become mandatory in 2016 in the field of EMS items, and further enhanced to all postal items containing merchandise starting in January 2018.
5. Extending postal item-related information to include electronic identification and content specifications, enabling postal administrations to become trusted third parties in their respective postal territories, providing proof of identity according to set levels of assurance to enable secured e-commerce, is in the process to be specified and will be implemented in close cooperation with the WCO, IATA and related authorities. In Europe, related technical and service-oriented standardization work was initiated by Ecommerce Europe and mandated to CEN by the European Commission in 2016.
6. Extending the item related cross-border interconnectivity to overcome Customs and VAT related challenges, so that authorities adapt their controls and supervision to the new supply chain modalities that are linked to the e-commerce environment. This is supposed to tackle the loss of revenue from import duties and taxes and to manage effectively the continuously increasing number of importations of consignments of low value customs.
7. Extending postal payment services to offer escrow functionalities for cross-border ecommerce, so that individuals who have never met can use posts as trusted intermediaries, have been incorporated into the postal payment transaction platform and connected within the global postal infrastructure facilitated by the UPU.

8. Extending individual postal item attributes to include the full digital data representation to cover all necessary security aspects, to pre-advise authorities entitled to inspect (customs) items in the postal territory of final destination, or transport operators (land-, rail-, air- transport, etc.), have been specified in order to be in line with security, customs and related regulations. The necessary interface-related, technical and service-oriented standardization, so that the wider postal stakeholder environment is included in this work was initiated by Ecommerce Europe and mandated accordingly by the European Commission,
9. Providing the interface capabilities to connect to item-specific data, based on algorithms and reflecting the preferences of recipients. Including authorization to add extra services, e.g. to open parcel lockers, parcel stations or engage third parties to drop-off or pick-up items.



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