Public inquiry regarding the offer and use of parcel lockers

How can you react to this document?

Until 13 February 2026
Only by e-mail to consultation.sg@bipt.be
With reference CONSULT-2025-C7

Contact person: Dirk Appelmans (+32 2 226 87 67)

Replies shall be sent electronically to the address mentioned.

Please attach this form as the first page to your answer.

Your comments should refer to the paragraphs and/or text sections to which they relate and clearly indicate what is confidential.

Belgian Institute for Postal Services and Telecommunications
Boulevard du Roi Albert II 32 PO box 10 | 1000 Brussels
T +32 2 226 88 88 | **F** +32 2 226 88 77 | **www.bipt.be**

TABLE OF CONTENTS

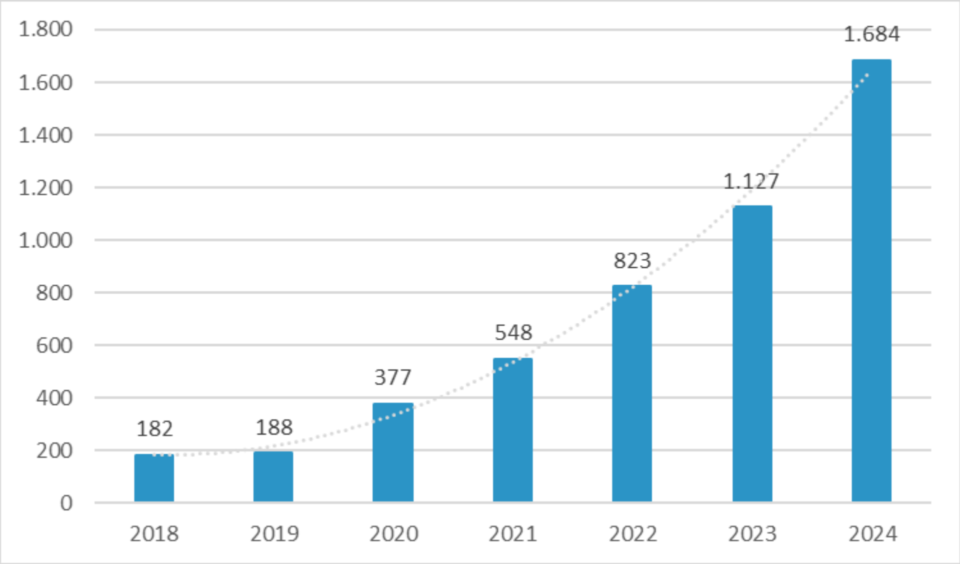
1. Context

1.1 Economic aspects

1.1.1 Evolution of the number of parcel lockers

1. The number of parcel lockers has increased significantly in Belgium in recent years. At the end of 2024, the total number of parcel lockers in Belgium amounted to 1,684. Almost ten times the number compared to six years earlier.

Figure 1. Evolution of the number of parcel lockers in Belgium (2018-2024)



Source: BIPT

2. Bpost started to roll out a network of parcel lockers in 2014, both for sending and collecting parcels.[1] Two years later, bpost acquired a majority interest in a Dutch parcel locker network. Bpost set the goal of expanding the Belgian network quickly to 450 parcel lockers by the end of 2018.[2] By 2020, bpost increased the number of locations with parcel lockers to 375 in total. In 2025, bpost announced that it would step up its investment in parcel lockers, with a view to reaching 2,500 parcel lockers by the end of that year.[3]

3. In addition to bpost, DHL Express (for parcel shipment only), Instabee and Mondial Relay also have a network of parcel lockers, albeit on a smaller scale than bpost. Nonetheless, Mondial Relay already has 300 parcel lockers and plans to add another 500 units in 2025.[4]

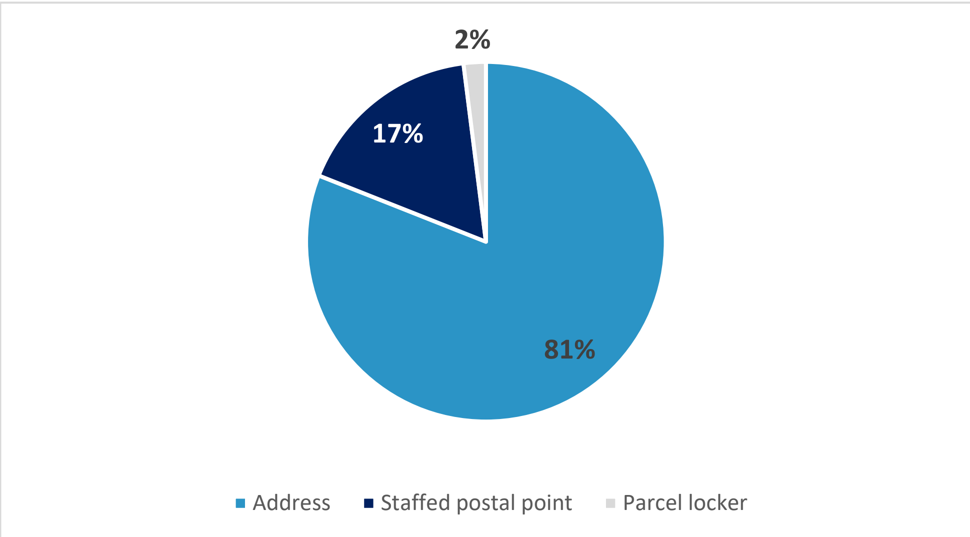
4. As indicated in its 2024-2026 Strategic Plan, the BIPT has not analysed the matter of the "first mover advantage" with regard to parcel lockers before. Parcel lockers have seen a steady growth

[1] Bpost's 2014 annual report: http://corporate.bpost.be/~/media/Files/B/Bpost/annual-reports/ar-2014.PDF;
[2] Bpost press release (4 October 2017): http://corporate.bpost.be/media/press-releases/2017/04-10-2017?sc_lang=nl-BE.
[3] https://press.bpost.be/bpost-rondt-de-kaap-van-1500-pakjesautomaten-en-blijft-er-zes-per-dag-bijplaatsen;
[4] https://www.hln.be/zandhoven/grootste-pakketautomaat-van-het-land-staat-sinds-kort-in-zandhoven-in-een-maand-werden-hier-al-tweeduizend-pakjes-opgehaald~a15bd663/.

in Belgium and the need for regulation concerning these seems limited so far. Parcel lockers are only one of the possible channels to receive or send parcels. It is a less commonly used method in countries such as Belgium and not always the preferred method for all private users. This means that a large parcel volume and increased operator market share are required to make a network of parcel lockers viable. If consumer preferences evolve in the future, the best locations (certainly scarce public locations) could already be in use. Consequently, it is possible that a "first mover advantage" arises in the future. Due to the limited public space and a limited number of commercially advantageous locations, operators would benefit from rapidly expanding a network of parcel lockers.

5. To date, the BIPT has observed that the growth of the network of parcel lockers is anticipating the increase in usage. It appeared that, anno 2024, 81% of all parcels and express items were still delivered at home (at an address and not at collection points). Manned postal points account for about 17%, while parcel lockers receive about 2% of the volume. These ratios have remained relatively constant over the past few years, home delivery remaining the most popular, but we nevertheless see an incremental increase in the (relative) use of parcel lockers. We should bear in mind that these figures also contain B2B volumes, while it is mainly B2C and C2X parcels that are potentially delivered in parcel lockers. Thus, the increase in parcel locker deliveries does not show clearly within such a global context.

Figure 2. Ratio of delivery at address, manned postal point and parcel locker (2024)



Source: BIPT

1.1.2 Distribution of parcel lockers and other postal points

6. In 2024, the average number of parcel lockers amounts to one location with a parcel locker per 18.1 km² or per 7,014 inhabitants. By comparison, five years ago, this was only one location per 164.1 km² or per 61,361 inhabitants. However, parcel lockers are still mainly found in regional capitals and in more densely populated areas. However, it should be borne in mind that there are different types of postal access points. For instance, there are the physical offices of bpost, but also the postal points, operated by third parties, which postal operators use. At the end of 2024, all postal operators in Belgium had a total of 9,685 manned points.[5] On average that means one manned point per 3.2 km² or per 1,220 inhabitants at the end of 2024.

7. Bpost is obliged, under the 7th management contract for services of general economic interest, to operate at least one post office in each municipality. This will allow citizens across the entire territory to send and retrieve parcels. It should be acknowledged that a parcel locker does offer a certain degree of flexibility to the citizen, as it is not subject to opening and closing hours and is much more limited in size.

8. A recent bill[6] proposes to add a new point 4 in Article 16, § 1, of the Postal Act to oblige the universal service provider to provide at least one parcel locker per municipality. The BIPT concluded in an opinion[7] that, in view of the market developments and the still relatively limited use of parcel lockers, imposing a legal obligation upon bpost to provide one parcel locker in each municipality is premature. If it could be demonstrated that there is a genuine need for at least one parcel locker per municipality, and that a free market is not producing the desired result, legislative intervention could be considered. However, this does not seem to be the case at the moment. Furthermore, the networks of parcel lockers are currently in a phase of expansion, which makes it seem premature to impose a minimum legal requirement at this stage.

1.2 Legal aspects

9. Article 2, 35°, of the Act of 26 January 2018 on postal services (hereinafter "the Postal Act") defines a "parcel locker" as "an automated device with vaults capable of receiving, sending or returning parcels."

10. However, Article 9, § 1, of the Postal Act stipulates that these parcel lockers are part of the postal infrastructure:

   "*The postal infrastructure includes, in particular, mailboxes, letterboxes and parcel lockers.*"

11. Postal service providers should provide each other with reciprocal access in a transparent and non-discriminatory manner to those parts of the postal infrastructure necessary for the development of postal activities. In that regard, Article 9, § 1, of the Postal Act further states:

---

[5] It should be noted however, that the same locations may be represented more than once. For it is possible that certain manned points, such as newsagent's shops or petrol stations, work for more than one operator. In recent years, for example, we have seen that in almost 3 out of 10 cases, the street name and house number of a manned point appear multiple times in the database.
[6] Bill 0921/001.
[7] https://www.bipt.be/file/cc73d96153bbd5448a56f19d925d05b1379c7f21/da5c5dc4512c6749e423dfd80b81e6a3c7e038bc/advies-wetsvoorstel-pakketautomaten-2025-08-27.pdf

"Whenever necessary to protect the interests of users, to promote the sustainable development of the postal service]1, and/or to promote effective competition, postal service providers shall grant each other transparent, non-discriminatory mutual access to services falling within the scope of the universal service and elements of postal infrastructure that are necessary to develop postal activities, without prejudice to the implementation of Article 17, § 1, 5°.

12. The postal infrastructure elements in question shall be made available at a market-oriented price. Agreements that lay down technical and tariff access conditions must be submitted to the BIPT in accordance with Article 9, § 2, of the Postal Act:

    "§ 2. The technical and tariff conditions related to this access shall be agreed upon between the postal service providers concerned. They shall be laid down in a written agreement, a copy of which shall be sent to the Institute. […]".

2. Public consultation – questions to stakeholders

2.1 Questions to provide an overview of the state of the supply and use of parcel lockers

1. How would you rate the supply, current distribution and presence of parcel lockers in Belgium, both geographically and in relation to population density?

2. How do you assess that consumers in Belgium use parcel lockers (compared to home delivery or manned collection points)?

3. What factors (e.g. price, ease of use, limited opening hours of other access points, location, security ...) do you think influence consumers' decisions today to use parcel lockers or not? Are there any significant differences in the services provided by the various suppliers of parcel lockers?

4. What evolution do you see in terms of both the use of the parcel locker networks in Belgium over the next five years?

5. Do you feel that offering the possibility of delivery in parcel lockers is a necessity to reach certain target groups? How do you see this change over the next five years?

2.2 Questions aimed at identifying difficulties in the provision and use of parcel lockers

1. As a postal service provider, do you experience difficulties in accessing parcel lockers? If so, which (e.g. price, location of injection, different terms?)

2. As a postal service provider, do you experience difficulties in the quality, availability, volume, capacity or other modes of service associated with the use of parcel lockers?

3. Are there any difficulties in building up their own network of parcel lockers for example, in terms of the investment needed (CAPEX) or finding suitable locations (and partnerships, for example due to the existence of exclusive contracts) or the limited public space?

4. What problems do you think consumers experience with the use of parcel lockers (e.g. accessibility and availability, inconvenience due to the focus of all parcel locker providers on the same busy locations [8], (digital) user-friendliness, user information, communication, follow-up of issues ...)?

2.3 Questions focusing on proposals and actions to improve the use and supply of parcel lockers

1. What actions or innovations (e.g. shared networks, technological standards, agreements on tariffs and methods) could, in your opinion, make the use of parcel lockers more attractive to postal service providers?

2. What actions or innovations (e.g. shared networks, technological standards, agreements on tariffs and methods) could, in your opinion, make the use of parcel lockers more attractive to consumers?

3. Do you think that certain specific legislation and regulation prevents the development or expansion of an own network of parcel lockers? Or do you think there is a need for a (more) specific legal framework?

[8] Hotelling's law of spatial competition explains that competing firms, seeking to maximize their market share, often locate close to each other -while targeting similar high-traffic locations- rather than spread out to maximise customer satisfaction and supply.